

PUBLIC DISCLOSURE

April 2, 2018

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**Compass Bank
RSSD ID NUMBER: 697633
Birmingham, Alabama**

**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: OUTSTANDING

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

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

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

Major factors supporting the institution's rating include:

- The overall geographic distribution of HMDA¹-reportable lending reflects good penetration in low- and moderate-income geographies.
- The overall geographic distribution of small business lending reflects excellent penetration in low- and moderate-income geographies.
- The overall distribution of HMDA-reportable lending among borrowers of different income levels is good.
- The overall distribution of small business lending among businesses of different sizes is excellent.
- The bank makes an excellent level of community development loans, often in a leadership position.
- The bank makes an excellent level of qualified community development investments in response to assessment area community development needs, often in a leadership position.
- Retail delivery systems are reasonably accessible to the geographies and individuals of different income levels in the bank's assessment areas.
- The bank makes an excellent level of community development services in the bank's assessment areas.

DESCRIPTION OF INSTITUTION

BBVA Compass Bank (Compass Bank) is a large, interstate commercial bank headquartered in Birmingham, Alabama. As of December 31, 2016, the bank operates 666 branch offices across seven states including Alabama, Arizona, California, Colorado, Florida, New Mexico, and Texas. Deposits totaled \$67.9 billion as of June 30, 2016, making Compass Bank the 25th largest deposit holder in the United States among commercial

¹ Home mortgage loans are reported by institutions on the Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR). The register includes home purchase, refinance, home improvement, and multifamily loans originated and purchased by the institution.

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banks and savings institutions.² Compass Bank received a “Satisfactory” rating at its previous Community Reinvestment Act (CRA) Performance Evaluation (PE) dated December 7, 2015. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment areas.

Business Structure

Compass Bank is a subsidiary of BBVA Compass Bancshares, Inc., an \$83.6 billion bank holding company as of December 31, 2016 headquartered in Houston, Texas, and a wholly-owned subsidiary of Banco Bilbao Vizcaya Argentaria (BBVA) S.A., a global financial services group headquartered in Bilbao, Spain. Compass Bank operates under the trade name BBVA Compass. Compass Bank was the 2nd largest bank in Alabama based on deposit market share, the 5th largest in Texas, and the 5th largest in Arizona as of June 30, 2016. Although Compass Bank is an Alabama chartered institution, many executive offices are located in Houston, Texas, the bank’s largest market for both deposits and lending. Compass Bank offers a variety of consumer and business banking products through its three main business units: Commercial Banking, Retail Banking, and Wealth Management. Products include commercial and wholesale banking, treasury management, Small Business Administration (SBA) loans, international services, merchant processing, retail banking services, consumer loans, mortgages, home equity lines and loans, credit cards, check cards, securities brokerage, mutual funds and annuities, financial counseling, wealth management, pension plan management and insurance.

Credit Products and Loan Portfolio

Compass Bank offers a variety of residential real estate, consumer, and commercial loan products to meet the credit needs of individuals and businesses in its assessment areas. Primary residential real estate loan products consist of closed-end, one-to-four family mortgage loans, and home equity lines of credit. Consumer loan products include auto loans, personal lines of credit and installment loans. Commercial lending products comprise commercial real estate loans, SBA loans, small business lines of credit, small business credit cards, equipment leasing financing and business term loans for various purposes.

The following table shows the distribution of Compass Bank’s loan portfolio as of December 31, 2015 and December 31, 2016. In 2015, commercial and industrial loans represented the largest volume of loans by dollar, followed closely by one- to four-family dwelling loans; in 2016, the volume of loans in these two categories was relatively the same. Nonfarm, nonresidential real estate represented about 17.7 percent of the bank’s loans in 2016, followed by loans to individuals at 9.3 percent. Agricultural loans and farmland lending make up less than 1.0 percent of the loan portfolio.

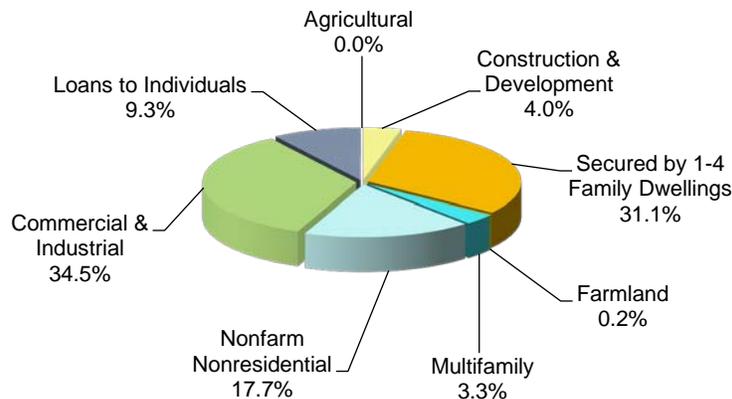
² *Top 50 Commercial Banks and Savings Institutions by Total Domestic Deposits, June 30, 2016.* FDIC. Web. 27 September 2018
<https://www5.fdic.gov/sod/sodSummary.asp?barItem=3>

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COMPOSITION OF LOAN PORTFOLIO				
Loan Type	12/31/2016		12/31/2015	
	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	2,124,843	4.0%	2,353,983	4.3%
Secured by One- to Four- Family Dwellings	16,626,370	31.1%	17,407,173	32.1%
Other Real Estate: Farmland	94,578	0.2%	98,275	0.2%
Multifamily	1,740,571	3.3%	1,803,553	3.3%
Nonfarm nonresidential	9,469,917	17.7%	8,649,985	15.9%
Commercial and Industrial	18,461,954	34.5%	18,905,631	34.8%
Loans to Individuals	4,979,269	9.3%	5,047,368	9.3%
Agricultural Loans	10,801	0.0%	22,892	0.0%
Total	\$53,508,303	100.00%	\$54,288,860	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.

**Loan Portfolio
as of
12/31/2016**



Compass Bank’s loan portfolio includes products with flexible terms to help meet the credit needs of low- and moderate-income borrowers and small businesses. Most notably, the bank offers an affordable home purchase mortgage product with flexible credit terms targeted to low- and moderate-income families and LMI communities, along with closing cost assistance in the form of a grant to the buyer. Compass Bank also originates FHA and VA mortgage products that assist LMI borrowers and military members, veterans, and eligible surviving spouses of veterans of the U.S. Armed Forces become homeowners. Additionally, the institution has developed a team

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of dedicated Community Development Mortgage Banking Officers (CDMBOs) that specialize in affordable housing finance for low- and moderate-income individuals in order to respond to the unique and sometimes complex housing finance needs of these borrowers.

For small businesses, the bank is an active Small Business Administration (SBA) lender, offering the SBA 504, 7(a) and SBA Express loan products. Compass Bank was the 10th highest dollar volume lender nationwide for the SBA 7(a) loan program and the 5th most active lender in the number of SBA 7(a) loans through September 30, 2016. The 7(a) program is the SBA's most common loan program, offering funds to small businesses for multiple purposes with flexible repayment terms.³ Compass Bank has a strategic focus on lending to small businesses with gross annual revenues of \$1 million or less. As part of this strategy, the bank offers pre-approved business credit cards, business lines, and term loans up to \$100,000. The bank also provides a small business training curriculum to increase small business capacity throughout its footprint.

³ SBA's 7(a) Loan Program Explained. Small Business Administration. Web 2 October 2018. <http://www.sba.gov/community/blogs/sbas-7a-loan-program-explained>

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SCOPE OF EXAMINATION

Compass Bank is an interstate bank with 78 assessment areas across seven states. Each assessment area was reviewed for lending, investment, and service performance using either full-scope or limited-scope examination procedures, with at least one assessment area in each state where the bank has branches evaluated with a full-scope review. Twelve full-scope assessment areas were chosen for this examination. Criteria used to select full-scope assessment areas included the volume of HMDA-reportable and CRA small business lending, deposit market share, number of branches, percentage of deposits, amount of community development activity, and other non-financial considerations. Full-scope assessment areas typically represent the most active markets in each state based on these criteria. Where similar activity was noted, full-scope assessment areas were considered that were not selected at the previous examination.

Assessment areas receiving full-scope reviews are:

- Texas: Houston, Dallas, Austin and Laredo
- Alabama: Birmingham and Huntsville
- Arizona: Phoenix
- California: Riverside and Modesto
- Florida: Jacksonville
- Colorado: Denver
- New Mexico: Albuquerque

The state of Texas had the highest number of branches and largest concentration of lending and deposit activity; as a result, performance in this state received the greatest weight in determining the overall rating for each test and the institution overall, followed by the remaining states in the order in which they are presented. A description of each state and full-scope assessment area is included in the applicable section of this report.

Examination Review Period and Products Reviewed

This evaluation included an analysis of HMDA-reportable loans and CRA small business loans originated between January 1, 2015, and December 31, 2016. To determine the final lending test rating, equal weight was given to lending performance in 2015 and 2016. HMDA-reportable home purchase and refinance loans and CRA-reportable small business loans were the major lending products reviewed. Small farm, home improvement, and multifamily loans were not considered due to low activity levels. The analysis did not include other types of consumer loans, credit cards or commercial loans. Retail banking services such as branch distribution and hours of operation were analyzed for the same review period.

The community development activity review period was April 1, 2015, to December 31, 2017. Community development loans originated within this timeframe were included in the lending test analysis, and community development investments funded during this period were analyzed as part of the investment test. Investments

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with community development as a primary purpose that were funded during a prior review period but still outstanding as of December 31, 2017, were also considered. Community development services that took place during the review period were included in the service test review. A loan, investment, or service has community development as a primary purpose when it is designed for the express purpose of revitalizing or stabilizing low- or moderate-income areas, designated disaster areas, or underserved or distressed nonmetropolitan middle-income areas; providing affordable housing for, or community services targeted to, low- or moderate-income persons; or promoting economic development by financing small businesses and farms that meet the requirements set forth in 12 CFR 228.12(g).

Examination Analysis

This evaluation of Compass Bank's record of lending in individual assessment areas includes the use of and comparison to demographic characteristics. The primary sources for demographic data are the 2010 U.S. Census and 2016 Dun & Bradstreet data. Demographic characteristics of a particular assessment area are useful in analyzing a financial institution's record of lending since they provide a means of estimating loan demand and identifying lending opportunities. To understand small business demand, self-reported data on revenue size and geographic location from business entities is collected and published by Dun & Bradstreet. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The data, along with information about housing and economic conditions, is used to establish performance context and evaluate the bank accordingly.

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

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

Compass Bank's lending performance was also compared to the performance of aggregate lenders in 2015 and 2016. Aggregate lenders include all lenders required to report HMDA-reportable and CRA small business lending data within the respective assessment areas. Lending market share is also discussed to give a better understanding of where Compass ranks relative to peers in individual markets.

For retail services, the bank's branch distribution analysis was conducted using data as of December 31, 2016. Changes in the median family income level of branch locations that resulted from changes in census data were taken into consideration as part of this analysis.

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Community development activities were reviewed to determine that they have community development as a primary purpose and meet the geographic requirements of the regulation. The eligibility of a loan, investment, or service is based on demographic information available to the bank at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, the innovativeness, and/or complexity of those activities, and their responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted to gauge the relative performance of the institution in a particular assessment area.

In order to better understand assessment area community development and credit needs, several sources were used, including contacts with community development practitioners, review of publicly accessible data, information submitted by the institution, and plans that describe the community development environment in local markets. Community contact interviews were conducted with representatives from affordable housing, economic development, social service, and governmental organizations operating inside the bank's assessment areas. These individuals have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish a context for the communities in which the bank operates and to gather information on the bank's performance.

In most of the bank's markets, community contacts noted that affordable housing was the biggest concern. Residents are faced with decreased affordability due to rising rents and cost of living. An abundance of opportunity exists for financial institutions to get more involved in financing affordable housing projects and supporting low- and moderate-income homeownership programs. Community contacts also identified the need for financial education and outreach to promote financial capability and access to financial services for unbanked and underbanked low- and moderate-income populations. Another common concern noted by the contacts was the increased demand for highly skilled labor resulting in a need for workforce development. Education, tools, and resources are needed to help low- and moderate-income individuals access new career opportunities. Finally, almost all of the community contacts cited small business development as an area of major need. Opportunities exist for banks to participate in lending programs, increase direct lending and access to credit, provide technical assistance through workshops and other small business education, and assign bank loan officers to small business development offices. Neighborhood revitalization has the potential to positively impact small business startups and expansions and increase demand for access to business capital. More detailed information obtained from individual community contacts is included in the Credit and Community Development Needs section for each assessment area.

Compass Bank also has a community development needs assessment program in place in which staff and management meet with community development practitioners to ascertain the needs, challenges, and opportunities of local markets. During the review period, employees met with various nonprofit organizations, community development leaders, and government officials in each of its major markets to discuss opportunities for community development activities. Bank management indicated that affordable housing financing and development, access to credit for small businesses, capacity-building for community development financial

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institutions, and financial education were identified through this process as primary needs across major markets. This information was taken into consideration with feedback from community contacts and other market research to formulate a context for the environment within which the bank operates in each of its full-scope assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Lending test performance is rated outstanding. Performance in Texas, Alabama, Arizona, Colorado, and New Mexico was excellent while performance in California and Florida was good.

Detailed information about HMDA-reportable and CRA small business loans can be found in Appendices G and H for full-scope and limited-scope assessment areas, respectively. In some assessment areas and product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, general references are made about performance and the reader should refer to the appendices for specific data.

Lending Activity

The following table summarizes the bank's lending activity for 2015 and 2016. Compass Bank originated more CRA small business loans than HMDA-reportable loans. As a result, small business lending typically had a greater impact on lending ratings. Lending was responsive to credit needs in all states and commensurate with deposits in each state; no conspicuous gaps in lending activity by income category were identified. Detailed information about lending activity can be found in each of the state sections of this report.

Summary of Lending Activity

Loan Type	#	%	\$(000s)	%
Total Consumer	0	0	\$0	0
Home Improvement	1,538	--	\$83,059	--
Home Purchase	14,783	--	\$5,027,611	--
Multi-Family Housing	16	--	\$131,822	--
Refinancing	6,332	--	\$1,998,841	--
Total HMDA	22,669	32	\$7,241,333	75
Total Small Business	49,116	68	\$2,383,186	25
Total Small Farm	115	0	\$5,935	0
TOTAL LOANS	71,900	100	\$9,630,454	100

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

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

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	1,434	93.2	\$78,764	94.8	104	6.8	\$4,295	5.2
Home Purchase - Conventional	11,153	82.1	\$3,886,764	80.7	2,435	17.9	\$928,864	19.3
Home Purchase - FHA	910	93	\$150,734	90.6	68	7	\$15,559	9.4
Home Purchase - VA	199	91.7	\$41,735	91.3	18	8.3	\$3,955	8.7
Multi-Family Housing	10	62.5	\$38,282	29	6	37.5	\$93,540	71
Refinancing	5,950	94	\$1,795,650	89.8	382	6	\$203,191	10.2
Total HMDA	19,656	86.7	\$5,991,929	82.7	3,013	13.3	\$1,249,404	17.3
Total Small Business	47,947	97.6	\$2,312,233	97	1,169	2.4	\$70,953	3
Total Small Farm	99	86.1	\$4,765	80.3	16	13.9	\$1,170	19.7
TOTAL LOANS	67,702	94.2	\$8,308,927	86.3	4,198	5.8	\$1,321,527	13.7

Note: Affiliate loans not included

Overall, 94.2 percent of total loan units were located inside the assessment areas during the review period, which includes 97.6 percent of small business loans and 86.7 percent of HMDA-reportable loans. This indicates Compass Bank’s willingness to originate loans that are responsive to the small business and residential credit needs of its assessment areas.

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

The overall geographic distribution of HMDA-reportable and CRA small business lending reflects good penetration in low- and moderate-income geographies. Of the 12 full-scope assessment areas, four are considered excellent for geographic distribution and eight are good. The geographic distribution of small business loans across assessment areas is excellent and HMDA-reportable lending by geography is good.

The overall distribution of loans among borrowers of different income levels and businesses of different sizes is excellent. Of the 12 full-scope assessment areas, seven are considered excellent for borrower distribution and five are good. The distribution of small business loans by borrower income across the assessment areas is excellent and HMDA-reportable lending by borrower income distribution is good. The analyses of HMDA-reportable and small business lending within each assessment area are discussed in detail later in this report.

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Community Development Lending

Compass Bank is a leader in making community development loans. The bank originated or renewed 431 community development loans totaling nearly \$1.8 billion during the review period. This volume of community development lending is considered excellent given the presence of the institution in its assessment areas and community development lending opportunities.

Community Development Loan Purpose	#	\$ ('000s)
Affordable Housing	75	\$537,490
Community Services	136	\$356,829
Economic Development	174	\$389,410
Revitalization & Stabilization	46	\$480,320
Total	431	\$1,764,050

The largest concentration of community development loans by state was in Texas with \$820.8 million, accounting for 46.5 percent of bank-wide community development lending. This performance is considered excellent given the bank's presence in the Texas assessment areas, performance in the full-scope assessment areas, and community development lending opportunities. Performance in the Houston full-scope assessment area was the primary driver for the state. The state of Alabama had the second largest dollar amount of community development loans during the review period at nearly \$287.2 million, accounting for 16.3 percent of bank-wide community development lending. The bank's performance in Alabama was considered excellent while performance in the Birmingham full-scope assessment area was the primary driver for the state. The remaining five states accounted for \$654.3 million in community development loans, with an additional \$1.8 million allocated at the institutional level serving assessment areas in three states (Arizona, California, and Texas).

Community development lending during the review period met a variety of critical community development needs: community services targeted to low- and moderate-income individuals including health care, education, and social services; promotion of economic development by financing small businesses that resulted in permanent job creation, retention, or improvement, often through SBA lending; construction and permanent funding of affordable housing for low- and moderate-income individuals; and revitalization or stabilization of low- and moderate-income geographies, including FEMA designated disaster areas. For example, the Bank utilized internal loan and investment products as well as Low-Income Housing Tax Credits (LIHTC) to provide nonprofit and for profit affordable housing developers with flexible and creative capital structures that allowed complex, high impact projects to materialize. In 2016 alone, Compass Bank closed almost \$380 million in LIHTCs financing over 3,500 affordable rental units. Many of these units also provide support for workforce development, seniors, families, and special needs. Additionally, the bank originated approximately \$353 million of SBA loans that directly financed the creation or retention of permanent jobs for low- and moderate-income individuals or in low- and moderate-income geographies. The table above provides a breakdown of community development loans originated or renewed during the review period by community development purpose, number, and dollar amount.

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

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Investment Test

Compass Bank’s overall performance under the investment test is outstanding. The bank made an excellent level of investments that demonstrated excellent responsiveness to community development needs and often acted in a leadership position. Specifically, the bank had excellent performance in Alabama, California, and Texas while performance was good in Arizona, Colorado, Florida, and New Mexico. By assessment area, performance was excellent in six full-scope assessment areas and good in six full-scope assessment areas. Performance in Texas had the greatest impact on the investment test rating due to its relatively high concentration of branches, deposits and lending among states within the bank’s footprint; the majority of the bank’s qualified investments were also in Texas.

Overall, the bank made qualified investments (not including contributions) that benefited its assessment areas, or a broader statewide or regional area that also benefited its assessment areas of almost \$1.1 billion; of that total amount, \$694.3 million was invested during the review period. Total investments include a \$7.3 million investment in a national fund that will acquire existing stabilized affordable rental housing projects and work with developers to maintain the long-term affordability of the projects.

Investment Purpose	#	\$(‘000s)
Affordable Housing	390	\$951,757
Community Services	27	\$17,700
Economic Development	78	\$85,082
Total	495	\$1,054,539

The bank is a leader in financing affordable housing through investments in low income housing tax credits. During the review period, the bank invested \$492.2 million in low income housing tax credits that financed the development of more than 5,000 affordable housing units. In addition to the equity investments noted earlier, the bank also provided significant debt financing for these projects as well. The bank also provided support for affordable housing through investments in mortgage backed securities and equity funds.

Compass is a national leader in providing support for Community Development Financial Institutions (CDFIs). CDFIs are mission-driven lenders that finance affordable housing, small businesses, and community facilities. During the review period, the bank partnered with 20 CDFIs located across its footprint and provided 73 equity equivalent (EQ2) loans as well as equity and stock purchases totaling \$54 million to help increase CDFI lending capacity. In addition to the investments, the bank provided a two-year grant of \$500,000 to the national CDFI trade association to develop an innovative leadership program designed to train a diverse cohort of CDFI leaders to champion transformational change and address inequities in access to capital in low- to moderate-income communities. The program was designed to promote innovation in the CDFI industry. Finally, the bank made numerous donations to support local and regional CDFIs.

Compass Bank made qualified contributions totaling \$19.2 million during the review period, of which \$13.6 million directly benefited one of the bank’s assessment areas and \$3.5 million benefited a broader statewide or regional area that also benefited one or more of the bank’s assessment areas. The bank also had approximately \$2.1 million in contributions that benefited its entire footprint.

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The majority of the contributions provided support for organizations engaged in community services for low- and moderate-income individuals or communities, including but not limited to financial education and literacy; education and charter schools; workforce development; youth and family programs; emergency assistance including food and housing; and health services.

Contribution Purpose	#	\$('000s)
Affordable Housing	392	\$3,274
Community Services	1148	\$12,749
Economic Development	168	\$2,454
Revitalize & Stabilize	13	\$765
Total	1,721	\$19,242

The bank made a number of large contributions to national organizations to help build the capacity of nonprofits in local markets, in addition to the support for CDFI industry noted above. Several of these donations focused on developing leadership capacity within the nonprofits, and others provided financing for organizational assessments, to help the nonprofits improve operations and financial sustainability. Additionally, the bank provided support for statewide coalitions that provide training and other resources of local nonprofits. The donations reflect the bank’s leadership in addressing the critical community need across its footprint for more nonprofit capacity in all community development segments.

Finally, the bank provided support to national community development trade associations focused on affordable housing and small businesses, as well as associations focused on community development for certain populations, including Asian Pacific Islanders and Hispanics. These donations also contributed to the bank’s leadership role nationwide in community development.

A summary of the bank’s investments and contributions can be found in Appendix F; additional detail regarding specific investments and contributions can be found in the state and full-scope assessment area sections.

Service Test

Compass Bank’s service test performance is rated high satisfactory. Performance was excellent in Alabama and good in the remaining six states.

Retail Banking Services

Retail banking delivery systems are reasonably accessible within Compass’ geographies and to individuals of different income levels. The distribution of 666 branch offices and 925 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment areas. The distribution of the bank’s branches in low-income tracts was similar to both the percentage of households and businesses in the same geography; 6.9 percent of total branches were in low-income tracts compared to 7.3 percent of households and 6.2 percent of businesses. The distribution of the bank’s branches in moderate-income tracts was less than the percentage of households and greater than the percentage of businesses in the same geography; 22.1 percent of total branches were in moderate-income tracts compared to 24.1 percent of households and 19.1 percent of businesses.

Institution Rating

During the review period, Compass opened five branches and closed ten. One branch was opened in a low-income tract and three branches were opened in moderate-income tracts, with the branch openings occurring in Alabama, Arizona, California, and Florida assessment areas. In terms of low- and moderate income branch closures, only one branch was closed in a low-income tract and four branches in moderate-income tracts. The branch closures were in Alabama, Arizona, California, and New Mexico assessment areas. Overall, Compass Bank's record of opening and closing of branches has not adversely affected the accessibility of banking services to low- and moderate-income geographies throughout the bank's footprint. A specific listing of branches opened or closed can be found in the bank's CRA public file.

Banking services and business hours do not vary in a way that inconveniences the bank's assessment areas, particularly low- and moderate-income individuals and low- and moderate-income geographies. The majority of all Compass Bank branches (83.0 percent) offer extended hours and 34.1 percent offer weekend hours, compared to 81.3 percent of branches in low- and moderate-income tracts that offer extended hours, and 35.8 percent of branches in low- and moderate-income tracts that offer weekend hours. The bank also offers alternative systems for delivering retail banking services, including full-service ATMs, online banking, and mobile banking. The bank has maintained its partnership with a popular grocery store chain in Texas, and has increased the number of full-service and cash-only ATMs inside the stores. In 2015, the bank launched a mobile banking app, which can be accessed in Spanish and allows for real-time updates on account balances. The bank also participates in a variety of retail programs designed to benefit lower-income customers and small businesses, including Individual Development Accounts (IDAs) and various free and second chance checking accounts.

The geographic distribution of branches as of December 31, 2016 is below. The table also includes data related to branch openings and closures since the previous examination, ATMs, and demographics.

Geographic Distribution of Branches & ATMS
Assessment Area: Whole Bank

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs		Cash only ATMs				Census Tracts		House holds	Total Businesses					
	#	%				Open	Closed	#	%	Open	Closed	#	%	Open	Closed			#	%			
Low	46	6.9%	1	1	39	40	16	Total	139	8.5%	67	7.2%	7	1	72	10.1%	12	7	1268	8.9%	7.3%	6.2%
DTO	0		0	0				SA	85		14		5	0	71		12	7				
Moderate	147	22.1%	3	4	123	117	53	Total	390	23.8%	207	22.4%	21	5	183	25.7%	31	32	3675	25.7%	24.1%	19.1%
DTO	0		0	0				SA	204		27		16	1	177		30	32				
Middle	227	34.1%	1	4	207	193	75	Total	531	32.4%	306	33.1%	13	8	225	31.6%	56	47	4839	33.9%	35.9%	32.8%
DTO	0		0	0				SA	234		17		11	1	217		56	47				
Upper	245	36.8%	0	1	211	202	83	Total	574	35.0%	343	37.1%	12	8	231	32.4%	55	44	4345	30.4%	32.8%	41.6%
DTO	0		0	0				SA	237		11		9	3	226		55	44				
Unknown	1	0.2%	0	0	0	1	0	Total	4	0.2%	2	0.2%	1	0	2	0.3%	0	0	155	1.1%	0.0%	0.3%
DTO	0		0	0				SA	3		1		0	0	2		0	0				
Total	666	100.0%	5	10	580	553	227	Total	1638	100.0%	925	100.0%	54	22	713	100.0%	154	130	14282	100.0%	100.0%	100.0%
DTO	0		0	0				SA	763		70		41	5	693		153	130				

2016 FFIEC Census Data, 2016 D&B Info and 2010 ACS Data
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DTO - Drive thru only is a subset of total branches
 SA - Stand Alone ATM is a subset of total ATMs

Institution Rating

Community Development Services

Compass Bank makes an excellent level of community development services throughout its footprint. Community development service performance was excellent in Alabama and Texas. Performance was good in Arizona, California, Colorado, Florida, and New Mexico. During the review period, employees engaged in 4,136 qualified community development service activities totaling 43,821 hours.

The table to the right provides a breakdown of qualified community development services by purpose, number, and hours. Compass Bank employees were involved with organizations and activities that promote or facilitate affordable housing for low- and moderate-income individuals, community services targeted to low- and moderate-income individuals, and economic development by educating

Community Development Services Purpose	#	Hours
Affordable Housing	605	5,354
Community Services	2,794	28,692
Economic Development	737	9,775
Revitalization & Stabilization	0	0
Total	4,136	43,821

or financing small businesses. During the exam period, 65.5 percent of the bank’s service hours were committed to community services. Notably, 31.4 percent of the bank’s overall service activities targeted adult financial education, including homebuyer education, to low- and moderate-income individuals across the bank’s footprint. The bank also demonstrated that small business development was a priority, committing 7,387 service hours to small business education, including 890 hours that were provided through its proprietary BBVA Compass Momentum program. Finally, the bank showed its willingness to take on leadership roles in many of the organizations in its assessment areas by committing approximately 10,490 hours, or 23.9 percent, of total community development service hours to board or committee service.

Compass Bank supported a variety of initiatives, organizations, and entities addressing disaster relief, workforce development, entrepreneurship, homelessness prevention, and youth financial education. It is worth noting that bank leaders engaged in board service leadership with affordable housing providers, community development financial institutions, community development corporations, and economic development organizations throughout the bank’s footprint. Employees also taught small business education, homebuyer education, financial literacy, and served on board and finance committees in an effort to support small business lending, first time homeownership, homeowner preservation, and organizational capacity building.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Pursuant to 12 CFR 228.28(c), in determining a bank’s CRA rating, the Federal Reserve System considers evidence of discriminatory or other illegal credit practices in any geography by the bank or in any assessment area by an affiliate whose loans have been considered as a part of the bank’s lending performance. The Federal Reserve Bank of Atlanta did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

Institution Rating

Further, section 1025 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203) assigns to the Bureau of Consumer Financial Protection (BCFP) exclusive examination authority, and primary enforcement authority, to ensure compliance by banks with Federal consumer financial laws, if the bank has more than \$10 billion in assets. The CFPB has not provided the Federal Reserve Bank of Atlanta with any information about, or other evidence of, discriminatory or other illegal credit practices relative to this institution with respect to the Federal consumer financial laws.

Texas

CRA RATING FOR TEXAS: OUTSTANDING

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects good penetration throughout the assessment areas, and the distribution of loans by borrower income reflects excellent penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an excellent level of community development loans in its Texas assessment areas.
- The bank provides an excellent level of qualified community development investments and grants that are responsive to several identified community development needs of the Texas assessment areas.
- Retail banking services are adequate in the bank's Texas assessment areas.
- The bank provides an excellent level of community development services throughout the Texas assessment areas.

Texas

SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment areas in Texas:

- Austin
- Dallas
- Houston
- Laredo

Limited-scope reviews were conducted for the remaining 25 assessment areas:

- Abilene
- Beaumont
- Brownsville
- Bryan-College Station
- Burnet-Gillespie-Kerr
- Corpus Christi
- East Texas
- El Paso
- Grimes-Walker-Washington
- Hale
- Harrison
- Howard-Runnels
- Killeen-Temple
- Kleberg
- Limestone
- Longview
- Lubbock
- McAllen
- Odessa
- San Angelo
- San Antonio
- Starr-Willacy
- Tyler
- Val Verde-Maverick
- Waco

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXAS

As of June 30, 2016, Compass Bank had \$38.2 billion in deposits in Texas accounting for 55.7 percent of the bank's total deposits. Compass Bank operated 339 branch offices in Texas as of December 31, 2016, representing 50.9 percent of the bank's total branches. Overall, the bank's HMDA-reportable and CRA lending activity in the state was slightly less than the percentage of total institutional deposits. HMDA-reportable lending in Texas accounted for 42.7 percent of total institutional HMDA-reportable lending by number of loans and 38.4 percent by dollar volume. CRA small business lending in Texas accounted for 59.4 percent of the bank's total CRA small business lending by number of loans and 60.2 percent by dollar volume.

The following table shows lending activity from January 1, 2015, through December 31, 2016.

Texas

Statewide Summary of Lending Activity Assessment Areas Located in Texas

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	5,428	14.7%	\$1,623,828	43.9%
HMDA Refinance	2,212	6.0%	\$606,165	16.4%
HMDA Home Improvement	747	2.0%	\$40,530	1.1%
HMDA Multi-Family	8	0.0%	\$31,582	0.9%
Total HMDA	8,395	22.7%	\$2,302,105	62.3%
Total Small Business	28,485	77.1%	\$1,391,174	37.6%
Total Farm	62	0.2%	\$3,340	0.1%
TOTAL LOANS	36,942	100.0%	\$3,696,619	100.0%

Originations and Purchases

Texas

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

Lending Test

The lending test rating in the state of Texas is outstanding. Overall, performance in Texas with regard to the geographic distribution of loans reflects good penetration throughout the assessment areas. The distribution of loans by borrower income reflects excellent penetration among customers of different income levels and businesses of different sizes. Additionally, Compass made an excellent level of community development loans in Texas.

During the review period, Compass Bank reported 28,485 small business loans and 8,395 HMDA-reportable loans in Texas. As such, small business lending was given greater weight when determining the lending test rating for Texas. The rating for Texas is based on performance in the four full-scope assessment areas: Austin, Dallas, Houston, and Laredo. Approximately 78.9 percent of the bank's HMDA-reportable and small business lending by dollar volume in Texas occurred within these assessment areas.

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

Geographic and Borrower Distribution

The geographic distribution of Compass Bank's HMDA-reportable and small business loans is good, and the distribution of loans by borrower income and revenue size of businesses is excellent. As noted above, the rating for the state of Texas is derived from the Austin, Dallas, Houston, and Laredo full-scope assessment areas. A detailed discussion of the borrower and geographic distribution of lending for these assessment areas is included in the next section of this report.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the state of Texas. The bank originated 205 community development loans totaling \$820.8 million benefiting Texas assessment areas during the review period, including 22 loans for \$84.4 million in the Austin full-scope assessment area, 37 loans for \$165.8 million in the Dallas full-scope assessment area, 44 loans for \$226.2 million in the Houston full-scope assessment area, and four loans for \$24.6 million in the Laredo full-scope assessment area. Performance was excellent in Austin and Houston and good in Dallas and Laredo. Statewide community development lending performance was driven by performance in the full-scope assessment areas, and the Houston assessment area had the greatest impact. More information on community development loans can be found in the full-scope assessment area sections of this report.

Investment Test

The investment test rating for Texas is outstanding.

The bank made an excellent level of qualified investments and contributions totaling \$605.6 million that directly benefited the Texas assessment areas. The bank's investment portfolio for the state included LIHTC investments, mortgage-backed securities, EQ2 investments and CDFI stock purchases, investments in SBA loan pools and

Texas

other investment funds, and grants. The bank also had contributions totaling \$262,500 to statewide affordable housing and community development associations, as well to an asset building organization, a CDFI, and a charter school operator that serve the entire state. Lastly, the bank had investments that benefited all states within the bank's footprint, including Texas; these investments are described in the institution overview.

Performance in all full-scope assessment areas was excellent. Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections, and a summary of the bank's investments and contributions for all assessment areas can be found in Appendix F.

Service Test

The service test rating for Texas is high satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. Statewide, banking services and hours of operation do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. During the review period, the bank did not open any branch offices in Texas, but closed two branch offices. The branch closures were not in low- or moderate-income tracts. Overall, the bank's record of opening and closing of branch offices has generally not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or low- and moderate-income individuals.

Community Development Services

The bank provides an excellent level of community development services that benefit low- and moderate-income residents and small businesses in Texas. Statewide, the bank provided a total of 18,151 qualified service hours within its assessment areas during the examination period, including 12,588 total service hours in the four full-scope assessment areas. Performance in Dallas, the largest of the four full-scope assessment areas, was good, while performance in the remaining three full-scope assessment areas was excellent. Additionally, employees engaged in 5,563 total service hours in the 25 limited-scope assessment areas. Furthermore, bank employees engaged in 98 service hours at statewide organizations that benefited a broader statewide or regional area, including the bank's assessment areas.

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

Houston, Texas

METROPOLITAN AREA *(Full-Scope Review)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOUSTON, TEXAS ASSESSMENT AREA

Overview

The Houston assessment area contains seven of the nine counties in the Houston-The Woodlands-Sugar Land, TX MSA (Houston MSA), including Austin, Brazoria, Fort Bend, Galveston, Harris, Montgomery, and Waller counties. Compass Bank operates 76 branches in the assessment area, which represent 22.4 percent of the branches statewide and 11.4 percent of the institution's branches. Of the bank's deposits in Texas, 38.3 percent are in the Houston assessment area. Additionally, the Houston assessment area represents 30.1 percent of Compass Bank's 2015 and 2016 combined HMDA-reportable and CRA small business lending by number of loans in the state.

The Houston assessment area is a highly competitive market dominated by national and regional banks. According to the June 30, 2016 FDIC Summary of Deposits Report, Compass Bank ranked 4th out of 98 financial institutions operating in the assessment area with 6.7 percent deposit market share and \$14.6 billion in deposits. The top financial institutions in the assessment area by deposit market share are JPMorgan Chase Bank with 38.3 percent, followed by Wells Fargo Bank and Bank of America, with collectively 20.9 percent deposit market share.

For HMDA-reportable lending, Compass Bank originated or purchased 0.9 percent of the HMDA-reportable loans in the Houston assessment area in 2015. Out of 886 reporters, Compass Bank was ranked 20th by number of loans originated or purchased in 2015. In 2016, the bank originated 0.6 percent of the HMDA-reportable loans in the Houston assessment area. Compass Bank ranked 38th out of 902 reporters in 2016. Wells Fargo, Quicken Loans, JPMorgan Chase, Flagstar Bank, and Bank of America were the top HMDA lenders in Houston in 2015 and 2016.

CRA small business lending is also highly competitive. For CRA small business and small farm lending, Compass Bank ranked 7th out of 192 reporters in 2015, with 3.2 percent of reported loans. In 2016, the bank ranked 8th out of 212 reporters, with 2.7 percent of loans. CRA lending in the assessment area was dominated by American Express, Chase Bank, Citibank, Wells Fargo Bank, Capital One Bank and Bank of America in 2015 and 2016.

Houston, Texas

Population and Income Characteristics

The Houston MSA is the 5th most populous MSA in the United States with 6.8 million residents.⁴ The majority of the MSA population resides in Harris County. Its county seat is Houston, the 4th largest city in the country with 2.3 million residents.⁵ The assessment area is made up of 1,051 census tracts; 130 tracts (12.4 percent) are low-income, 299 tracts (28.4 percent) are moderate-income, 279 tracts (26.5 percent) are middle-income, 336 tracts (32.0 percent) are upper-income and 7 (0.7 percent) have unknown income levels. Of the families living in the assessment area, 40.2 percent are considered low- to moderate-income low- and moderate-income, which is slightly higher than the state level at 39.7 percent. Additionally, 62.1 percent of families living in low- and moderate-income tracts have income below the poverty level.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Houston MSA. The following table provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). The table indicates that the FFIEC estimated median family income for the Houston MSA decreased slightly from \$70,100 in 2015 to \$68,000 in 2016.

Borrower Income Levels
Houston-The Woodlands-Sugar Land, TX MSA

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2015	\$70,100	0 - \$35,049	\$35,050 - \$56,079	\$56,080 - \$84,119	\$84,120 - & above
2016	\$68,000	0 - \$33,999	\$34,000 - \$54,399	\$54,400 - \$81,599	\$81,600 - & above

Economic Conditions

U.S. News & World Report ranked Houston, Texas, the 26th best place to live out of 125 metro areas in the United States based on quality of life, the job market, and the value and desire of living in the city. Due to a healthy and robust economy, the Houston economy has quickly rebounded by adding two jobs for every job that was lost during the economic downturn.⁶

⁴ Houston's Economy. Greater Houston Partnership, n.d. Web. 8 Aug. 2017.
http://www.houston.org/pdf/research/quickview/Most_Current_Talking_Points.pdf.

⁵ Ibid

⁶ "Best Places to Live." U.S. News & World Report 2018. n.d. Web. 2 May 2018. <https://realestate.usnews.com/places/texas/houston>

Houston, Texas

Houston is an energy capital and center for many segments of the oil and gas industry including exploration, production, transmission, marketing, supply, and technology. There are more than 1,500 energy-related companies located within the MSA, and Houston employs 30.0 percent of the nation's jobs in oil and gas extraction. Additionally, 40 of the 134 publicly traded oil and gas exploration firms are located in the Houston region.⁷

Healthcare is also a primary economic driver in the assessment area, employing over 290,000. Most notably, the Houston MSA is home to the world's largest medical complex, the Texas Medical Center (TMC), which covers over 1,300 acres and sees 7.2 million patients per year. The TMC's 54 member institutions include six general hospitals, eleven specialty hospitals, three medical schools, five nursing schools, and schools of dentistry and pharmacy.⁸

Nonfarm payroll employment in the Houston metro area totaled 3.0 million jobs in March 2016.⁹ The industries employing the majority of residents in the Houston MSA are trade, transportation, and utilities (21.0 percent of jobs), professional and business services (16.2 percent), educational and health services (12.9 percent), and government (13.2 percent). The goods-producing sector accounts for nearly one in five of the region's jobs.¹⁰ Major employers in the region with more than 10,000 employees include Memorial Hermann Healthcare System, the University of Texas MD Anderson Cancer Center, United Airlines, Exxon Mobil Corporation, Houston Methodist, Shell Oil Company, and Kroger Company.¹¹

Small businesses play an important role in the Houston economy. According to 2016 Dun & Bradstreet data, there were 293,774 businesses within the Houston assessment area, 90.6 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered small businesses.¹² SBA loan data indicated record-setting SBA loan volumes in the assessment area for 2014 and 2015. According to SBA's District Office in Houston, the dollar amount of SBA loans increased by 15.0 percent to more than \$804 million between 2014 and 2015.¹³ The state of Texas was awarded 7.6 percent of the SBA federal contracts in 2016 and educated 60,579 individuals through SBA resource partners; this was the second highest number of individuals trained in the nation that year.¹⁴ In August 2017, Houston was hit by Hurricane Harvey.¹⁵ As a

⁷ Greater Houston Partnership. Web. 8 Sept. 2017. http://www.houston.org/pdf/research/quickview/Most_Current_Talking_Points.pdf

⁸ Houston Economic Development Guide 2016 Guide. Greater Houston Partnership, 08 Feb. 2016. Web. 8 Aug. 2017.

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⁹ Houston Economy at a Glance. Greater Houston Partnership. n.d. Web. 8 Aug. 2017.

http://www.houston.org/pdf/research/quickview/Economy_at_a_Glance.pdf

¹⁰ Talking Points Q3 2018. Greater Houston Partnership, n.d. Web. 8 Aug. 2017.

http://www.houston.org/pdf/research/quickview/Most_Current_Talking_Points.pdf

¹¹ Houston Economic Development Guide 2016 Guide. Greater Houston Partnership, 08 Feb. 2016. Web. 8 Aug. 2017.

¹² FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

¹³ Smith, Cara. "Houston Small Businesses Get Record-breaking Amount of Loans." Houston Business Journal, 23 Nov. 2015. Web. 13 Sept. 2016.

<http://www.bizjournals.com/houston/news/2015/11/23/houston-small-businesses-get-record-breaking.html>

¹⁴ "Fiscal Year 2016 Total SBA Loan Approvals and Federal Contracts Awarded by State." U.S. Small Business Administration. n.d. Web 1 May 2018. https://www.sba.gov/sites/default/files/aboutsbaarticle/FY_2016_Data_508C_V3.pdf

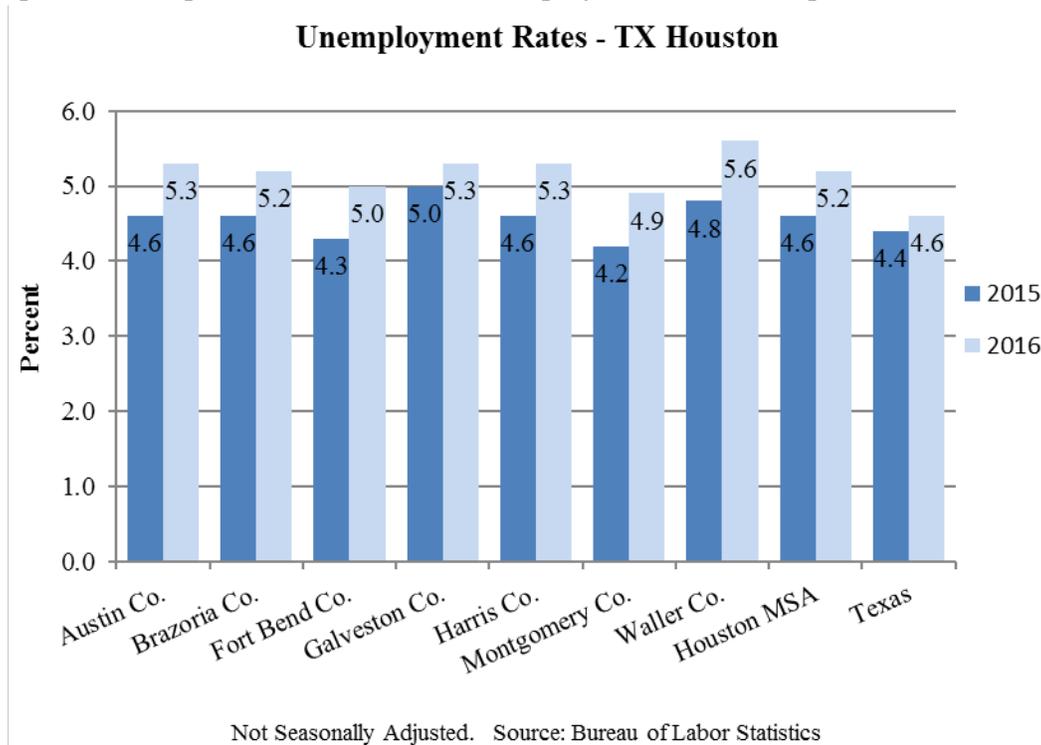
¹⁵ Initial Public Notice for DR-4332-TX. Federal Emergency Management Agency. n.d. Web. 8 Mar. 2018.

<https://www.fema.gov/disaster/notices/initial-public-notice-dr-4332-tx>

Houston, Texas

result, Texas was also awarded the 3rd highest number of disaster assistance loans at 3,447, deploying \$160.3 million in the state.¹⁶

Economic conditions weakened slightly during the review period in the Houston assessment area. As shown in the chart below, the unemployment rate increased between 2015 and 2016. The unemployment rate for the MSA in 2016 was 5.2 percent, compared to the statewide unemployment rate of 4.6 percent.



Despite the weakening economy, the housing market in the assessment area has been strong. According to data from the Houston Association of Realtors, 2014 through 2016 were record years for the Houston housing market with strong gains recorded in sales volume and pricing, and increased single-family building permits. Single-family home sales totaled 76,449 in 2016, representing a 3.0 percent increase from 2015 and 1.3 percent above the previous record high in 2014.¹⁷ Prices in the market also continued to climb through the review period. The median price increased by 2.7 percent to \$225,903 in 2016.¹⁸ At the beginning of 2016, there was a 3.3 month supply of homes, ending the year exactly where it began.¹⁹ Concurrently, the metro area experienced a decrease in the number of new single-family building permits, from 38,315 in 2014 to 35,367 in 2016.²⁰

¹⁶ "Fiscal Year 2016 Total SBA Loan Approvals and Federal Contracts Awarded by State." U.S. Small Business Administration. n.d. Web 1 May 2018. https://www.sba.gov/sites/default/files/aboutsbaarticle/FY_2016_Data_508C_V3.pdf

¹⁷ MLS Report for December and Full-Year 2015. Houston Association of REALTORS, n.d. Web. 9 Aug. 2017. <https://www.har.com/content/mls/?m=1&y=17>

¹⁸ Ibid

¹⁹ Ibid

²⁰ "Houston, TX (U.S. Census Bureau Residential Construction Branch)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 10 Sep. 2017. <<http://www.policymap.com/>>.

Houston, Texas

Homeownership for low- and moderate-income families in the Houston area is becoming less affordable. Using the assumption that a borrower can obtain a loan for approximately three times the borrower's annual income, and using 2016 FFIEC median family income figures, affordable homes would be priced at \$101,997 or below for low-income individuals and \$163,197 or below for moderate-income individuals. In 2016, only 3.9 percent of houses in the MSA sold for less than \$100,000, which would be affordable for low-income families, and 13.9 percent sold for less than \$150,000, which would be affordable for moderate-income families. Of the seven counties in the bank's assessment area, Harris County had the largest number of single-family home sales under \$150,000 in 2017, followed by Galveston County, Montgomery County, and Fort Bend County.²¹ These numbers suggest that low- and moderate-income individuals would have difficulty finding affordable homes in the current housing market and relatively close to employment centers.²²

According to 2016 census data, there were 2,174,879 housing units located in the assessment area, 55.7 percent of which were owner-occupied, 32.7 percent were rental units, and 11.6 percent were vacant. In low-income census tracts, only 21.5 percent of housing units were owner-occupied, while 44.8 percent were owner-occupied in moderate-income tracts. The median age of the housing stock across the assessment area was 28 years, while the median age was 38 years in low-income census tracts and 36 years in moderate-income tracts. These factors indicate that lending opportunities in the low- and moderate-income tracts may be more challenging than in other areas.

According to the Greater Houston Partnership, over 160,000 houses sustained damage by Hurricane Harvey.²³ Moody's Analytics reports that while there is a reduced supply of available housing, single-family permits are increasing although they are still below average pace. Additionally, an impediment to rebuilding is the issue of homeowners without flood insurance. This situation may be somewhat alleviated by Congress' appropriation of over \$50 million for Houston as well as Florida, California, and Puerto Rico.²⁴

²¹ *Houston-The Woodlands-Sugarland MSA; Fourth Quarter 2017*. Real Estate Center, Texas A&M University Quarterly Housing Report. N.d. Web. 8 May 2018. <https://www.recenter.tamu.edu/data/housing-activity/>

²² Housing Activity for Houston. Real Estate Center Texas A&M University, n.d. Web. 10 Aug. 2017. <https://www.recenter.tamu.edu/data/housing-activity/#!/activity/MLS_Area/Houston>.

²³ Houston Economy at a Glance. Greater Houston Partnership. n.d. Web. 8 Aug. 2017. http://www.houston.org/pdf/research/quickview/Economy_at_a_Glance.pdf

²⁴ Precip U.S. Metro. Houston-The Woodlands-Sugar Land TX. Moody's Analytics, February 2018. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

Houston, Texas

In 2017 WalletHub ranked Houston 135th on its list of the worst cities for renters due to the cost of living, reflective of a high rent-to-price ratio, or whether it is more advantageous to rent or purchase a property based on total housing cost.²⁵ The average rent for a single-family unit increased 3.2 percent from 2016 to 2017 to \$1,595 for three bedrooms or less.²⁶ In the final quarter of 2017, the Federal Reserve Bank of Dallas noted that due to flooding, several apartments were taken off the market temporarily due to damage, while the demand for short-term leases rose because of the increase in displaced residents. Short-term leases are typically higher cost and could have contributed to higher average lease rates at the end of 2017.²⁷ In 2016, 21,719 rental units were added to the market. In May 2017, 9,386 units were under construction with 17,207 units planned prior to Hurricane Harvey.²⁸ Post-Harvey, Moody's reports that corresponding multifamily building permits are not rising to meet demand.²⁹

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

²⁵ "2017's Best & Worst Places to Rent in America." Wallet Hub. N.d. Web. 2 May 2018. <https://wallethub.com/edu/best-cities-for-renters/23010/>

²⁶ *Houston-The Woodlands-Sugarland MSA; Fourth Quarter 2017*. Real Estate Center, Texas A&M University Quarterly Housing Report. N.d. Web. 8 May 2018. <https://www.recenter.tamu.edu/data/housing-activity/>

²⁷ *Housing Economic Indicators, January 30, 2018*. Federal Reserve Bank of Dallas. N.d. Web. 8 May 2018. <https://www.dallasfed.org/-/media/Documents/research/indicators/hou/2018/hou1802.pdf>

²⁸ *2017 Houston Facts*. Greater Houston Partnership. n.d. Web. 7 May 2018. https://issuu.com/houston/docs/2017_houston_facts_web

²⁹ Moody's Analytics

Houston, Texas

Combined Demographics Report

Assessment Area: TX Houston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	130	12.4	118,416	8.7	40,727	34.4	323,934	23.7
Moderate-income	299	28.4	339,749	24.9	64,479	19.0	225,139	16.5
Middle-income	279	26.5	387,833	28.4	37,277	9.6	239,127	17.5
Upper-income	336	32.0	519,803	38.1	18,881	3.6	577,601	42.3
Unknown-income	7	0.7	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,051	100.0	1,365,801	100.0	161,364	11.8	1,365,801	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	231,057	49,670	4.1	21.5	136,410	59.0	44,977	19.5
Moderate-income	564,431	253,081	20.9	44.8	230,301	40.8	81,049	14.4
Middle-income	605,424	361,904	29.9	59.8	178,104	29.4	65,416	10.8
Upper-income	773,888	546,519	45.1	70.6	166,509	21.5	60,860	7.9
Unknown-income	79	0	0.0	0.0	50	63.3	29	36.7
Total Assessment Area	2,174,879	1,211,174	100.0	55.7	711,374	32.7	252,331	11.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	22,868	7.8	19,723	7.4	3,016	12.1	129	5.1
Moderate-income	56,201	19.1	50,320	18.9	5,563	22.2	318	12.5
Middle-income	74,405	25.3	67,653	25.4	6,204	24.8	548	21.5
Upper-income	140,161	47.7	128,398	48.2	10,215	40.8	1,548	60.8
Unknown-income	139	0.0	121	0.0	16	0.1	2	0.1
Total Assessment Area	293,774	100.0	266,215	100.0	25,014	100.0	2,545	100.0
Percentage of Total Businesses:			90.6		8.5		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	54	2.4	51	2.3	3	7.0	0	0.0
Moderate-income	286	12.5	281	12.5	5	11.6	0	0.0
Middle-income	815	35.6	794	35.3	20	46.5	1	100.0
Upper-income	1,137	49.6	1,122	49.9	15	34.9	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,292	100.0	2,248	100.0	43	100.0	1	100.0
Percentage of Total Farms:			98.1		1.9		.0	

2016 FFIEC Census Data and 2016 D&B Information

Houston, Texas

Community Contacts and Community Development Opportunities

To better understand the community development and economic landscapes, several community development professionals were contacted. These individuals discussed the various needs and opportunities across the region as well as how financial institutions can be responsive to local community development needs. According to these contacts, housing affordability and workforce development are significant concerns for the area. Houston is known for its zoning issues. Without the ability to regulate land use, maintaining housing affordability is especially challenging. A community contact would, therefore, like to see low interest loans and other financial support to help with housing affordability preservation as roughly 30 projects are reaching the end of their affordability period in the area. Leadership from financial institutions could also improve the affordable housing environment. Financial institutions have provided more financial literacy training, and the contact would like to see the financial training lead to more direct job placement at banks (e.g., internships, part-time, full-time, or some other model).

A community contact also noted that while the Texas Association of Community Development Corporations (CDCs) is fairly strong, there are a limited number of CDC developers. She suggested that the dearth of CDC developers is primarily due to limited funding. In recent years and under the previous mayor, public funding was directed to homeless initiatives. However, a new mayor was elected in December 2015, and it remains to be seen whether public support will be increased and redirected to affordable housing and neighborhood revitalization. In terms of opportunities for financial institutions, operating grants, equity equivalent investments (EQ2s) and revolving lines of credit are always needed by organizations engaged in community development work.

Residents and community-based organizations are actively engaged in neighborhood revitalization. In 2009, Houston LISC launched the GO Neighborhoods program — a multiyear place-based initiative for revitalizing Houston communities. GO Neighborhoods is a comprehensive community development approach that leverages resources by working across sectors including housing and real estate; family income and wealth; economic development; quality education; and healthy environments and lifestyle. Currently, LISC partners with three GO Neighborhoods: Northside Village, Independence Heights, and OST/South Union. LISC also partners with six Pipeline GO Neighborhoods: Magnolia Park, Denver Harbor, Sunnyside, Alief, Gulfton, and the Greater Third Ward. In each of the demonstration neighborhoods, LISC assists with a planning process with residents and community stakeholders to develop a Quality of Life Agreement (QLA), which is the neighborhood's visioning document and plan for building a sustainable community. The QLA identifies strategic areas of focus, as well as action steps needed. All of the current GO Neighborhoods have been identified by the City of Houston's Housing and Community Development Department as high opportunity areas and labeled Community Revitalization Areas (CRAs) and CRA outreach areas.

Other community development financing tools include the Low-Income Housing Tax Credit (LIHTC) program and Houston's Tax Increment Reinvestment Zones (TIRZs). The LIHTC program provided tax credits in the amount of \$10.1 million in 2014 and \$11.2 million in 2015 to support affordable rental housing projects in the

Houston, Texas

Houston assessment area.³⁰ In 2015, 75.0 percent of the awarded tax credit amounts were in urban markets. While LIHTC participation can be competitive, it presents a good opportunity for bank investments and financing. The TIRZs are created by the city council to attract and encourage new investment in areas that have a “substantial number of substandard, slum, deteriorated, or deteriorating structures” or other defective, unsafe, or unsanitary conditions.³¹ TIRZ funding can be used to purchase property for redevelopment or make improvements to infrastructure, including sidewalks, roadways, and utilities. The city has 27 active TIRZs with eight zones contributing a third of their funds for affordable housing throughout the city or within the limits of the TIRZ.

In light of the financial challenges facing low- to moderate-income individuals particularly, there are opportunities for banks to partner with organizations that have created specific programs and activities to improve financial capability and household financial stability, such as BankOn Houston, United Way THRIVE, and LISC Financial Opportunity Centers (FOCs). BankOn Houston is a collaborative effort of financial institutions, nonprofits, and government agencies working on strategies that provide lower-income families with access to mainstream financial institutions and services. United Way THRIVE, a collaborative initiative launched and led by United Way of Greater Houston, leverages more than 20 nonprofit partners and partnerships with employers, community colleges, financial institutions and city and state agencies, to help families increase income and skills, build savings, and acquire assets. LISC FOCs are career and personal financial service centers, located in the six targeted neighborhoods, which provide employment and career planning assistance, financial education and coaching, and access to income support services. To address workforce skills gaps, the Greater Houston Partnership launched UpSkill Houston in 2014 in collaboration with over 60 employers, educational institutions, social service organizations, and government agencies.³²

³⁰ *Multifamily Housing Programs*. Texas Department of Housing and Community Affairs, n.d. Web. 29 Oct. 2015. <<http://www.tdhca.state.tx.us/multifamily/>>.

³¹ Asgarian, Roxanna. "Houston's Affordable Housing Wouldn't Work without TIRZ Funds." *Houston Business Journal*, 10 Nov. 2015. Web. 13 Sept. 2016. http://www.bizjournals.com/houston/morning_call/2015/11/houstons-affordable-housing-wouldnt-work-without.html

³² *2017 Annual Report*. Greater Houston Partnership. n.d. Web. 7 May 2018. http://www.houston.org/assets/pdf/2017_Annual_Report.pdf

Houston, Texas

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS **LENDING TEST**

Compass Bank's lending performance in the Houston assessment area is excellent. The geographic distribution of loans reflects good penetration throughout the assessment area, while the distribution of borrowers reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank is a leader in making community development loans in the Houston assessment area.

During the review period, the bank reported 2,679 HMDA-reportable loans compared to 8,430 small business loans in the Houston assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Houston assessment area contains 13.6 percent of the bank's total HMDA-reportable lending by number of loans and 16.1 percent by dollar volume, and 17.6 percent of its total small business lending by number of loans and 19.3 percent by dollar volume. In comparison, 21.3 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low- and moderate-income tracts is good overall. Compass Bank originated 10.4 percent of its small business loans in low-income tracts, where 7.4 percent of small businesses in the assessment area are located, and outperformed the aggregate lenders in 2015 and 2016. Additionally, the bank originated 18.4 percent of its small business loans in moderate-income tracts, where 18.9 percent of small businesses in the assessment area are located, and performed similarly to aggregate in both years.

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Home Purchase Loans

Home purchase lending in low-income census tracts is excellent. For the review period, Compass Bank's home purchase lending in low-income tracts (4.3 percent) exceeded the percentage of owner-occupied units (4.1 percent) in these tracts; the bank outperformed the aggregate lenders in 2015 and 2016.

Home purchase lending in moderate-income census tracts is adequate. Compass Bank's home purchase lending in moderate-income census tracts (12.1 percent) was below the percentage of owner-occupied units (20.9 percent) in these tracts, while the bank's average performance for the review period was slightly above aggregate lending performance in moderate-income tracts.

Home Refinance Loans

Home refinance lending in low- and moderate-income census tracts is adequate. The percentage of home refinance loans originated in both geographies (13.7 percent) was significantly below the percentage of owner-occupied units in these tracts; however, the bank's performance was greater than the aggregate lending performance in 2015 and 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is excellent. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent. Approximately 63.3 percent of small business loan originations were extended to businesses with revenues of \$1 million or less, as compared to 90.6 percent of total businesses in the assessment area that are classified as small businesses. In both years, the bank outperformed aggregate lenders in the percentage of loans to small businesses. In addition, 98.0 percent of the bank's small business loan originations were in amounts of \$250,000 or less, which typically represent loan amounts requested by very small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. Compass Bank's home purchase lending to low-income borrowers (3.9 percent) was much less than the percentage of low-income families (23.7 percent) living in the assessment area. However, the bank's home purchase lending to low-income borrowers exceeded aggregate in 2015 and 2016.

Home purchase lending to moderate-income borrowers is good. The bank's home purchase lending to moderate-income borrowers (14.2 percent) was slightly less than the percentage of moderate-income families (16.5 percent) in the assessment area during the review period; however, the bank's lending was greater than aggregate in both years.

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Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. While the bank's home purchase lending to low-income borrowers (4.4 percent) was significantly less than the percentage of low-income families, the bank's performance exceeded aggregate lenders in 2015 and was comparable to aggregate performance in 2016.

Home refinance lending to moderate-income borrowers is good. Compass Bank's home refinance lending to moderate-income borrowers (11.9 percent) was less than the percentage of moderate-income families in the assessment area, but greater than aggregate lending in both years of the review period.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the Houston assessment area. The bank originated 44 community development loans totaling \$226.2 million during the review period, including a loan for \$7 million to construct, equip, and occupy a new manufacturing building in an Industrial Reinvestment Zone creating 132 new jobs. Several other loans financed public infrastructure improvements located in low- and moderate-income TIF Zones including Hurricane Harvey disaster relief. Compass Bank also financed five Low-Income Housing Tax Credits that provided over 800 units of affordable housing. This housing includes some Single-Room Occupancy (SRO) units and units set aside for permanent supportive housing targeted to the homeless transitioning out of homelessness. Other units are reserved for families living on extremely low incomes. These units are expected to be supported by project based vouchers from the City of Houston's Medicaid Waiver program along with the proprietor's own Residential Services Program. Supportive services include case management, rental subsidies, assistance with medications, food and basic household essentials, household training, self-sufficiency services, GED prep and testing, and substance abuse treatment. Many of these housing units are located adjacent to the Metro light rail for transit access along with Class A office space and retail space available for local nonprofits. Other loans finance a college preparatory school where 83 percent of the students receive free or reduced-price lunches. Loans to small businesses will create over 550 new jobs for low- and moderate-income individuals. Additionally, the bank originated 52 community development loans for \$128.5 million at the broader state or regional level with a purpose that includes serving the Houston assessment area. These loans met the community service needs of the area by financing skilled nursing facilities that primarily treat Medicaid patients and public charter schools predominantly serving students receiving free or reduced-price lunches. Given Compass Bank's high volume of community development loans strengthened by the diversity of loan purposes responding to the needs of the community, Compass Bank is a leader in providing community development loans in the Houston assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Houston assessment area is excellent. The bank made an excellent level of qualified community development investments in the assessment area, often in a leadership position. Additionally, the bank's investments exhibit excellent responsiveness to credit and community development needs in the assessment area.

Houston, Texas

The bank invested nearly \$171.5 million in the Houston assessment area, including \$101.6 million in new investments during the review period and \$66.1 million in prior period investments. The total also includes approximately \$3.7 million in contributions made during the review period. The bank leveraged several different investment vehicles in the Houston assessment area, including EQ2 investments in CDFIs, Low-Income Housing Tax Credits, investments in equity funds, mortgage-backed securities and a stock purchase in a CDFI. Nearly all of the bank's investments during the review period financed affordable housing, including eight LIHTC investments totaling \$79.2 million. Through the LIHTC investments, the bank helped finance almost 1,400 affordable housing units, including some targeting formerly homeless and the very lowest income individuals. The bank also made several significant contributions to support services offered at the LIHTC projects. These investments were highly responsive to the need in the assessment area for affordable housing, particularly for the lowest-income.

The bank's contributions demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$2.7 million for community services to low- and moderate-income individuals, \$547,500 for revitalization and stabilization of designated disaster areas and low- and moderate-income geographies, and \$490,500 for economic development.

As noted earlier, the bank also had investments and contributions that served a broader regional area that includes the Houston assessment area.

Notable examples of the bank's investments include the following:

- A \$3.5 million investment in the local affiliate of a national CDFI to support affordable housing programs; this CDFI focuses on housing as a core component of a holistic revitalization strategy for low- and moderate-income communities.
- A \$1 million investment in a national CDFI to provide capital for loans for charter schools, affordable housing, and community facilities benefiting low-and moderate-income individuals and communities in the Houston MSA.
- Grants totaling \$1.8 million to a local charter school district that serves primarily low- and moderate-income students; the grants will support the operations of the district and the opening of a new school in a low-income community.
- \$400,000 in contributions to two organizations to provide temporary shelter and other assistance to individuals displaced by Hurricane Harvey.
- Grants totaling \$100,000 to support Financial Opportunity Centers (FOCs), which provide a one-stop-shop for financial education and coaching, career planning, and access to income support services. With the help of these grants, the centers will serve approximately 2,500 clients.
- Grants totaling \$60,000 to support financial education and small business technical assistance programs, primarily for women.
- Two grants totaling \$25,000 to support a workforce development program that is designed to prepare low- and moderate-income individuals for careers in the financial services industry.

Houston, Texas

SERVICE TEST

Compass Bank's service test performance in the Houston assessment area is good.

Retail Services

Retail banking services are adequate. The distribution of 76 branch offices and 114 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has eight branches in low-income tracts; thus the percentage of branches in low-income tracts (10.5 percent) was greater than both the percentage of households (9.7 percent) and the percentage of businesses (7.8 percent) in the same geography. The distribution of the bank's nine branches (11.8 percent) in moderate-income tracts was less than both the percentage of households (25.1 percent) and the percentage of businesses (19.1 percent) in the same geography. Overall, delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels.

During the examination period, the bank neither opened nor closed any branches in the assessment area. However, the bank opened a total of 13 and closed 2 full-service ATMs in the assessment area. Eight of the 13 opened full-service ATMs were located in low- or moderate-income tracts. The two closed full-service ATMs were located in upper-income tracts. Overall, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.

Compass Bank offers extended and weekend hours at its branches in low- and moderate-income tracts comparable to branches in middle- and upper-income tracts. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Houston, Texas

Geographic Distribution of Branches & ATMS

Assessment Area: TX Houston

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	8	10.5%	0	0	8	8	7	Total	23	10.7%	13	11.4%	4	0	10	10.0%	2	1	130	12.4%	9.7%	7.8%
DTO	0		0	0				SA	15		5		4	0	10		2	1				
Moderate	9	11.8%	0	0	9	9	6	Total	33	15.4%	14	12.3%	4	0	19	19.0%	2	1	299	28.4%	25.1%	19.1%
DTO	0		0	0				SA	23		4		4	0	19		2	1				
Middle	13	17.1%	0	0	13	13	12	Total	40	18.7%	22	19.3%	1	0	18	18.0%	3	6	279	26.5%	28.1%	25.3%
DTO	0		0	0				SA	21		3		1	0	18		3	6				
Upper	46	60.5%	0	0	42	44	28	Total	118	55.1%	65	57.0%	4	2	53	53.0%	14	13	336	32.0%	37.1%	47.7%
DTO	0		0	0				SA	54		2		2	1	52		14	13				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	7	0.7%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	76	100.0%	0	0	72	74	53	Total	214	100.0%	114	100.0%	13	2	100	100.0%	21	21	1051	100.0%	100.0%	100.0%
DTO	0		0	0				SA	113		14		11	1	99		21	21				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides an excellent level of community development services in the Houston assessment area. Employees provided 3,995 service hours to qualified organizations by participating in 328 community development service activities.

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities which support low- and moderate-income individuals, communities, and small businesses in the Houston assessment area. Of the bank's total service hours, 2,097 hours were committed to financial education. Additionally, bank staff engaged in 815 hours of board or committee service to qualified nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- A bank leader served as a board member and served on the Building Committee and Housing Committee for a local CDC that promotes expansion of affordable housing in low- and moderate-income communities. Additionally, 61 bank volunteers were trained by the organization as Disaster Relief Counselors and subsequently assisted victims of Hurricane Harvey to complete applications for assistance through FEMA or the Texas Workforce Commission.

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- The bank hosted a Pro-Bono Service Awareness Day in the assessment area. Over 40 employees volunteered for 393 hours to provide banking expertise and business acumen in finance, marketing, and legal support to build the capacity of 11 nonprofit organizations in Houston.
- Working with a local CDFI chapter, bankers conducted over 30 small business education workshops in the assessment area during the exam period, totaling over 200 service hours.

Compass Bank demonstrated an excellent level of engagement in community services as well as responsiveness to identified affordable housing and economic development needs in the Houston assessment area.

Dallas, Texas

METROPOLITAN AREA (Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DALLAS, TEXAS ASSESSMENT AREA

Overview

The Dallas assessment area is comprised of 10 counties located in the Dallas-Fort Worth-Arlington, TX MSA, including Collin, Dallas, Denton, Ellis, Hood, Johnson, Kaufman, Parker, Rockwall, and Tarrant. As of December 31, 2016, Compass Bank operated 99 branches in the assessment area. The bank's branch presence in the assessment area represents 29.2 percent of branches and 28.0 percent of deposits in Texas. In addition, the market represents the second largest concentration of combined HMDA-reportable and CRA small business lending in the state at 28.1 percent by dollar volume.

The assessment area is a highly competitive market dominated by national and super regional banks. According to the June 30, 2016 FDIC Summary of Deposits Report, Compass Bank ranks 5th out of 154 financial institutions operating in the assessment area with 4.4 percent in deposits (\$10.7 billion). The top financial institutions by deposit market share are Bank of America with 29.1 percent, JPMorgan Chase Bank with 21.7 percent and Wells Fargo Bank with 8.0 percent.

HMDA-reportable and CRA small business lending are similarly competitive. Compass Bank's residential loan production accounted for less than 1.0 percent of total HMDA-reportable lending activity during the review period. In 2016, 1,014 lenders reported 256,804 HMDA-reportable loans in the assessment area. For both years, Wells Fargo Bank, JPMorgan Chase Bank, and Quicken Loans were top HMDA reporters in the market. CRA small business lending was led by American Express, Citibank, Chase Bank, and Capital One in both years. Compass Bank ranked 8th out of 241 small business reporters in 2016 with 2.9 percent of the total CRA small business loans; the bank had similar performance in 2015. As mentioned, the Dallas assessment area represents Compass Bank's second largest concentration of combined HMDA-reportable and CRA small business lending by units and dollars statewide.

Population and Income Characteristics

According to 2017 U.S. census data, the population of the assessment area is estimated at approximately 7.2 million people.³³ From 2010 to 2017, the assessment area population grew by 15.3 percent, greater than the statewide population growth rate of 12.6 percent.³⁴ The Dallas MSA is the fourth most populous MSA in the United States and had the largest numeric population gains of all metropolitan areas in 2017.³⁵ In addition, four counties in the Dallas assessment area — Collin, Dallas, Denton, and Tarrant — ranked in the top 10 counties nationwide in population gains from July 1, 2016, to July 1, 2017.³⁶ Dallas and Fort Worth are the largest cities

³³ QuickFacts. U.S. Census Bureau, n.d. Web. 19 April 2018. <http://quickfacts.census.gov>

³⁴ Ibid

³⁵ U.S. Census Bureau. "Dallas-Fort Worth-Arlington Has Largest Growth in the U.S." *Press Release Number: CB18-50*, US Census, 22 Mar. 2018, www.census.gov/newsroom/press-releases/2018/popest-metro-county.html

³⁶ Ibid

Dallas, Texas

in the assessment area with an estimated population of 1.3 million and 854,113 residents, respectively, as of 2016 census data.³⁷ Other sizeable cities in the assessment area include Arlington, Denton, Garland, Irving, and McKinney.

The assessment area is made up of 1,292 census tracts: 147 tracts are low-income (11.4 percent), 328 tracts are moderate-income (25.4 percent), 387 tracts are middle-income (30.0 percent), 426 tracts are upper-income (33.0 percent), and 4 tracts are unknown income (0.3 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the area. The Dallas-Fort Worth-Arlington MSA is made up of two metropolitan divisions (MDs): the Dallas-Plano-Irving MD and the Fort Worth-Arlington MD. The following tables set forth the estimated median family income in 2015 and 2016 for both MDs and provide a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). The tables indicate that the estimated median family income for the Dallas MD increased by \$1,200 from 2015 to 2016; however, income declined by the same amount for the Fort Worth MD. In addition, 39.3 percent of families in the assessment area are considered low- to moderate-income.³⁸

Borrower Income Levels Dallas-Plano-Irving, TX MD

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2015	\$70,500	0 - \$35,249	\$35,250 - \$56,399	\$56,400 - \$84,599	\$84,600 - & above
2016	\$71,700	0 - \$35,849	\$35,850 - \$57,359	\$57,360 - \$86,039	\$86,040 - & above

Borrower Income Levels Fort Worth-Arlington, TX MD

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2015	\$70,500	0 - \$35,249	\$35,250 - \$56,399	\$56,400 - \$84,599	\$84,600 - & above
2016	\$69,300	0 - \$34,649	\$34,650 - \$55,439	\$55,440 - \$83,159	\$83,160 - & above

³⁷ "Dallas, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2018. <http://www.policymap.com/>

³⁸ FRB Atlanta Calculations of 2016 Census Data

Dallas, Texas

The percentage of people living below the federal poverty line in the Dallas MSA was 14.0 percent between 2012 and 2016, falling below the state poverty rate of 16.7 percent.³⁹ For this same period, the percentage of people living below the poverty level varies across the assessment area, from a low of 6.2 percent in Rockwall County to as high as 18.6 percent in Dallas County.⁴⁰ In the city of Dallas, several pockets of concentrated poverty exist; over two-fifths of the Dallas zip codes have percentages of people below the poverty line exceeding 25.0 percent. In low- and moderate-income areas specifically, 32.8 percent of families living in low-income census tracts live below the poverty level and 17.5 percent of families living in moderate-income census tracts live below the poverty level.⁴¹

Economic Conditions

The Dallas-Fort Worth-Arlington MSA is the fastest growing region in the country and the fourth largest MSA in the United States. Given the unique characteristics and economic conditions of the two MDs that make up the MSA, it is important to discuss each separately for this section of the report.

Dallas-Plano-Irving Metropolitan Division (MD) – The Dallas MD is home to many corporate headquarters, including more than 19 Fortune 500 companies, including Exxon-Mobil Corp., AT&T Inc., and J.C. Penney Company, Inc. Total employment in the area is approximately 2.6 million as of 2017, representing an 11.7 percent increase from 2014.⁴² The professional and business services sector is the largest employment sector in the region, representing 18.8 percent. Another leading sector in the area is education and health services. The Dallas MD is an important hub for healthcare and education and is home to numerous hospitals, medical research facilities, and universities. Baylor Scott and White Health, two of the top employers in the region, are in the education and health services sector, each employing more than 10,000 employees.⁴³ Lastly, the region benefits from the Dallas-Fort Worth Airport (DFW); it is the fourth busiest airport in the world and a major economic engine for the region.

Fort Worth-Arlington MD – Employment growth has been strong across many industries in the Fort Worth-Arlington MD. Total employment in the area is approximately 1.0 million as of 2017, representing a 6.2 percent increase from 2014.⁴⁴ Besides government, the other major industries include education and health services, leisure and hospitality services, retail trade, and professional and business services. The area also benefits from manufacturing, particularly military aircraft and truck manufacturing. Headquartered in the city of Fort Worth, American Airlines is the largest employer in the MD, with 25,000 employees. Other leading employers include Lockheed Martin Aeronautics Company (manufacturing), Texas Health Resources, and Fort Worth Independent School District (ISD). The military has a notable presence as well as a significant impact on the local economy. In particular, the fifth largest employer in the region is Naval Air Station (NAS) Fort Worth Joint Reserve Base (JRB), with an estimated 11,000 military and civilian personnel.⁴⁵ The diverse base of employers and industries provides the region with stability during weak business cycles.

³⁹ "Dallas, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

⁴⁰ Ibid

⁴¹ FRB Atlanta Calculations of 2016 Census Data

⁴² Friedman, Edward. "Dallas-Plano-Irving TX" Précis U.S. Metro. Moody's Analytics, November 2017. Web. 20 April 2018.

<https://www.economy.com/precismetro>

⁴³ Ibid

⁴⁴ Friedman, Edward. "Fort Worth-Arlington TX" Précis U.S. Metro. Moody's Analytics, November 2017. Web. 20 April 2018.

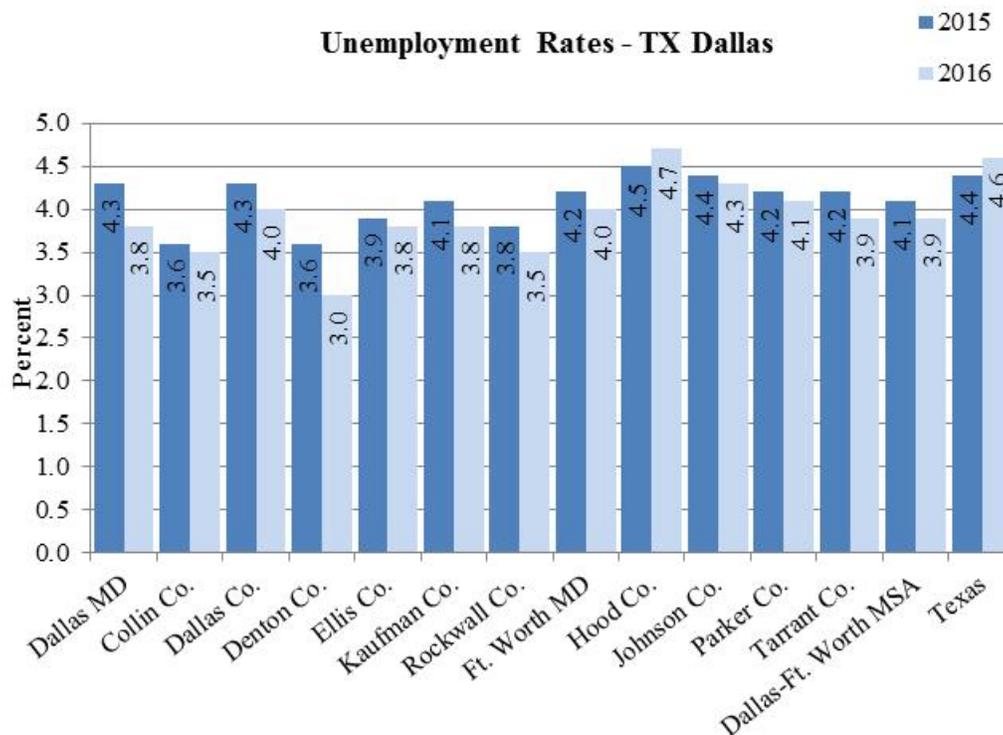
<https://www.economy.com/precismetro>

⁴⁵ Ibid

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Small businesses are integral to the Dallas MSA economy. According to 2016 Dun & Bradstreet information, there were 334,992 businesses within the Dallas assessment area; 91.3 percent had total annual revenues less than or equal to \$1 million.⁴⁶ Additionally, 17.8 percent of small businesses with revenues less than or equal to \$1 million are located in moderate-income tracts and 6.5 percent are in low-income tracts. Lending to small businesses is also increasing. According to an analysis of CRA loan data, the number of small business loans increased by 16.6 percent between 2014 and 2016, with nearly 145,925 loans made in 2016.⁴⁷ During this same period, loans made to firms with revenues of \$1 million or less represented a greater share of total small business loans than prior years.⁴⁸ This may be an indication that there may be fewer obstacles for smaller firms to access credit in the market.

As shown in the table below, the unemployment rate in the Dallas MSA dropped slightly from 4.1 percent in 2015 to 3.9 percent in 2016. This compares favorably to the statewide rate of 4.6 percent. All counties in the assessment area, with the exception of Hood County, experienced a decline in their unemployment rate between 2015 and 2016.



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

There were 2.4 million housing units in the assessment area as of 2016 census data, of which 56.9 percent were owner-occupied, 33.8 percent were rental units, and 9.3 percent were vacant. The census data shows that 10.1 percent of the housing stock in the assessment area is located in low-income tracts and 24.4 percent is in moderate-income tracts. More specifically, the proportion of the housing stock that is owner-occupied is 44.8 percent in

⁴⁶ FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

⁴⁷ "Dallas MSA, TX (CRA Loan Data)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 20 April 2018. <http://www.policymap.com/>

⁴⁸ Federal Reserve Bank of Atlanta calculations of data from PolicyMap CRA Loan Data.

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moderate-income tracts and 26.0 percent in low-income tracts. In low- and moderate-income tracts, housing is disproportionately rental and vacant units, suggesting that residential lending opportunities may be limited in low-income tracts in particular.

During the review period, home prices continued to rise steadily. The median home price in the Dallas MSA in 2017 was \$255,000, a 20.3 percent increase from 2015.⁴⁹ There is considerable variation in the median home price in the counties throughout the assessment area. Collin County had the highest median price at \$324,700, while Johnson County had the lowest median price at \$195,200. Since Dallas and Tarrant are the most populous counties in the assessment area, it should be noted that the median home prices in those areas were \$235,000 and \$225,000, respectively.⁵⁰ While positive overall, price increases make it more difficult for potential homeowners with low to moderate incomes to enter into the market. The minimum annual income needed to afford a median-priced home in the Dallas MSA was \$59,237,⁵¹ which is slightly above the threshold for moderate-income. In the MSA, 39.3 percent of families are low- or moderate-income.

⁴⁹ *Texas Quarterly Housing Report*, Texas Association of Realtors, www.texasrealestate.com/market-research/quarterly-housing-report/

⁵⁰ *Housing Activity*, Real Estate Center, Texas A&M University, www.recenter.tamu.edu/data/housing-activity/

⁵¹ "The Salary You Must Earn to Buy a Home in the 50 Largest Metros." *HSH.com*, HSH Associates, Financial Publishers, 22 Feb. 2018, www.hsh.com/finance/mortgage/salary-home-buying-25-cities.html#miami.

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Recent HMDA data shows home lending has improved in the assessment area. The number of loans originated inside the assessment area increased by 41.9 percent from 2014 to 2016 driven by refinances.⁵² Between 2014 and 2016, the number of home loans that were refinance loans increased by 90.1 percent, whereas the number of home loans made that were used to purchase a home increased by 19.9 percent.⁵³

Concerning rental housing affordability, nearly 45.0 percent of all renters in the Dallas MSA were cost-burdened (paying more than 30.0 percent of income towards housing costs) between 2012 and 2016.⁵⁴ The 2017 Out of Reach study by the National Low Income Housing Coalition indicates that an individual would need to earn an hourly wage of \$19.83 or an annual income of \$41,240 to afford the fair market rent (\$1,031) for a two-bedroom apartment in the Dallas MSA.⁵⁵ For an extremely low-income individual (someone earning 30.0 percent of the area median income, or \$22,020), rent is affordable at \$551 a month.⁵⁶ There does not appear to be a significant number of lower cost rental units available. For a four-person family earning 30.0 percent of the area median income, less than 5.0 percent of all rental units are likely affordable in Collin, Dallas, and Tarrant counties.⁵⁷

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

⁵² "Dallas, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

⁵³ Ibid

⁵⁴ "Dallas MSA, TX (U.S. Census Bureau)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 7 Apr. 2018. <http://www.policymap.com/>

⁵⁵ *Out of Reach 2017*. National Low Income Housing Coalition, *Out of Reach 2017*, <http://www.nlihc.org/oor/>

⁵⁶ Ibid

⁵⁷ "Dallas MSA, TX (U.S. Census Bureau)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 7 Apr. 2018. <http://www.policymap.com/>

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Combined Demographics Report

Assessment Area: TX Dallas

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	147	11.4	126,232	8.4	41,460	32.8	337,628	22.4
Moderate-income	328	25.4	344,000	22.8	60,334	17.5	254,235	16.9
Middle-income	387	30.0	490,138	32.5	36,357	7.4	282,374	18.7
Upper-income	426	33.0	547,675	36.3	15,681	2.9	633,817	42.0
Unknown-income	4	0.3	9	0.0	0	0.0	0	0.0
Total Assessment Area	1,292	100.0	1,508,054	100.0	153,832	10.2	1,508,054	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	241,824	62,931	4.6	26.0	140,529	58.1	38,364	15.9
Moderate-income	584,175	261,631	19.2	44.8	254,340	43.5	68,204	11.7
Middle-income	789,054	458,655	33.6	58.1	262,285	33.2	68,114	8.6
Upper-income	782,106	581,503	42.6	74.4	153,446	19.6	47,157	6.0
Unknown-income	18	18	0.0	100.0	0	0.0	0	0.0
Total Assessment Area	2,397,177	1,364,738	100.0	56.9	810,600	33.8	221,839	9.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	23,069	6.9	19,776	6.5	3,142	12.0	151	5.0
Moderate-income	61,279	18.3	54,396	17.8	6,508	24.8	375	12.4
Middle-income	98,550	29.4	90,829	29.7	6,970	26.6	751	24.9
Upper-income	151,594	45.3	140,414	45.9	9,454	36.0	1,726	57.3
Unknown-income	500	0.1	335	0.1	154	0.6	11	0.4
Total Assessment Area	334,992	100.0	305,750	100.0	26,228	100.0	3,014	100.0
Percentage of Total Businesses:			91.3		7.8		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	91	2.9	85	2.8	6	11.5	0	0.0
Moderate-income	337	10.9	331	10.8	6	11.5	0	0.0
Middle-income	1,249	40.2	1,235	40.5	14	26.9	0	0.0
Upper-income	1,426	45.9	1,399	45.9	26	50.0	1	100.0
Unknown-income	1	0.0	1	0.0	0	0.0	0	0.0
Total Assessment Area	3,104	100.0	3,051	100.0	52	100.0	1	100.0
Percentage of Total Farms:			98.3		1.7		.0	

2016 FFIEC Census Data and 2016 D&B Information

Dallas, Texas

Credit and Community Development Needs

To better understand the community development and economic landscapes, examiners referenced findings from a Federal Reserve Bank of Dallas report and contacted several community development practitioners. These individuals discussed the various needs and opportunities across the region as well as how financial institutions can be responsive to local community development needs. Information from these discussions is included in the appropriate sections of this report.

As part of its Community Outlook Series, the Federal Reserve Bank of Dallas published *The Scarcity of Texas Affordable Housing* in September 2016, which summarizes findings on trends, challenges, and emerging issues across the state from a survey of affordable housing developers. The report also describes critical affordable housing issues in five Texas regions, including the Dallas MSA. Overwhelmingly, the developers surveyed indicate the increasing need for affordable housing. They also indicate that growing costs, particularly associated with rising land prices, and insufficient funding are among the issues plaguing affordable housing developers in Texas. In the Dallas region, more specifically, survey respondents cited community opposition, access to capital, and regulations as the top barriers. Clearly, financial institutions working with nonprofit and for-profit developers on affordable housing projects in a lending, investing or advising capacity can be responsive to local community development needs.

The City of Dallas has also identified affordable housing as a priority issue and has adopted its first ever comprehensive housing policy to address its current shortage of 20,000 units.⁵⁸ City officials have proposed three areas they will target with funding, incentives, etc., which are as follows: 1) Redevelopment Areas where there is a project that has started or will be starting within the next 12 months; 2) Stabilization Areas indicates neighborhoods where redevelopment threatens to displace the lower-income residents who are already there; and 3) Emerging Market Areas, which the city defines as its most distressed areas. The City of Dallas proposes to use several sources of funding such as federal money, private foundations, bond funds, and revenue from tax increment financing districts to meet its housing goals. Working on projects in these identified areas is another opportunity where banks can be responsive to targeted redevelopment.

Related to neighborhood revitalization, the mayor of Dallas launched a redevelopment initiative, GrowSouth, for southern Dallas in 2012.⁵⁹ It is a comprehensive strategy to improve living conditions, produce jobs, boost property values, and create a thriving tax base. Southern Dallas encompasses approximately 54.0 percent of the city's land area yet provides only 15.0 percent of the city's tax base. It is also where 45.0 percent of the city's population resides. Compared to North Dallas, the area is characterized by lower incomes, older homes, poor infrastructure, and low-performing schools. While community contacts noted the need for flexible housing rehabilitation financing and commercial real estate loans in southern Dallas, the area presents numerous opportunities for banks to engage in community development activities through lending, investing, and delivering community services.

⁵⁸ Comprehensive Housing Policy. Rep. City of Dallas, Department of Housing and Neighborhood Revitalization, 19 Mar 2018. Web. 26 June 2018. <http://dallascityhall.com/departments/housing-neighborhood-revitalization/pages/default.aspx>

⁵⁹ GrowSouth. City of Dallas, n.d., Web. 26 June 2018. <http://www.dallasgrowsouth.com/>

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Dallas assessment area is excellent. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Also, the distribution of borrowers reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes a relatively high level of community development loans.

During the review period, the bank reported 2,302 HMDA-reportable loans compared to 9,675 small business loans in the Dallas assessment area. Therefore small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Dallas assessment area contains 11.7 percent of the bank's total HMDA-reportable lending by number of loans and 9.6 percent by dollar volume, and 20.2 percent of its total small business lending by number of loans and 20.0 percent by dollar volume. In comparison, 15.6 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low- and moderate-income census tracts is excellent. Compass Bank's percentage of small business loans in low- and moderate-income census tracts (28.9 percent) exceeded the percentage of small businesses (24.3 percent) in those tracts. In addition, the bank's small business lending in tracts of both income levels exceeded aggregate lending performance in 2015 and 2016.

Home Purchase Loans

Home purchase lending in low- and moderate-income tracts is excellent. For the review period, Compass Bank's home purchase lending (4.6 percent) in low-income tracts was equal to the percentage of owner-occupied units in these tracts, while the bank's home purchase lending in moderate-income tracts (25.5 percent) exceeded the percentage of owner-occupied units (19.2 percent) in these tracts. In both geographies, the bank's

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performance was considerably greater than the aggregate lending performance over the review period. It is worth noting that the bank originated 31.3 percent of its home purchase loans in moderate-income tracts in 2016, which far exceeded the percentage of owner-occupied units (19.2 percent) and the percentage of aggregate loans (10.7 percent).

Home Refinance Loans

Home refinance lending in low- and moderate-income census tracts is good. The percentage of home refinance loans originated in both geographies (14.5 percent) was less than the percentage of owner-occupied units in these tracts (23.8 percent); however, the bank's performance was greater than the aggregate lending performance in 2015 and 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is excellent. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent. For the review period, 65.1 percent of the bank's loans were originated to businesses with revenues of \$1 million or less. By comparison, 91.3 percent of total businesses in the assessment area are classified as small businesses. In both years, the bank outperformed aggregate lenders in the percentage of loans to small businesses. In addition, 98.5 percent of the bank's small business loan originations were in amounts of \$250,000 or less, which typically represent loan amounts requested by very small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is good. Compass Bank's home purchase lending to low-income borrowers (7.7 percent) was considerably less than the percentage of low-income families living in the assessment area (22.4 percent). However, the bank's home purchase lending to low-income borrowers exceeded aggregate in 2015 and 2016.

Home purchase lending to moderate-income borrowers is excellent. The bank's home purchase lending to moderate-income borrowers (28.6 percent) was greater than the percentage of moderate-income families (16.9 percent) in the assessment area during the review period, and the bank's lending was more than double aggregate in both years.

Home Refinance Loans

Home refinance lending to low-income borrowers is good. While the bank's home purchase lending to low-income borrowers (6.5 percent) was significantly less than the percentage of low-income families, the bank's performance exceeded aggregate lenders in 2015 and 2016.

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Home refinance lending to moderate-income borrowers is excellent. Compass Bank's home refinance lending to moderate-income borrowers (17.3 percent) was greater than the percentage of moderate-income families in the assessment area and greater than aggregate lending in both years of the review period.

Community Development Lending

Compass Bank makes a relatively high level of community development loans in the Dallas assessment area. The bank originated 37 community development loans totaling \$165.8 million during the review period, including loans for \$4 million to finance Head Start programs educating children in poverty. Another loan financed a senior assisted living facility with a majority of Medicaid patients. Other loans financed small businesses creating 230 jobs for low- and moderate-income individuals. Compass Bank also financed seven Low-Income Housing Tax Credits that provided over 1,000 units of affordable housing for low- and moderate-income individuals and families. Additionally, the bank originated 52 community development loans for \$128.5 million at the broader state or regional level with a purpose that includes serving the Dallas assessment area. These loans met the community service needs of the area by financing skilled nursing facilities that primarily treat Medicaid patients and public charter schools predominantly serving students receiving free or reduced-price lunches. This volume of community development lending is considered good given the bank's size and presence in the assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Dallas assessment area is excellent. The bank made an excellent level of qualified community development investments and exhibited excellent responsiveness to credit and community development needs in the assessment area.

The bank invested \$189.9 million in the Dallas assessment area, including \$105.4 million in new investments during the review period and \$83.0 million in prior period investments. The total also includes approximately \$1.4 million in contributions made during the review period. The bank leveraged several different investment vehicles in the Dallas assessment area, including EQ2 investments in CDFIs, Low-Income Housing Tax Credits, investments in equity funds and mortgage-backed securities. Nearly all of the bank's investments during the review period financed affordable housing, including six LIHTC investments totaling \$82.3 million. Through the LIHTC investments, the bank helped finance about 850 affordable housing units. Several of these projects also included space to offer needed social services to residents; these investments responded to the need for quality affordable housing and community services in the assessment area.

The bank's contributions demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$933,550 for community services to low- and moderate-income individuals, \$391,000 for affordable housing, and \$92,500 to support economic development.

As noted earlier, the bank also had investments and contributions that served a broader regional area that includes the Dallas assessment area.

Dallas, Texas

Notable examples of the bank's investments include the following:

- A \$250,000 investment in a regional CDFI to provide small business loans and technical assistance to business owners in the Dallas assessment area;
- Grants totaling \$50,000 to a nonprofit housing organization based in Fort Worth for homebuyer education and housing counseling. With the grant, the nonprofit will provide housing counseling to 150 clients and assist 160 senior citizen households with education on reverse mortgages.
- Grants for \$38,250 to help nonprofits expand their capacity to meet the growing demand for affordable housing. The bank provided funding to a national community development intermediary to fund a capacity-building program for two nonprofit affordable housing developers.
- A grant for \$7,500 to a nonprofit restaurant to support job training and an internship program for juvenile offenders. The restaurant also participated in the BBVA Momentum program, which provides education and training for social entrepreneurs.

SERVICE TEST

Compass Bank's service test performance in the Dallas assessment area is good.

Retail Services

Retail banking services are adequate. The distribution of 99 branch offices and 142 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has seven branches in low-income tracts; thus the percentage of branches in low-income tracts (7.1 percent) was less than the percentage of households (9.4 percent) and similar to the percentage of businesses (6.9 percent) in the same geography. The distribution of the bank's 15 branches (15.2 percent) in moderate-income tracts was less than both the percentage of households (23.7 percent) and the percentage of businesses (18.3 percent) in the same geography. Overall, delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels.

During the examination period, the bank neither opened nor closed any branches in low- or moderate-income tracts in the assessment area. However, the bank closed a branch in both a middle- and upper-income tract. Additionally, the bank opened five full-service ATMs and closed two full-service ATMs in the assessment area. Two of the five opened full-service ATMs were located in low- or moderate-income tracts. The two closed full-service ATMs were located in middle- and upper-income tracts. Overall, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.

Compass Bank offers extended and weekend hours at its branches in low- and moderate-income tracts at a rate comparable to branches in middle- and upper-income tracts. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Dallas, Texas

Geographic Distribution of Branches & ATMS

Assessment Area: TX Dallas

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	7	7.1%	0	0	6	7	4	Total	10	6.2%	10	7.0%	1	0	0	0.0%	0	1	147	11.4%	9.4%	6.9%
DTO	0		0	0				SA	1		1		1	0	0		0	1				
Moderate	15	15.2%	0	0	14	13	9	Total	20	12.3%	17	12.0%	1	0	3	15.0%	0	0	328	25.4%	23.7%	18.3%
DTO	0		0	0				SA	3		0		0	0	3		0	0				
Middle	32	32.3%	0	1	31	30	15	Total	44	27.2%	39	27.5%	0	1	5	25.0%	1	1	387	30.0%	33.1%	29.4%
DTO	0		0	0				SA	4		0		0	0	4		1	1				
Upper	45	45.5%	0	1	41	40	19	Total	88	54.3%	76	53.5%	3	1	12	60.0%	0	2	426	33.0%	33.8%	45.3%
DTO	0		0	0				SA	13		2		2	0	11		0	2				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	0.3%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	99	100.0%	0	2	92	90	47	Total	162	100.0%	142	100.0%	5	2	20	100.0%	1	4	1292	100.0%	100.0%	100.0%
DTO	0		0	0				SA	21		3		3	0	18		1	4				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides a relatively high level of community development services in the Dallas assessment area. Employees provided 5,512 service hours to qualified organizations by participating in 461 different community development service activities.

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities which support low- and moderate-income individuals, communities, and small businesses in the Dallas assessment area. Of the bank's total service hours, 4,947 hours were committed to financial education. Additionally, bank staff engaged in 359 hours of board or committee service to qualified nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- In addition to implementing its proprietary BBVA Momentum technical assistance program for small businesses, the bank also hosted workshops at its branches, some of which benefited veteran business owners.
- Over 45 bank employee volunteers facilitated a two-week financial education program in partnership with a local nonprofit to benefit low- and moderate-income adults in Dallas County.

Considering its significant market share and branch presence in the Dallas assessment area, the bank demonstrated a good level of engagement in community services as well as responsiveness to identified affordable housing and economic development needs.

Austin, Texas

METROPOLITAN AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE AUSTIN, TEXAS ASSESSMENT AREA

Overview

The Austin assessment area includes Hays, Travis and Williamson counties, which are three of the five counties that comprise the Austin-Round Rock MSA. As of December 31, 2016, Compass Bank operated 30 branch offices in the assessment area. The bank's branch presence in the assessment area represents 8.8 percent of branches and 7.2 percent of deposits in Texas. In addition, the market represents the third largest concentration of combined HMDA-reportable and CRA small business lending in the state at 10.7 percent by dollar volume.

Austin is a very active banking market. According to the June 30, 2016 FDIC Summary of Deposits Report, there were 65 financial institutions operating 441 branch locations across the three counties with \$39.1 billion in total deposits. Compass Bank was ranked 5th in the market with 7.0 percent in deposits (\$2.8 billion). Wells Fargo Bank had the largest deposit market share at 20.7 percent, followed by Bank of America with 19.6 percent, and JPMorgan Chase Bank with 16.2 percent.

HMDA-reportable and CRA small business lending are similarly competitive. Compass Bank's 2015 and 2016 residential loan production accounted for less than 1.0 percent of total HMDA-reportable lending activity, ranking 35th in 2015 and 53rd in 2016. For 2016, Wells Fargo, JPMorgan Chase, University Federal Credit Union, and Quicken Loans were the top HMDA lenders in the assessment area. CRA small business lending was led by American Express, Citibank, Chase Bank, and Wells Fargo. Compass ranked 8th in both 2015 and 2016 with 2.9 percent and 2.3 percent, respectively, of the total CRA small business loans.

Population and Income Characteristics

The Austin assessment area has experienced significant growth since the last decennial census. According to 2017 U.S. census data, the population of the assessment area was estimated at approximately 1.9 million people.⁶⁰ From 2010 to 2017, the assessment area population grew by 24.0 percent, greater than the statewide population growth rate of 12.6 percent.⁶¹ The Austin MSA ranked in the top 10 metropolitan areas for both numeric and percentage population increase in 2017.⁶² Since 2010, Hays and Williamson counties have posted population gains of 36.5 and 29.6 percent, respectively.⁶³ Hays County was also ranked as the fourth fastest growing county in the country.⁶⁴

⁶⁰ QuickFacts. U.S. Census Bureau, n.d. Web. 19 April 2018. <http://quickfacts.census.gov>

⁶¹ Ibid

⁶² *Austin in the News: Ratings & Rankings*, Austin Chamber of Commerce, www.austinchamber.com/economic-development/business-climate/austin-in-the-news.

⁶³ QuickFacts. U.S. Census Bureau, n.d. Web. 19 April 2018. <http://quickfacts.census.gov>

⁶⁴ *Austin in the News: Ratings & Rankings*, Austin Chamber of Commerce, www.austinchamber.com/economic-development/business-climate/austin-in-the-news.

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The assessment area is made up of 332 census tracts: 36 tracts are low-income (10.8 percent), 76 tracts are moderate-income (22.9 percent), 115 tracts are middle-income (34.6 percent), 102 tracts are upper-income (30.7 percent), and 3 tracts are unknown income (0.9 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Austin-Round Rock MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for the MSA increased from \$76,800 in 2015 to \$77,800 in 2016. Data shows that the median family income is lowest in Hays County (\$77,069) and highest in Williamson County (\$88,161).⁶⁵ In addition, 38.2 percent of families in the assessment area are considered low- to moderate-income.⁶⁶

Borrower Income Levels Austin-Round Rock, TX MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2015	\$76,800	0 - \$38,399	\$38,400 - \$61,439	\$61,440 - \$92,159	\$92,160 - & above
2016	\$77,800	0 - \$38,899	\$38,900 - \$62,239	\$62,240 - \$93,359	\$93,360 - & above

While poverty across the nation has increased over the past few years, the Austin MSA has experienced declining rates of poverty for the five-year period ending 2016, and this after Austin was ranked as the second-fastest growing city with suburban poverty of the top 100 biggest U.S. cities.⁶⁷ The percentage of people living below the federal poverty line in the Austin MSA was 13.3 percent between 2012 and 2016, this down from 14.0 percent for the prior five-year period. Comparatively, the national poverty rate was 15.1 percent between 2012 and 2016.⁶⁸ For this same period, Williamson County had the lowest percentage of people living below the federal poverty line at 7.2 percent, while Travis County and Hays County had rates of 15.2 percent and 16.2 percent of residents, respectively.⁶⁹ In Austin, however, over one-third of the 32 zip codes have percentages of people living below poverty line that exceed 20.0 percent. In addition, a significant percentage of families in low- and moderate-income areas live below the poverty level. Specifically, 32.6 percent of families living in low-income census tracts live below the poverty level, and 14.4 percent of families living in moderate-income census tracts live below the poverty level.⁷⁰

⁶⁵ "Austin, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 April 2018. <http://www.policymap.com/>

⁶⁶ FRB Atlanta Calculations of 2016 Census Data

⁶⁷ Rice, Laura. "Austin: Second Fastest Growing City for Suburban Poverty." *Austin's NPR Station*, KUT 90.5, 20 May 2013, kut.org/post/austin-second-fastest-growing-city-suburban-poverty.

⁶⁸ "Austin, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

⁶⁹ Ibid

⁷⁰ FRB Atlanta Calculations of 2016 Census Data

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Economic Conditions

Austin is the state capital of Texas and home to its flagship state university, the University of Texas at Austin. Consequently, government represents the largest employment sector for the Austin MSA, with nearly 181,500 government workers, or 17.7 percent of total nonfarm employment.⁷¹ The second largest employment sector is professional and business services, representing 16.7 percent of total employment and primarily driven by information technology (IT) and services. Austin is a hub for technology-based companies, including Dell Inc., Samsung, Apple Computer, IBM, and NXP Semiconductors.⁷² Overall, Austin has a robust economy with job growth above the national average and wages rising faster than the national average. The leisure and hospitality and retail trade sectors, the two lowest paid sectors, represent 22.5 percent of total employment, or approximately 230,700 jobs, with annual average earnings of \$25,965 and \$39,242, respectively.

Small businesses represent a vibrant ecosystem in the Austin economy. According to 2016 Dun & Bradstreet information, there were 95,488 businesses within the Austin assessment area; 91.7 percent had total annual revenues less than or equal to \$1 million.⁷³ Additionally, 16.1 percent of small businesses with revenues less than or equal to \$1 million are located in moderate-income tracts and 5.8 percent are in low-income tracts. Throughout the assessment area, lending to small businesses has increased over the review period. According to an analysis of CRA loan data, the number of small business loans increased by 14.7 percent between 2014 and 2016, with nearly 43,400 loans made in 2016.⁷⁴ Loans made to firms with revenues of \$1 million or less represented 47.2 percent of total small business loans in 2016, which was lower than prior years.⁷⁵ This may be an indication that smaller firms are utilizing other alternative lending sources in the market.

It should be noted that all counties in the Austin assessment area have enterprise zones. The Texas Enterprise Zone Program is an economic development tool for local communities to partner with the State of Texas to promote job creation and capital investment in economically distressed areas of the state. Designated projects are eligible to apply for state sales and use tax refunds on purchases of all taxable items purchased for use at the qualified business site related to the project or activity.

The unemployment rate in the assessment area illustrates further a strong local economy in the Austin area. As shown in the table below, unemployment declined during the review period to 3.2 percent in the MSA. This compares quite favorably to the state unemployment rate, which was 4.6 percent in 2016; the national unemployment rate was 4.7 percent as of December 2016.⁷⁶

⁷¹ Friedman, Edward. "Austin-Round Rock TX" Précis U.S. Metro. Moody's Analytics, January 2018. Web. 20 April 2018.

<https://www.economy.com/precismetro>

⁷² Ibid

⁷³ FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

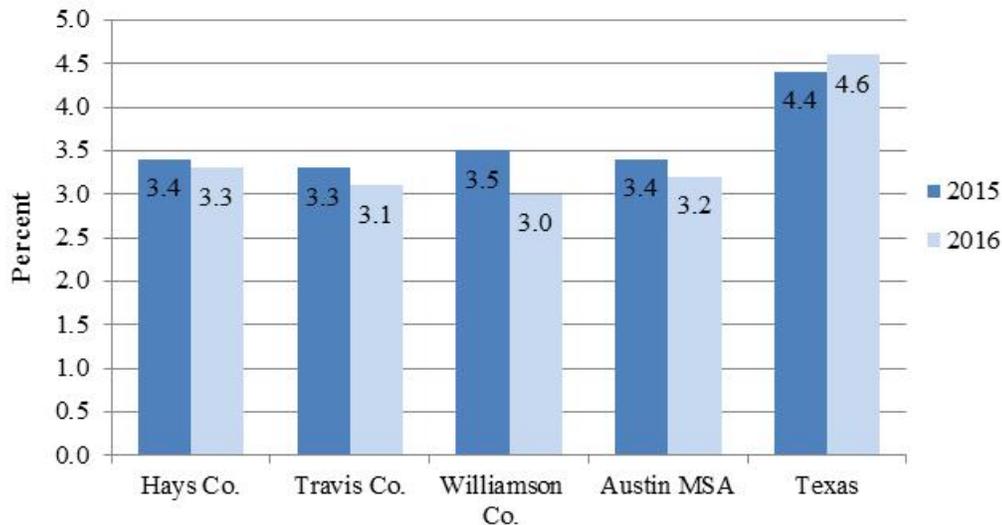
⁷⁴ "Hays County, Travis County, and Williamson County, TX (CRA Loan Data)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 20 April 2018. <http://www.policymap.com/>

⁷⁵ Federal Reserve Bank of Atlanta calculations of data from PolicyMap CRA Loan Data.

⁷⁶ "At a Glance Tables." U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 20 April 2018. <http://www.bls.gov/eag/home.htm>

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Unemployment Rates - TX Austin



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

There were 634,303 housing units in the assessment area according to the 2016 census data, of which 53.6 percent were owner-occupied, 38.4 percent were rental units and 8.0 percent were vacant. While a majority of units were owner-occupied, a disproportionately higher percentage of housing units in low- and moderate-income tracts were rental units or vacant. More specifically, 11.2 percent of the housing stock in the assessment area is located in low-income tracts and 21.7 percent is in moderate-income tracts. The census data also shows that the proportion of the housing stock that is owner-occupied is 40.0 percent in moderate-income tracts and 22.1 percent in low-income tracts.

During the review period, residential lending volume returned to pre-recession peak levels, and home prices continued to rise steadily. The median home price in the Austin MSA in 2017 was \$295,000, a 13.5 percent increase from 2015.⁷⁷ Of the three counties in the assessment area, Travis County had the highest median price at \$338,000, while Hays and Williamson counties posted median prices of \$264,990 and \$285,000, respectively, in December 2017.⁷⁸ Although prices have continued to rise, house price appreciation in 2017 has weakened from the double-digit annual gains from 2013 to 2016, and the area has recently experienced a decline in new single-family permits since early 2017. A report from Moody's Analytics posits that the increase in housing supply in recent years is beginning to put downward pressure on prices and has increased the likelihood of slower growth.⁷⁹

The area's home prices have cut into affordability, making metropolitan Austin less affordable than elsewhere in the state and making it more difficult for potential homeowners with low- to moderate-incomes to enter into the market. The minimum annual income needed to afford a median-priced home in the Austin MSA was

⁷⁷ *Texas Quarterly Housing Report*, Texas Association of Realtors, www.texasrealestate.com/market-research/quarterly-housing-report/

⁷⁸ *Housing Activity*, Real Estate Center, Texas A&M University, www.recenter.tamu.edu/data/housing-activity/

⁷⁹ Friedman, Edward. "Austin-Round Rock TX" Précis U.S. Metro. Moody's Analytics, January 2018. Web. 20 April 2018. <https://www.economy.com/precismetro>

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\$67,148.⁸⁰ In the MSA, 21.1 percent of families are low-income, earning at or below \$38,899, and 17.1 percent are moderate-income, earning between \$38,900 and \$62,239.

After a sharp decline in 2013, recent HMDA data shows home lending has improved in the Austin MSA. The number of loans originated in the MSA increased by 35.1 percent from 2014 to 2016.⁸¹ Between 2014 and 2016, the number of home loans that were refinance loans increased by 79.2 percent, while the number of home loans made that were used to purchase a home increased by 16.0 percent.⁸²

Similar to home prices, rents in the apartment market have increased progressively during the review period, while median incomes have not increased at the same rate, resulting in cost burden (paying more than 30.0 percent of income towards housing costs). Forty-seven percent of all renters in Travis County were cost-burdened between 2012 and 2016.⁸³ Also, there does not appear to be a significant number of lower cost rental units available. For a four-person family earning 30.0 percent of the area median income (considered to be extremely low-income), less than 3.0 percent of all rental units are likely affordable across the assessment area.⁸⁴ This figure increases to 35.0 percent in Travis County and 40.0 percent in Williamson County for a four-person family earning 50.0 percent of the area median income. The 2017 Out of Reach study by the National Low Income Housing Coalition indicates that an individual would need to earn an hourly wage of \$22.98 or an annual income of \$47,800 to afford the fair market rent (\$1,195) for a two-bedroom apartment in the Austin MSA.⁸⁵ It should be noted that the rental market in certain areas, including downtown Austin, is largely impacted by student enrollment at the University of Texas.

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

⁸⁰ "The Salary You Must Earn to Buy a Home in the 50 Largest Metros." *HSH.com*, HSH Associates, Financial Publishers, 22 Feb. 2018, www.hsh.com/finance/mortgage/salary-home-buying-25-cities.html#miami

⁸¹ "Austin, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

⁸² "Austin, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

⁸³ "Travis County and Williamson County, TX (U.S. Census Bureau)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 7 Apr. 2018. <http://www.policymap.com/>

⁸⁴ Ibid

⁸⁵ *Out of Reach 2017*. National Low Income Housing Coalition, *Out of Reach 2017*, <http://www.nlihc.org/oor/>

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Combined Demographics Report

Assessment Area: TX Austin

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	10.8	34,001	9.4	11,068	32.6	76,194	21.1
Moderate-income	76	22.9	68,906	19.1	9,898	14.4	61,830	17.1
Middle-income	115	34.6	127,288	35.3	7,168	5.6	71,378	19.8
Upper-income	102	30.7	130,897	36.3	3,724	2.8	151,690	42.0
Unknown-income	3	0.9	0	0.0	0	0.0	0	0.0
Total Assessment Area	332	100.0	361,092	100.0	31,858	8.8	361,092	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	71,315	15,768	4.6	22.1	46,628	65.4	8,919	12.5
Moderate-income	137,669	55,107	16.2	40.0	69,980	50.8	12,582	9.1
Middle-income	220,015	127,485	37.5	57.9	77,186	35.1	15,344	7.0
Upper-income	205,304	141,321	41.6	68.8	49,976	24.3	14,007	6.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	634,303	339,681	100.0	53.6	243,770	38.4	50,852	8.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	5,725	6.0	5,051	5.8	629	9.3	45	4.0
Moderate-income	15,741	16.5	14,102	16.1	1,499	22.1	140	12.5
Middle-income	28,312	29.6	26,254	30.0	1,810	26.6	248	22.1
Upper-income	45,666	47.8	42,136	48.1	2,845	41.9	685	61.1
Unknown-income	44	0.0	32	0.0	9	0.1	3	0.3
Total Assessment Area	95,488	100.0	87,575	100.0	6,792	100.0	1,121	100.0
Percentage of Total Businesses:				91.7		7.1		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	27	2.5	25	2.3	2	20.0	0	0.0
Moderate-income	183	16.9	179	16.7	4	40.0	0	0.0
Middle-income	351	32.4	349	32.5	2	20.0	0	0.0
Upper-income	524	48.3	522	48.6	2	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,085	100.0	1,075	100.0	10	100.0	0	.0
Percentage of Total Farms:				99.1		.9		.0

2016 FFIEC Census Data and 2016 D&B Information

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Credit and Community Development Needs

To better understand the community development and economic landscapes, several community development practitioners were contacted. These individuals discussed the various needs and opportunities across the region as well as how financial institutions can be responsive to local community development needs. Information from these conversations is included in the appropriate sections of this report. Several themes, however, emerged from the discussions; in particular, contacts noted that low- to moderate-income communities are being pushed further and further to the edge of city limits. In addition, community contacts noted limited public transportation in the metropolitan area. Less than half of residents living in lower income suburban communities in the Austin region have access to transit, and about 12 percent of the region's jobs are reachable by public transit with a 90-minute commute.⁸⁶ These factors along with others discussed below impact the types of community development interventions that are needed in the market.

For low and extremely low-income households, there is a scarcity of affordable housing units for renters. The HUD Consolidated Action Plans for Travis County and Williamson County underscore this need. The 2014-2018 Travis County Consolidated Plan & Action Plan states that rapid population growth in the Austin area has resulted in an imbalance between supply and demand in the housing market. The most recent data shows a historically low housing inventory. In addition, many households have housing problems defined as one of the following: a cost burden greater than 30.0 percent of income, overcrowding, and/or housing without complete kitchen or plumbing facilities. In Travis County, the cost burden was the most prevalent housing problem. Residents of the area also indicated an urgent need for repairs for owner-occupied housing. The Travis County Consolidated Action Plan also cited data by the Urban Institute, which estimates that for every 100 extremely low-income residents of Travis County (defined as a household of four that earns less than \$22,750); there are only 13 units of affordable rental housing. This translates into a gap of 43,508 units of affordable rental housing. Barriers to affordable housing include lack of funding (federal and state) for affordable housing, utility costs, and issues with comprehensive planning and land use authority.⁸⁷

According to the 2014-2018 Williamson County Consolidated Plan & Action Plan, the recent economic recession substantially increased the number of households experiencing housing problems. Affordable housing is the greatest need throughout Williamson County, with over 500 applicants on the public housing waiting lists and well over 600 applicants waiting to receive assistance through the housing choice voucher program. However, barriers exist to developing more affordable housing, including access to affordable and developable land, and contractors willing to do the projects.⁸⁸

A community contact specializing in affordable housing and redevelopment in the assessment area indicated that there is an abundance of opportunity for financial institutions to get more involved in financing affordable housing projects in the area. National institutions including Wells Fargo and Chase are doing the largest redevelopment projects, but local institutions have not been as engaged, according to contacts. The contact

⁸⁶ Kneebone, Elizabeth and Alan Berube, *Confronting Suburban Poverty in America*, Brookings Institution Press, 2014.

⁸⁷ "Travis County PY2014-18 Consolidated Plan and Action Plan." *Travis County TX Gov*, Travis County Government, 5 Aug. 2014, www.traviscountytx.gov/health-human-services/cdbg/plans-reports

⁸⁸ "Williamson County PY2014-18 Consolidated Plan and Action Plan." *Williamson County TX Gov*, Williamson County Government, 21 Mar. 2014, <https://www.wilco.org/Departments/HUD-Grants/CDBG-Application>

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indicated further that the biggest opportunities in working with financial institutions are lower debt service payments, higher loan-to-value ratios, below-market interest rates, higher equity pricing and overall creative financing.

There are a number of state and local incentives and programs to assist in small business development. A community contact that works with small businesses noted that there is a need to increase education and understanding of technology in order to equip small businesses, and particularly those in low- and moderate-income communities, with access to competitive technological platforms that allow them to engage consumers with their products. Access to credit and capital is also a challenge, according to the contact, particularly to small business owners in low- and moderate-income communities. Finally, the contact stated that there is a desperate need to provide education, tools, and resources to help low- and moderate-income individuals access new career opportunities. There are some programs in place to address these issues including the Texas Business Opportunity and Development Program, BiGAustin's Small Business and Job Creation Re-Entry Program, the CDFI Technical Assistance Program, the Micro-enterprise Development Program, and HP Learning Initiative for Entrepreneurs. Overall, this contact felt that banks needed to be more proactive in understanding community needs and linking their funding and investments to these needs. Many banks, she noted, fund only certain organizations, and those organizations may not be addressing the most important needs in the community.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS **LENDING TEST**

Compass Bank's lending performance in the Austin assessment area is excellent. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank is a leader in making community development loans in the assessment area.

During the review period, the bank reported 937 HMDA-reportable loans compared to 2,456 small business loans in the Austin assessment area. Therefore small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Austin assessment area contains 4.8 percent of the bank's total HMDA-reportable lending by number of loans and 4.7 percent by dollar volume, and 5.1 percent of its total small business lending by number of loans and 4.8 percent by dollar volume. In comparison, 4.0 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low-income census tracts is adequate. The bank originated 5.8 percent of its small business loans in low-income tracts, which was equal to the percentage of small businesses in those tracts in the assessment area. The bank's performance, however, was weaker than aggregate performance in both years. Performance was considered adequate given the competition and dominance by national lenders in the assessment area. The bank held 2.3 percent of the total CRA small business market share in 2016 as compared to the top 5 lenders, which collectively held 66.0 percent of the market share.

Small business lending in moderate-income census tracts is excellent. Compass Bank originated 18.6 percent of its small business loans in moderate-income census tracts, where 16.1 percent of small businesses in the assessment area are located. In addition, the bank's performance was greater than aggregate in 2015 and 2016.

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Home Purchase Loans

Home purchase lending in low- and moderate-income census tracts is excellent. For the review period, Compass Bank's home purchase lending in low- and moderate-income census tracts (37.7 percent) exceeded the percentage of owner-occupied units (20.8 percent) in these tracts. In addition, the bank's performance was considerably greater than the aggregate lending performance in low- and moderate-income tracts for both years. Quite notably, the bank originated 33.3 percent of its home purchase loans in moderate-income census tracts in 2016, which far exceeded the percentage of owner-occupied units (16.2 percent) and the percentage of aggregate loans (16.4 percent).

Home Refinance Loans

Home refinance lending in low- and moderate-income census tracts is good. While the percentage of home refinance loans originated in both geographies (19.7 percent) was slightly less than the percentage of owner-occupied units (20.8 percent) in these tracts, the bank's performance was greater than the aggregate lending performance in 2015 and 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is excellent. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent. Approximately 65.4 percent of small business loan originations were extended to businesses with revenues of \$1 million or less for the review period. By comparison, 91.7 percent of total businesses in the assessment area are classified as small businesses. In both years, the bank outperformed aggregate lenders in the percentage of loans to small businesses. In addition, 98.6 percent of the bank's small business loan originations were in amounts of \$250,000 or less, which typically represent loan amounts requested by very small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. Compass Bank's home purchase lending to low-income borrowers (4.0 percent) was significantly less than the percentage of low-income families living in the assessment area (21.1 percent). However, the bank's home purchase lending to low-income borrowers exceeded aggregate in 2015 and 2016.

Home purchase lending to moderate-income borrowers is excellent. The bank's home purchase lending to moderate-income borrowers (28.2 percent) was greater than the percentage of moderate-income families in the assessment area (17.1 percent) during the review period, and the bank's lending was more than double aggregate in both years.

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Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. While the bank's home purchase lending to low-income borrowers (5.2 percent) was significantly less than the percentage of low-income families, the bank's performance exceeded aggregate lenders in 2015 and was comparable to aggregate 2016.

Home refinance lending to moderate-income borrowers is excellent. Compass Bank's home refinance lending to moderate-income borrowers (18.1 percent) was greater than the percentage of moderate-income families in the assessment area and greater than aggregate lending in both years of the review period.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the Austin assessment area. The bank originated 22 community development loans totaling \$84.4 million during the review period, including a loan for \$1 million to purchase the land in a moderate-income geography to build a facility to provide a healthy, nurturing, home-like community for underprivileged youth. Other loans totaling \$36 million financed schools and training programs for low- and moderate-income persons, including a public charter high school for adults that provides training to complete state certification exams for nurse assistant and administrative assistant programs. Compass Bank also financed a Low-Income Housing Tax Credit that provided over 125 units of affordable housing, a portion of which is reserved for individuals with special needs suffering from drug/alcohol addiction, HIV, or abuse. The project includes on-site services such as an after-school program, summer youth program, adult classes (ESL, money management, etc.) and Children's HOME initiative. Off-site services include financial education, financial coaching, matched savings accounts, micro-enterprise training, and college savings assistance. Another \$25.2 million of loans financed small businesses to create and retain over 120 jobs for low- and moderate-income individuals. Additionally, the bank originated 52 community development loans for \$128.5 million at the broader state or regional level with a purpose that includes serving the Austin assessment area. These loans met the community service needs of the area by financing skilled nursing facilities that primarily treat Medicaid patients and public charter schools predominantly serving students receiving free or reduced-price lunches. Given Compass Bank's high volume of community development loans strengthened by the diversity of loan purposes responding to the needs of the community, Compass Bank is a leader in providing community development loans in the Austin assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Austin assessment area is excellent. The bank made an excellent level of qualified community development investments that exhibited excellent responsiveness to credit and community development needs in the assessment area.

The bank invested approximately \$60.2 million in the Austin assessment area, including \$37.3 million in new investments during the review period and \$22.2 million in prior period investments. The total also includes \$785,200 in contributions made during the review period. The bank invested in three Low-Income Housing Tax Credit projects during the review period, which helped finance almost 300 new affordable housing rental units; these investments were responsive to the region's significant need for new affordable housing.

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The bank's contributions also demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$495,000 for community services to low- and moderate-income individuals, \$147,700 for economic development, \$92,500 for affordable housing and \$50,000 to support the revitalization of a designated disaster area. The bank also had investments and contributions that served a broader statewide or regional area that includes the Austin assessment area.

Notable examples of the bank's investments include the following:

- A \$1.0 million investment in a local CDFI to finance loans for small businesses and \$55,000 in grants to support the CDFI's education and lending programs.
- Grants totaling \$131,700 to launch BBVA Momentum in Texas (described in the Institution section of this report). The funds will be used to develop and host three educational training programs for social entrepreneurs to consolidate and scale their ventures in partnership with the UT-Austin McCombs School of Business.
- The bank provided \$55,000 in grants to support several education and workforce development initiatives designed to lift low-income individuals out of poverty.
- Grants totaling \$37,500 to support free tax assistance programs in Austin.

SERVICE TEST

Compass Bank's service test performance in the Austin assessment area is good.

Retail Services

Retail banking services are adequate. The distribution of 30 branch offices and 47 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has two branches in low-income tracts; thus the percentage of branches in low-income tracts (6.7 percent) was less than the percentage of households (10.7 percent) and slightly greater than the percentage of businesses (6.0 percent) in the same geography. The distribution of the bank's four branches (13.3 percent) in moderate-income tracts was less than both the percentage of households (21.4 percent) and the percentage of businesses (16.5 percent) in the same geography. Most notable is the large number of stand-alone ATMs in low- and moderate-income tracts. The bank has a total of 189 cash-only ATMs, of which 61 (32.2 percent) are located in low- and moderate-income tracts. Overall, delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels.

During the examination period, the bank neither opened nor closed any branches in the assessment area. However, the bank opened four full-service ATMs and closed one full-service ATM in the assessment area. One of the four opened full-service ATMs was located in a moderate-income tract. The closed full-service ATM was in an upper-income tract. To increase access to retail services for low- and moderate-income customers, the bank expanded its ATM network and formed a partnership with a community grocery chain to place the bank's ATMs inside its stores. During the review period, 112 cash-only ATMs were opened throughout the assessment area and 31 (27.7 percent) were opened in low- and moderate-income tracts.

Austin, Texas

Overall, the bank’s record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.

Compass Bank offers extended and weekend hours at all of its branches located in low- and moderate-income tracts, excluding one branch office located in a moderate-income tract that does not offer weekend hours. Overall, retail services do not vary in a way that inconveniences any portion of the bank’s assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Geographic Distribution of Branches & ATMS

Assessment Area: TX Austin

Tract Category	Branches							ATMs								Demographics					
	Total Branches		Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs		Cash only ATMs				Census Tracts		House holds	Total Businesses				
	#	%				Open	Closed	#	%	#	%	Open	Closed	#	%			%	%		
Low	2	6.7%	0	0	2	2	2	Total 24	10.2%	2	4.3%	0	0	22	11.6%	9	0	36	10.8%	10.7%	6.0%
DTO	0		0	0				SA 22		0		0	0	22		9	0				
Moderate	4	13.3%	0	0	4	4	3	Total 48	20.3%	9	19.1%	1	0	39	20.6%	22	1	76	22.9%	21.4%	16.5%
DTO	0		0	0				SA 40		1		1	0	39		22	1				
Middle	11	36.7%	0	0	11	11	3	Total 83	35.2%	15	31.9%	0	0	68	36.0%	45	2	115	34.6%	35.1%	29.6%
DTO	0		0	0				SA 67		0		0	0	67		45	2				
Upper	12	40.0%	0	0	10	10	1	Total 80	33.9%	20	42.6%	2	1	60	31.7%	36	0	102	30.7%	32.8%	47.8%
DTO	0		0	0				SA 62		2		2	0	60		36	0				
Unknown	1	3.3%	0	0	0	1	0	Total 1	0.4%	1	2.1%	1	0	0	0.0%	0	0	3	0.9%	0.0%	0.0%
DTO	0		0	0				SA 0		0		0	0	0		0	0				
Total	30	100.0%	0	0	27	28	9	Total 236	100.0%	47	100.0%	4	1	189	100.0%	112	3	332	100.0%	100.0%	100.0%
DTO	0		0	0				SA 191		3		3	0	188		112	3				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides an excellent level of community development services in the Austin assessment area. Employees provided 1,982 service hours to qualified organizations by participating in 199 community development service activities.

Compass Bank’s community development service activities benefited organizations that provide affordable housing, community services, and economic development activities which support low- and moderate-income individuals, communities, and small businesses in the Austin assessment area. Of the bank’s total service hours, 1,176 hours were committed to financial education. Additionally, bank staff engaged in 187 board or committee service hours benefitting qualified nonprofit organizations.

Austin, Texas

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- A bank leader provided multiyear board service at a youth development agency, lending financial expertise to help the organization achieve its \$14 million fundraising goal as part of its capital campaign.
- The bank hosted several workshops to provide technical assistance to small businesses in the assessment area as part of its proprietary BBVA Momentum program. Assistance was provided by bank volunteers in multiple locations and totaled over 550 service hours during the exam period.
- Bankers provided over 100 hours of homebuyer education to benefit clients of a nonprofit organization in the assessment area that supports affordable housing for low- and moderate-income individuals and families.

Compass Bank demonstrated an excellent level of engagement in community services as well as responsiveness to identified affordable housing and economic development needs in the Austin assessment area.

Laredo, Texas

METROPOLITAN AREA (Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAREDO, TEXAS ASSESSMENT AREA

Overview

The Laredo assessment area is comprised of a single county, Webb, and covers the same area as the Laredo MSA. As of December 31, 2016, Compass Bank operated 11 branches in the assessment area. The bank's branch presence in the assessment area represents 3.2 percent of branches and 4.6 percent of deposits in Texas.

According to the June 30, 2016 FDIC Summary of Deposits Report, Compass Bank was ranked 2nd in the market with 28.4 percent of deposits (\$1.8 billion), directly behind International Bank of Commerce with 29.2 percent of deposits. Overall, there are 12 banks active in the market operating 56 branches and holding a total of \$6.1 billion in deposits.

The market is dominated by a few regional and national lenders. In 2015, Compass Bank ranked 4th with 7.1 percent of small business loan originations in the assessment area. Similarly, the bank ranked 4th out of 80 CRA small business loan reporters in 2016 with 8.2 percent of small business loans. CRA small business lending was led by American Express, Texas Community Bank, and International Bank of Commerce in both years.

For HMDA-reportable lending, Compass Bank ranked 11th in 2016 with approximately 2.2 percent of all HMDA-reportable loans and 6th in 2015 with 3.0 percent of all HMDA-reportable loans. For both years, Wells Fargo Bank, NTFN, PennyMac Loan Services, and SFMC L.P. were the top HMDA reporters in the market.

Population and Income Characteristics

The city of Laredo, located in Webb County, is the principal city within the assessment area and the county seat. It is located north of the Rio Grande and neighbors the Mexican city of Nuevo Laredo. Laredo had a population of 257,156 as of July 2016, a growth of 8.9 percent from its 2010 population.⁸⁹ It should also be noted that the city of Laredo represents nearly 95.0 percent of the total population in the Laredo MSA.⁹⁰

The assessment area is made up of 61 census tracts: 2 tracts are low-income (3.3 percent), 22 tracts are moderate-income (36.1 percent), 22 tracts are middle-income (36.1 percent), 14 tracts are upper-income (23.0 percent), and 1 tract has unknown income (1.6 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Laredo MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for the MSA

⁸⁹ QuickFacts. U.S. Census Bureau, n.d. Web. 20 April 2018. <http://quickfacts.census.gov>

⁹⁰ Ibid

Laredo, Texas

increased slightly from \$43,200 in 2015 to \$43,900 in 2016. In addition, 39.7 percent of families are considered low- to moderate-income.⁹¹ Laredo has the third lowest per capita income in Texas.

Borrower Income Levels Laredo, TX MSA

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2015	\$43,200	0 - \$21,599	\$21,600 - \$34,559	\$34,560 - \$51,839	\$51,840 - & above
2016	\$43,900	0 - \$21,949	\$21,950 - \$35,119	\$35,120 - \$52,679	\$52,680 - & above

It should be noted that the Laredo MSA has been plagued by high rates of poverty for years. The percentage of people living below the federal poverty line in Webb County was 32.1 percent between 2012 and 2016 compared to the national poverty rate of 15.1 percent.⁹² In addition, an extremely significant percentage of families in low- and moderate-income areas live below the poverty level. Specifically, 54.8 percent of families living in low-income census tracts live below the poverty level, and 40.7 percent of families living in moderate-income census tracts live below the poverty level.⁹³ Lending opportunities in these areas may be severely impacted.

Economic Conditions

Laredo is one of 11 land ports of entry along Texas' 1,254-mile border with Mexico. Its location and five border crossings make it a prime location for major transportation companies that deal with U.S.-Mexico trade. Laredo's exports and imports totaled \$283.2 billion in 2016, trailing only Los Angeles and New York City. From 2014 to 2017, the Laredo Customs District accounted for more than 50 percent all of U.S. trade with Mexico. Laredo's trade is all about Mexico. In 2016, 96.2 percent of all Laredo trade was with Mexico. Laredo's top exports include motor vehicles, automotive parts, motor vehicle engines, and engine parts, while its top imports include motor vehicle parts and commercial vehicles.⁹⁴ This is an area that is dependent on its trade economy, and any threats to trade policies with Mexico would impact economic growth. For example, if the terms of NAFTA are renegotiated to allow for the imposition of tariffs on certain goods, tariffs would reduce the volume of imports passing across the border and impact the Laredo economy.

Total employment in the area was approximately 104,100 as of 2017, representing a 5.5 percent increase from 2014.⁹⁵ Government is the largest employment sector in the region, representing 22.9 percent of all jobs and larger than Texas and national percentages in this sector. The other leading sectors in the assessment area include

⁹¹ FRB Atlanta Calculations of 2016 Census Data

⁹² "Laredo, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

⁹³ FRB Atlanta Calculations of 2016 Census Data

⁹⁴ "2017 Laredo Trade Numbers." *International Bridge System*, WorldCity Inc., www.ci.laredo.tx.us/bridgesys/Bridge_Index.html#

⁹⁵ Kuranova, Olga. "Laredo TX" Précis U.S. Metro. Moody's Analytics, January 2018. Web. 20 April 2018. <https://www.economy.com/precismetro>

Laredo, Texas

education and health services (15.9 percent), transportation and logistics (15.2 percent) and retail trade (12.1 percent). Top employers in the MSA are Wal-Mart Stores, Inc., H-E-B (grocery chain), McDonald's, Laredo Medical Center, and Texas A&M International University.⁹⁶

The federal government provides stability given the larger U.S. Border Patrol presence. Under the new Homeland Security guidelines released by the Trump Administration, more than 15,000 immigration agents would be hired, with at least one-third of those slated to be Border Patrol personnel. Any planned increases to Customs Border Patrol would provide a significant boon for the Laredo economy. The average annual earnings for government employees in the Laredo region are \$68,887.⁹⁷

At 15.2 percent, the transportation and logistics sector accounts for a higher share of jobs than in any other metro area and almost four times the national average. As mentioned previously, because vehicles and parts make up a large component of imports coming across the border into Laredo, any decline in automotive sales or increased competition from other Texas border points will tend to impact the logistics industry in Laredo. The average annual earnings for the transportation sector in the Laredo region are \$44,070.⁹⁸

Small businesses are vital to the Laredo economy. According to 2016 Dun & Bradstreet information, there were 7,946 businesses within the Laredo assessment area; 88.5 percent had total annual revenues less than or equal to \$1 million.⁹⁹ Additionally, 21.7 percent of small businesses with revenues less than or equal to \$1 million in the assessment area are located in moderate-income tracts and 0.9 percent are in low-income tracts. Lending to small businesses increased over the review period. According to an analysis of CRA loan data, the number of small business loans increased by 37.8 percent between 2014 and 2016, with nearly 5,100 loans made in 2016.¹⁰⁰ However, small business lending still remains nearly 45.0 percent below peak lending levels. During this same period, loans made to firms with revenues of \$1 million or less averaged 49.8 percent of total small business loans, which was lower than previous years.¹⁰¹ This may be an indication that smaller firms are utilizing other alternative lending sources in the market or that lending has tightened to this segment.

Unemployment in the MSA increased from 4.7 percent in 2015 to 4.9 percent in 2016, mirroring the two-tenths increase at the state level.¹⁰² Moody's Analytics reported that during the review period, mining employment was nearly cut in half when energy prices collapsed. Other reports indicate that Laredo's overall trade fell in 2016, primarily driven by a decline in trade with Mexico. Both of these factors may have contributed to the increase in the unemployment rate from 2015 to 2016. It should also be noted that 65.6 percent of residents in the Laredo MSA have at least a high school diploma compared with 82.0 percent for the state.¹⁰³

⁹⁶ Ibid

⁹⁷ Ibid

⁹⁸ Ibid

⁹⁹ FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

¹⁰⁰ "Webb County, TX (CRA Loan Data)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 20 Jul. 2018. <http://www.policymap.com/>

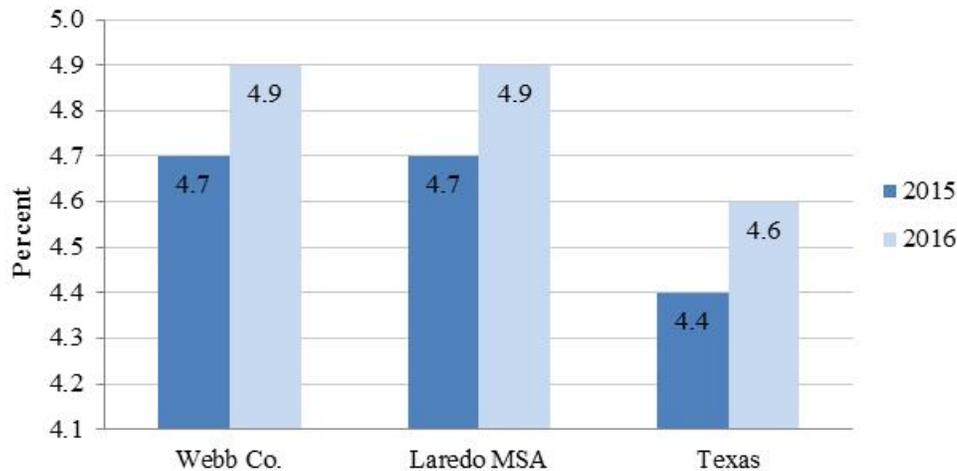
¹⁰¹ Ibid

¹⁰² Federal Reserve Bank of Atlanta calculations of data from the Bureau of Labor Statistics.

¹⁰³ "Webb County, TX (Census)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 20 Jul. 2018. <http://www.policymap.com/>

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Unemployment Rates - TX Laredo



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

There were 71,286 housing units in the assessment area according to the 2016 census data, of which 58.6 percent were owner-occupied, 32.2 percent were rental units and 9.2 percent were vacant. There are 2 low-income census tracts in the assessment area as mentioned previously, and these tracts contain only 2.3 percent of the housing stock with 768 owner-occupied units; this suggests that residential lending opportunities may be limited in low-income tracts. As for moderate-income tracts, residential lending opportunities may be greater. There are over 11,000 owner-occupied units located in moderate-income tracts, or 50.6 percent of the housing units located in these tracts.

The median home price in the Laredo MSA in 2017 was \$162,900, a 5.2 percent increase from 2015, while home sales trended downward by 2.3 percent for the year.¹⁰⁴ The supply of homes in Laredo provided around 5.3 months of inventory. As a result, new permits for single-family residential homes have not recovered much and are still below pre-recession levels. A majority of the new homes in the area are priced between \$100,000 and \$199,000. Housing in this price range bodes well for lower wage workers. Approximately 30.9 percent of all homes in Webb County are likely affordable for a four-person family earning 50.0 percent of area median income; this figure increases to 44.4 percent for a four-person family earning 80.0 percent of area median income.¹⁰⁵

After a slump in 2014, HMDA data shows home lending has improved in the assessment area. The number of loans originated inside the assessment area increased by 21.3 percent from 2014 to 2016. Between 2014 and 2016, the number of home loans that were refinance loans increased by 48.5 percent, whereas the number of home loans made that were used to purchase a home increased by 9.0 percent.¹⁰⁶

¹⁰⁴ *Texas Quarterly Housing Report*, Texas Association of Realtors, www.texasrealestate.com/market-research/quarterly-housing-report/

¹⁰⁵ "Webb County, TX (HUD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 23 April 2018. <http://www.policymap.com/>

¹⁰⁶ "Laredo, TX MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 April 2018. <http://www.policymap.com/>

Laredo, Texas

Within the MSA, nearly one out of every two renters is considered housing cost-burdened, meaning that housing costs account for more than 30.0 percent of household income. For renters making less than \$50,000, nearly 61.1 percent were cost-burdened by housing costs between 2012 and 2016.¹⁰⁷ A local community contact indicated that there is a low supply of rental housing in Laredo, which further places an upward pressure on rental rates as well. The 2017 Out of Reach study by the National Low Income Housing Coalition confirms rental affordability is a problem, finding an individual would need to earn an hourly wage of \$15.67 or an annual income of \$32,600 to afford the fair market rent (\$815) for a two-bedroom apartment in the Laredo MSA.¹⁰⁸ Twenty-three percent of the workforce is in retail trade and the leisure and hospitality sectors, which have average annual earnings of \$28,381 and \$21,266, respectively.¹⁰⁹

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

¹⁰⁷ "Webb County, TX MSA (U.S. Census Bureau)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 23 April 2018. <http://www.policymap.com/>

¹⁰⁸ *Out of Reach 2017*. National Low Income Housing Coalition, *Out of Reach 2017*, <http://www.nlihc.org>

¹⁰⁹ Kuranova, Olga. "Laredo TX" Précis U.S. Metro. Moody's Analytics, January 2018. Web. 20 April 2018. <https://www.economy.com/precismetro>

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Combined Demographics Report

Assessment Area: TX Laredo

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	3.3	1,374	2.6	753	54.8	12,714	23.6
Moderate-income	22	36.1	15,783	29.3	6,421	40.7	8,690	16.1
Middle-income	22	36.1	20,237	37.6	4,937	24.4	9,667	17.9
Upper-income	14	23.0	16,466	30.6	1,576	9.6	22,789	42.3
Unknown-income	1	1.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	61	100.0	53,860	100.0	13,687	25.4	53,860	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,626	768	1.8	47.2	793	48.8	65	4.0
Moderate-income	21,938	11,105	26.6	50.6	8,310	37.9	2,523	11.5
Middle-income	26,517	15,087	36.1	56.9	9,091	34.3	2,339	8.8
Upper-income	21,205	14,817	35.5	69.9	4,743	22.4	1,645	7.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	71,286	41,777	100.0	58.6	22,937	32.2	6,572	9.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	63	0.8	61	0.9	2	0.2	0	0.0
Moderate-income	1,690	21.3	1,523	21.7	152	17.5	15	31.3
Middle-income	2,363	29.7	2,125	30.2	224	25.8	14	29.2
Upper-income	3,806	47.9	3,303	47.0	484	55.8	19	39.6
Unknown-income	24	0.3	19	0.3	5	0.6	0	0.0
Total Assessment Area	7,946	100.0	7,031	100.0	867	100.0	48	100.0
Percentage of Total Businesses:			88.5		10.9		.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	9	10.5	9	10.8	0	0.0	0	0.0
Middle-income	27	31.4	25	30.1	2	66.7	0	0.0
Upper-income	50	58.1	49	59.0	1	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	86	100.0	83	100.0	3	100.0	0	.0
Percentage of Total Farms:			96.5		3.5		.0	

2016 FFIEC Census Data and 2016 D&B Information

Laredo, Texas

Credit and Community Development Needs

The Federal Reserve Bank of Dallas released a report in 2015 entitled *Las Colonias in the 21st Century*, which provides insight on the opportunities, successes and challenges of colonia communities in achieving a high quality of living, financial stability, and assets for future generations. The report focuses on infrastructure, housing, economic opportunity, education, and health in six Texas counties that have the highest concentration of colonias. Webb County is one of six counties featured in the report. Colonias are defined by the Texas Office of the Secretary of State as “a residential area along the Texas-Mexico border that may lack some of the most basic living necessities such as potable water, septic or sewer systems, electricity, paved roads or safe and sanitary housing.” There are 62 colonias in Webb County. The report also indicates that in colonia communities, demographic indicators differ sharply from the rest of Texas with respect to the following: the majority of residents have less than a high school diploma (54.0 percent); the unemployment rate and poverty rate are higher (10.8 percent and 42.0 percent, respectively); and a large percentage of residents are not in the labor force (43.2 percent). According to one contact, most banks do not directly provide support to improve conditions in colonias. However, the contact stated that banks indirectly help by supporting local businesses which, in turn, increases job opportunities for residents living in colonias.

The prevalence of poverty discussed earlier highlights the importance of continued poverty alleviation strategies, education collaboratives, and workforce development initiatives within the assessment area. The Corporation for Enterprise Development’s (CFED) Asset & Opportunity Scorecard found that 57.6 percent of residents in the region are liquid asset poor, meaning they lack the liquid assets to cover basic expenses or live at the poverty level for three months if a crisis led to the absence of income. This level of poverty and the lack of financial assets by many of the residents in the region suggest a need for financial literacy and asset building strategies for low- and moderate-income families. These factors create several community development service or investment opportunities for financial institutions.

The housing data previously discussed, as well as feedback from a community contact, suggest that rental rates are high in Laredo, and the highest priority should be developing affordable rental housing that is commensurate with the current prevailing wage rate in Laredo. More colonias have been springing up recently, spurred by the lack of affordable housing options within the city. The contact further described that when the oil and gas boom began, many residents were earning high incomes, and developers built and/or offered expensive apartments to accommodate demand from high wage earners. Unfortunately, once the oil and gas boom ended, workers began to see less overtime, decreased earnings, and massive layoffs; rental rates have not decreased correspondingly.

There are a few housing organizations serving the area that financial institutions can partner with to increase affordable rental and ownership options. Bank involvement may include serving in a leadership capacity with these organizations or on affordable housing committees, participating in Federal Home Loan Bank grant applications, financing rental housing developments, and offering flexible financing products and down-payment assistance programs that target low- and moderate-income homebuyers. According to a local practitioner, many of the planned housing development initiatives in Laredo have stalled because of lack of funding and extremely high development costs; the contact stated it is very difficult for developers and nonprofits to gain access to land and water when planning any given project.

Laredo, Texas

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Laredo assessment area is good. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes a relatively high level of community development loans.

During the review period, the bank reported 221 HMDA-reportable loans compared to 811 small business loans in the Laredo assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Laredo assessment area contains 1.1 percent of the bank's total HMDA-reportable lending by number of loans and 0.5 percent by dollar volume, and 1.7 percent of its total small business lending by number of loans and by dollar volume. In comparison, 2.6 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Fewer than 1.0 percent of the small businesses in the assessment area are located in low-income tracts, and less than 1.0 percent of aggregate small business lending occurred in those tracts. Therefore, small business lending in low-income tracts was not evaluated as part of the lending test in this assessment area.

Small business lending in moderate-income census tracts is good. Compass Bank originated 18.5 percent of its small business loans in moderate-income tracts, where 21.7 percent of small businesses in the assessment area are located. The bank's performance was greater than aggregate lending in 2015 and similar in 2016. The bank's geographic distribution of small business loans reflects good penetration in the assessment area given the size of the market and competition.

Laredo, Texas

Home Purchase Loans

Low-income tracts contain 1.8 percent of the owner-occupied units in the assessment area, and fewer than 1.0 percent of aggregate home purchase loans were made in those tracts. Therefore, home purchase lending in low-income tracts was not evaluated as part of the lending test in this assessment.

Home purchase lending in moderate-income census tracts is good. Compass Bank's home purchase lending in moderate-income census tracts (14.4 percent) was significantly below the percentage of owner-occupied units in these tracts (26.6 percent); however, the bank outperformed aggregate lending levels in moderate-income tracts for 2015 and 2016.

Home Refinance Loans

During the review period, Compass Bank did not originate any refinance loans in low-income census tracts, where 1.8 percent of owner-occupied units are located. Aggregate lenders also exhibited low lending levels for home refinance loans compared to the percentage of owner-occupied units in low-income census tracts. As such, an assessment of home refinance lending in low-income tracts is not included in the evaluation of this assessment area.

Home refinance lending in moderate-income census tracts is poor. The percentage of home refinance loans originated in moderate-income census tracts (1.4 percent) was significantly less than the percentage of owner-occupied units in these tracts. In addition, the bank's performance was considerably below the aggregate lending performance in 2015 and 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is good. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good. For the review period, 63.0 percent of the bank's loans were originated to businesses with revenues of \$1 million or less. By comparison, 88.5 percent of total businesses in the assessment area are classified as small businesses. In both years, the bank outperformed aggregate lenders in the percentage of loans to small businesses. Additionally, 97.7 percent of small business loans were originated in amounts of \$250,000 or less, indicating a willingness to lend in the smaller amounts that are typically requested by small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is poor. Compass Bank's home purchase lending to low-income borrowers (1.1 percent) was much less than the percentage of low-income families (23.6 percent) living in the assessment area. With one loan in 2015, the bank's home purchase lending to low-income borrowers exceeded the aggregate percentage, but the bank made no loans in 2016.

Laredo, Texas

Home purchase lending to moderate-income borrowers is good. The bank's home purchase lending to moderate-income borrowers (14.4 percent) was slightly less than the percentage of moderate-income families (16.1 percent) in the assessment area during the review period; however, the bank's lending was greater than aggregate in both years.

Home Refinance Loans

Home refinance lending to low-income borrowers is poor. The bank's home purchase lending to low-income borrowers (1.4 percent) was significantly less than the percentage of low-income families. With one loan in 2015, the bank's performance exceeded aggregate lenders, but the bank made no loans in 2016.

Home refinance lending to moderate-income borrowers is adequate. Compass Bank's home refinance lending to moderate-income borrowers (5.8 percent) was less than the percentage of moderate-income families in the assessment area. The bank's performance was greater than aggregate lending in 2015 and slightly less than aggregate in 2016.

Community Development Lending

Compass Bank makes a relatively high level of community development loans in the Laredo assessment area. Despite the market providing limited community development opportunities given a scarcity of local housing organizations, the bank originated four community development loans totaling \$24.6 million during the review period. Three loans qualifying as Low-Income Housing Tax Credits will provide nearly 500 units of affordable housing for low- and moderate-income individuals and families. Rents for these units will be subsidized by an allocation of the Tenant Based Rental Assistance from the City of Laredo as part of the HUD HOME Investment Partnerships Program. One loan to a small business will create 5 new jobs for low- and moderate-income individuals. Additionally, the bank originated 52 community development loans for \$128.5 million at the broader state or regional level with a purpose that includes serving the Laredo assessment area. These loans meet the community service needs of the area by financing skilled nursing facilities that primarily treat Medicaid patients and public charter schools predominantly serving low- and moderate income students. This volume of community development lending is considered good given the bank's size and presence in the assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Laredo assessment area is excellent. The bank made an excellent level of qualified community development investments relative to the bank's presence in this assessment area and available community development opportunities.

The bank invested nearly \$28.2 million in the Laredo assessment area, including approximately \$27.7 million in new investments during the review period and \$250,000 in prior period investments. The total also includes \$256,000 in contributions made during the review period. The bank invested \$16.8 million in a LIHTC project during the review period, which provided about 125 units of affordable housing; this investment was responsive to the need in the assessment area for quality affordable housing. In addition, the bank invested \$250,000 during the prior review period in a regional CDFI to increase access to capital for small businesses in the Laredo assessment area.

Laredo, Texas

The bank's contributions demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$153,000 to support community services to low- and moderate-income individuals, \$80,000 for affordable housing, and \$22,500 to support economic development. The bank's contributions provided strong support for financial education and homebuyer counseling throughout the assessment area. In addition, as noted earlier, the bank had contributions that served a broader regional area that includes the Laredo assessment area.

SERVICE TEST

Compass Bank's service test performance in the Laredo assessment area is good.

Retail Services

Retail banking services are adequate. The distribution of 11 branch offices and 21 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has no branches in low-income tracts compared to 2.4 percent of households and 0.8 percent of businesses in the same geography. The distribution of the bank's three branches (27.3 percent) in moderate-income tracts was less than the percentage of households (30.0 percent) and greater than the percentage of businesses (21.3 percent) in the same geography. Overall, delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels.

During the examination period, the bank neither opened nor closed any branches in the assessment area. Additionally, no full-service ATMs were opened in the assessment area, but two full-service ATMs in upper-income tracts were closed. Overall, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.

Compass Bank offers extended and weekend hours at all its branches in moderate-income tracts. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Laredo, Texas

Geographic Distribution of Branches & ATMS

Assessment Area: TX Laredo

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	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	2	3.3%	2.4%	0.8%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	3	27.3%	0	0	3	3	3	Total	12	33.3%	8	38.1%	0	0	4	26.7%	0	1	22	36.1%	30.0%	21.3%
DTO	0		0	0				SA	6		2		0	0	4		0	1				
Middle	4	36.4%	0	0	3	4	3	Total	11	30.6%	8	38.1%	0	0	3	20.0%	0	0	22	36.1%	37.4%	29.7%
DTO	0		0	0				SA	4		1		0	0	3		0	0				
Upper	4	36.4%	0	0	4	3	1	Total	12	33.3%	5	23.8%	0	2	7	46.7%	0	0	14	23.0%	30.2%	47.9%
DTO	0		0	0				SA	7		0		0	0	7		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	1	2.8%	0	0.0%	0	0	1	6.7%	0	0	1	1.6%	0.0%	0.3%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Total	11	100.0%	0	0	10	10	7	Total	36	100.0%	21	100.0%	0	2	15	100.0%	0	1	61	100.0%	100.0%	100.0%
DTO	0		0	0				SA	18		3		0	0	15		0	1				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides an excellent level of community development services in the Laredo assessment area. Employees provided 1,099 service hours to qualified organizations by participating in 135 different community development service activities.

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities which support low- and moderate-income individuals, communities, and small businesses in the Laredo assessment area. Of the bank's total service hours, 904 hours were committed to financial education. Additionally, bank staff engaged in 64 hours of board or committee service to qualified nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- Bank volunteers provided over 300 hours of technical assistance, board service, and homebuyer education to low- and moderate-income clients of an economic development corporation in Laredo.
- In partnership with several local nonprofit organizations, bank volunteers promoted affordable homeownership by providing financial education and mortgage application technical assistance to low- and moderate-income first-time homebuyers.

Laredo, Texas

In spite of limited branch presence, Compass Bank has significant deposit market share in the Laredo assessment area and is a leader in providing community development services as demonstrated by its excellent level of engagement in community services as well as its responsiveness to identified affordable housing and economic development needs.

Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TEXAS METROPOLITAN ASSESSMENT AREAS

- **Abilene Assessment Area (Jones and Taylor counties)**
 - As of December 31, 2016, Compass Bank operated four branches in the assessment area, representing 1.2 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$161.3 million in deposits in this assessment area, representing a market share of 6.5 percent and 0.4 percent of Compass Bank's total deposits in Texas.
- **Beaumont Assessment Area (Hardin, Jefferson, and Orange counties)**
 - As of December 31, 2016, Compass Bank operated 13 branches in the assessment area, representing 3.8 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$826.6 million in deposits in this assessment area, representing a market share of 16.5 percent and 2.2 percent of Compass Bank's total deposits in Texas.
- **Brownsville Assessment Area (Cameron County)**
 - As of December 31, 2016, Compass Bank operated 10 branches in the assessment area, representing 2.9 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$684.9 million in deposits in this assessment area, representing a market share of 15.5 percent and 1.8 percent of Compass Bank's total deposits in Texas.
- **Bryan-College Station Assessment Area (Brazos County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 0.6 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$326.4 million in deposits in this assessment area, representing a market share of 7.1 percent and 0.9 percent of Compass Bank's total deposits in Texas.
- **Corpus Christi Assessment Area (Nueces County)**
 - As of December 31, 2016, Compass Bank operated four branches in the assessment area, representing 1.2 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$ 101.4 million in deposits in this assessment area, representing a market share of 2.0 percent and 0.3 percent of Compass Bank's total deposits in Texas.
- **El Paso Assessment Area (El Paso County)**
 - As of December 31, 2016, Compass Bank operated six branches in the assessment area, representing 1.8 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$544.3 million in deposits in this assessment area, representing a market share of 5.3 percent and 1.4 percent of Compass Bank's total deposits in Texas.
- **Killeen-Temple Assessment Area (Bell County)**
 - As of December 31, 2016, Compass Bank operated five branches in the assessment area, representing 1.5 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$647.6 million in deposits in this assessment area, representing a market share of 18.3 percent and 1.7 percent of Compass Bank's total deposits in Texas.

Metropolitan Areas (Limited Review)

- **Longview Assessment Area (Gregg County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 0.6 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$94.3 million in deposits in this assessment area, representing a market share of 2.8 percent and 0.2 percent of Compass Bank's total deposits in Texas.
- **Lubbock Assessment Area (Lubbock County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 0.6 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$ 89.1 million in deposits in this assessment area, representing a market share of 1.1 percent and 0.2 percent of Compass Bank's total deposits in Texas.
- **McAllen Assessment Area (Hidalgo County)**
 - As of December 31, 2016, Compass Bank operated 16 branches in the assessment area, representing 4.7 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$1.6 billion in deposits in this assessment area, representing a market share of 16.8 percent and 4.1 percent of Compass Bank's total deposits in Texas.
- **Odessa Assessment Area (Ector County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 0.6 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$86.8 million in deposits in this assessment area, representing a market share of 3.1 percent and 0.2 percent of Compass Bank's total deposits in Texas.
- **San Angelo Assessment Area (Tom Green County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 0.3 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$26.7 million in deposits in this assessment area, representing a market share of 1.2 percent and 0.1 percent of Compass Bank's total deposits in Texas.
- **San Antonio Assessment Area (Bexar, Kendall, Comal, and Guadalupe counties)**
 - As of December 31, 2016, Compass Bank operated 24 branches in the assessment area, representing 7.1 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$1.5 billion in deposits in this assessment area, representing a market share of 1.5 percent and 4.0 percent of Compass Bank's total deposits in Texas.
- **Tyler Assessment Area (Smith County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 0.6 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$268.4 million in deposits in this assessment area, representing a market share of 4.5 percent and 0.7 percent of Compass Bank's total deposits in Texas.
- **Waco Assessment Area (Falls and McLennan counties)**
 - As of December 31, 2016, Compass Bank operated five branches in the assessment area, representing 1.5 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$346.3 million in deposits in this assessment area, representing a market share of 7.3 percent and 0.9 percent of Compass Bank's total deposits in Texas.

Metropolitan Areas (Limited Review)

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Abilene	Not Consistent (Below)	Consistent	Not Consistent (Below)
Beaumont	Not Consistent (Below)	Consistent	Consistent
Brownsville	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Above)
Bryan-College Station	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Corpus Christi	Not Consistent (Below)	Not Consistent (Below)	Consistent
El Paso	Not Consistent (Below)	Consistent	Not Consistent (Above)
Killeen-Temple	Not Consistent (Below)	Not Consistent (Below)	Consistent
Longview	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Lubbock	Not Consistent (Below)	Consistent	Not Consistent (Below)
McAllen	Not Consistent (Below)	Consistent	Consistent
Odessa	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
San Angelo	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
San Antonio	Consistent	Not Consistent (Below)	Not Consistent (Below)
Tyler	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Waco	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)

For the lending test, Compass Bank received a rating of outstanding for the State of Texas. With the exception of San Antonio, performance in the remaining 14 metropolitan limited-scope assessment areas was less than the statewide lending test performance. For the geographic distribution of loans, lending levels were good in Abilene, Corpus Christi, Killeen-Temple, Lubbock, San Angelo, San Antonio, Tyler, and Waco; and adequate in the remaining seven metropolitan limited-scope assessment areas. Performance was excellent for the borrower distribution of loans in Brownsville, Bryan-College Station, Odessa, and San Antonio; and good in the remaining 11 assessment areas. There was an excellent level of community development loans in El Paso, Lubbock and San Antonio assessment areas; good levels of community development loans in Beaumont, Brownsville, and McAllen; and an adequate level in the Waco assessment area. Poor or very poor level of community development lending was noted in the remaining assessment areas. The absence of community development lending in the Abilene, Bryan-College Station, Longview, Odessa, San Angelo, and Tyler assessment areas was also a factor in the weaker performance for these assessment areas.

For the investment test, Compass Bank received a rating of outstanding for the State of Texas. The bank had an excellent level of investments in the Abilene, Beaumont, El Paso, Lubbock, and McAllen metropolitan limited-scope assessment areas and performance exceeded the state performance. The bank’s investment performance

Metropolitan Areas (Limited Review)

was weaker in the remaining limited scope assessment areas. However, the bank had a significant level of investments in Brownsville, Bryan-College Station, Corpus Christi, San Antonio and Waco assessment areas and an adequate level of investments in Longview, San Angelo, and Tyler. The bank had a poor level of investments in the Killeen-Temple and Odessa limited scope assessment areas.

For the service test, Compass Bank received a rating of high satisfactory for the State of Texas. Performance in the Beaumont, Corpus Christi, Killeen-Temple, and McAllen metropolitan assessment areas was consistent with the bank's state performance while performance in the Brownsville and El Paso assessment areas was stronger than the bank's state performance due to excellent community development services. Although service test performance in the remaining nine assessment areas was weaker than the bank's state performance, the performance in Bryan-College Station, Longview, Lubbock, San Antonio, Tyler, and Waco metropolitan assessment areas was still considered adequate.

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

Non-Metropolitan Areas (Limited Review)

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

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

- **Burnet-Gillespie-Kerr Assessment Area (Burnet, Gillespie, and Kerr counties)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 0.9 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$213.8 million in deposits in this assessment area, representing a market share of 7.2 percent and 0.6 percent of Compass Bank's total deposits in Texas.
- **East Texas Assessment Area (Jasper, Polk, San Augustine, and Tyler counties)**
 - As of December 31, 2016, Compass Bank operated seven branches in the assessment area, representing 2.1 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$186.2 million in deposits in this assessment area, representing a market share of 12.7 percent and 0.5 percent of Compass Bank's total deposits in Texas.
- **Grimes-Walker-Washington Assessment Area (Grimes, Walker, and Washington counties)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 0.9 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$208.7 million in deposits in this assessment area, representing a market share of 9.7 percent and 0.5 percent of Compass Bank's total deposits in Texas.
- **Hale Assessment Area (Hale County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 0.3 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$15.7 million in deposits in this assessment area, representing a market share of 2.9 percent and 0.0 percent of Compass Bank's total deposits in Texas.
- **Harrison Assessment Area (Harrison County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 0.3 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$29.3 million in deposits in this assessment area, representing a market share of 3.6 percent and 0.1 percent of Compass Bank's total deposits in Texas.
- **Howard-Runnels Assessment Area (Howard and Runnels counties)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 0.3 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$ 49.9 million in deposits in this assessment area, representing a market share of 5.6 percent and 0.1 percent of Compass Bank's total deposits in Texas.
- **Kleberg Assessment Area (Kleberg County)**
 - As of December 31, 2016, Compass Bank operated no branches in the assessment area; the bank, however, operated one full-service ATM and one cash-only ATM in the assessment area.
 - As of June 30, 2016, the bank had \$138.0 million in deposits in this assessment area, representing a market share of 5.2 percent and 2.9 percent of Compass Bank's total deposits in Texas.

Non-Metropolitan Areas (Limited Review)

- **Limestone Assessment Area (Limestone County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 0.3 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$41.3 million in deposits in this assessment area, representing a market share of 15.8 percent and 0.1 percent of Compass Bank’s total deposits in Texas.
- **Starr-Willacy Assessment Area (Starr and Willacy counties)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 0.9 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$ 88.0 million in deposits in this assessment area, representing a market share of 16.7 percent and 0.2 percent of Compass Bank’s total deposits in Texas.
- **Val Verde-Maverick Assessment Area (Val Verde and Maverick counties)**
 - As of December 31, 2016, Compass Bank operated five branches in the assessment area, representing 1.5 percent of its branches in Texas.
 - As of June 30, 2016, the bank had \$213.7 million in deposits in this assessment area, representing a market share of 16.3 percent and 0.6 percent of Compass Bank’s total deposits in Texas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Non-metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Burnet-Gillespie-Kerr	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
East Texas	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Above)
Grimes-Walker-Washington	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Hale	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Harrison	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Howard-Runnels	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Kleberg	Consistent	Not Consistent (Below)	Not Consistent (Below)
Limestone	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Starr-Willacy	Not Consistent (Below)	Not Consistent (Below)	Consistent
Val Verde-Maverick	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)

For the lending test, Compass Bank received a rating of outstanding for the State of Texas. With the exception of Kleberg, performance in the remaining nine non-metropolitan limited-scope assessment areas was less than the statewide lending test performance. For the geographic distribution of loans, lending levels were excellent in Kleberg and Limestone; good in East, Harrison, Starr-Willacy and Val-Verde-Maverick; and adequate in Grimes-Walker-Washington and Howard-Runnels. Lending gaps for geographic distribution of loans were noted in the Burnet-Gillespie-Kerr and Hale assessment areas. Performance was excellent for the borrower distribution of loans in Grimes-Walker-Washington and Kleberg; adequate in the Harrison assessment area; and good in the

Non-Metropolitan Areas (Limited Review)

remaining seven assessment areas. There was an excellent level of community development loans in the Starr-Willacy assessment area. However, the absence of community development lending in all the remaining assessment areas was a contributing factor in the weaker performance for these assessment areas.

For the investment test, Compass Bank received a rating of outstanding for the State of Texas. The bank's investment performance was weaker than statewide performance in all limited scope non-metropolitan assessment areas. However, the bank had a significant level of investments in Burnet-Gillespie-Kerr, Harrison, and Val-Verde-Maverick assessment areas and an adequate level of investments in Grimes-Walker-Washington, Hale, Howard-Runnels, Limestone, and Starr-Willacy. The bank had a poor level of investments in the East Texas and Kleberg limited scope assessment areas.

For the service test, Compass Bank received a rating of high satisfactory for the State of Texas. Performance in the Starr-Willacy metropolitan assessment area was consistent with the bank's state performance while performance in the East Texas assessment area was stronger than the bank's state performance due to excellent retail delivery services. Although service test performance in the remaining eight assessment areas was weaker than the bank's state performance, the performance in Burnet-Gillespie-Kerr, Grimes-Walker-Washington, Limestone, and Val Verde-Maverick non-metropolitan assessment areas was still considered adequate. The other four non-metropolitan assessment areas had poor levels of services primarily due to limited community development performance.

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

Alabama

CRA RATING FOR ALABAMA: OUTSTANDING

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects good penetration throughout the assessment areas, and the distribution of loans by borrower income reflects excellent penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an excellent level of community development loans in its Alabama assessment areas.
- The bank provides an excellent level of qualified community development investments and grants that are responsive to several identified community development needs of the Alabama assessment areas.
- Retail banking services are good in the bank's Alabama assessment areas.
- The bank provides an excellent level of community development services throughout the Alabama assessment areas.

Alabama

SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment areas in Alabama:

- Birmingham
- Huntsville

Limited-scope reviews were conducted for the remaining 12 assessment areas:

- Anniston
- Auburn
- Daphne-Fairhope-Foley
- Decatur
- Dothan
- Eufaula
- Florence
- Gadsden
- Mobile
- Montgomery
- Northeast Alabama
- Tuscaloosa

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

As of June 30, 2016, Compass Bank had \$12.8 billion in deposits in Alabama accounting for 18.7 percent of the bank's total deposits. Compass Bank operated 88 branch offices in Alabama as of December 31, 2016, representing 13.2 percent of the bank's total branches. Overall, the bank's HMDA-reportable and CRA lending activity in the state was slightly less than the percentage of total institutional deposits. HMDA-reportable lending in Alabama accounted for 12.9 percent of total institutional HMDA-reportable lending by number of loans and 7.5 percent by dollar volume. CRA small business lending in Alabama accounted for 9.0 percent of the bank's total CRA small business lending by number of loans and 8.6 percent by dollar volume.

The following table shows lending activity from January 1, 2015, through December 31, 2016.

Alabama

Statewide Summary of Lending Activity Assessment Areas Located in Alabama

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	1,549	22.7%	\$287,114	44.2%
HMDA Refinance	819	12.0%	\$159,225	24.5%
HMDA Home Improvement	159	2.3%	\$4,180	0.6%
HMDA Multi-Family	0	0.0%	\$0	0.0%
Total HMDA	2,527	37.0%	\$450,519	69.4%
Total Small Business	4,297	62.9%	\$198,749	30.6%
Total Farm	6	0.1%	\$310	0.0%
TOTAL LOANS	6,830	100.0%	\$649,578	100.0%

Originations and Purchases

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

Lending Test

The lending test rating in the state of Alabama is outstanding. Overall, performance in Alabama with regard to the geographic distribution of loans reflects good penetration throughout the assessment areas. The distribution of loans by borrower income reflects excellent penetration among customers of different income levels and businesses of different sizes. Additionally, Compass made an excellent level of community development loans in Alabama.

During the review period, Compass Bank reported 4,297 small business loans and 2,527 HMDA-reportable loans in Alabama. As such, small business lending was given greater weight when determining the lending test rating for Alabama. The rating for Alabama is based on performance in the Birmingham and Huntsville full-scope assessment areas. Approximately 57.3 percent of the bank's HMDA-reportable and small business lending by dollar volume in Alabama occurred within these assessment areas.

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

Geographic and Borrower Distribution

The geographic distribution of Compass Bank's HMDA-reportable and small business loans is good, and the distribution of loans by borrower income and revenue size of businesses is excellent. As noted above, the rating for the state of Alabama is derived from the Birmingham and Huntsville full-scope assessment areas. A detailed discussion of the borrower and geographic distribution of lending for these assessment areas is included in the next section of this report.

Alabama

Community Development Lending

Compass Bank makes an excellent level of community development loans in the state of Alabama. The bank originated 46 community development loans totaling \$287.2 million in Alabama assessment areas during the review period, including 18 loans for \$108.9 million in the Birmingham full-scope assessment area and three loans for \$13.1 million in the Huntsville full-scope assessment area. Performance was excellent in Birmingham and adequate in Huntsville. Statewide community development lending performance was driven by performance in the full-scope assessment areas, and the Birmingham assessment area had the greatest impact. More information on community development loans can be found in the full-scope assessment area sections of this report.

Investment Test

The investment test rating for Alabama is outstanding.

The bank made an excellent level of qualified investments and contributions totaling \$181.2 million that directly benefited the Alabama assessment areas. The bank's investment portfolio for the state included LIHTC investments, mortgage-backed securities, EQ2 investments in CDFIs, investments in SBA loan pools, and grants. The bank also had contributions totaling \$149,000 to several statewide organizations that supported asset building, financial education, college counseling, and community development capacity building. Lastly, the bank had investments that benefited all states within the bank's footprint, including Alabama; these investments are described in the institution overview.

Performance in Birmingham was excellent while Huntsville was considered good. Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections, and a summary of the bank's investments and contributions for all assessment areas can be found in Appendix F.

Service Test

The service test rating for Alabama is outstanding.

Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank's geographies and individuals of different income levels in its assessment areas. Statewide, banking services and hours of operation do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. During the review period, the bank opened a branch office and closed a branch office located in low-income tracts in the state of Alabama. Overall, the bank's record of opening and closing of branch offices has generally not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or low- and moderate-income individuals.

Alabama

Community Development Services

The bank provides an excellent level of community development services that benefit low- and moderate-income residents and small businesses in Alabama. Statewide, the bank provided a total of 11,822 qualified service hours within its assessment areas during the examination period, including 6,256 service hours in the Birmingham assessment area and 825 service hours in the Huntsville assessment area. Performance was excellent in both assessment areas. Additionally, employees engaged in 4,386 total service hours in the 12 limited-scope assessment areas. Finally, bank employees engaged in over 355 service hours at statewide organizations that benefited a broader statewide or regional area, including the bank's assessment areas.

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

Birmingham, Alabama

METROPOLITAN AREA

(Full-Scope Review)

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

Overview

The Birmingham assessment area includes Blount, Jefferson, Shelby, St. Clair, and Walker counties, which are five of the seven counties that comprise the Birmingham-Hoover, AL MSA. As of December 31, 2016, Compass Bank operated 29 branch offices in the assessment area, which represent 33.0 percent of the branches statewide and 4.4 percent of the institution's branches overall. Of the bank's deposits in Alabama, 55.4 percent are in Birmingham. The assessment area represents 48.1 percent of Compass Bank's combined HMDA-reportable and CRA small business lending by dollar volume in the state.

The Birmingham assessment area is a highly competitive banking market where national and regional banks have a significant presence. According to the June 30, 2016 FDIC Summary of Deposits Report, there were 45 financial institutions operating 316 branch offices in the Birmingham assessment area with a total of \$37.0 billion in deposits. Compass Bank ranked 2nd in the market with 19.2 percent of deposits (\$7.1 billion). Regions Bank had the largest deposit market share at 31.6 percent. Wells Fargo Bank, Cadence Bank, and ServisFirst Bank also held a significant share of deposits in the assessment area at 22.8 percent collectively.

HMDA-reportable and CRA small business lending are similarly competitive. Compass Bank originated or purchased 1.9 percent of the HMDA-reportable loans in Birmingham in 2015, ranking 10th out of 447 reporters. In 2016, the bank originated or purchased 1.6 percent of the HMDA-reportable loans in the assessment area, ranking 13th out of 462 reporters. Wells Fargo, Regions Bank, Quicken Loans, and Fairway Independent Mortgage Corporation were the top HMDA lenders in the Birmingham assessment area in 2015 and 2016.

For CRA small business and small farm lending, Compass Bank ranked 8th out of 104 reporters in 2015, with 4.2 percent of reported loans in Birmingham. In 2016, the bank ranked 9th out of 114 reporters, with 3.7 percent of reported loans. Lending in the assessment area was dominated by American Express, Citibank, Regions Bank, and Wells Fargo Bank in 2015 and 2016.

Population and Income Characteristics

The assessment area population increased 8.4 percent from 2000 to 2016, reaching an estimated 1,074,920 residents as of December 2016.¹¹⁰ During the same timeframe, the state's population grew by 8.9 percent. The majority of the growth in the assessment area occurred in Shelby County and St. Clair County, which grew by 43.7 percent and 33.7 percent, respectively. Jefferson County, the most populous county in the state, experienced a 0.4 percent population decline. The population in Walker County decreased significantly more, by 7.2 percent, from 2000 to 2016.

¹¹⁰ Birmingham, AL (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 25 Apr. 2018.
<http://www.policymap.com/>

Birmingham, Alabama

The assessment area is made up of 251 census tracts: 25 tracts are low-income (10.0 percent), 63 tracts are moderate-income (25.1 percent), 91 tracts are middle-income (36.3 percent), 71 tracts are upper-income (28.3 percent), and 1 tract has an unknown income level (0.4 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Birmingham-Hoover MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income remained unchanged at \$62,500 from 2015 to 2016. Data shows that the median family income is highest in Shelby County (\$85,654) and the lowest in Walker County (\$47,254).¹¹¹ In addition, 38.8 percent of families are considered low- to moderate-income.¹¹²

Borrower Income Levels Birmingham-Hoover, AL MSA

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2015	\$62,500	0	- \$31,249	\$31,250	- \$49,999	\$50,000	- \$74,999	\$75,000	- & above
2016	\$62,500	0	- \$31,249	\$31,250	- \$49,999	\$50,000	- \$74,999	\$75,000	- & above

Poverty is a problem in the assessment area, particularly in Walker County and Jefferson County, where the percentage of households below the federal poverty line in 2016 was 17.4 percent and 15.0 percent, respectively. It was lowest at 6.8 percent in Shelby County. The rate of households living below poverty in the Birmingham-Hoover MSA overall was 13.5 percent, below the state rate of 16.9 percent. In addition, a significant percentage of families in low- and moderate-income areas live below the poverty level. Specifically, 21.1 percent of families below the poverty level are located in low-income tracts and 34.0 percent are located in moderate-income tracts.

Economic Conditions

Birmingham was historically a manufacturing-based economy driven by the iron and steel industry. In April 2016 the economy transitioned to a diversified service-based economy, with 7.3 percent of total employment in manufacturing. The top employment sectors include government, wholesale and retail trade, education and health services, and professional services.¹¹³ The University of Alabama at Birmingham is the largest employer in the region with 23,000 employees. Other major employers include Regions Financial Corp., St. Vincent's Health System, Baptist Health System, Inc., AT&T Inc., and Children's of Alabama.¹¹⁴ The Birmingham region is also experiencing new investment and economic development. According to the Birmingham Business Alliance,

¹¹¹ "Birmingham, AL (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 30 April 2018. <http://www.policymap.com/>

¹¹² FRB Atlanta Calculations of 2016 Census Data.

¹¹³ "Comprehensive Housing Market Analysis: Birmingham, Alabama." Office of Policy Development and Research. U.S. Department of Housing and Urban Development, 1 May 2016. Web. 16 Oct. 2017. https://www.huduser.gov/portal/ushmc/chma_archive.html

¹¹⁴ Ibid

Birmingham, Alabama

Birmingham received nearly \$1.1 billion in new capital investments in 2015, creating over 3,500 new jobs providing a range of employment opportunities at different wage levels.¹¹⁵

In terms of economic conditions for small businesses, the entrepreneurial community is also growing. Innovation Depot, a nationally recognized business and technology incubator, served over 112 companies that provided over 1,064 jobs in 2017.¹¹⁶ Innovation Depot continues to generate new businesses and partnerships that are helping position the city as an entrepreneurial center, evident by a 5-year cumulative \$1.7 billion economic impact. According to 2016 Dun & Bradstreet information, there were 43,213 businesses within the Birmingham assessment area, 88.9 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses.¹¹⁷ Additionally, 17.0 percent of small businesses in the assessment area were located in moderate-income tracts, while there were far fewer (7.3 percent) in low-income tracts.

Small business lending opportunities remained stable between 2012 and 2016 in the assessment area.¹¹⁸ In 2016, of the total 17,859 loans made in the assessment area, 8,921 loans were made to small businesses with revenues less than or equal to \$1 million. From 2014 to 2016, small business lending increased in four of the five counties in the assessment area, led by Blount County at 23.9 percent. However, in Walker County, there was a 10.6 percent decrease in the number of small business loans during the same timeframe. At 53.9 percent, St. Clair County had the highest ratio of loans made to small businesses with revenue of \$1 million or less. Blount County had the lowest ratio at 46.8 percent. This may be an indication that smaller firms are able to access credit in the market with few impediments.

Economic conditions are generally stable in the Birmingham-Hoover MSA.¹¹⁹ As shown in the table below, unemployment increased marginally (0.1 percent) during the review period to 5.6 percent in the MSA. This is slightly below the state unemployment rate, which was 5.9 percent in 2016. The national unemployment rate was 4.7 percent as of December 2016.¹²⁰ Shelby County boasted the lowest unemployment rate at 4.4 percent, while Walker County continued to have the highest unemployment rate of the five counties in the assessment area at 7.6 percent. A combination of factors, including slow population growth and low educational attainment, in the Birmingham-Hoover MSA have hindered job growth.¹²¹ Personal income growth dropped significantly from 4.2 percent in 2014 to 0.9 percent in 2016.¹²² The Birmingham-Hoover MSA has also experienced challenges in the steel industry. In 2015, US Steel announced that it was permanently closing a blast furnace in Fairfield, Alabama,

¹¹⁵ Poe, Kelly. "Birmingham Got \$1.1 Billion in Capital Investment in 2015, Report Says." AL.com. Alabama Media Group, 17 Aug. 2015. Web. 16 Oct. 2017. http://www.al.com/business/index.ssf/2016/04/birmingham_got_11_billion_in_c.html

¹¹⁶ 2017 Annual Report. Rep. Innovation Depot, n.d. Web. 11 July 2018.. https://issuu.com/innovationdepot/docs/id_annual_report_2017

¹¹⁷ FRB Atlanta Calculations of 2016 Census Data.

¹¹⁸ "Birmingham, AL (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 30 April 2018. <http://www.policymap.com/>

¹¹⁹ FRB Atlanta Calculations of 2016 Census Data.

¹²⁰ "At a Glance Tables." U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 8 August 2018.

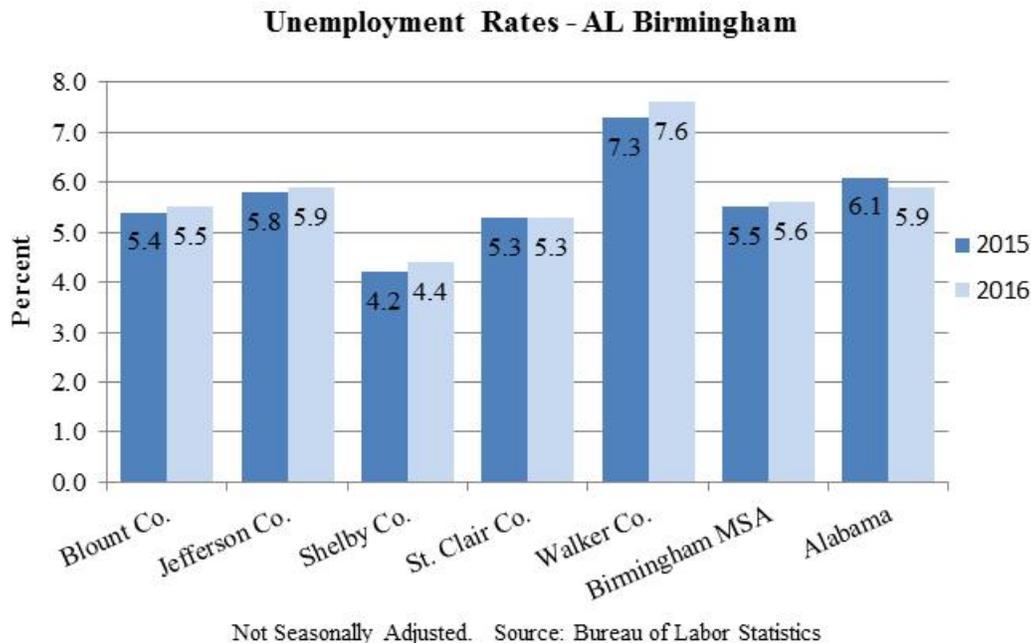
<http://www.bls.gov/eag/home.htm>

¹²¹ Precis U.S. Metro. Birmingham-Hoover AL. Moody's Analytics, February 2018. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

¹²² Ibid

Birmingham, Alabama

a suburb of Birmingham. In total, about 1,100 people were laid off as a result of this decision.¹²³ Despite these challenges, job growth has been steady and wages are slowly rising again, particularly for employee payrolls in the construction sector.¹²⁴



There were 468,150 housing units in the assessment area according to the 2016 census data, of which 62.6 percent were owner-occupied, 24.6 percent were rental units, and 12.8 percent were vacant. While a majority of units were owner-occupied, a high percentage of housing units in low- and moderate-income tracts were rental units or vacant. More specifically, approximately 67.2 percent of all housing units in low-income tracts were rentals or vacant, while 49.8 percent were rentals or vacant in moderate-income census tracts. The census data also shows that 32.8 percent and 50.2 percent of the housing stock was owner-occupied in low- and moderate-income tracts, respectively. The median age of the housing stock was 34 years, though housing was significantly older in the low- and moderate-income census tracts (53 years and 42 years, respectively). These factors suggest that HMDA-reportable home purchase lending opportunities in low- and moderate-income tracts may be limited, and there may be more opportunities for refinancing.

The Birmingham housing market has been generally improving since 2011. According to the Alabama Center for Real Estate, residential home sales in the Birmingham metro area (Jefferson, Shelby, St. Clair and Blount counties) for the year 2017 totaled 14,915 units, which was 18 percent higher than the 2012-2016 five-year average of 12,637 units.¹²⁵ For 2016, sales totaled 14,705 units, which was 16.4 percent higher than the 2012-

¹²³ Poe, Kelly. "US Steel Closing Blast Furnace at Fairfield Permanently." AL.com. Alabama Media Group, 17 Aug. 2015. Web. 16 Oct. 2017. http://www.al.com/business/index.ssf/2015/08/us_steel_closing_blast_furnace.html

¹²⁴ Ibid

¹²⁵ Birmingham Metro Residential Real Estate: Annual Trends Report. Rep. Alabama Center for Real Estate, UAB, n.d. Web. 11 July 2018. http://dlambw9zjuu0uw.cloudfront.net/market_annual/5.pdf?1484660597

Birmingham, Alabama

2016 five-year average. During the same timeframe, median home prices also rose. The median home price for 2017 was \$193,025, which was 14.9 percent higher than the 2012-2016 five-year average of \$168,035.¹²⁶ For 2016, the median home price was \$183,396, which was 9.1 percent higher than the 2012-2016 five-year average.

In terms of affordability, 22.4 percent of Jefferson County homeowners were cost-burdened between 2012 and 2016.¹²⁷ Housing cost burden occurs when owners or renters spend 30.0 percent or more of their monthly household income on housing costs or gross rent. During the same time, Blount County homeowners were the least cost-burdened in the assessment area at 16.9 percent. The number of cost-burdened renters is higher, ranging from 31.9 percent in Blount County to 47.1 percent in Jefferson County between 2012 and 2016.

The assessment area has an adequate inventory of affordable homes, particularly for moderate-income families. In 2015, 11.0 percent of all homes in Shelby County were likely affordable for a four-person low-income family earning 50.0 percent of area median income (AMI). However, 62.4 percent of all homes in the county were affordable for a four-person moderate-income family earning 80.0 percent of AMI.¹²⁸ Low-income families have more opportunities for affordable homeownership in Walker County, where 36.7 percent of homes were affordable for a four-person family earning 50.0 percent of AMI. Comparatively, the same size family is more likely to find a two-bedroom rental unit in Blount County, where 89.3 percent of rental units are affordable for low-income families. Similarly, approximately 98.0 percent of rental units in Blount County and Walker County are likely affordable for a four-person family earning 80.0 percent of AMI.

It is important to note that the housing market in the city of Birmingham faces additional challenges due to the high concentration of vacant and abandoned housing units that have resulted from decades of population loss and the more recent foreclosure crisis. Birmingham city officials have identified nearly 16,000 abandoned properties and vacant lots that need to be demolished or cleared in order to spur redevelopment.¹²⁹ These properties are concentrated in the city's low- and moderate-income neighborhoods and have a destabilizing effect on the surrounding communities. To help address this issue, the city created a new land bank authority in 2014, which bundles vacant and blighted properties and offers the land to entities for redevelopment.¹³⁰

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

¹²⁶ Ibid

¹²⁷ "Birmingham, AL (HMDA Data)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 11 July 2018. <http://www.policymap.com/>

¹²⁸ Ibid

¹²⁹ Stein, Kelsey. "Birmingham Has a \$4.5 Million Property Demolition Problem." AL.com. Alabama Media Group, 20 July 2015. Web. 25 July 2017. http://www.al.com/news/birmingham/index.ssf/2015/07/birmingham_has_a_45_million_pr.html

¹³⁰ Bryant, Joseph D. "Want Some Land for Cheap? Promise to Redevelop It? Come to Birmingham City Hall." AL.com. Alabama Media Group, 14 July 2014. Web. 26 July 2017. http://www.al.com/news/birmingham/index.ssf/2014/07/want_some_land_for_cheap_promi.html

Birmingham, Alabama

Combined Demographics Report

Assessment Area: AL Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	25	10.0	17,911	6.5	5,928	33.1	60,103	21.8
Moderate-income	63	25.1	55,073	20.0	9,537	17.3	46,907	17.0
Middle-income	91	36.3	110,239	40.0	9,919	9.0	53,868	19.5
Upper-income	71	28.3	92,690	33.6	2,648	2.9	115,035	41.7
Unknown-income	1	0.4	0	0.0	0	0.0	0	0.0
Total Assessment Area	251	100.0	275,913	100.0	28,032	10.2	275,913	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	39,955	13,121	4.5	32.8	17,881	44.8	8,953	22.4
Moderate-income	105,593	52,977	18.1	50.2	33,612	31.8	19,004	18.0
Middle-income	182,372	121,450	41.4	66.6	39,264	21.5	21,658	11.9
Upper-income	140,230	105,486	36.0	75.2	24,388	17.4	10,356	7.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	468,150	293,034	100.0	62.6	115,145	24.6	59,971	12.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,377	7.8	2,808	7.3	545	12.5	24	5.7
Moderate-income	7,485	17.3	6,515	17.0	881	20.2	89	21.0
Middle-income	14,886	34.4	13,438	35.0	1,271	29.1	177	41.8
Upper-income	17,458	40.4	15,651	40.7	1,674	38.3	133	31.4
Unknown-income	7	0.0	7	0.0	0	0.0	0	0.0
Total Assessment Area	43,213	100.0	38,419	100.0	4,371	100.0	423	100.0
Percentage of Total Businesses:			88.9		10.1		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	104	24.5	102	25.0	2	12.5	0	0.0
Middle-income	189	44.6	180	44.1	9	56.3	0	0.0
Upper-income	130	30.7	125	30.6	5	31.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	424	100.0	408	100.0	16	100.0	0	.0
Percentage of Total Farms:			96.2		3.8		.0	

2016 FFIEC Census Data and 2016 D&B Information

Birmingham, Alabama

Credit and Community Development Needs

To better understand the local community development and economic landscapes, individuals familiar with the community and with community development activities were contacted. These individuals discussed the various opportunities and challenges in the region and how financial institutions can be responsive to local community development needs. There are numerous opportunities in this assessment area for banks to partner with nonprofits, developers, and community development financial institutions to engage in a wide range of community development activities, including affordable housing development, workforce development, neighborhood revitalization, small business lending, financial education, or provision of technical assistance to nonprofit organizations and their constituencies.

Access to quality homeownership units that meet the needs of the area's residents is an ongoing concern in Birmingham. According to the *2014 City of Birmingham Housing and Neighborhoods Study*, there is a greater desire for homeownership units than rental units, and one of the most important opportunities identified by renters was access to down payment assistance programs to help them transition from rental housing to homeownership.¹³¹

Increasing the supply of affordable rental housing to a large segment of the Birmingham workforce presents another concern. While housing is relatively affordable for a median income household, there are many who earn less than the median income. In addition, employees in a number of Birmingham's top occupations fall below the HUD classification of low-income (less than 80 percent of the area median income). Comparing the fair market rent to the average income of these employees reveals that many are paying significantly more than 30 percent of their income for housing. For those in the lowest income brackets, the challenge is even greater. Therefore, increasing housing for very-low and low-income households is a significant need. The City's public housing authority is the primary provider of housing for those at the lowest income levels. However, as of July 2014, nearly 4,500 families were on the waiting list for public housing units or Section 8 tenant-based assistance.¹³²

Community revitalization and stabilization is also one of the primary needs in Birmingham and provides a significant opportunity for bank participation through lending, investment, and/or service activities. As noted earlier, the city has a vast number of blighted and vacant properties that have destabilized entire neighborhoods. The city has focused on demolition and created a land bank to facilitate the movement of blighted properties back into productive use. Birmingham has also targeted federal funds to address the high concentration of blighted and vacant housing in low- and moderate-income communities and to increase the supply of quality affordable housing units in these areas.¹³³ A significant challenge for the city, however, is determining how best to utilize limited resources. The volume of vacant properties far exceeds the city's resources for blight remediation. Thus, the city continues to work on a strategy to equitably distribute resources while still aiming to have an impact on

¹³¹ *City of Birmingham Housing and Neighborhood Study*. Rep. City of Birmingham, Dec. 2014. Web. 17 Oct. 2017.
http://www.imaginebham.com/uploads/1/4/4/7/14479416/2014_birmingham_housing_and_neighborhood_study.pdf

¹³² Ibid

¹³³ *City of Birmingham Consolidated Plan 2010-2015*. Rep. City of Birmingham, n.d. Web 17 Oct. 2017.
<https://www.birminghamal.gov/wp-content/uploads/2017/08/BhamConPlanFinal5-13-10.pdf>

Birmingham, Alabama

neighborhoods with opportunity.¹³⁴ Financial institutions can determine their level of involvement while working in leadership or technical assistance capacities with organizations, committees, and work groups that are addressing these issues.

One community contact noted that significant numbers of low- and moderate-income individuals are unbanked, despite considerable outreach by financial institutions to open deposit accounts for this segment of the community. As a part of their efforts to bank low- and moderate-income individuals, financial institutions have partnered with nonprofit organizations. The contact also noted that economic feasibility is the biggest obstacle to limited community development in the assessment area. While large financial institutions in this area have helped fund large-scale development, additional development is needed in low- and moderate-income areas to support small businesses or local development with neighborhood job opportunities.

¹³⁴ *City of Birmingham Housing and Neighborhood Study*. Rep. City of Birmingham, Dec. 2014. Web. 17 Oct. 2017.
https://www.imaginebham.com/uploads/1/4/4/7/14479416/2014_birmingham_housing_and_neighborhood_study.pdf

Birmingham, Alabama

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Birmingham assessment area is excellent. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank is a leader in making community development loans in the assessment area.

During the review period, the bank reported 1,156 HMDA-reportable loans compared to 1,502 small business loans in the Birmingham assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Birmingham assessment area contains 5.9 percent of the bank's total HMDA-reportable lending by number of loans and 4.1 percent by dollar volume, and 3.1 percent of its total small business lending by number of loans and 2.8 percent by dollar volume. In comparison, 10.4 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low- and moderate-income census tracts is excellent. Compass Bank's percentage of small business loans in low- and moderate-income census tracts exceeded the percentage of small businesses in those tracts. The bank originated 8.5 percent of its small business loans in low-income tracts and 17.4 percent in moderate-income tracts during the review period. By comparison, 7.3 percent of small businesses are located in low-income tracts, and 17.0 percent of small businesses are located in moderate-income tracts. In addition, the bank's small business lending exceeded aggregate performance in 2015 and 2016.

Birmingham, Alabama

Home Purchase Loans

Home purchase lending in low- and moderate-income census tracts is adequate. For the review period, Compass Bank's home purchase lending in low- and moderate-income census tracts (9.0 percent) was below the percentage of owner-occupied units (22.6 percent) in these tracts. However, the bank's average performance for the review period was slightly above aggregate lending performance in low-income tracts and similar to the aggregate lending performance in moderate-income tracts.

Home Refinance Loans

During the review period, Compass Bank originated two (0.5 percent) home refinance loans in low-income census tracts, where 4.5 percent of owner-occupied units are located. Aggregate lenders also exhibited low lending levels for home refinance loans compared to the percentage of owner-occupied units in low-income census tracts. As such, an assessment of home refinance lending in low-income tracts is not included in the evaluation of this assessment area.

Home refinance lending in moderate-income census tracts is adequate. The percentage of home refinance loans originated in moderate-income census tracts (8.5 percent) was less than the percentage of owner-occupied units (18.1 percent) in these tracts; however, performance was above the aggregate lending performance in 2015 and slightly less than the aggregate lenders in 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is excellent. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent. For the review period, 72.5 percent of the bank's loans were originated to businesses with revenues of \$1 million or less. By comparison, 88.9 percent of total businesses in the assessment area are classified as small businesses. Compass Bank's performance was considerably greater than the aggregate lending performance in both years. Additionally, 98.9 percent of small business loans were originated in amounts of \$250,000 or less, indicating a willingness to lend in the smaller amounts that are typically requested by small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. Compass Bank's home purchase lending to low-income borrowers (7.5 percent) was significantly less than the percentage of low-income families (21.8 percent) living in the assessment area. However, the bank's home purchase lending to low-income borrowers exceeded aggregate lending in 2015 and was slightly below aggregate in 2016.

Home purchase lending to moderate-income borrowers is excellent. The bank's home purchase lending to moderate-income borrowers (32.8 percent) was greater than the percentage of moderate-income families (17.0 percent) in the assessment area, and the bank's lending was nearly double aggregate in 2015 and 2016.

Birmingham, Alabama

Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. While the bank's home refinance lending to low-income borrowers (5.0 percent) was significantly less than the percentage of low-income families, the bank was comparable to aggregate lenders in 2015 and 2016.

Home refinance lending to moderate-income borrowers is good. Compass Bank's home refinance lending to moderate-income borrowers (16.7 percent) was comparable to the percentage of moderate-income families in the assessment area and greater than aggregate lending in both years of the review period.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the Birmingham assessment area. The bank originated 18 community development loans totaling \$108.9 million during the review period, including a loan for \$14 million as part of a New Markets Tax Credit that will revitalize a low-income geography with a hotel/restaurant/retail development creating over 130 full-time jobs. Another loan financed the construction of a grocery store serving a moderate-income geography that previously lacked access to fresh foods. Compass Bank also financed three Low-Income Housing Tax Credits that provided over 550 units of affordable housing dedicated for individuals and families earning less than 60 percent of AMI. Additionally, Compass Bank made loans to a diversity of nonprofit organizations with a mission to serve low-and moderate-income individuals ranging from providing youth education services to emergency and energy assistance and home weatherization services. Given Compass Bank's high volume of community development loans strengthened by the diversity of loan purposes responding to the needs of the community, Compass Bank is a leader in providing community development loans in the Birmingham assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Birmingham assessment area is excellent. The bank made an excellent level of qualified community development investments in the assessment area, often in a leadership position. Additionally the bank's investments exhibit excellent responsiveness to credit and community development needs in the assessment area.

The bank invested nearly \$82.0 million in the Birmingham assessment area, including \$60.1 million in new investments during the review period and \$20.4 million in prior period investments. The total also includes approximately \$1.5 million in contributions made during the review period. The bank leveraged several different investment vehicles in the Birmingham assessment area, including EQ2 investments in CDFIs, Low-Income Housing Tax Credits, investments in equity funds and mortgage-backed securities. During the review period, the bank invested \$50.6 million in four Low-Income Housing Tax Credit projects that helped finance more than 1,000 affordable housing units, responding to the need for quality affordable housing in the assessment area. The bank's contributions demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$767,500 for community services to low- and moderate-income individuals, \$330,500 to support economic development, \$182,750 for affordable housing and \$167,500 to support revitalization and stabilization activities in low- and moderate-income communities.

Birmingham, Alabama

As noted earlier, the bank also had investments and contributions that served a broader regional area that includes the Birmingham assessment area.

Notable examples of the bank's investments include the following:

- A \$1.5 million investment in a national CDFI to support a lease-to-own and rehab-to-sale program in Birmingham that renovates single-family homes and provides affordable housing options for those in low- and moderate-income neighborhoods. Additionally, the bank partnered with the organization to host a homebuyer workshop and an expo for prospective house-buyers, providing participants with the resources to responsibly purchase a home.
- A \$1.6 million investment in a national fund that is focused on preserving existing affordable housing projects; the fund is providing financial support for the preservation of a 96-unit affordable housing development in the Birmingham assessment area.
- An investment in a regional CDFI, with \$1.0 million specifically targeted to increasing access to capital for small businesses in Birmingham.
- A \$250,000 contribution to a nonprofit to support a new education and workforce development center. The program will provide life and job skills training, financial education, and career counseling. The nonprofit estimates that the grant proceeds will provide 12,800 individuals with workforce development training.
- Five grants totaling \$165,000 to an economic development organization that stimulates business growth and encourages neighborhood revitalization in Birmingham. The grants were used to fund an intensive technical assistance program for new and growing businesses and to provide funding to launch a new real estate development fund.

SERVICE TEST

Compass Bank's service test performance in the Birmingham assessment area is excellent.

Retail Services

Retail banking services are good. The distribution of 29 branch offices and 64 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank only has one branch in a low-income census tract; thus the percentage of branches in low-income tracts (3.5 percent) was less than both the percentage of households (7.6 percent) and businesses (7.8 percent) in the same geography. The distribution of the bank's eight branches in moderate-income tracts (27.6 percent), however, exceeded both the percentage of households (21.2 percent) and businesses (17.3 percent). Overall, delivery systems are considered accessible to the bank's geographies and individuals of different income levels.

Birmingham, Alabama

No branches were opened or closed during the review period. However, the bank opened three full-service ATMs and closed one full-service ATM in the assessment area. Two of the three opened full-service ATMs were located in moderate-income tracts. The closed full-service ATM was in an upper-income tract. Overall, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals in the assessment area.

The bank offers extended hours at its branches in low- and moderate-income tracts at a rate comparable to branches in middle- and upper-income. Although no weekend hours are offered at the one branch in a low-income tract, the bank offers weekend hours at branch offices located in moderate-income tracts at a rate comparable to branches in middle- and upper-income tracts. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Geographic Distribution of Branches & ATMS

Assessment Area: AL Birmingham

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend- ed Hours	Week- end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	1	3.5%	0	0	1	1	0	Total	12	14.8%	8	12.5%	0	0	4	23.5%	0	1	25	10.0%	7.6%	7.8%
DTO	0		0	0				SA	10		6		0	0	4		0	1				
Moderate	8	27.6%	0	0	6	5	3	Total	31	38.3%	23	35.9%	2	0	8	47.1%	0	0	63	25.1%	21.2%	17.3%
DTO	0		0	0				SA	12		4		1	0	8		0	0				
Middle	11	37.9%	0	0	11	8	7	Total	22	27.2%	19	29.7%	1	0	3	17.6%	0	0	91	36.3%	39.4%	34.4%
DTO	0		0	0				SA	4		1		1	0	3		0	0				
Upper	9	31.0%	0	0	9	9	4	Total	16	19.8%	14	21.9%	0	1	2	11.8%	0	0	71	28.3%	31.8%	40.4%
DTO	0		0	0				SA	3		1		0	1	2		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	0.4%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	29	100.0%	0	0	27	23	14	Total	81	100.0%	64	100.0%	3	1	17	100.0%	0	1	251	100.0%	100.0%	100.0%
DTO	0		0	0				SA	29		12		2	1	17		0	1				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides an excellent level of community development services in the Birmingham assessment area. Employees provided 6,256 service hours to qualified organizations by participating in 586 community development service activities.

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities which support low- and moderate-income individuals, communities, and small businesses in the Birmingham assessment area. Of the bank's total service hours, 4,151 hours were committed to financial education. Additionally, bank staff engaged in 1,200 hours of board or committee service to qualified nonprofit organizations.

Birmingham, Alabama

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- A bank leader provided financial expertise through committee service hours which benefited a local nonprofit organization that provides mentoring, education workshops and scholarships to low-income, minority students enrolled in their first year of college.
- A bank leader served as an executive board, advisory board, and capital campaign committee member at a local nonprofit to support the bank's partnership with the organization to develop the BBVA Compass Center for Workforce Development.
- Multiple bank leaders served on boards and committees and provided technical assistance to an economic development organization that supports small business recruitment and retention as well as public investments. Bankers lent expertise in personnel recruitment, marketing, board development, communication, and organizational structure.

Compass Bank is a leader in providing community development services as demonstrated by its excellent level of engagement in community services as well as its responsiveness to identified affordable housing and economic development needs in the Birmingham assessment area.

Huntsville, Alabama

METROPOLITAN AREA

(Full-Scope Review)

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

Overview

The Huntsville assessment area includes both Limestone County and Madison County in the Huntsville, AL MSA. Compass Bank operates 9 branches in the Huntsville assessment area, which represent 10.2 percent of the branches statewide and 1.4 percent of the institution's branches overall. As of June 30, 2016, 8.0 percent of the bank's deposits in Alabama were in the Huntsville assessment area. Additionally, the Huntsville assessment area represents 10.1 percent of Compass Bank's combined HMDA-reportable and CRA small business lending by number of loans in the state.

The assessment area is a competitive banking market where national and regional banks have a significant presence. Compass Bank ranks 2nd in deposit market share amongst 29 institutions in the Huntsville assessment area. According to the June 30, 2016 FDIC Summary of Deposits Report, the bank had 13.8 percent deposit market share and \$1.0 billion in deposits. Regions Bank holds the largest share of deposits at 21.1 percent followed by Compass Bank, ServisFirst Bank, Branch Banking and Trust Company (BB&T) and Wells Fargo Bank.

Compass Bank originated or purchased 0.6 percent of the HMDA-reportable loans in the Huntsville assessment area in 2015, ranking 38th out of 309 reporters. In 2016, the bank originated or purchased 0.5 percent, ranking 40th out of 336 reporters. Redstone Federal Credit Union, Wells Fargo Bank, FirstBank, Regions Bank, and Quicken Loans were the top HMDA lenders in the Huntsville assessment area in 2015 and 2016.

CRA small business lending is also competitive. For CRA small business and small farm lending, Compass Bank ranked 9th out of 60 reporters in 2015, with 3.8 percent of reported loans. In 2016, the bank ranked 8th out of 76 reporters, with 3.0 percent of reported loans. Lending in the assessment area was dominated by American Express, Capital One Bank, Synchrony Bank, Citibank, and Wells Fargo Bank in 2015 and 2016.

Population and Income Characteristics

The Huntsville assessment area has experienced growth since the last decennial census. According to 2017 U.S. census data, the population of the assessment area was estimated at approximately 455,448 people.¹³⁵ From 2010 to 2017, the assessment area population grew by 9.1 percent, greater than the statewide population growth rate of 2.0 percent.¹³⁶ While a majority of the growth occurred in Limestone County, which grew by 14.0 percent, the most populous area is Madison County at 361,046 residents.¹³⁷

¹³⁵ U.S. Census. American Community Survey. Market at a Glance: Huntsville, AL MSA. n.d. Web. 3 Apr. 2018.
<https://www.census.gov/quickfacts/fact/table/AL,madisoncountyalabama,limestonecountyalabama/PST045217>

¹³⁶ Ibid

¹³⁷ Ibid

Huntsville, Alabama

The assessment area is made up of 89 census tracts: 11 tracts are low-income (12.4 percent), 26 tracts are moderate-income (29.2 percent), 29 tracts are middle-income (32.6 percent), and 23 tracts are upper-income (25.8 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Huntsville MSA. As shown, the median family income decreased from \$75,000 in 2015 to \$71,800 in 2016. Data shows that the median family income is considerably higher in Madison County (\$78,355) than in Limestone County (\$64,453).¹³⁸ In addition, 39.6 percent of families in the assessment area are considered low- to moderate-income.¹³⁹

Borrower Income Levels Huntsville, AL MSA

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2015	\$75,000	0	- \$37,499	\$37,500	- \$59,999	\$60,000	- \$89,999	\$90,000	- & above
2016	\$71,800	0	- \$35,899	\$35,900	- \$57,439	\$57,440	- \$86,159	\$86,160	- & above

With regards to poverty, 9.0 percent of families in the assessment area live in poverty according to 2016 FFIEC census data. The percentage of people living in poverty in Limestone County was 10.3 percent, while 8.7 percent of residents in Madison County lived in poverty. The statewide rate was 13.0 percent.¹⁴⁰ Comparatively, the national poverty rate was 15.1 percent between 2012 and 2016.¹⁴¹ A significant percent of families in low- and moderate-income areas live below the poverty level. Specifically, 23.9 percent of families below the poverty level are located in low-income tracts and 38.9 percent are located in moderate-income tracts.

Economic Conditions

The primary industries in Huntsville are defense, aerospace, bioscience, information technology, and advanced manufacturing.¹⁴² Military spending in the area topped \$7.0 billion as of 2014.¹⁴³ U.S. Army Redstone Arsenal provides 41,866 jobs for the market within its 38,000-acre campus.¹⁴⁴ Other leading employers in Madison County are NASA with 6,500 employees, Huntsville Hospital with 6,341 employees, and Huntsville City Schools with 3,000 employees.¹⁴⁵ Huntsville is also home to Cummings Research Park, the second largest research park in the U.S. and the fourth largest in the world.¹⁴⁶

¹³⁸ "Huntsville, AL (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 19 Apr 2018. <http://www.policymap.com/>

¹³⁹ FRB Atlanta Calculations of 2016 Census Data

¹⁴⁰ FRB Atlanta Calculations of 2016 Census Data

¹⁴¹ "Huntsville, AL (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 22 Aug 2018. <http://www.policymap.com/>

¹⁴² "HuntsvilleMetro: A community overview by the Chamber of Commerce of Huntsville/Madison County." Chamber of Commerce Huntsville/Madison. n.d. Web 3 May 2018. https://issuu.com/hsvchamber/docs/huntsville_metro_community_overview?e=17205879/37136180

¹⁴³ Ibid

¹⁴⁴ Ibid

¹⁴⁵ "Leading Employers." Huntsville/Madison Chamber of Commerce. n.d. Web 3 May 2018. http://hsvchamber.org/wp-content/uploads/2018/02/2018_Leading_Employers.pdf

¹⁴⁶ Ibid

Huntsville, Alabama

The workforce in Huntsville is highly educated and skilled, boasting the highest ratio of engineers, computer systems analysts, and user support specialists in the U.S. and enough talent to support an additional 10,000 manufacturing jobs through 2024.¹⁴⁷ In 2016, Woodbridge, a company specializing in foam for automotive seats, brought 164 new jobs to Limestone County, providing a \$17.4 million investment.¹⁴⁸ In the same year, The Boeing Company expanded in Madison County, adding 470 jobs and \$78.0 million in capital investment.¹⁴⁹ In 2015, GE Aviation brought 300 new jobs to Limestone County with a \$200.0 million investment, and Polaris Industries added 2,000 jobs with a \$140.0 million investment.¹⁵⁰

In February 2016, The Associated General Contractors of America announced that the Huntsville area leads the nation in new construction job growth. Huntsville was also ranked number one in job growth in the tech industry by StateTech in September 2017 and one of the top 10 best-paying cities for STEM jobs by SmartAsset in February 2017.¹⁵¹ ¹⁵² Eleven new companies added 851 jobs in Huntsville in 2016 and 2017, totaling \$320.3 million in capital investment; 30 existing companies added 2,772 jobs totaling \$573.1 million in capital investment. The Huntsville assessment area economic growth index, which combines employment, gross domestic product and wages, is 34.0 percent, which exceeds the state at 13.0 percent and the nation at 20.0 percent.¹⁵³ ¹⁵⁴ Due to the high skill level required of jobs in the assessment area and the education of the workforce, new jobs may provide more opportunities for employees at higher wage levels versus low- and moderate-income wage earners.

In terms of economic conditions for small businesses, the entrepreneurial community is growing. The University of Alabama in Huntsville (UAH) hosts the Procurement Technical Assistance Center (PTAC) to support government contracting at the state, federal and local level.¹⁵⁵ UAH also provides services to entrepreneurs and small businesses through the Small Business Development Center (SBDC).¹⁵⁶ In 2017, the SBDC supported 39 new business start-ups in the region and provided 13.3 million in capital investment to create 200 jobs.¹⁵⁷

According to 2016 Dun & Bradstreet information, there were 16,639 businesses within the Huntsville assessment area, 90.7 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses. Additionally, 23.5 percent of small businesses in the assessment area were located in moderate-income tracts, while there were far fewer in low-income tracts at 9.8 percent. Lending to

¹⁴⁷ "HuntsvilleMetro: A community overview by the Chamber of Commerce of Huntsville/Madison County." Chamber of Commerce Huntsville/Madison. n.d. Web 3 May 2018. https://issuu.com/hsvchamber/docs/huntsville_metro_community_overview?e=17205879/37136180

¹⁴⁸ "New & Expanding Industry." Huntsville/Madison County Chamber of Commerce. n.d. Web. 2 May 2018. http://hsvchamber.org/wp-content/uploads/2017/09/New_and_Expanding_2016_2010.pdf

¹⁴⁹ Ibid

¹⁵⁰ Ibid

¹⁵¹ "Media Recognition." Huntsville Madison County Chamber. n.d. Web. 2 May 2018. <http://hsvchamber.org/category/accolades/>

¹⁵² "2017 Annual Report" Chamber of Commerce of Huntsville/Madison County. Web. 30 Apr. 2018

https://issuu.com/hsvchamber/docs/2017_annual_report_online?e=17205879/58377756

¹⁵³ "2016 Annual Report." Chamber of Commerce of Huntsville/Madison County. Web. 30 Apr. 2018

https://issuu.com/hsvchamber/docs/coc_annual_report_2016_final?e=17205879/42908638

¹⁵⁴ "2017 Annual Report" Chamber of Commerce of Huntsville/Madison County. Web. 30 Apr. 2018

https://issuu.com/hsvchamber/docs/2017_annual_report_online?e=17205879/58377756

¹⁵⁵ "About PTAC." The University of Alabama in Huntsville. n.d. Web. 2 May 2018. <https://www.uah.edu/sbdc/ptac/about>

¹⁵⁶ "Small Business Development Center." The University of Alabama in Huntsville. n.d. Web. 23 Aug 2018. <https://www.uah.edu/sbdc/small-business-development-center>

¹⁵⁷ "Annual Report 2017." Huntsville/Madison County Chamber of Commerce. n.d. Web. 1 May 2018.

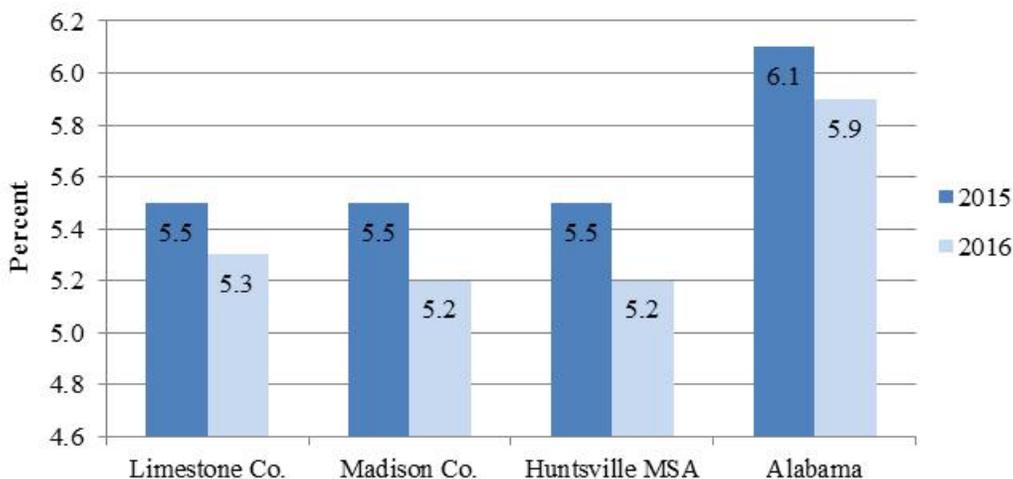
https://issuu.com/hsvchamber/docs/2017_annual_report_online

Huntsville, Alabama

small businesses remained stable between 2014 and 2016 in the assessment area. In 2016, 6,475 small business loans totaling \$357,366,000 were made to firms in Huntsville. This is an increase of 11.7 percent in lending in Madison County and 12.6 percent in Limestone since 2014. In Madison County and Limestone County, respectively, 52.3 percent and 52.6 percent of all small business loans were made to businesses with revenues of \$1 million or less. This may be an indication that there are fewer obstacles for smaller firms to access credit in the market.

Economic conditions have improved in the Huntsville MSA, with new jobs and declining unemployment over the review period. As shown in the following table, the unemployment rate in the Huntsville MSA fell from 5.5 percent in 2015 to 5.2 percent in 2016, which was below the state unemployment rate of 5.9 percent. The national unemployment rate was 4.7 percent as of December 2016.¹⁵⁸ The unemployment rates were 5.3 percent in Limestone County and 5.2 percent in Madison County.

Unemployment Rates - AL Huntsville



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

There were 174,937 housing units located in the assessment area according to the 2016 census data, of which 64.2 percent were owner-occupied, 25.3 percent were rental units, and 10.5 percent were vacant.¹⁵⁹ Rental and vacant units were more concentrated in low- and moderate-income tracts. In low-income census tracts, approximately 76.5 percent of all housing units were rentals or vacant; in moderate-income census tracts, 44.5 percent of the units were rental or vacant. The median age of the housing stock was 28 years, though housing was much older in the low- and moderate-income census tracts (42 years and 35 years, respectively). These factors suggest that HMDA-reportable lending opportunities in the low- and moderate-income tracts may be limited.

¹⁵⁸ "Databases, Tables & Calculators by Subject." U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 23 Aug 2018. <http://www.bls.gov/eag/home.htm>

¹⁵⁹ FRB Atlanta Calculations of 2015 Census Data

Huntsville, Alabama

The Huntsville housing market is generally affordable for low- to moderate-income individuals. Only 15.5 percent of Madison County homeowners and 16.8 percent of Limestone County homeowners were cost-burdened from 2012 to 2016.¹⁶⁰ Housing cost burden occurs when owners or renters spend 30.0 percent or more of their monthly household income on housing costs or gross rent. The proportion of cost-burdened renters is higher: 42.7 percent in Madison County and 39.5 percent in Limestone County.

In 2017, the median selling price of a home was \$162,212, an increase from \$140,596 in 2012.¹⁶¹ Rising home prices present possible emerging affordability barriers for low- and moderate-income families. Homes were on the market in 2017 for an average of 92 days, a steady decline from 121 days in 2012.¹⁶² The decline in the number of houses on the market each year from 7,033 in 2012 to 5,240 in 2017 demonstrates potential home inventory challenges in the assessment area.¹⁶³

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

¹⁶⁰ "Huntsville, AL (HUD)" GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 30 Apr. 2018. <http://www.policymap.com/>

¹⁶¹ "Home Sales." Huntsville/Madison County Chamber of Commerce. n.d. Web. 2 May 2018. http://hsvchamber.org/wp-content/uploads/2018/02/home_sales_2000_2017.pdf

¹⁶² Ibid

¹⁶³ Ibid

Huntsville, Alabama

Combined Demographics Report

Assessment Area: AL Huntsville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	11	12.4	6,846	6.5	2,271	33.2	24,134	22.8	
Moderate-income	26	29.2	25,910	24.5	3,693	14.3	17,750	16.8	
Middle-income	29	32.6	39,891	37.8	2,709	6.8	19,571	18.5	
Upper-income	23	25.8	33,011	31.2	814	2.5	44,203	41.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	89	100.0	105,658	100.0	9,487	9.0	105,658	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	#	%	#	%	#	%
Low-income	17,151	4,027	3.6	23.5	9,797	57.1	3,327	19.4	
Moderate-income	47,730	26,482	23.6	55.5	15,343	32.1	5,905	12.4	
Middle-income	62,909	44,309	39.5	70.4	12,706	20.2	5,894	9.4	
Upper-income	47,147	37,484	33.4	79.5	6,444	13.7	3,219	6.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	174,937	112,302	100.0	64.2	44,290	25.3	18,345	10.5	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	1,772	10.6	1,481	9.8	284	19.9	7	6.1	
Moderate-income	4,018	24.1	3,555	23.5	440	30.8	23	20.0	
Middle-income	5,577	33.5	5,206	34.5	332	23.3	39	33.9	
Upper-income	5,272	31.7	4,855	32.2	371	26.0	46	40.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	16,639	100.0	15,097	100.0	1,427	100.0	115	100.0	
Percentage of Total Businesses:				90.7		8.6		.7	
	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	3	0.9	0	0.0	0	0.0	
Moderate-income	100	29.5	96	29.2	4	40.0	0	0.0	
Middle-income	182	53.7	179	54.4	3	30.0	0	0.0	
Upper-income	54	15.9	51	15.5	3	30.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	339	100.0	329	100.0	10	100.0	0	.0	
Percentage of Total Farms:				97.1		2.9		.0	

2016 FFIEC Census Data and 2016 D&B Information

Huntsville, Alabama

Credit and Community Development Needs

To better understand the local community development and economic landscapes, individuals familiar with the community and with community development activities were contacted. 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, and/or service activities.

According to a community contact, many low- and moderate-income residents are unbanked. However, the contact did not attribute the significant number of unbanked individuals in the area to lack of accessibility, but rather lack of trust in financial institutions or avoidance of taxes. Banks are engaged in establishing bankable clients and are knowledgeable about community reinvestment and development. Outreach efforts include credit repair counseling.

The contact stated that, historically, most of the small business lending occurs in the Huntsville area and its immediate market. Huntsville has had an above average recovery from the economic downturn due to federal government defense spending supporting the aerospace sector. Yet, there are still targeted efforts to expand lending to include low- and moderate-income census tracts in the surrounding five counties that also make up the region.

Generally, banks refer low- and moderate-income clients and small businesses that they are not able to finance to local small business development resources for credit counseling or access to alternative financing. Banks actively consult with community partners regarding lending scenarios and to source business and community development opportunities. The community contact stated that small businesses in the market need more capital, and banks have capacity to extend lending resources directly to business owners or to intermediate small business development organizations. Large banks are making multi-million dollar investments to support small business development. In addition, community banks continue to compete for participation in financing. However, fintech lenders, some of who may have predatory lending practices, are a growing competitor in the market to banks. Fintech lenders will extend credit for working capital and only require minimal credit standards, but repayment terms are not always perceived as feasible or favorable for small business borrowers.

To further understand community development concerns, the City of Huntsville consulted with 24 partner agencies to assess the area's highest needs and develop a consolidated plan. Some of the top needs identified by agency stakeholders include: 1) increase availability and affordability of housing for low- and moderate-income families; 2) revitalize deteriorating neighborhoods; and 3) finance projects to increase jobs in low- and moderate-income areas.

In response to the survey, the City developed a strategic plan and programs utilizing CDBG and HOME federal funds. The programs address housing rehabilitation, economic development, down payment assistance, housing counseling, and new construction. The City will seek opportunities to leverage the federal funds through partnerships with local banking institutions, nonprofit organizations, and institutions of higher education. As of 2015, the City has partnered with Huntsville Housing Authority to provide 1,700 rental apartments for low-income individuals and their families. The Housing Authority operates 1,697 units of public housing and administers 1,606 Housing Choice (Section 8) vouchers. Homeownership options are also available to residents

Huntsville, Alabama

through HOME funds, Multifamily HOME, and down payment assistance programs. The City also supports homeless programs executed through other organizations, primarily the North Alabama Coalition for the Homeless (NACH). NACH provides shelter and outreach services for domestic violence victims, scatter site emergency shelter, day care for the chronically homeless, and technical assistance for agency data monitoring.

Huntsville, Alabama

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Huntsville assessment area is good. The geographic distribution of loans reflects good penetration throughout the assessment area, while the distribution of borrowers reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes an adequate level of community development loans.

During the review period, the bank reported 196 HMDA-reportable loans compared to 490 small business loans in the Huntsville assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Huntsville assessment area contains 1.0 percent of the bank's total HMDA-reportable lending by number of loans and 0.6 percent by dollar volume, and 1.0 percent of its total small business lending by number of loans and 1.1 percent by dollar volume. In comparison, 1.5 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low-income census tracts is excellent. Compass Bank originated 14.1 percent of its small business loans in low-income census tracts, where 9.8 percent of small businesses in the assessment area are located. In addition, the bank's performance was greater than aggregate in 2015 and 2016.

Small business lending in moderate-income census tracts is good. The bank originated 20.8 percent of its small business loans in moderate-income tracts, where 23.5 percent of small businesses in the assessment area are located. However, the bank's performance was greater than aggregate performance in both years.

Huntsville, Alabama

Home Purchase Loans

Home purchase lending in low-income census tracts is good. Compass Bank's home purchase lending in low-income census tracts (3.7 percent) was slightly above the percentage of owner-occupied units (3.6 percent) in these tracts and greater than aggregate lending performance in 2015 and 2016.

Home purchase lending in moderate-income census tracts is adequate. Lending performance in these tracts (17.8 percent) was less than the percentage of owner-occupied units (23.6 percent) during the review period. The bank's average performance was similar to aggregate performance in 2015 and significantly greater than aggregate in 2016.

Home Refinance Loans

Home refinance lending in low-income census tracts is adequate. The bank's home refinance lending in low-income census tracts was slightly less than the percentage of owner-occupied units in those tracts throughout the review period. Compass Bank originated 2.7 percent of its home refinance loans in these tracts, where 3.6 percent of owner-occupied units are located. Compass Bank had no home refinance loan originations in 2015, thus underperforming compared to aggregate lenders. However, the bank exceeded aggregate performance in 2016 with two home refinance loans.

Home refinance lending in moderate-income census tracts is good. Although the bank's lending performance in moderate-income census tracts (21.9 percent) was less than the percentage of owner-occupied units located in these tracts, the bank's performance exceeded aggregate lenders in 2015 and 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is excellent. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent. Approximately 72.4 percent of small business loan originations were extended to businesses with revenues of \$1 million or less. While this performance was less than the percentage of small businesses in the assessment area (90.7 percent), it was significantly greater than aggregate lending performance. In addition, 98.1 percent of the bank's small business loan originations were in amounts of \$250,000 or less, which typically represent loan amounts requested by very small businesses.

Home Purchase Loans

Home purchase lending to low- and moderate-income borrowers is excellent. Compass Bank's home purchase lending to low-income borrowers (22.4 percent) was comparable to the percentage of low-income families (22.8 percent) living in the assessment area, and the bank outperformed aggregate lenders in both years of the review

Huntsville, Alabama

period. The bank's home purchase lending to moderate-income borrowers (26.2 percent) was greater than the percentage of moderate-income families (16.8 percent) living in the assessment area; the bank performed slightly below aggregate in 2015 but exceeded aggregate in 2016.

Home Refinance Loans

Home refinance lending to low-income borrowers is good. While the bank's home refinance lending to low-income borrowers (13.7 percent) was less than the percentage of low-income families, the bank's performance was greater than aggregate lending in 2015 and 2016.

Home refinance lending to moderate-income borrowers is excellent. Compass Bank's home refinance lending to moderate-income borrowers (21.9 percent) was greater than the percentage of moderate-income families in the assessment area and greater than aggregate lending in both years of the review period.

Community Development Lending

Compass Bank makes an adequate level of community development loans in the Huntsville assessment area. The bank originated three community development loans totaling \$13.1 million during the review period, including a loan for \$7.2 million qualifying as a Low-Income Housing Tax Credit that provided 60 units of affordable housing dedicated for individuals and families earning less than 60 percent of the area median income. Additionally, Compass Bank made a loan to finance the construction of a new indoor classroom in a public library located in a moderate-income geography. The classroom will serve as workforce development center for the community, providing computer classes and private tutoring sessions to help patrons build computer skills or to receive one-on-one assistance with constructing a resume. Given the bank's size and presence in the assessment area, the bank's community development lending adequately responds to the community development and credit needs in this assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Huntsville assessment area is good. The bank made a significant level of qualified community development investments that exhibited good responsiveness to credit and community development needs in the assessment area.

The bank invested nearly \$13.1 million in the Huntsville assessment area, including \$8.2 million in new investments during the review period and \$4.7 million in prior period investments. The total also includes \$142,000 in contributions made during the review period. All of the bank's investments supported affordable housing; during the review period the bank invested \$8.2 million in a Low-Income Housing Tax Credit project that financed the development of a 60-unit affordable senior housing project. The bank's contributions demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$64,500 to nonprofits that offer community services to low- and moderate-income individuals, \$40,000 to support economic development and \$37,500 for affordable housing. The bank also had investments and contributions that served a broader regional area that includes the Huntsville assessment area.

Huntsville, Alabama

SERVICE TEST

Compass Bank’s service test performance in the Huntsville assessment area is excellent.

Retail Services

Retail banking services are good. The distribution of nine branch offices and 14 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has no branches in low-income census tracts compared to 8.8 percent of households and 10.6 percent of businesses in the same geography. The distribution of the bank’s four branches in moderate-income tracts (44.4 percent) exceeded both the percentage of households (26.7 percent) and businesses (24.1 percent). Overall, delivery systems are considered accessible to the bank’s geographies and individuals of different income levels.

No branches or ATMs were opened or closed during the review period. Therefore, the bank’s record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals in the assessment area.

The bank offers extended and weekend hours at its branches in moderate-income tracts comparable to branches in middle- and upper-income tracts. Overall, retail services do not vary in a way that inconveniences any portion of the bank’s assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Geographic Distribution of Branches & ATMS

Assessment Area: AL Huntsville

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	0	0.0%	0	0	0	0	0	Total	1	5.9%	0	0.0%	0	0	1	33.3%	0	0	11	12.4%	8.8%	10.6%
DTP	0		0	0				SA	1		0		0	0	1		0	0				
Moderate	4	44.4%	0	0	4	4	1	Total	6	35.3%	6	42.9%	0	0	0	0.0%	0	0	26	29.2%	26.7%	24.1%
DTP	0		0	0				SA	0		0		0	0	0		0	0				
Middle	3	33.3%	0	0	3	3	1	Total	4	23.5%	4	28.6%	0	0	0	0.0%	0	0	29	32.6%	36.4%	33.5%
DTP	0		0	0				SA	0		0		0	0	0		0	0				
Upper	2	22.2%	0	0	2	2	1	Total	6	35.3%	4	28.6%	0	0	2	66.7%	0	0	23	25.8%	28.1%	31.7%
DTP	0		0	0				SA	2		0		0	0	2		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	0	0.0%	0.0%	0.0%
DTP	0		0	0				SA	0		0		0	0	0		0	0				
Total	9	100.0%	0	0	9	9	3	Total	17	100.0%	14	100.0%	0	0	3	100.0%	0	0	89	100.0%	100.0%	100.0%
DTP	0		0	0				SA	3		0		0	0	3		0	0				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

Huntsville, Alabama

Community Development Services

Compass Bank provides an excellent level of community development services in the Huntsville assessment area. Employees provided 825 service hours to qualified organizations by participating in 78 community development service activities.

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities which support low- and moderate-income individuals, communities, and small businesses in the Huntsville assessment area. Of the bank's total service hours, 657 hours were committed to financial education. Additionally, bank staff engaged in 142 hours of board or committee service to qualified nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- A bank leader provided multi-year service to a nonprofit small business development organization benefiting women entrepreneurs in Huntsville. The banker lent expertise as treasurer on the organization's board of directors. Additionally, over 30 Compass Bank volunteers facilitated more than 10 small business education workshops to clients of the organization throughout the exam period.
- Two bank leaders provided multi-year board service to a community development organization that provides workforce development, mental health, and housing support services to low- and moderate-income individuals and families. One of the leaders lent expertise on the board's Finance Committee.

In spite of limited community development service opportunities, Compass Bank is a leader in providing community development services as demonstrated by its excellent level of engagement in community services as well as its responsiveness to identified affordable housing and economic development needs in the Huntsville assessment area.

Metropolitan Areas (Limited Review)

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

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

- **Anniston Assessment Area (Calhoun County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 3.4 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$155.7 million in deposits in this assessment area, representing a market share of 9.1 percent and 1.2 percent of Compass Bank's total deposits in **Alabama**.
- **Auburn Assessment Area (Lee County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 3.4 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$259.8 million in deposits in this assessment area, representing a market share of 10.5 percent and 2.0 percent of Compass Bank's total deposits in **Alabama**.
- **Daphne-Fairhope-Foley Assessment Area (Baldwin County)**
 - As of December 31, 2016, Compass Bank operated five branches in the assessment area, representing 5.7 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$438.4 million in deposits in this assessment area, representing a market share of 11.1 percent and 3.4 percent of Compass Bank's total deposits in **Alabama**.
- **Decatur Assessment Area (Morgan County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 2.3 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$198.9 million in deposits in this assessment area, representing a market share of 11.1 percent and 1.5 percent of Compass Bank's total deposits in **Alabama**.
- **Dothan Assessment Area (Houston County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 3.4 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$409.3 million in deposits in this assessment area, representing a market share of 15.8 percent and 3.2 percent of Compass Bank's total deposits in **Alabama**.
- **Florence Assessment Area (Colbert and Lauderdale counties)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 3.4 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$258.0 million in deposits in this assessment area, representing a market share of 10.3 percent and 2.0 percent of Compass Bank's total deposits in **Alabama**.
- **Gadsden Assessment Area (Etowah County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 2.3 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$126.6 million in deposits in this assessment area, representing a market share of 11.1 percent and 1.0 percent of Compass Bank's total deposits in **Alabama**.

Metropolitan Areas (Limited Review)

- **Mobile Assessment Area (Mobile County)**
 - As of December 31, 2016, Compass Bank operated 12 branches in the assessment area, representing 13.6 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$980.6 million in deposits in this assessment area, representing a market share of 14.9 percent and 7.6 percent of Compass Bank’s total deposits in **Alabama**.
- **Montgomery Assessment Area (Montgomery County)**
 - As of December 31, 2016, Compass Bank operated seven branches in the assessment area, representing 8.0 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$1.2 billion in deposits in this assessment area, representing a market share of 18.8 percent and 9.1 percent of Compass Bank’s total deposits in **Alabama**.
- **Tuscaloosa Assessment Area (Tuscaloosa County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 3.4 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$238.1 million in deposits in this assessment area, representing a market share of 7.4 percent and 1.9 percent of Compass Bank’s total deposits in **Alabama**.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Anniston	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Auburn	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Daphne-Fairhope-Foley	Not Consistent (Below)	Consistent	Not Consistent (Below)
Decatur	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Dothan	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Florence	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Gadsden	Consistent	Not Consistent (Below)	Not Consistent (Below)
Mobile	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Montgomery	Consistent	Not Consistent (Below)	Not Consistent (Below)
Tuscaloosa	Not Consistent (Below)	Consistent	Not Consistent (Below)

For the lending test, Compass Bank received a rating of outstanding for the State of Alabama. With the exception of Gadsden and Montgomery, performance in the remaining eight metropolitan limited-scope assessment areas was less than the statewide lending test performance. For the geographic distribution of loans, lending levels were excellent in Florence and Gadsden; good in Decatur, Dothan, Mobile, and Montgomery; and adequate in the remaining four metropolitan limited-scope assessment areas. Performance was good for the borrower

Metropolitan Areas (Limited Review)

distribution of loans in Anniston, Dothan, Florence, and Tuscaloosa; and excellent in the remaining six assessment areas. There was an excellent level of community development loans in Daphne-Fairhope-Foley, Dothan, Gadsden, Montgomery, and Tuscaloosa assessment areas and good levels of community development loans in Mobile. Poor or very poor level of community development lending in the Anniston, Auburn, Decatur, and Florence assessment areas was also a factor in weaker performance for these four assessment areas.

For the investment test, Compass Bank received a rating of outstanding for the State of Alabama. The bank had an excellent level of investments in the Daphne-Fairhope-Foley and the Tuscaloosa metropolitan limited-scope assessment areas and performance was consistent with the state performance. Performance in the remaining metropolitan limited-scope assessment areas was weaker than statewide performance. The bank had a significant level of investments in the Auburn, Dothan, Florence, Gadsden, and Mobile assessment areas while the level of investments was adequate in Anniston, Decatur, and Montgomery.

For the service test, Compass Bank received a rating of outstanding for the State of Alabama. Although service test performance in all of the metropolitan limited-scope assessment areas was rated weaker than the state, six metropolitan limited-scope assessment areas (Auburn, Decatur, Dothan, Mobile, Montgomery, and Tuscaloosa) were still considered good and four (Anniston, Daphne, Florence, and Gadsden) were considered adequate. Auburn, Decatur, Dothan, Montgomery, and Tuscaloosa metropolitan assessment areas all exhibited excellent community development performance which was consistent with the bank's statewide performance.

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

Non-Metropolitan Areas (Limited Review)

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

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

- **Eufaula Assessment Area (Barbour County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 2.3 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$83.8 million in deposits in this assessment area, representing a market share of 19.8 percent and 0.7 percent of Compass Bank’s total deposits in **Alabama**.
- **Northeast Alabama Assessment Area (Cullman, Dekalb, Jackson, and Marshall counties)**
 - As of December 31, 2016, Compass Bank operated five branches in the assessment area, representing 5.7 percent of its branches in **Alabama**.
 - As of June 30, 2016, the bank had \$375.7 million in deposits in this assessment area, representing a market share of 7.7 percent and 2.9 percent of Compass Bank’s total deposits in **Alabama**.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Non-metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Eufaula	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Northeast Alabama	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)

For the lending test, Compass Bank received a rating of outstanding for the State of Alabama. Although below the state performance, lending levels were poor in Eufaula and adequate in Northeast Alabama for the geographic distribution of loans, and good for the borrower distribution of loans in the Eufaula assessment area and excellent in the Northeast Alabama assessment area. There was a good level of community development loans in the Northeast Alabama assessment area and adequate levels of community development loans in the Eufaula assessment area.

For the investment test, Compass Bank received a rating of outstanding for the State of Alabama. Performance in the non-metropolitan limited scope assessment areas was weaker than the statewide performance; in both the Eufaula and Northeast Alabama assessment areas, the bank had an adequate level of investments.

For the service test, Compass Bank received a rating of outstanding for the State of Alabama. Although service test performance in the Eufaula non-metropolitan assessment area was below the bank’s state performance, performance in this assessment area was still considered adequate. Performance in the Northeast AL non-metropolitan assessment area was weaker than the bank’s statewide performance primarily because of limited community development performance.

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

Arizona

CRA RATING FOR ARIZONA: OUTSTANDING

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects excellent penetration throughout the assessment areas and the distribution of loans by borrower income reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an excellent level of community development loans in its Arizona assessment areas.
- The bank provides a significant level of qualified community development investments and grants that are responsive to several identified community development needs of the Arizona assessment areas.
- Retail banking services are adequate in the bank's assessment area.
- The bank provides a relatively high level of community development services throughout the assessment area.

Arizona

SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment area in Arizona:

- Phoenix

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

- | | |
|--------------------|------------------------|
| • Flagstaff | • Prescott |
| • Lake Havasu City | • Sierra Vista-Douglas |
| • Northern Arizona | • Tucson |

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ARIZONA

As of June 30, 2016, Compass Bank had \$4.8 billion in deposits in Arizona accounting for 7.0 percent of the bank's total deposits. Compass Bank operated 75 branch offices in Arizona, as of December 31, 2016, representing 11.3 percent of the bank's total branches. HMDA-reportable lending in Arizona accounted for 12.5 percent of total institutional HMDA-reportable lending by number of loans and 11.9 percent by dollar volume. CRA small business lending in Arizona accounted for 10.1 percent of the bank's total CRA small business lending by number of loans and 10.6 percent by dollar volume. Overall, the bank's HMDA-reportable and CRA lending activity was greater than the percentage of total institutional deposits.

The following table shows lending activity from January 1, 2015, through December 31, 2016.

Statewide Summary of Lending Activity Assessment Areas Located in Arizona

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	1,374	18.8%	\$442,388	46.2%
HMDA Refinance	869	11.9%	\$259,374	27.1%
HMDA Home Improvement	210	2.9%	\$8,738	0.9%
HMDA Multi-Family	0	0.0%	\$0	0.0%
Total HMDA	2,453	33.5%	\$710,500	74.3%
Total Small Business	4,853	66.4%	\$245,902	25.7%
Total Farm	6	0.1%	\$240	0.0%
TOTAL LOANS	7,312	100.0%	\$956,642	100.0%

Originations and Purchases

Arizona

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

Lending Test

The lending test rating in the state of Arizona is outstanding. Overall, performance in Arizona with regard to the geographic distribution of loans reflects excellent penetration throughout the assessment areas. The distribution of loans by borrower income reflects good penetration among customers of different income levels and businesses of different sizes. Additionally, Compass made an excellent level of community development loans in Arizona.

During the review period, Compass Bank reported 4,853 small business loans and 2,453 HMDA-reportable loans in Arizona. As such, small business lending was given greater weight when determining the lending test rating for Arizona. The rating for Arizona is based on performance in the Phoenix full-scope assessment area. Approximately 67.7 percent of the bank's HMDA-reportable and small business lending by number of loans in Arizona occurred within this assessment area.

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

Geographic and Borrower Distribution

The geographic distribution of Compass Bank's HMDA-reportable and small business loans is excellent and the distribution of loans by borrower income and revenue size of businesses is good. As noted above, the rating for the state of Arizona is derived from the Phoenix full-scope assessment area. A detailed discussion of the borrower and geographic distribution of lending for this assessment area is included in the next section of this report.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the state of Arizona. The bank originated 36 community development loans totaling \$216.5 million in Arizona assessment areas during the review period, including 20 loans for \$114.8 million in the Phoenix full-scope assessment area. Performance was excellent in Phoenix. Statewide community development lending performance was driven by performance in the full-scope assessment area. More information on community development loans can be found in the full-scope assessment area section of this report.

Investment Test

The investment test rating for Arizona is high satisfactory.

The bank made a significant level of qualified investments and contributions totaling \$55.9 million that benefited the Arizona assessment areas. The bank's investment portfolio for the state included LIHTC investments, mortgage-backed securities, EQ2 investments in CDFIs, investments in SBA loan pools, and grants. The bank also had contributions totaling \$2.7 million to statewide organizations; the largest donation supported scholarships

Arizona

for low- and moderate-income students across the state to attend private schools. Lastly, the bank had investments that benefited all states within the bank's footprint, including Arizona; these investments are described in the institution section.

The bank's performance in the Phoenix full-scope assessment area was good. Notably, the bank's performance in all limited scope assessment areas was consistent with statewide investment test performance. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section and a summary of the bank's investments and contributions for all assessment areas can be found in Appendix F.

Service Test

The service test rating for Arizona is high satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. Statewide, banking services and hours of operation do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. During the review period, the bank opened two branch offices in Arizona: one each in a moderate-income and middle-income census tract. The bank also closed four branch offices throughout the state; of those closed, two were in moderate-income tracts and two were in middle-income tracts. Overall, the bank's record of opening and closing of branch offices has generally not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or low- and moderate-income individuals.

Community Development Services

The bank provides a relatively high level of community development services that benefit low- and moderate-income residents and small businesses in Arizona. Statewide, the bank provided a total of 4,057 qualified service hours within its assessment areas during the examination period, including 2,761 hours in the Phoenix assessment area. Performance in Phoenix was good. Additionally, employees engaged in 1,296 total service hours in the six limited-scope assessment areas. Finally, bank employees engaged in 76 service hours at statewide organizations that benefited the broader statewide or regional area, including the bank's assessment areas.

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

Phoenix, Arizona

METROPOLITAN AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PHOENIX, ARIZONA ASSESSMENT AREA

Overview

The Phoenix full scope assessment area consists of Maricopa and Pinal counties, which together compose the Phoenix-Mesa-Scottsdale, AZ MSA. As of December 31, 2016, Compass Bank operated 50 branches in the assessment area, which represents 66.7 percent of the branches statewide and 63.2 percent of the bank's deposits in Arizona. Additionally, the assessment area represents 76.6 percent of Compass Bank's combined HMDA-reportable and CRA small business lending by dollar volume in the state.

The Phoenix assessment area is a highly competitive banking market where national and regional banks have a significant presence. According to the June 30, 2016 FDIC Summary of Deposits Report, there were 58 financial institutions operating 867 branches in the Phoenix assessment area with a total of \$86.1 billion in deposits. Compass Bank ranked 5th in the market, with 3.5 percent of deposits (\$3.0 billion). JPMorgan Chase Bank had the largest deposit market share at 27.2 percent, followed by Wells Fargo Bank with 24.3 percent, and Bank of America with 19.8 percent.

HMDA-reportable and CRA small business lending are similarly competitive. For HMDA-reportable lending, Compass Bank originated and purchased 0.5 percent of the HMDA-reportable loans in Phoenix during 2015, ranking 41st out of 813 reporters. In 2016, the bank originated and purchased 0.3 percent of the HMDA-reportable loans in the Phoenix assessment area, ranking 66th out of 852 reporters. Wells Fargo Bank, US Bank, JPMorgan Chase Bank, Quicken Loans, and Freedom Mortgage were the top HMDA lenders in the Phoenix assessment area in 2016.

CRA small business lending is also highly competitive. For CRA small business and small farm lending, Compass Bank ranked 10th out of 184 reporters in 2015, with 1.7 percent of reported loans. In 2016, the bank ranked 9th out of 208 reporters, with 1.3 percent of reported loans. Lending in the assessment area was dominated by Citibank, American Express, Chase Bank, Wells Fargo Bank, and Bank of America in 2016.

Population and Income Characteristics

Phoenix is the urban core of the assessment area and was ranked the 5th largest city in the United States in 2017, according to census data.¹⁶⁴ During the same timeframe, Maricopa County had the highest annual population increase among counties in the United States.¹⁶⁵ The assessment area population increased 7.0 percent from 2010 to 2016, reaching an estimated 4,486,153 residents as of December 2016.¹⁶⁶ During the same timeframe,

¹⁶⁴ "Phoenix now the 5th largest city in the US, census says." Fox News U.S. 25 Mar. 2017. Web. 29 Aug. 2018.

¹⁶⁵ Ibid.

¹⁶⁶ Maricopa County; Pinal County, AZ (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 29 Aug. 2018. <http://www.policymap.com/>

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the state’s population grew by 5.3 percent.¹⁶⁷ The population in Maricopa County increased by 271,432, reflecting a 7.1 percent increase from 2010 to 2016. The population in Pinal County increased by 21,834 reflecting a 5.8 percent increase.¹⁶⁸

The assessment area is made up of 991 census tracts: 91 tracts are low income (9.2 percent), 243 tracts are moderate income (24.5 percent), 336 tracts are middle income (33.9 percent), 311 tracts are upper-income (31.4 percent), and 10 tracts have unknown income levels (1.0 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Phoenix-Mesa-Scottsdale MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income decreased from \$64,000 in 2015 to \$62,900 in 2016. The assessment area median family income is greater than the state median family income of \$59,840.¹⁶⁹ Data shows that the median family income was higher in Maricopa County (\$65,438) than in Pinal County (\$56,299).¹⁷⁰ In addition, 29.9 percent of families in the assessment area are considered low- to moderate-income.

Borrower Income Levels Phoenix-Mesa-Scottsdale, AZ MSA

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2015	\$64,000	0 - \$31,999	\$32,000 - \$51,199	\$51,200 - \$76,799	\$76,800 - & above
2016	\$62,900	0 - \$31,449	\$31,450 - \$50,319	\$50,320 - \$75,479	\$75,480 - & above

The level of poverty in the assessment area has climbed closer to the state rate in the last few years. The percentage of people living below the federal poverty line in the Phoenix-Mesa-Scottsdale MSA was 16.5 percent between 2012 and 2016 compared to the state poverty rate of 17.7 percent.¹⁷¹ In addition, a significant percent of families in low- and moderate-income areas live below the poverty level. Specifically, 25.0 percent of families below the poverty level are located in low-income tracts and 39.1 percent are located in moderate-income tracts.

Economic Conditions

In 2017, Phoenix was deemed the 9th fastest growing economy by the U.S. Bureau of Economic Analysis, with 2.6 percent (\$5.2 billion) growth in its gross domestic product from 2015 to 2016, outpacing the 1.5 percent national growth rate.¹⁷² The city accomplished this by de-emphasizing economic dependence on real estate and

¹⁶⁷ Ibid.

¹⁶⁸ Ibid.

¹⁶⁹ FRB Atlanta Calculations of 2016 Census Data

¹⁷⁰ Ibid

¹⁷¹ "Phoenix, AZ MSA (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2017. <http://www.policymap.com/>

¹⁷² *Phoenix metro GDP 9ths-fastest growing in U.S.; Growth comes where it counts.* LinkedIn. n.d. Web 16 May 2018. <https://www.linkedin.com/pulse/phoenix-metro-gdp-9th-fastest-growing-us-growth-comes-eric-jay-toll/>

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sprawl.¹⁷³ Global trade was also a significant contributor to the economy, with Arizona being one of nine states where the value of exports exceeded the value of imports. Health care, technology, manufacturing, and financial and business advanced sectors were the primary drivers contributing to the growth in gross domestic product in the metro area according to the U.S. Bureau of Economic Analysis.¹⁷⁴ The top employers in the region are Banner Health Systems (40,226), Fry's Food Stores (18,870), and Wells Fargo Bank (14,480).¹⁷⁵ The Phoenix metro area had the fastest wage growth (7.6 percent) of U.S. metropolitan areas from July 2016 to July 2017.¹⁷⁶ As of August 2017, 60.0 percent of the workforce in the Phoenix metro was in advanced industry sectors, compared to less than 50.0 percent in 2007.

In terms of economic conditions for small businesses, the Greater Phoenix area ranked number one for small business wage growth in 2018.¹⁷⁷ The City provides numerous incentives and development opportunities for entrepreneurs and small business owners. Of all businesses in the city, 95.0 percent have 50 or fewer employees.¹⁷⁸ According to 2016 Dunn & Bradstreet information, there were 193,639 businesses within the Phoenix assessment area, 91.7 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses.¹⁷⁹ Additionally, 15.9 percent of small businesses in the assessment area were located in moderate tracts, while there were far fewer in low income tracts at 6.0 percent. A higher percent of small business loans were made to companies with less than \$1.0 million revenue in Pinal County (59.8 percent) compared to Maricopa County (51.3 percent).¹⁸⁰ There were 48,094 loans made to firms with revenues of \$1.0 million or less in 2016 in the assessment area. While 95.5 percent of these loans were made in Maricopa County, the most growth occurred in Pinal County (36.3 percent) between 2014 and 2016, where there appear to be fewer obstacles for smaller firms to access credit in the market.

As shown in the following table, the unemployment rate in the Phoenix-Mesa-Scottsdale MSA fell from 5.2 percent in 2015 to 4.6 percent in 2016, which is below the 2016 national rate of 4.7 percent for this period and the statewide unemployment rate of 5.4 percent.¹⁸¹

¹⁷³ *Ibid.*

¹⁷⁴ *Ibid.*

¹⁷⁵ Precis U.S. Metro. Phoenix-Mesa-Scottsdale AZ. Moody's Analytics, February 2018. n.d. Web. 3 Apr. 2018. <https://www.moodysanalytics.com/>

¹⁷⁶ *Phoenix metro GDP 9ths-fastest growing in U.S.; Growth comes where it counts.* LinkedIn. n.d. Web 16 May 2018.

<https://www.linkedin.com/pulse/phoenix-metro-gdp-9th-fastest-growing-us-growth-comes-eric-jay-toll/>

¹⁷⁷ *Phoenix one of the top 20 places to live in US.* Phoenix Business Journal. n.d. Web. 17 May 2018.

<https://www.bizjournals.com/phoenix/news/2018/04/11/phoenix-one-of-the-top-20-places-to-live-in-us.html>

¹⁷⁸ Small Business Resources. The City of Phoenix, Office of Community and Economic Development. n.d. Web. 16 May 2018.

<https://www.phoenix.gov/econdev/small-business>

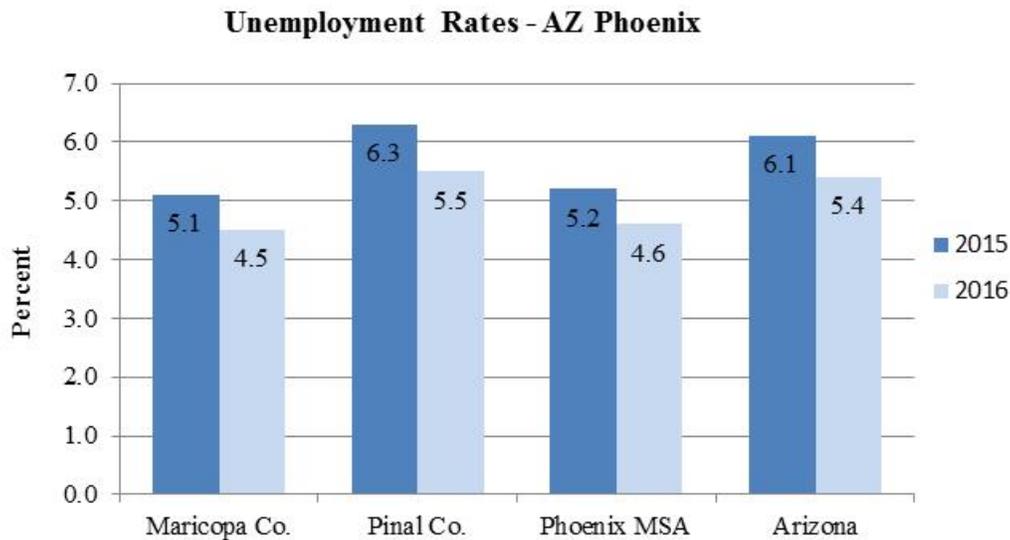
¹⁷⁹ FRB Atlanta Calculations of 2016 Census Data

¹⁸⁰ "Phoenix, Arizona." *GIS Mapping and Geographic Information System Data.* The Reinvestment Fund, n.d. Web. 30 Apr. 2018.

<http://www.policymap.com/>

¹⁸¹ "At a Glance Tables." U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 16 Oct. 2017. <http://www.bls.gov/eag/home.htm>

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Not Seasonally Adjusted. Source: Bureau of Labor Statistics

There were 1,745,666 housing units located in the assessment area according to the 2016 census data, 57.8 percent of which were owner-occupied, 28.2 percent were rental units, and 14.0 percent were vacant. Rental and vacant units were more concentrated in low- and moderate-income tracts. In low-income census tracts, approximately 71.6 percent of all housing units were rentals or vacant; in moderate-income census tracts, 52.8 percent of the units were rental or vacant. The median age of the housing stock was 23 years, though housing was much older in the low- and moderate-income census tracts (35 years and 33 years, respectively) compared to the assessment area overall. These factors collectively suggest that HMDA-reportable lending opportunities in the low- and moderate-income tracts may be limited.

The Phoenix housing market improved considerably from 2011 to 2016, with an increase in single-family permits from 7,297 to 18,433 and a comparable increase in multifamily permits from 1,784 to 10,150.¹⁸² Single-family home permits were up another 10.0 percent from November 2016 to November 2017.¹⁸³ There was also a 9.0 percent increase in new and existing home sales, and average home prices increased by 5.0 percent during the same time.¹⁸⁴ The Phoenix housing market improvement is also evident by total HMDA originations, and particularly in home purchase lending volume.¹⁸⁵ By number of loans, all HMDA home purchase originations in the assessment area, increased by 39.4 percent from 2014 to 2016. There was a fairly equal distribution of home purchase loan originations (50.3 percent) and refinances (49.7 percent) in 2016 as a percentage of all mortgage originations.

¹⁸² Precip U.S. Metro. Phoenix-Mesa-Scottsdale AZ. Moody's Analytics, February 2018. n.d. Web. 3 Apr. 2018. <https://www.moodysanalytics.com/>

¹⁸³ "Market at a Glance: Phoenix-Mesa-Scottsdale, Arizona." Office of Policy Development and Research (PD&R)

U.S. Department of Housing and Urban Development. n.d. Web. 3 Apr. 2018.

<https://www.huduser.gov/portal/MCCharts/MsasCharts.html?msaID=043806,38060&msaName=Phoenix-Mesa-Scottsdale, AZ MSA&dt=April 3, 2018>

¹⁸⁴ *Ibid.*

¹⁸⁵ "Phoenix, Arizona." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 30 Apr. 2018. <http://www.policymap.com/>

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Further analysis of HMDA lending indicates that loan originations to borrowers earning 50.0 to 80.0 percent of the MSA median income increased by 42.6 percent by number of loans from 2014 to 2016 and by 22.8 percent over the same time period for borrowers earning less than 50.0 percent of MSA median income. It should be noted that since 2010, originations by number of loans to borrowers earning less than 50.0 percent of MSA median income have declined by 35.3 percent. During the same time frame, originations by number of loans to borrowers earning 50.0 to 80.0 percent of MSA median income have increased by 33.7 percent. This indicates housing affordability and financing for both low-income borrowers may be a growing concern.¹⁸⁶

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC Census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

¹⁸⁶ Ibid.

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Combined Demographics Report

Assessment Area: AZ Phoenix

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	91	9.2	67,852	6.8	24,990	36.8	211,821	21.2
Moderate-income	243	24.5	231,330	23.1	39,053	16.9	177,591	17.8
Middle-income	336	33.9	364,276	36.4	24,710	6.8	204,723	20.5
Upper-income	311	31.4	336,588	33.7	11,102	3.3	405,928	40.6
Unknown-income	10	1.0	17	0.0	0	0.0	0	0.0
Total Assessment Area	991	100.0	1,000,063	100.0	99,855	10.0	1,000,063	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	129,633	36,898	3.7	28.5	69,196	53.4	23,539	18.2
Moderate-income	460,137	216,896	21.5	47.1	168,563	36.6	74,678	16.2
Middle-income	626,346	383,966	38.1	61.3	159,031	25.4	83,349	13.3
Upper-income	529,055	370,906	36.8	70.1	95,001	18.0	63,148	11.9
Unknown-income	495	145	0.0	29.3	226	45.7	124	25.1
Total Assessment Area	1,745,666	1,008,811	100.0	57.8	492,017	28.2	244,838	14.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	13,273	6.9	10,705	6.0	2,404	17.0	164	8.4
Moderate-income	31,369	16.2	28,177	15.9	2,942	20.9	250	12.8
Middle-income	59,625	30.8	55,636	31.3	3,529	25.0	460	23.5
Upper-income	88,379	45.6	82,315	46.4	4,992	35.4	1,072	54.9
Unknown-income	993	0.5	742	0.4	243	1.7	8	0.4
Total Assessment Area	193,639	100.0	177,575	100.0	14,110	100.0	1,954	100.0
Percentage of Total Businesses:			91.7		7.3		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	62	3.8	57	3.7	5	4.7	0	0.0
Moderate-income	258	15.8	234	15.3	24	22.6	0	0.0
Middle-income	575	35.2	534	34.9	41	38.7	0	0.0
Upper-income	730	44.7	694	45.4	36	34.0	0	0.0
Unknown-income	9	0.6	9	0.6	0	0.0	0	0.0
Total Assessment Area	1,634	100.0	1,528	100.0	106	100.0	0	.0
Percentage of Total Farms:			93.5		6.5		.0	

2016 FFIEC Census Data and 2016 D&B Information

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Credit and Community Development Needs

To better understand the local community development and economic landscapes, individuals familiar with the community and with community development activities were contacted. These individuals discussed the various opportunities and challenges in the region and how financial institutions can be responsive to local community development needs. Community contacts identified several needs and opportunities. One community contact observed that vulnerable populations in the assessment area tend to be seniors and mono-lingual, non-English speaking populations. While rents are not increasing as drastically as other metro areas, seniors on fixed incomes are often impacted by slight cost changes. The contact recommended banks provide savings, budgeting, and identity theft financial education for seniors. The contact also indicated that regional approaches to expand transportation are needed to address resource segregation in villages or townships in the assessment area. For instance, a resident may only qualify for services in their village but may not be able to access resources across townships.

Another community contact offered perspective on small business banking and mortgage financing. Businesses in the region need micro financing through banks as well as innovative products for small dollar lending at lower, fixed interest rates. Financing costs are high for existing micro lenders in the assessment area to provide small dollar loans and non-real estate secured loans. Banks may perceive this type of alternative lending as high risk and choose not to engage. While banks provide basic CRA service to the community through partnership with CDCs, participation in SBA programs and leadership on committees, there is less evidence of flexible, complex or innovative lending. Mortgage financing also needs down payment assistance and portfolio products to meet low- and moderate-income financing needs.

Multifamily housing developments typically leverage Low Income Housing Tax Credits (LIHTCs). According to the contact, priorities for this program seem to have shifted from transit-oriented, quality housing with supportive services to high volume of unit production. This is a possible result of the current Qualified Allocation Plan, which the State uses to award LIHTCs. Transit oriented workforce housing is a need, particularly for low- and moderate-income households. Opportunity Zone funds can potentially address affordable housing challenges and related issues.

A community contact indicated there is a shortage of entrepreneur development organizations and financial resources to support their operations and programs. The contact also indicated that while smaller businesses need microloans and technical assistance, there are sufficient SBA products and bank products for small business loans exceeding \$250,000 in the assessment area.

Home prices in Southern, Eastern and Western Phoenix are becoming less affordable due to gentrification. There is population migration from central Phoenix in search of more affordable homes. Maryville, located in western Phoenix, is particularly in need of housing support resources. While personal income has increased, it has been outpaced by average monthly rent, which is estimated to have tripled in recent years.

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Support for workforce and skills development and job preparation and placement exist in the assessment area. However, there is a need for more impactful interventions to encourage job retention, particularly when low- and moderate-income workers face challenges such as health, childcare, and debt issues that can adversely impact job and financial stability. Organizations in the area lack resources to scale operations to meet needs.

Overall, contacts noted that banks are engaged to varying degrees in the community but some sponsored activities are not reflective of the banks' full capacities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Phoenix assessment area is excellent. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank is a leader in making community development loans.

During the review period, the bank reported 1,730 HMDA-reportable loans compared to 3,219 small business loans in the Phoenix assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Phoenix assessment area contains 8.8 percent of the bank's total HMDA-reportable lending by number of loans and 9.3 percent by dollar volume, and 6.7 percent of its total small business lending by number of loans and 7.5 percent by dollar volume. In comparison, 4.4 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

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Small Business Loans

Small business lending in low- and moderate-income census tracts is excellent. Compass Bank's percentage of small business loans in low and moderate-income census tracts (29.9 percent) exceeded the percentage of small businesses (21.9 percent) in those tracts. In addition, the bank's small business lending outperformed aggregate performance in 2015 and 2016.

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Home Purchase Loans

Home purchase lending in low-income census tracts is good. For the review period, Compass Bank's home purchase lending in low-income tracts (2.9 percent) was below the percentage of owner-occupied units (3.7 percent) in these tracts; however, the bank's performance was above aggregate lending performance for 2015 and 2016.

Home purchase lending in moderate-income census tracts is excellent. Compass Bank's home purchase lending in moderate-income census tracts (24.7 percent) exceeded the percentage of owner-occupied units (21.5 percent) in these tracts, and was greater than the aggregate lending performance over the review period.

Home Refinance Loans

Home refinance lending in low-income census tracts is adequate. While the percentage of home refinance loans originated in low-income census tracts (1.9 percent) was less than the percentage of owner-occupied units in these tracts, the bank's performance was greater than the aggregate lending performance in 2015 and 2016.

Home refinance lending in moderate-income census tracts is good. The percentage of home refinance loans originated in moderate-income census tracts (15.8 percent) was less than the percentage of owner-occupied units in these tracts; however, performance was above the aggregate lending performance throughout the review period.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is excellent. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good. Approximately 61.4 percent of small business loan originations were extended to businesses with revenues of \$1 million or less. While the percentage of small business loans to businesses with revenues of \$1 million or less was less than the percentage of small businesses in the assessment area during the review period (91.7 percent), Compass Bank's performance was greater than the aggregate lending performance in both years. Additionally, 98.2 percent of small business loans were originated in amounts of \$250,000 or less, indicating a willingness to lend in the smaller amounts that are typically requested by small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is good. Compass Bank's home purchase lending to low-income borrowers (8.3 percent) was significantly less than the percentage of low-income families (21.2 percent) living in the assessment area. However, the bank's home purchase lending to low-income borrowers exceeded aggregate in 2015 and 2016.

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Home purchase lending to moderate-income borrowers is excellent. The bank's home purchase lending to moderate-income borrowers (25.5 percent) was greater than the percentage of moderate-income families (17.8 percent) in the assessment area during the review period. The bank's lending was greater than aggregate in both years as well.

Home Refinance Loans

Home refinance lending to low-income borrowers is good. While the bank's home refinance lending to low-income borrowers (7.8 percent) was significantly less than the percentage of low-income families, the bank's performance exceeded aggregate lenders in 2015 and 2016.

Home refinance lending to moderate-income borrowers is excellent. Compass Bank's home refinance lending to moderate-income borrowers (18.9 percent) was more than the percentage of moderate-income families in the assessment area, and greater than aggregate lending in both years of the review period.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the Phoenix assessment area. The bank originated 20 community development loans totaling \$114.8 million during the review period. Notably, the bank made three loans for \$9 million to federally qualified health centers in underserved areas providing primary care on a sliding fee scale to low- and moderate-income individuals. Other loans financed small businesses creating over 100 jobs for low- and moderate-income individuals. Compass Bank also financed two Low-Income Housing Tax Credit projects that provided over 110 units of affordable housing dedicated for seniors earning less than 60 percent of the Area Median Income. Additionally, Compass Bank made a \$3.7 loan to repurpose and decontaminate a Superfund site in a low-income geography with contaminated groundwater. The site will be repurposed for light manufacturing and retail of cargo containers and firefighter training structures. Given Compass Bank's high volume of community development loans strengthened by the diversity of loan purposes responding to the needs of the community, Compass Bank is a leader in providing community development loans in the Phoenix assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Phoenix assessment area is good. The bank made a significant level of qualified community development investments that exhibited good responsiveness to credit and community development needs in the assessment area.

The bank invested more than \$29.9 million in the Phoenix assessment area, including \$18.0 million in new investments during the review period and \$11.2 million in prior period investments. The total also includes approximately \$644,500 in contributions made during the review period. The bank leveraged several different investment vehicles in the Phoenix assessment area, including EQ2 investments in CDFIs, Low Income Housing Tax Credits, and mortgage-backed securities; these investments financed affordable housing, economic development and community services for low- and moderate-income individuals. The bank's contributions also demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling

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\$475,500 for community services to low- and moderate-income individuals, \$167,000 for affordable housing and \$2,500 to support economic development. The bank also had investments and contributions that served a broader regional area that includes the Phoenix assessment area.

Notable examples of the bank's investments include:

- A \$1.2 million dollar investment and \$57,500 in grants to a regional community development corporation and its affiliate CDFI that focuses on housing, economic development, education, and health and human services, primarily for the Hispanic community.
- A \$2.0 million investment in a Latino CDFI focused on investing capital and creating financing solutions to increase opportunities for the Latino community and low-income families.
- A \$1.5 million investment and \$120,000 in grants to the local chapter of a national CDFI to support a comprehensive community development initiative focused on increasing family incomes through education, homeownership counseling, investing in small business entrepreneurs, and supporting healthy environments.
- Three grants for more than \$60,000 to a nonprofit organization that provides a one-stop-shop for homeownership and financial counseling. The bank's contributions will support 150 down payment assistance loans and the development of 16 affordable single-family homes.
- Two grants totaling \$22,500 to a nonprofit to support educational and workforce development opportunities for low- and moderate-income individuals interested in becoming pharmacy technicians; workforce development was identified by the bank as one of the primary community development needs in the assessment area

SERVICE TEST

Compass Bank's service test performance in the Phoenix assessment area is good.

Retail Services

Retail banking services are adequate. The distribution of 50 branch offices and 55 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has four branches in low-income tracts; thus the percentage of branches in low-income tracts (8.0 percent) was comparable to the percentage of households (7.1 percent) and greater than the percentage of businesses (6.9 percent) in the same geography. The distribution of the bank's nine branches (18.0 percent) in moderate-income tracts was less than the percentage of households (25.7 percent) and greater than the percentage of businesses (16.2 percent) in the same geography. Overall, the bank's delivery systems are reasonably accessible within Compass' geographies and to individuals of different income levels.

During the examination period, the bank did not open or close any branches or full service ATMs in low- and moderate-income tracts in the assessment area. However, the bank opened and closed a branch and full service ATM in a middle-income tract. Overall, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.

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Compass offers extended hours at its branches in low- and moderate-income tracts at a rate comparable to branches in middle- and upper-income tracts. No weekend hours are offered in any branches in this assessment area. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals

Geographic Distribution of Branches & ATMS

Assessment Area: AZ Phoenix

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend- ed Hours	Week- end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	4	8.0%	0	0	3	3	0	Total	4	6.9%	4	7.3%	0	0	0	0.0%	0	0	91	9.2%	7.1%	6.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	9	18.0%	0	0	9	7	0	Total	11	19.0%	9	16.4%	0	0	2	66.7%	1	0	243	24.5%	25.7%	16.2%
DTO	0		0	0				SA	2		0		0	0	2		1	0				
Middle	17	34.0%	1	1	13	14	0	Total	20	34.5%	20	36.4%	1	1	0	0.0%	0	0	336	33.9%	36.2%	30.8%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	20	40.0%	0	0	12	11	0	Total	23	39.7%	22	40.0%	0	0	1	33.3%	0	0	311	31.4%	31.0%	45.6%
DTO	0		0	0				SA	1		0		0	0	1		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	10	1.0%	0.0%	0.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	50	100.0%	1	1	37	35	0	Total	58	100.0%	55	100.0%	1	1	3	100.0%	1	0	991	100.0%	100.0%	100.0%
DTO	0		0	0				SA	3		0		0	0	3		1	0				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides a relatively high level of community development services in the Phoenix assessment area. Employees provided 2,761 service hours to qualified organizations by participating in 250 different community development services.

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities. Of the bank's total service hours, 2,456 hours were committed to financial education. Additionally, bank staff engaged in 244 hours of board or committee service to qualified nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- Bank volunteers provided over 60 hours of small business education to numerous small business owners through a local community development corporation.
- A commercial lender served on the board and a local advisory committee of an affordable housing nonprofit organization with a mission to support equitable development for low- and moderate income individuals and communities.

Phoenix, Arizona

Compass Bank demonstrated a good level of engagement in community services as well as responsiveness to identified affordable housing and economic development needs in the Phoenix assessment area.

Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ARIZONA METROPOLITAN ASSESSMENT AREAS

- **Flagstaff Assessment Area (Coconino County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 1.3 percent of its branches in Arizona.
 - As of June 30, 2016, the bank had \$176.5 million in deposits in this assessment area, representing a market share of 10.5 percent and 3.7 percent of Compass Bank's total deposits in Arizona.
- **Lake Havasu City Assessment Area (Mojave County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 4.0 percent of its branches in Arizona.
 - As of June 30, 2016, the bank had \$138.0 million in deposits in this assessment area, representing a market share of 5.2 percent and 2.9 percent of Compass Bank's total deposits in Arizona.
- **Prescott Assessment Area (Yavapai County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 2.7 percent of its branches in Arizona.
 - As of June 30, 2016, the bank had \$151.7 million in deposits in this assessment area, representing a market share of 4.1 percent and 3.2 percent of Compass Bank's total deposits in Arizona.
- **Sierra-Vista-Douglas Assessment Area (Cochise County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 2.7 percent of its branches in Arizona.
 - As of June 30, 2016, the bank had \$80.3 million in deposits in this assessment area, representing a market share of 6.7 percent and 1.7 percent of Compass Bank's total deposits in Arizona.
- **Tucson Assessment Area (Pima County)**
 - As of December 31, 2016, Compass Bank operated 15 branches in the assessment area, representing 20.0 percent of its branches in Arizona.
 - As of June 30, 2016, the bank had \$ 1.1 billion in deposits in this assessment area, representing a market share of 7.8 percent and 23.9 percent of Compass Bank's total deposits in Arizona.

Metropolitan Areas (Limited Review)

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Flagstaff	Not Consistent (Below)	Consistent	Consistent
Lake Havasu City	Not Consistent (Below)	Consistent	Consistent
Prescott	Not Consistent (Below)	Consistent	Not Consistent (Below)
Sierra-Vista-Douglas	Not Consistent (Below)	Consistent	Not Consistent (Below)
Tucson	Consistent	Consistent	Consistent

For the lending test, Compass Bank received a rating of outstanding for the State of Arizona. With the exception of Tucson, performance in the remaining four metropolitan limited-scope assessment areas was less than the statewide lending test performance. For the geographic distribution of loans, lending levels were excellent in Tucson and good in the remaining four assessment areas. Performance was adequate for the borrower distribution of loans in Flagstaff; and good in the remaining assessment areas. There was an excellent level of community development loans in Lake Havasu City and Tucson, and adequate levels of community development loans in Prescott. Poor or very poor level of community development lending in the Flagstaff and Sierra-Vista-Douglas assessment areas was also a factor in weaker performance for these two assessment areas.

For the investment test, Compass Bank received a rating of high satisfactory for the State of Arizona. The bank had a significant level of investments in all of the metropolitan limited scope assessment areas and performance was consistent with the state.

For the service test, Compass Bank received a rating of high satisfactory for the State of Arizona. Service test performance in the Flagstaff, Lake Havasu City, and Tucson metropolitan assessment areas was consistent with the bank’s state performance. Although performance in the Sierra-Vista-Douglas metropolitan assessment area was below the bank’s state performance, service test performance in this assessment area was still considered adequate. Performance in the Prescott metropolitan assessment area was weaker than statewide performance primarily because of limited community development performance. Flagstaff and Lake Havasu City metropolitan assessment areas both exhibited excellent community development performance, which was stronger than the bank’s statewide performance.

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

Non-Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ARIZONA NON-METROPOLITAN ASSESSMENT AREAS

- **Northern Arizona Assessment Area (Gila and Navajo counties)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 2.7 percent of its branches in Arizona.
 - As of June 30, 2016, the bank had \$72.0 million in deposits in this assessment area, representing a market share of 5.4 percent and 1.5 percent of Compass Bank’s total deposits in Arizona.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Non-metropolitan Assessment Area			
Assessment Areas	Lending Test	Investment Test	Service Test
Northern Arizona	Not Consistent (Below)	Consistent	Not Consistent (Below)

For the lending test, Compass Bank received a rating of outstanding for the State of Arizona. Although below the state performance, lending levels were poor in Northern Arizona for the geographic distribution of loans, and adequate for the borrower distribution of loans. There was, however, an excellent level of community development loans in the Northern Arizona assessment area.

For the investment test, Compass Bank received a rating of high satisfactory for the State of Arizona. The bank had a significant level of investments in the Northern Arizona non-metropolitan limited scope assessment area and performance was consistent with the state.

For the service test, Compass Bank received a rating of high satisfactory for the State of Arizona. Service test performance in the Northern Arizona nonmetropolitan assessment area was weaker than the state performance primarily due to limited community development performance and weaker retail banking services.

The performance in the non-metropolitan limited-scope assessment area did not affect the overall state rating.

California

CRA RATING FOR CALIFORNIA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects good penetration throughout the assessment areas, and the distribution of loans by borrower income reflects excellent penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes a relatively high level of community development loans in its California assessment areas.
- The bank provides an excellent level of qualified community development investments and grants that are responsive to several identified community development needs of the California assessment areas.
- Retail banking services are good in the bank's California assessment areas.
- The bank provides a relatively high level of community development services throughout the assessment areas.

California

SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment areas in California:

- Modesto
- Riverside

Limited-scope reviews were conducted for the remaining 11 assessment areas:

- Amador-Calaveras-Tuolome
- Bakersfield
- Fresno
- Los Angeles
- Merced
- Oakland
- Sacramento
- San Diego
- San Francisco
- San Jose
- Stockton

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CALIFORNIA

As of June 30, 2016, Compass Bank had \$4.2 billion in deposits in California accounting for 6.2 percent of the bank's total deposits. Compass Bank operated 62 branch offices in California as of December 31, 2016, representing 9.3 percent of the bank's total branches. Overall, the bank's HMDA-reportable and CRA lending activity in the state was significantly greater than the percentage of total institutional deposits. HMDA-reportable lending in California accounted for 15.5 percent of total institutional HMDA-reportable lending by number of loans and 26.3 percent by dollar volume. CRA small business lending in California accounted for 7.7 percent of the bank's total CRA small business lending by number of loans and 6.8 percent by dollar volume.

The following table shows lending activity from January 1, 2015, through December 31, 2016.

California

Statewide Summary of Lending Activity Assessment Areas Located in California

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	1,789	26.6%	\$1,051,713	60.6%
HMDA Refinance	1,113	16.5%	\$505,387	29.1%
HMDA Home Improvement	137	2.0%	\$15,050	0.9%
HMDA Multi-Family	1	0.0%	\$3,600	0.2%
Total HMDA	3,040	45.1%	\$1,575,750	90.8%
Total Small Business	3,683	54.7%	\$158,375	9.1%
Total Farm	13	0.2%	\$380	0.0%
TOTAL LOANS	6,736	100.0%	\$1,734,505	100.0%

Originations and Purchases

California

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

Lending Test

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

During the review period, Compass Bank reported 3,683 small business loans and 3,040 HMDA-reportable loans in California. As such, small business lending was given slightly greater weight when determining the lending test rating for California. The rating for California is based on performance in the Modesto and Riverside full-scope assessment areas. Approximately 13.7 percent of the bank's HMDA-reportable and small business lending by dollar volume in California occurred within these assessment areas.

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

Geographic and Borrower Distribution

The geographic distribution of Compass Bank's HMDA-reportable and small business loans is good, and the distribution of loans by borrower income and revenue size of businesses is excellent. As noted above, the rating for the state of California is derived from the Modesto and Riverside full-scope assessment areas. A detailed discussion of the borrower and geographic distribution of lending for these assessment areas is included in the next section of this report.

Community Development Lending

Compass Bank makes a relatively high level of community development loans in the state of California. The bank originated 48 community development loans totaling \$157.1 million in California assessment areas during the review period, including 12 loans for \$38.9 million in the Riverside full-scope assessment area, but no loans in the Modesto full-scope assessment area. Performance was excellent in Riverside and poor in Modesto. Performance in the limited-scope assessment areas was generally good. Statewide community development lending performance was driven by performance in the full-scope assessment areas, and the Riverside assessment area had the greatest impact. More information on community development loans can be found in the full-scope assessment area sections of this report.

Investment Test

The investment test rating for California is outstanding.

The bank made an excellent level of qualified investments and contributions totaling \$89.8 million that directly benefited the California assessment areas. The bank's investment portfolio for the state included LIHTC investments, mortgage-backed securities, EQ2 investments in CDFIs, investments in SBA loan pools and equity

California

funds, and grants. The bank also had contributions totaling \$281,750 to organizations that serve the entire state, including several statewide affordable housing and community development associations, as well as a statewide CDFI and other organizations that support financial education and asset building. Lastly, the bank had investments that benefited all states within the bank's footprint, including California; these investments are described in the institution overview.

Performance in the Riverside full-scope assessment area was excellent while performance in the Modesto full-scope assessment area was good. Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections, and a summary of the bank's investments and contributions for all assessment areas can be found in Appendix F.

Service Test

The service test rating for California is high satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank's geographies and individuals of different income levels in its assessment areas. Statewide, banking services and hours of operation do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. During the review period, the bank relocated a branch office within a moderate-income tract in the state of California. Overall, the bank's record of opening and closing of branch offices has generally not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or low- and moderate-income individuals.

Community Development Services

The bank provides a relatively high level of community development services that benefit low- and moderate-income residents and small businesses in California. Statewide, the bank provided a total of 3,825 qualified service hours within its assessment areas during the examination period, including 195 hours in the Modesto assessment area and 861 hours in the Riverside assessment area. Performance in Riverside, the larger of the two full-scope assessment areas, was good. Performance in Modesto was adequate. Additionally, employees engaged in 2,769 total service hours in the 11 limited-scope assessment areas. Finally, bank employees engaged in 382 service hours at statewide organizations that benefited a broader statewide or regional area, including the bank's assessment areas.

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

Riverside, California

METROPOLITAN AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RIVERSIDE, CALIFORNIA ASSESSMENT AREA

Overview

The Riverside assessment area consists of Riverside and San Bernardino counties, which together comprise the Riverside-San Bernardino-Ontario MSA. As of December 31, 2016, Compass Bank operated 21 branches in the assessment area. The bank's branch presence in the assessment area represents 33.9 percent of branches and 31.8 percent of deposits in California.

Three financial institutions, Bank of America, Wells Fargo Bank and JPMorgan Chase Bank, hold 56.2 percent of deposits in the assessment area. According to the June 30, 2016 FDIC Summary of Deposits Report, Compass Bank is ranked 8th in the market with 2.9 percent of deposits (\$1.3 billion). Overall, there are 45 banks active in the market operating 562 branches and holding a total of \$45.8 billion in deposits.

Compass Bank's 2016 residential loan production accounted for less than 1.0 percent of total HMDA-reportable lending activity, ranking 136th among 816 lenders inside the assessment area. Wells Fargo, PennyMac Loan Services, Quicken Loans, Inc., and Broker Solutions were the top four HMDA lenders in the Riverside market. The bank performed similarly in 2015.

Compass Bank ranked 13th and 15th in CRA lending in 2015 and 2016, respectively. Out of 156 CRA reporters, the bank had nearly 1.0 percent of total CRA loans in 2016. The assessment area lending was dominated by Citibank, American Express Bank, Bank of America, and Wells Fargo in both years with over 60.0 percent of market share.

Population and Income Characteristics

According to U.S. census data, the population of the assessment area was estimated at approximately 4.6 million people in 2017, representing 11.6 percent of the statewide population.¹⁸⁷ From 2010 to 2017, the assessment area population grew by 8.4 percent, greater than the statewide population growth rate of 6.1 percent.¹⁸⁸ In 2016, Riverside County and San Bernardino County were the 10th and 12th most populous counties nationwide, respectively.¹⁸⁹ It is also important to note that San Bernardino County is the largest county in the contiguous United States and has been characterized as larger than the nine smallest states.¹⁹⁰ About 93 percent of San Bernardino County is desert; the remainder consists of the San Bernardino Mountains, primarily consisting of

¹⁸⁷ QuickFacts. U.S. Census Bureau, n.d. Web. 19 April 2018. <https://census.gov/quickfacts>

¹⁸⁸ Ibid

¹⁸⁹ "Riverside-San Bernardino-Ontario MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 17 April 2018. <http://www.policymap.com/>

¹⁹⁰ *The ARC Blog*, San Bernardino County Assessor Recorder County Clerk, sbcountyarcblog.org/2017/05/18/why-is-san-bernardino-county-so-big/

Riverside, California

public lands owned and managed by federal and state agencies, and the San Bernardino Valley, the most populous region of the county.¹⁹¹ San Bernardino County, along with Riverside County, makes up a region known as “The Inland Empire,” which is one of the fastest growing metropolitan areas in the United States.

The assessment area is made up of 822 census tracts: 47 tracts are low-income (5.7 percent), 232 tracts are moderate-income (28.2 percent), 295 tracts are middle-income (35.9 percent), 243 tracts are upper-income (29.6 percent), and 5 tracts are unknown income (0.6 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Riverside-San Bernardino-Ontario MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for the MSA increased from \$60,500 in 2015 to \$61,400 in 2016. Of the two counties, data shows that the median family income is lower in San Bernardino County.¹⁹² According to census data, 39.3 percent of families are considered low- to moderate-income.¹⁹³

Borrower Income Levels
Riverside-San Bernardino-Ontario, CA MSA

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2015	\$60,500	0 - \$30,249	\$30,250 - \$48,399	\$48,400 - \$72,599	\$72,600 - & above
2016	\$61,400	0 - \$30,699	\$30,700 - \$49,119	\$49,120 - \$73,679	\$73,680 - & above

The percentage of people living below the federal poverty line in the Riverside MSA was 17.7 percent between 2012 and 2016 compared to the national poverty rate of 15.1 percent.¹⁹⁴ The percentage of people living below the federal poverty line in Riverside County was 16.5 percent between 2012 and 2016, while 19.2 percent of residents in San. Bernardino County lived in poverty. In addition, a significant percentage of families in low- and moderate-income areas live below the poverty level. Specifically, 33.4 percent of families living in low-income census tracts live below the poverty level and 17.8 percent of families living in moderate-income census tracts live below the poverty level.¹⁹⁵

¹⁹¹ “2015 San Bernardino County Community Indicators Report.” *San Bernardino County - Official Website*, Board of Supervisors, 2015, www.sbcounty.gov/.

¹⁹² “Riverside-San Bernardino-Ontario MSA (U.S. Census).” GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 17 April 2018. <http://www.policymap.com/>

¹⁹³ FRB Atlanta Calculations of 2016 Census Data

¹⁹⁴ “Riverside-San Bernardino-Ontario MSA (U.S. Census).” GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 17 April 2018. <http://www.policymap.com/>

¹⁹⁵ FRB Atlanta Calculations of 2016 Census Data

Riverside, California

Economic Conditions

Economic conditions have strengthened in the Riverside MSA since 2010, and all jobs lost during the Great Recession have been fully recovered. Between 2015 and 2017, total employment increased by 6.8 percent, to nearly 1.5 million jobs.¹⁹⁶ The metropolitan area has a significant government sector, which accounts for approximately 17.0 percent of total employment. The other major employment sectors include wholesale and retail trade (16.8 percent), education and health services (15.3 percent), and leisure and hospitality (11.6 percent).¹⁹⁷ With its large availability of land and lower business costs, the area has also become a major hub for industries related to logistics, transportation and warehousing. San Bernardino County was the top job center in 2015 with 51.3 percent of MSA jobs, but both counties have experienced consistent job growth since 2013.¹⁹⁸

It is worth noting that the metropolitan area lags California and the U.S. in hourly earnings because the area lacks a high-skilled labor force as well as the relatively low to medium wages paid by the employment sectors noted above. For the MSA, higher education's share of employment is only about half the U.S. average. According to Moody's, only about 21.0 percent of the MSA's population has a bachelor's degree or higher compared with California's 33.0 percent and even higher rates in Los Angeles and San Diego.¹⁹⁹ This does little to attract more skill-based firms with higher wages.

Small businesses are integral to the Riverside MSA economy. According to 2016 Dun & Bradstreet information, there were 145,092 businesses within the Riverside assessment area; 92.2 percent had total annual revenues less than or equal to \$1 million.²⁰⁰ Additionally, 23.6 percent of small businesses with revenues less than or equal to \$1 million are located in moderate-income tracts and 4.3 percent are in low-income tracts. While lending to small businesses increased during the review period, the volume, as of 2016, remains nearly 48.6 percent below peak lending levels. According to an analysis of CRA loan data, the number of small business loans increased by 29.7 percent between 2014 and 2016, with 84,232 loans made in 2016.²⁰¹ During this same period, loans made to firms with revenues of \$1 million or less averaged 52.8 percent share of total small business loans, which is higher than previous years.²⁰² This may be an indication that there are fewer obstacles for smaller firms to access credit in the market.

The declining unemployment rate reflects the level of economic growth in the region in the last few years. Unemployment in the MSA declined from 6.6 percent in 2015 to 5.9 percent in 2016. The unemployment rate was higher in Riverside County at 6.1 percent; however, both counties experienced rates above the state.²⁰³

¹⁹⁶ Wurm, Martin. "Riverside-San Bernardino-Ontario, CA." Précis U.S. Metro. Moody's Analytics, February 2018. Web. 17 April 2018. <https://www.economy.com/precismetro>

¹⁹⁷ Ibid

¹⁹⁸ "Riverside, CA MSA (Jobs in All Industries -LEHD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 18 April 2018. <http://www.policymap.com/>

¹⁹⁹ Wurm, Martin. "Riverside-San Bernardino-Ontario, CA." Précis U.S. Metro. Moody's Analytics, February 2018. Web. 17 April 2018. <https://www.economy.com/precismetro>

²⁰⁰ FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

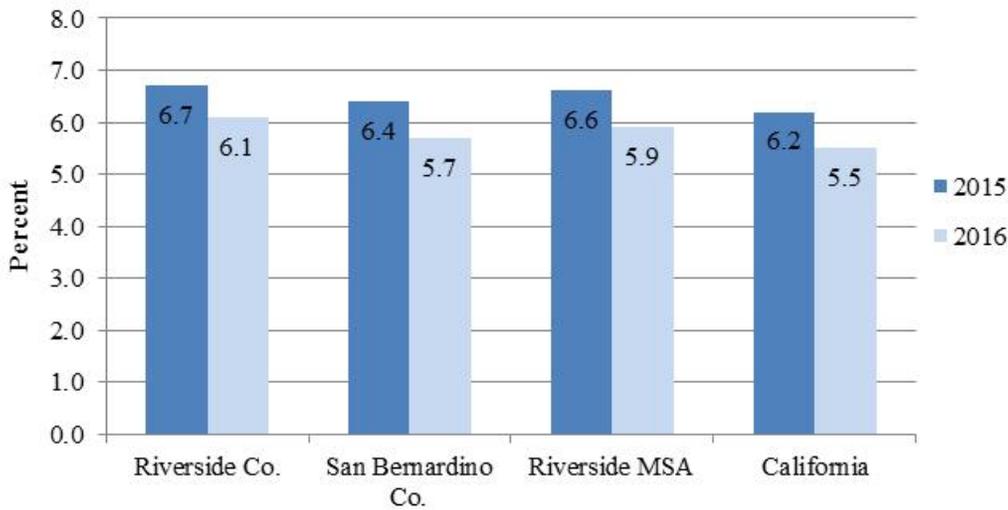
²⁰¹ "Riverside and San Bernardino Counties, CA (CRA Loan Data)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 18 April 2018. <http://www.policymap.com/>

²⁰² Ibid

²⁰³ Federal Reserve Bank of Atlanta calculations of data from the Bureau of Labor Statistics.

Riverside, California

Unemployment Rates - CA Riverside



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

There were 1,474,437 housing units in the assessment area according to the 2016 census data, of which 58.0 percent were owner-occupied, 27.7 percent were rental units and 14.3 percent were vacant. More specifically, the census data shows that 5.3 percent of the housing stock in the assessment area is located in low-income tracts and 26.6 percent is in moderate-income tracts. In low-income tracts, housing is disproportionately rental and vacant units, suggesting that residential lending opportunities may be limited in these areas. In moderate-income tracts, 47.2 percent of the housing stock is owner-occupied, indicating greater residential lending opportunities.

As of January 2017, the median home price in Riverside County was \$357,500, a 7.2 percent increase from a year earlier and an 88.3 percent increase from a low of \$189,900 in January 2009.²⁰⁴ In San Bernardino County, home prices have also increased by nearly 104.0 percent since reaching a trough in May 2009, with a median price of \$245,440 as of January 2017.²⁰⁵ San Bernardino County is still considered one of the most affordable markets in Southern California despite its steep rise in recent years. The minimum income needed to afford a median-priced home was \$55,780 a year in San Bernardino County, with 50.0 percent of families able to afford a median house price as of the 4th quarter of 2017.²⁰⁶ In comparison, the minimum income needed to afford the typical Riverside County house was \$77,780, with 38.0 percent of families able to afford a median house price. In the MSA, 21.8 percent of families are low-income, earning at or below \$30,699, and 17.5 percent are moderate-income, earning between \$30,700 and \$49,119.

²⁰⁴ Riverside County Median Home Prices, January 2017. County of Riverside Economic Development Agency. Web. 7 April 2018.

<https://www.rivcoeda.org/RiversideCountyDemographicsNavOnly/Demographics/tabid/1110/Default.aspx>

²⁰⁵ Median Prices of Existing Detached Homes, January 2017. California Association of Realtors. Web. 7 April 2018.

<https://www.car.org/marketdata/data/housingdata>

²⁰⁶ Traditional Housing Affordability Index, 4th Quarter 2017. California Association of Realtors. Web. 7 April 2018.

<https://www.car.org/marketdata/data>

Riverside, California

Recent HMDA data shows home lending has improved drastically in the assessment area. The number of loans originated inside the assessment area increased by 61.8 percent from 2014 to 2016, driven by home refinances.²⁰⁷ Between 2014 and 2016, the number of home loans that were refinance loans increased by 86.8 percent, whereas the number of home loans made that were used to purchase a home increased by 34.5 percent.²⁰⁸

Similar to home ownership affordability for the lowest income residents, rental housing costs are an issue in the Riverside MSA. For a four-person family earning 30.0 percent of the area median income and considered to be extremely low-income, 5.0 percent of all rental units are likely affordable. This figure increases to nearly 15.0 percent of all rental units that are likely affordable for a four-person family earning 50.0 percent of the area median income.²⁰⁹ The 2017 Out of Reach study by the National Low Income Housing Coalition indicates that an individual would need to earn an hourly wage of \$23.02 or an annual income of \$47,880 to afford the fair market rent (\$1,197) for a two-bedroom apartment in the Riverside MSA.²¹⁰ Approximately 24.0 percent of the workforce is employed in retail and the leisure and hospitality sector, which have annual earnings of \$34,628 and \$25,483, respectively.

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

²⁰⁷ "Riverside, CA MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

²⁰⁸ "Riverside, CA MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

²⁰⁹ "Riverside, CA MSA (US Census Bureau)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 7 Apr. 2018. <http://www.policymap.com/>

²¹⁰ *Out of Reach 2017*. National Low Income Housing Coalition, *Out of Reach 2017*, <http://www.nlihc.org/oor/>

Riverside, California

Combined Demographics Report

Assessment Area: CA Riverside

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	47	5.7	48,336	5.1	16,150	33.4	207,250	21.8
Moderate-income	232	28.2	242,492	25.5	43,247	17.8	166,459	17.5
Middle-income	295	35.9	334,079	35.2	31,876	9.5	188,055	19.8
Upper-income	243	29.6	324,635	34.2	11,856	3.7	387,778	40.8
Unknown-income	5	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	822	100.0	949,542	100.0	103,129	10.9	949,542	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	77,505	24,558	2.9	31.7	41,955	54.1	10,992	14.2
Moderate-income	391,538	184,725	21.6	47.2	147,838	37.8	58,975	15.1
Middle-income	544,732	310,329	36.3	57.0	145,602	26.7	88,801	16.3
Upper-income	460,662	335,641	39.2	72.9	72,383	15.7	52,638	11.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	1,474,437	855,253	100.0	58.0	407,778	27.7	211,406	14.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6,270	4.3	5,758	4.3	455	4.3	57	8.5
Moderate-income	34,962	24.1	31,590	23.6	3,171	29.9	201	30.0
Middle-income	49,502	34.1	45,457	34.0	3,849	36.3	196	29.3
Upper-income	54,274	37.4	50,955	38.1	3,103	29.3	216	32.2
Unknown-income	84	0.1	54	0.0	30	0.3	0	0.0
Total Assessment Area	145,092	100.0	133,814	100.0	10,608	100.0	670	100.0
Percentage of Total Businesses:				92.2		7.3		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	58	4.6	45	3.9	13	11.9	0	0.0
Moderate-income	234	18.4	206	17.7	28	25.7	0	0.0
Middle-income	419	32.9	384	33.0	35	32.1	0	0.0
Upper-income	562	44.1	529	45.4	33	30.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,273	100.0	1,164	100.0	109	100.0	0	.0
Percentage of Total Farms:				91.4		8.6		.0

2016 FFIEC Census Data and 2016 D&B Information

Riverside, California

Credit and Community Development Needs

The high level of poverty discussed earlier highlights the importance of continued poverty alleviation strategies, education collaboratives, and workforce development initiatives within the assessment area. The Corporation for Enterprise Development's (CFED) Asset & Opportunity Scorecard found that 46.2 percent of households in the region are liquid asset poor, meaning they lack the liquid assets to cover basic expenses or live at the poverty level for three months if a crisis led to the absence of income.²¹¹ This level of poverty and the lack of financial assets by many of the residents in the region imply a need for asset building strategies for low- and moderate-income families. Moreover, the low level of baccalaureate attainment and vocational training remains a critical problem for residents and the business community, according to community contacts; they stress an educated and skilled workforce would help to secure higher wages and lower poverty levels. Therefore, these factors create several community development service or investment opportunities for financial institutions.

The housing data previously discussed, as well as feedback from a housing organization, suggests that even in the Inland Empire, where housing is considered more affordable than other areas of Southern California, owning or renting is still out of reach for lower-income individuals. This creates numerous opportunities for bank involvement, including serving in leadership roles with affordable housing organizations, participating in Federal Home Loan Bank grant applications and Low-Income Housing Tax Credit projects, financing rental housing developments, and offering flexible financing products and down payment assistance programs that target low- and moderate-income homebuyers.

According to a 2016 Small Business Credit Survey (SBCS) conducted by the 12 Federal Reserve Banks, small businesses expressed continued optimism while also reporting challenges with accessing credit, particularly smaller-revenue firms (annual revenues of \$1 million or less), stemming in part from weak credit scores and insufficient credit histories. Discussions with local community contacts support this finding and suggest that small businesses should seek credit education and loan preparation prior to accessing capital. The community contacts also noted that there may not be sufficient capital for microenterprises or small businesses that need small dollar amounts; interviewees recommended a multibank microloan consortium that could lower participating banks' risk and provide capital for start-ups and microenterprises. The SBCS confirms that most firms applied for \$100,000 or less, and three quarters sought \$250,000 or less, with smaller-revenue firms reporting higher approvals at Community Development Financial Institutions (CDFIs), small banks, and online lenders than at large banks.²¹² This data suggests that banks have an opportunity to provide a leadership role in establishing microenterprises or CDFIs, partnering with an online lender that serves small businesses, serving on loan committees or boards, or investing in community loan funds.

²¹¹ Corporation for Enterprise Development (CFED). Asset and Opportunity Scorecard, n.d. Web. 1 Jun. 2018. <http://assetsandopportunity.org/>.

²¹² "2016 Small Business Credit Survey of the Federal Reserve Banks: Report on Employer Firms." Federal Reserve Bank of Atlanta. Federal Reserve System, 2016. Web. 1 Jun. 2018. www.newyorkfed.org/medialibrary/media/smallbusiness/2016/SBCS-Report-EmployerFirms-2016.pdf.

Riverside, California

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Riverside assessment area is excellent. The geographic distribution of loans reflects good penetration throughout the assessment area while the distribution of borrowers reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank is a leader in making community development loans in this assessment area.

During the review period, the bank reported 448 HMDA-reportable loans compared to 1,349 small business loans in the Riverside assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Riverside assessment area contains 2.3 percent of the bank's total HMDA-reportable lending by number of loans and 2.2 percent by dollar volume, and 2.8 percent of its total small business lending by number of loans and 2.4 percent by dollar volume. In comparison, 2.0 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low-income census tracts is adequate. Compass Bank originated 3.4 percent of its small business loans in low-income census tracts, where 4.3 percent of small businesses in the assessment area are located. The bank's performance was slightly greater than aggregate in 2015 and 2016.

Small business lending in moderate-income census tracts is excellent percentage of small businesses operating in moderate-income census tracts (23.6 percent), and the bank's performance exceeded aggregate in both years. The bank performed remarkably well against aggregate lenders given the competition and dominance by national lenders in the assessment area and the bank's small market share.

Riverside, California

Home Purchase Loans

Home purchase lending in low- and moderate-income census tracts is excellent. For the review period, Compass Bank's home purchase lending in low- and moderate-income census tracts (30.2 percent) exceeded the percentage of owner-occupied units (24.5 percent) in these tracts. In addition, the bank's performance for the review period was considerably greater than the aggregate lending performance in low- and moderate-income tracts.

Home Refinance Loans

Home refinance lending in low-income census tracts is good. The percentage of home refinance loans originated in low-income census tracts (3.1 percent) was greater than the percentage of owner-occupied units in these tracts (2.9 percent), and performance was greater than the aggregate lending performance in 2015 and 2016.

Home refinance lending in moderate-income census tracts is excellent. The percentage of home refinance loans originated in moderate-income census tracts (27.6 percent) was considerably greater than the percentage of owner-occupied units (21.6 percent) in these tracts, and the bank's performance significantly exceeded aggregate lenders over the review period.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is excellent. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent. Approximately 68.9 percent of small business loan originations were extended to businesses with revenues of \$1 million or less. While the percentage of small business loans to businesses with revenues of \$1 million or less was less than the percentage of small businesses in the assessment area during the review period (92.2 percent), Compass Bank's performance was greater than the aggregate lending performance in both years. Additionally, 99.5 percent of small business loans were originated in amounts of \$250,000 or less, indicating a willingness to lend in the smaller amounts that are typically requested by small businesses.

Home Purchase Loans

Home purchase lending to low- and moderate-income borrowers is good. Compass Bank's home purchase lending to low-income borrowers (4.7 percent) was significantly less than the percentage of low-income families (21.8 percent) living in the assessment area, but the bank outperformed aggregate lending in both years of the review period. The bank's home purchase lending to moderate-income borrowers (16.4 percent) was slightly less than the percentage of moderate-income families (17.5 percent) living in the assessment area; the bank outperformed the aggregate in 2015 and 2016.

Riverside, California

Home Refinance Loans

Home refinance lending to low- and moderate-income borrowers is good. Compass Bank's home refinance lending to low-income borrowers (9.2 percent) was significantly less than the percentage of low-income families living in the assessment area, but the bank's performance was greater than aggregate lending in both years of the review period. The bank's home refinance lending to moderate-income borrowers (14.7 percent) was less than the percentage of moderate-income families living in the assessment area; however, the bank outperformed aggregate in 2015 and 2016.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the Riverside assessment area. The bank originated 12 community development loans totaling \$38.9 million during the review period, including a loan for \$6.9 million rehabbing an 80-unit senior housing complex with income restrictions and tax credit assistance. The housing complex also provides services that improve the quality of life for its residents, including intensive case management, substance abuse counseling, adult education classes, children's afterschool programs, financial literacy classes, job readiness programs, and sustainability and health programs. Another loan qualified as a Low-Income Housing Tax Credit that provided 38 units of affordable housing dedicated for individuals and families earning less than 60 percent of the area median income. Compass Bank also made a number of loans to small businesses, creating over 50 jobs targeted to low- and moderate-income individuals. Given the high volume of community development loans and the responsiveness to the needs of affordable housing and economic development, Compass Bank is a leader in providing community development loans in the Riverside assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Riverside assessment area is excellent. The bank made an excellent level of qualified community development investments relative to its presence in this assessment area and available community development opportunities.

The bank invested nearly \$32.5 million in the Riverside assessment area, including approximately \$21.0 million in new investments during the review period and \$11.4 million in prior period investments. The total also includes \$122,950 in contributions made during the review period. The bank invested \$19.3 million in three LIHTC projects during the review period, responding to the need for quality affordable housing in the assessment area. In addition, the bank invested in a regional CDFI and targeted \$1.6 million to specifically provide capital for small businesses in the Riverside assessment area. The bank's contributions demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$75,000 to support community services to low- and moderate-income individuals, \$20,450 to support economic development, and \$27,500 for affordable housing. In addition, as noted earlier, the bank had investments and contributions that served a broader regional area that includes the Riverside assessment area.

SERVICE TEST

Compass Bank's service test performance in the Riverside assessment area is good.

Riverside, California

Retail Services

Retail banking services are good. The distribution of 21 branch offices and 20 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has one branch in a low-income census tract; thus the percentage of branches in low-income tracts (4.8 percent) was comparable to the percentage of households (5.3 percent) and the percentage of businesses (4.3 percent) in the same geography. The distribution of the bank's six branches in moderate-income tracts (28.6 percent) exceeded both the percentage of households (26.3 percent) and the percentage of businesses (24.1 percent) in the same geography. Overall, delivery systems are considered accessible to the bank's geographies and individuals of different income levels.

No branches or ATMs were opened or closed during the review period. Therefore, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals in the assessment area.

The bank offers extended hours at all of its branches in low- and moderate-income tracts. The bank does not offer weekend hours at any of its branches in this assessment area. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Geographic Distribution of Branches & ATMS

Assessment Area: CA Riverside

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	1	4.8%	0	0	0	1	0	Total	1	4.5%	1	5.0%	0	0	0	0.0%	0	0	47	5.7%	5.3%	4.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	6	28.6%	0	0	3	6	0	Total	7	31.8%	6	30.0%	0	0	1	50.0%	0	0	232	28.2%	26.3%	24.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	8	38.1%	0	0	5	8	0	Total	8	36.4%	7	35.0%	0	0	1	50.0%	0	0	295	35.9%	36.1%	34.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	6	28.6%	0	0	3	6	0	Total	6	27.3%	6	30.0%	0	0	0	0.0%	0	0	243	29.6%	32.3%	37.4%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	5	0.6%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	21	100.0%	0	0	11	21	0	Total	22	100.0%	20	100.0%	0	0	2	100.0%	0	0	822	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA - Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides a relatively high level of community development services in the Riverside assessment area. Employees provided 861 service hours to qualified organizations by participating in 71 community development service activities.

Riverside, California

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities that support low- and moderate-income individuals, communities, and small businesses in the Riverside assessment area. Of the bank's total activities, 457 service hours were committed to financial education. Additionally, bank staff engaged in 387 hours of board or committee service to qualified nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- A bank lending officer served as chair of the board of directors of a local nonprofit organization that provides food distribution, disaster relief, rehabilitation, as well as banking and credit rebuilding programs to low- and moderate-income individuals and communities.
- A commercial bank leader served multiple years on the board of directors and as a member of the Finance Committee to a HUD-approved housing counseling agency. The banker supported the organization's affordable housing mission by providing expertise in strategic planning, marketing, and community outreach and was joined by other bank employees to facilitate workshops to existing and prospective homebuyers on topics such as financial literacy, homebuyer education, post-purchase counseling, foreclosure prevention, home maintenance, and insurance.

Compass Bank demonstrated a good level of engagement in community services as well as responsiveness to identified affordable housing and community service needs in the Riverside assessment area.

Modesto, California

METROPOLITAN AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MODESTO, CALIFORNIA ASSESSMENT AREA

Overview

The Modesto assessment area consists of Stanislaus County, which is the only county in the Modesto MSA. As of December 31, 2016, Compass Bank operated five branches in the Modesto assessment area, which represent 8.1 percent of the branches statewide and 0.8 percent of the institution's branches overall. Additionally as of 2016, 9.5 percent of the bank's statewide deposits and 2.9 percent of the combined HMDA-reportable and CRA small business lending (by dollar volume) in the state are in the Modesto assessment areas.

The banking market in the Modesto assessment area includes both national and local community banks. According to the June 30, 2016 FDIC Summary of Deposits Report, there were 19 financial institutions in the market operating 89 branches, with a total of \$7.3 billion in deposits in the assessment area. Compass Bank ranked 8th with 5.5 percent of total deposits (\$402.4 million). Collectively, Wells Fargo Bank, Bank of America, Bank of the West, and JPMorgan Chase Bank held 58.2 percent of deposits in the assessment.

Compass Bank originated or purchased less than 1.0 percent the HMDA-reportable loans in the Modesto assessment area in 2015 and 2016. Compass Bank was ranked 36th out of 373 reporters by number of loans originated or purchased in 2015 and 42nd out of 402 reporters in 2016. Wells Fargo, Scenic Oaks Funding, Quicken Loans, Stearns Lending and Loan Depot were the top HMDA lenders in the assessment area in 2016.

CRA small business lending is also competitive although Compass Bank is not a major CRA small business lender in this assessment area, with only 1.0 percent of the total CRA loans in 2015 and 2016. The bank ranked 15th out of 66 reporters in 2015 and 16th out of 75 reporters in 2016. Lending in the assessment area was dominated by Citibank, American Express, Wells Fargo Bank, Capital One Bank, and Chase Bank.

Population and Income Characteristics

The estimated population in the assessment area in 2017 was 547,899, representing a 6.5 percent increase from 2010.²¹³ Growth in the assessment area was greater than the state's population growth of 6.1 percent during the same time period.

The assessment area is made up of 94 census tracts: 4 tracts are low-income (4.3 percent), 20 tracts are moderate-income (21.3 percent), 44 tracts are middle-income (46.8 percent), and 26 tracts are upper-income (27.7 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Modesto MSA. As shown, the median family income increased from \$53,300 in 2015 to \$56,800 in 2016.

²¹³ QuickFacts. U.S. Census Bureau, n.d. Web.24 Apr. 2018. <https://www.census.gov/quickfacts/fact/table/stanislauscountycalifornia/PST045217>

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Borrower Income Levels Modesto, CA MSA

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2015	\$53,300	0 - \$26,649	\$26,650 - \$42,639	\$42,640 - \$63,959	\$63,960 - & above
2016	\$56,800	0 - \$28,399	\$28,400 - \$45,439	\$45,440 - \$68,159	\$68,160 - & above

2016 FFIEC census data indicates that 39.3 percent of families in the assessment area are considered low- to moderate-income.²¹⁴ The percentage of people living below the federal poverty line in Stanislaus County was 14.5 percent between 2012 and 2016.²¹⁵ In addition, 42.1 percent of families living in low-income census tracts live below the poverty level and 23.9 percent of families living in moderate-income census tracts live below the poverty level.²¹⁶ These factors indicate that HMDA-lending opportunities may be more limited in the low- and moderate-income tracts.

Economic Conditions

Agriculture and food processing are the largest industries in the Modesto assessment area, with almonds being the dominant crop. The seasonal nature of agriculture leads to significant employment fluctuations. Agriculture in the region has been negatively impacted recently due to years of drought, which finally ended in 2017. One in four jobs is directly tied to agriculture or related food manufacturing, placing the county at significant risk when these industries struggle. As a result, the region is focused on seeking out different types of industry in order to promote employment and general economic stability.²¹⁷

In addition to agriculture and food processing, other key industry sectors include manufacturing and a range of service industries, including healthcare, retail, and professional services. The top employers in the region include the Stanislaus County government, Modesto City Schools, E&J Gallo (the world’s largest wine producer), Con Agra, and the Doctors Medical Center.²¹⁸

Small businesses are vital to the local economy. According to 2016 Dun & Bradstreet information, there were 16,539 businesses within the Modesto assessment area, 91.6 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses. Approximately 18.2 percent of small businesses in the assessment area were located in moderate-income tracts, while notably fewer were located in low-income tracts at 2.5 percent. During this period, 54.6 percent of total small business loans were made to

²¹⁴ FRB Atlanta Calculations of 2015 FFIEC Census Data

²¹⁵ QuickFacts. U.S. Census Bureau, n.d. Web.24 Apr. 2018. <https://www.census.gov/quickfacts/fact/table/stanislauscountycalifornia/PST045217>.

²¹⁶ FRB Atlanta Calculations of 2015 FFIEC Census Data

²¹⁷ “Stanislaus County Comprehensive Economic Development Strategy 2017-2022.” City of Modesto. n.d. Web. 3, Mar.2018.

<http://www.stancounty.com/ceo/econ-dev/pdf/ceds.pdf>

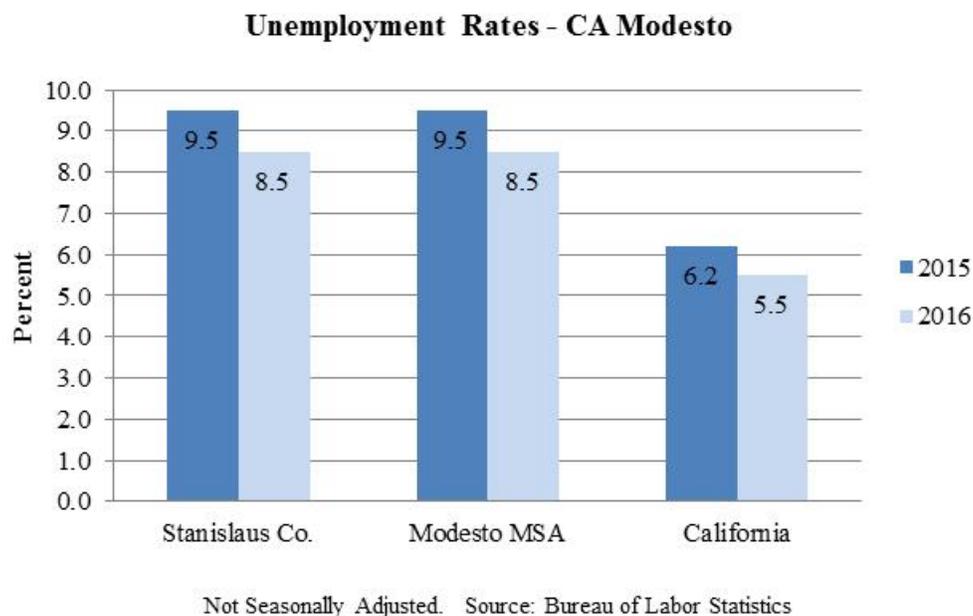
²¹⁸ Ibid

Modesto, California

firms with revenues of \$1 million or less; between 2012 and 2015, the number of loans made to small businesses increased by nearly 60.0 percent.²¹⁹ This could be an indication that there may be fewer obstacles for smaller firms to access credit in the market.

To support small businesses, in 2015 the Modesto City Council created the Grow Modesto Fund in partnership with the Fresno Community Development Financial Institution (now Access Plus Capital). The program leverages the city's Community Development Block Grant (CDBG) funds to create capital matches with non-CDBG funds that are deployed to small businesses in Modesto. Loans from \$5,000 to \$300,000 are available to start-ups through the fund, and the goal is job creation and retention for low- and moderate-income persons.²²⁰ Small businesses also have the option of business development support for project financing, regulatory guidance, and site development through Opportunity Stanislaus.

Economic conditions in the Modesto MSA have been challenging since the 2008 recession, and unemployment rates in this area remain elevated compared to the state and the nation overall. However, as shown in the following table, the unemployment rate declined over the review period from 9.5 percent in 2015 to 8.5 percent in 2016, though it is still significantly higher than the state unemployment rate of 5.5 percent²²¹ and the national rate of 4.7 percent.²²²



In addition to a declining unemployment rate, the assessment area has demonstrated progress in job and wage growth. The Milken Institute ranked Modesto 7th out of 200 large cities for 5-year wage growth from 2010 to 2015 and 37th for 5-year job growth from 2011 to 2016. The 2017 Milken Institute Best-Performing Cities Index

²¹⁹ "Modesto, CA (HUD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 30 Apr. 2018. <http://www.policymap.com/>

²²⁰ "City of Modesto Offers Entrepreneurs New Funding Source." *Central Valley Business Journal*, 26 Aug. 2015, cvbj.biz/2015/08/19/city-of-modesto-offers-entrepreneurs-new-funding-source/. Web. 28, May 2018.

²²¹ FRB Atlanta Calculations of 2015 FFIEC Census Data

²²² "At a Glance Tables." U.S. Bureau of Labor Statistics. n.d. Web. 16 Oct. 2017. <http://www.bls.gov/eag/home.htm>

Modesto, California

assesses regional economic growth by ranking large U.S. metropolitan areas. The index is based on job creation and sustainability and economic growth measured by increases in jobs, wages and salary, and technology. Modesto's overall ranking increased from 70th to 33rd, the largest marked improvement of all assessed cities. However, a local government agency notes that there is a continuing need for workforce development in the region.²²³

To aid in additional economic growth, the Stanislaus County Comprehensive Economic Development Strategy 2017-2022 is focused on downtown revitalization and infill development, with a specific focus on more public-private partnerships to foster downtown mixed-use development. The county is also focused on investment in local business parks and is seeking to acquire infrastructure financing for these parks, transportation, and for other industrial land uses.²²⁴

According to census data, there were 177,591 housing units located in the assessment area in 2010, 57.3 percent of which were owner-occupied, 34.9 percent were rental units, and 7.7 percent were vacant. Rental and vacant units were more concentrated in low- and moderate-income tracts. In low-income census tracts, approximately 77.3 percent of all housing units were rentals or vacant; in moderate-income census tracts, 54.3 percent of the units were rental or vacant. The median age of the housing stock was 32 years, though housing was much older, 39 years, in both the low- and moderate-income census tracts compared to the assessment area overall. These factors suggest that HMDA-reportable lending opportunities in the low- and moderate-income tracts may be limited.

The Modesto housing market was ground zero during the foreclosure crisis and as recently as 2014, Modesto was nationally recognized as a "zombie city" due to the continuing decline in housing prices and high unemployment rate.²²⁵ However, in recent years, the housing market has shown signs of stabilization. According to the City of Modesto December 2017 Economic Indicators report, the housing market in Modesto is reasonably affordable, with average monthly rental rates significantly lower than the state average. Home prices, foreclosure rates, and annualized appreciation also now outperform the state. The median list price for a home in Modesto as of August 2017 was \$275,000 versus \$520,000 for the state. Foreclosures are at historic lows with mortgage delinquency at 1.0 percent. Negative equity in Modesto is 9.4 percent, below the national rate of 10.4 percent.²²⁶ Additionally, the total number of vacant housing units has decreased in the assessment area from 14,323 in 2010 to 7,941 in 2016; only 2,344 units were available for rent or sale in 2016. Building permits for single-family homes have been on a steady incline since 2010 to address the inventory shortage from positive net migration into the assessment area.²²⁷

The improving housing market is evident in the increase in HMDA lending volume. An analysis of HMDA lending indicates a drop from 2012 to 2014 to 8,415 loan originations followed by a recovery, with originations

²²³ "Stanislaus County Comprehensive Economic Development Strategy 2017-2022." City of Modesto. n.d. Web. 3, Mar. 2018.
<http://www.stancounty.com/ceo/econ-dev/pdf/ceds.pdf>

²²⁴ Ibid

²²⁵ Gold, Howard. "6 Housing Boomtowns That Haven't Come Back." *USA Today*, 3 Nov. 2014.

²²⁶ "Economic Indicators, December 2017." City of Modesto and Zillow.com n.d. Web. 30 Mar. 2018.

https://www.modestogov.com/DocumentCenter/View/10081?pk_campaign=CED&pk_kwd=eiBrochure

²²⁷ U.S. Census. American Community Survey. Market at a Glance: Modesto, CA MSA. n.d. Web. 3 Apr. 2018.

<https://www.huduser.gov/portal/MCCharts/MsasCharts.html?msaID=063370,33700&msaName=Modesto, CA MSA&dt=May 1, 2018>

Modesto, California

rising to 13,541 loans in 2016; 42.0 percent of loan originations were for home purchase and 58.0 percent were for refinance.²²⁸ From 2012 to 2016, loan originations to borrowers earning 50.0 to 80.0 percent of the area median income declined by 6.2 percent over this time period, which indicates housing affordability and financing for low- and moderate-income borrowers may be a growing concern.²²⁹

The Modesto housing market is generally affordable, though affordability remains a concern for low- and moderate-income individuals. In 2015, only 15.1 percent of all homes in Stanislaus County were likely affordable for a four-person family earning less than 80.0 percent of area median income while 67.3 percent of two-bedroom rental units were likely affordable for the same family. However, nearly 53.8 percent of renters were considered cost-burdened between 2012 and 2016, meaning they spent more than 30.0 percent of their income on housing.²³⁰

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

²²⁸ "Modesto, CA (HUD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 30 Apr. 2018.
<http://www.policymap.com/>

²²⁹ Ibid

²³⁰ Ibid

Modesto, California

Combined Demographics Report

Assessment Area: CA Modesto

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	4	4.3	3,259	2.7	1,371	42.1	27,604	22.6	
Moderate-income	20	21.3	21,877	17.9	5,228	23.9	20,416	16.7	
Middle-income	44	46.8	55,079	45.1	6,660	12.1	23,962	19.6	
Upper-income	26	27.7	42,040	34.4	2,754	6.6	50,273	41.1	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	94	100.0	122,255	100.0	16,013	13.1	122,255	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	5,173	1,172	1.2	22.7	3,359	64.9	642	12.4	
Moderate-income	32,383	14,825	14.6	45.8	14,688	45.4	2,870	8.9	
Middle-income	80,477	45,192	44.4	56.2	29,186	36.3	6,099	7.6	
Upper-income	59,558	40,637	39.9	68.2	14,782	24.8	4,139	6.9	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	177,591	101,826	100.0	57.3	62,015	34.9	13,750	7.7	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	429	2.6	373	2.5	51	3.9	5	6.4	
Moderate-income	3,104	18.8	2,760	18.2	319	24.2	25	32.1	
Middle-income	7,305	44.2	6,673	44.1	601	45.6	31	39.7	
Upper-income	5,701	34.5	5,337	35.2	347	26.3	17	21.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	16,539	100.0	15,143	100.0	1,318	100.0	78	100.0	
Percentage of Total Businesses:			91.6		8.0		.5		
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	5	0.4	3	0.3	2	1.6	0	0.0	
Moderate-income	62	5.3	53	5.1	9	7.4	0	0.0	
Middle-income	633	54.2	559	53.5	74	60.7	0	0.0	
Upper-income	467	40.0	430	41.1	37	30.3	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	1,167	100.0	1,045	100.0	122	100.0	0	.0	
Percentage of Total Farms:			89.5		10.5		.0		

2016 FFIEC Census Data and 2016 D&B Information

Modesto, California

Credit and Community Development Needs

To better understand the community development and economic landscapes, several community development practitioners were contacted. These individuals discussed the various needs and opportunities across the region as well as how financial institutions can be responsive to local community development needs. Information from these conversations is included in the appropriate sections of this report. Access to affordable housing and expanding access to financing for small businesses were the primary issues discussed. Additionally, contacts noted that there was a need for financial services that extend to all populations through brick and mortar facilities and that nonprofit service providers need bank foundation funding and grants.

The City of Modesto Community and Economic Development Division published a 2015 to 2020 Consolidated Plan that indicates that the primary emphasis for the utilization of CDBG and Home Investment Partnerships Program (HOME) funds is neighborhood stabilization through supportive affordable housing rehabilitation and homebuyer assistance. The City's annual goal is to assist 24 families financially with home rehabilitation needs and 18 with homebuyer down payment assistance. The City's first priority, however, is addressing severe housing problems such as overcrowding, substandard housing, housing cost burden, and severe housing cost burden (households spending over 50.0 percent of income for housing costs).²³¹

Homeowners may receive support from the City through the Homebuyer Assistance Program (HAP). Eligible first-time homebuyers with incomes at or below 80.0 percent of Stanislaus County area median income may receive up to \$60,000 in home purchase assistance, of which up to 5.0 percent can be used for non-recurring closing costs. There is an opportunity for banks to support these programs by providing low-interest loans and other flexible mortgage products, and by providing contributions and homebuyer education service through any of the partnering Housing and Urban Development (HUD) approved counseling agencies.

Given the age and condition of the Modesto housing stock, rehabilitation is a high priority need. The City provides a loan program for lead-based paint inspection, clearing or stabilization of lead-based paint in housing repair and rehabilitation. Financial institutions can leverage home improvement or other lending products to support the need for home rehabilitation in Modesto.

The City's consolidated plan also references the need to increase affordable multifamily housing and discusses the corresponding barriers preventing development. Housing development is hindered by affordable housing policy that adversely affects land use, taxes, zoning ordinances, building codes, fees, long application processing times, growth limitations, and limited rates of return.²³² There is opportunity for banks to partner with the City to support housing development through land acquisition funding, secondary financing, infrastructure costs, and exemption or deferral of capital facilities fees for low-income housing. Currently the City is financing Archway Commons II, a multifamily residential project which will provide 74 units containing 1, 2, or 3 bedrooms.

Community contacts specializing in small business assistance noted several issues related to access to credit. One community contact expressed the concern that banks are not engaging with start-up businesses and extending

²³¹“City of Modesto 2015-2020 Year Consolidated Plan.” City of Modesto Community and Economic Development Department. n.d. Web 30 Mar. 2018. <https://www.modestogov.com/DocumentCenter/View/1051/FY-2015-2020-Consolidated-Plan-PDF>

²³² Ibid

Modesto, California

access to credit due to challenges with the financial health of the business, a lack of history, or tough underwriting criteria. The contact indicated that rural business owners and small-scale deals are disproportionately affected due to low expectations of profitable return. The contact expressed a need for banks to participate in regional economic development efforts that benefit a larger portion of small business owners.

A second contact indicated that in 2016 there was a higher percentage of large business clients in growth mode as evidenced by increased demand for expansion resources such as equipment purchase and real estate acquisition. The existence of billion-dollar international companies in Stanislaus County spurs opportunities for supply chains, and the businesses with existing capital are more likely to attain low-cost capital needed to compete for these opportunities; small businesses are at a disadvantage when it comes to competing with these firms. Microloans below \$25,000 are not in as high demand as loans ranging from \$25,000 to \$100,000. Overall, the contact stated that there is a need for banks to address smaller lending needs and to support pre-venture entities through responsive and affordable credit products.

The City is committed to removing hindrances to economic mobility. Its comprehensive economic development approach focuses on workforce development and efforts to attract businesses that create new job opportunities. The overarching America's Job Center of California (AJCC) system is located in Modesto. In partnership with local nonprofits, the center is an access point for job seeker education and training, employers, unemployment insurance claimants, youth, seniors, veterans, and businesses.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Modesto assessment area is good. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrowers also reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. However, the bank makes a low level of community development loans.

During the review period, the bank reported 192 HMDA-reportable loans compared to 230 small business loans in the Modesto assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Modesto assessment area contains 1.0 percent of the bank's total HMDA-reportable lending by number of loans and 0.7 percent by dollar volume, and 0.5 percent of its total small business lending by number of loans and 0.4 percent by dollar volume. In comparison, 0.6 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low-income census tracts is excellent. Compass Bank originated 8.7 percent of its small business loans in low-income census tracts, where 2.5 percent of small businesses in the assessment area are located. In addition, the bank's performance was significantly greater than aggregate in 2015 and 2016.

Small business lending in moderate-income census tracts is adequate. The bank originated 12.2 percent of its small business loans in moderate-income tracts, where 18.2 percent of small businesses in the assessment area are located; the bank's performance was weaker than aggregate performance in both years. While the bank's performance was below demographic and aggregate performance in moderate-income tracts, performance was considered adequate given the competition and dominance by national lenders in the assessment area and the bank's small market share.

Modesto, California

Home Purchase Loans

Home purchase lending in low-income census tracts is good. Lending performance in these tracts was greater than the percentage of owner-occupied units during the review period (4.3 percent of bank loans compared to 1.2 percent owner-occupied units). The bank's performance was also significantly greater than aggregate lending performance in 2015 and 2016.

Home purchase lending in moderate-income census tracts is excellent. For the review period, Compass Bank's home purchase lending in moderate-income census tracts (23.7 percent) exceeded the percentage of owner-occupied units (14.6 percent) in these tracts. In addition, the bank's performance was considerably greater than the aggregate lending performance in both years of the review period.

Home Refinance Loans

During the review period, Compass Bank originated only two home refinance loans in low-income tracts. Aggregate lenders also exhibited low lending levels for home refinance loans compared to the percentage of owner-occupied units in low-income census tracts. As such, an assessment of home refinance lending in low-income tracts is not included in the evaluation of this assessment area.

Home refinance lending in moderate-income census tracts is good. The bank's lending performance in moderate-income census tracts (14.3 percent) equaled the percentage of owner-occupied units located in these tracts, and the bank's performance exceeded aggregate lenders in 2015 and 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is good. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good. Approximately 65.2 percent of small business loan originations were extended to businesses with revenues of \$1 million or less. While this performance was less than the percentage of small businesses in the assessment area (91.6 percent), it was greater than aggregate lending performance. In addition, 99.6 percent of the bank's small business loan originations were in amounts of \$250,000 or less, which typically represent loan amounts requested by very small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. Compass Bank's home purchase lending to low-income borrowers (3.2 percent) was significantly less than the percentage of low-income families (22.6 percent) living in the assessment area. However, the bank's home purchase lending to low-income borrowers exceeded aggregate in 2015 and 2016.

Home purchase lending to moderate-income borrowers is excellent. The bank's home purchase lending to moderate-income borrowers (20.4 percent) was greater than the percentage of moderate-income families (16.7

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percent) in the assessment area during the review period. The bank's lending nearly doubled aggregate in both years.

Home Refinance Loans

Home refinance lending to low-income borrowers is good. While the bank's home refinance lending to low-income borrowers (8.8 percent) was significantly less than the percentage of low-income families, the bank's performance exceeded aggregate lenders in 2015 and 2016.

Home refinance lending to moderate-income borrowers is excellent. Compass Bank's home refinance lending to moderate-income borrowers (22.0 percent) was greater than the percentage of moderate-income families in the assessment area and greater than aggregate lending in both years of the review period.

Community Development Lending

Compass Bank makes a low level of community development loans in the Modesto assessment area. The bank originated no community development loans during the review period. The Modesto market provides limited community development opportunities as the area is mainly agricultural and has had very few tax credits available to it over the past 30 years. Additionally, three of the four largest national banks have large presences in this market and compete against Compass Bank. Despite the low level of community development loans, Compass Bank did originate six SBA loans that were counted under the retail lending test. Nonetheless, community development lending performance in the Modesto assessment area needs to improve.

INVESTMENT TEST

Compass Bank's investment performance in the Modesto assessment area is good. The bank made a significant level of qualified community development investments relative to the bank's presence in the assessment area and available community development opportunities.

The bank invested nearly \$4.7 million in the Modesto assessment area; all investments were made during the review period. The total also includes \$7,500 in contributions. Notably, the bank made a \$1.6 million investment in one CDFI to provide financing for small businesses and a second \$500,000 investment in a CDFI that finances affordable housing and community facilities. Both CDFIs serve a broader regional area, but the bank targeted its investments to specifically benefit the Modesto assessment area. The bank also made a \$2.6 million investment in an SBA loan pool that provided financing for several small businesses in the assessment area. In addition, as noted earlier, the bank had investments and contributions that served a broader regional area that includes the Modesto assessment area.

SERVICE TEST

Compass Bank's service test performance in the Modesto assessment area is adequate.

Modesto, California

Retail Services

Retail banking services are adequate. The distribution of five branch offices and five full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has no branches in low-income tracts compared to 2.8 percent of households and 2.6 percent of businesses. The distribution of the bank's one branch (20.0 percent) in a moderate-income tract was greater than both the percentage of households (18.0 percent) and the percentage of businesses (18.8 percent) in the same geography. Overall, delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels.

No branches or ATMs were opened or closed during the review period. Overall, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.

Compass Bank does not offer weekend hours in any branch offices in the assessment area; however, the bank does offer extended hours at its branch in a moderate-income tract. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Geographic Distribution of Branches & ATMS

Assessment Area: CA Modesto

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	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	4	4.3%	2.8%	2.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	20.0%	0	0	1	1	0	Total	1	20.0%	1	20.0%	0	0	0	0.0%	0	0	20	21.3%	18.0%	18.8%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	3	60.0%	0	0	1	2	0	Total	3	60.0%	3	60.0%	0	0	0	0.0%	0	0	44	46.8%	45.4%	44.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	1	20.0%	0	0	1	1	0	Total	1	20.0%	1	20.0%	0	0	0	0.0%	0	0	26	27.7%	33.8%	34.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	5	100.0%	0	0	3	4	0	Total	5	100.0%	5	100.0%	0	0	0	0.0%	0	0	94	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides an adequate level of community development services in the Modesto assessment area. Employees provided 195 service hours to qualified organizations by participating in 26 community development service activities.

Modesto, California

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities that support low- and moderate-income individuals, communities, and small businesses in the Modesto assessment area. Of the bank's total activities, 165 service hours were committed to financial education. Additionally, bank staff engaged in 30 hours of board or committee service to qualified nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- Bank volunteers facilitated over 60 hours of small business education to numerous small business owners in partnership with the local small business development center and county workforce programs.
- A banker facilitated nine homebuyer education workshops through a local affordable housing collaborative that targets low- and moderate-income individuals in communities within the assessment area that are adversely affected by disproportionately high unemployment, poverty, and foreclosure rates.

While there are identified opportunities to respond to affordable housing and economic development needs in Modesto, during the examination period the bank demonstrated an adequate level of engagement in community development activities in the assessment area.

Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CALIFORNIA METROPOLITAN ASSESSMENT AREAS

- **Bakersfield Assessment Area (Kern County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 1.6 percent of its branches in California.
 - As of June 30, 2016, the bank had \$29.8 million in deposits in this assessment area, representing a market share of 0.4 percent and 0.7 percent of Compass Bank's total deposits in California.
- **Fresno Assessment Area (Fresno County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 3.2 percent of its branches in California.
 - As of June 30, 2016, the bank had \$119.1 million in deposits in this assessment area, representing a market share of 0.9 percent and 2.8 percent of Compass Bank's total deposits in California.
- **Los Angeles Assessment Area (Los Angeles County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 1.6 percent of its branches in California.
 - As of June 30, 2016, the bank had \$36.8 million in deposits in this assessment area, representing a market share of 0.0 percent and 0.9 percent of Compass Bank's total deposits in California.
- **Merced Assessment Area (Merced County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 3.2 percent of its branches in California.
 - As of June 30, 2016, the bank had \$128.0 million in deposits in this assessment area, representing a market share of 6.1 percent and 3.0 percent of Compass Bank's total deposits in California.
- **Oakland Assessment Area (Alameda, Contra, and Costa counties)**
 - As of December 31, 2016, Compass Bank operated four branches in the assessment area, representing 6.5 percent of its branches in California.
 - As of June 30, 2016, the bank had \$ 369.0 million in deposits in this assessment area, representing a market share of 0.4 percent and 8.7 percent of Compass Bank's total deposits in California.
- **Sacramento Assessment Area (Placer and Sacramento counties)**
 - As of December 31, 2016, Compass Bank operated four branches in the assessment area, representing 6.5 percent of its branches in California.
 - As of June 30, 2016, the bank had \$270.6 million in deposits in this assessment area, representing a market share of 0.6 percent and 6.4 percent of Compass Bank's total deposits in California.

Metropolitan Areas (Limited Review)

- **San Diego Assessment Area (San Diego County)**
 - As of December 31, 2016, Compass Bank operated six branches in the assessment area, representing 9.7 percent of its branches in California.
 - As of June 30, 2016, the bank had \$544.6 million in deposits in this assessment area, representing a market share of 0.7 percent and 12.9 percent of Compass Bank's total deposits in California.
- **San Francisco Assessment Area (San Mateo County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 4.8 percent of its branches in California.
 - As of June 30, 2016, the bank had \$194.1 million in deposits in this assessment area, representing a market share of 0.6 percent and 4.6 percent of Compass Bank's total deposits in California.
- **San Jose Assessment Area (Santa Clara County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 3.2 percent of its branches in California.
 - As of June 30, 2016, the bank had \$96.2 million in deposits in this assessment area, representing a market share of 0.1 percent and 2.3 percent of Compass Bank's total deposits in California.
- **Stockton Assessment Area (San Joaquin County)**
 - As of December 31, 2016, Compass Bank operated nine branches in the assessment area, representing 14.5 percent of its branches in California.
 - As of June 30, 2016, the bank had \$579.5 million in deposits in this assessment area, representing a market share of 6.3 percent and 13.7 percent of Compass Bank's total deposits in California.

Metropolitan Areas (Limited Review)

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Bakersfield	Not Consistent (Below)	Not Consistent (Below)	Consistent
Fresno	Consistent	Consistent	Not Consistent (Below)
Los Angeles	Consistent	Consistent	Not Consistent (Above)
Merced	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Oakland	Consistent	Consistent	Not Consistent (Above)
Sacramento	Consistent	Not Consistent (Below)	Not Consistent (Above)
San Diego	Consistent	Not Consistent (Below)	Not Consistent (Below)
San Francisco	Consistent	Not Consistent (Below)	Not Consistent (Below)
San Jose	Consistent	Not Consistent (Below)	Consistent
Stockton	Not Consistent (Above)	Not Consistent (Below)	Consistent

For the lending test, Compass Bank received a rating of high satisfactory for the State of California. Performance in seven metropolitan limited-scope assessment areas was consistent with the statewide lending test performance, while performance in Bakersfield, Merced, and Stockton was less than the state performance. For the geographic distribution of loans, lending levels were excellent in San Francisco and Stockton; adequate in Bakersfield and Fresno; and good in the remaining six assessment areas. Performance was excellent for the borrower distribution of loans in Bakersfield and Stockton; adequate in the San Jose assessment area; and good in the remaining seven assessment areas. There was an excellent level of community development loans in Fresno, Los Angeles, Oakland, and Stockton; good levels in Sacramento, San Diego, and San Jose; and adequate levels of community development loans in San Francisco. The absence of community development lending in the Bakersfield and Merced assessment areas was also a factor in the weaker performance for these two assessment areas.

For the investment test, Compass Bank received a rating of outstanding for the State of California. The bank had an excellent level of investments in the Fresno, Los Angeles, and Oakland metropolitan limited-scope assessment areas and performance was consistent with the state performance. Performance in the other metropolitan limited-scope assessment areas was weaker than statewide performance; however, the bank still had a significant level of investments in the remaining seven assessment areas.

For the service test, Compass Bank received a rating of high satisfactory for the State of California. Performance in the Los Angeles, Oakland, and Sacramento metropolitan assessment area was stronger than the performance for the state, primarily driven by excellent community development services and good retail delivery services. Service test performance in the Bakersfield, San Jose, and Stockton metropolitan assessment areas was consistent with the bank’s state performance. Although performance in the Fresno, Merced, San Diego, and San Jose metropolitan assessment areas was weaker than the bank’s statewide performance, performance in these assessment areas was still considered adequate.

Metropolitan Areas (Limited Review)

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

Non-Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CALIFORNIA NON-METROPOLITAN ASSESSMENT AREAS

- **Amador-Calaveras-Tuolome Assessment Area (Amador, Calaveras, and Tuolome counties)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 3.2 percent of its branches in California.
 - As of June 30, 2016, the bank had \$120.4 million in deposits in this assessment area, representing a market share of 5.3 percent and 2.8 percent of Compass Bank’s total deposits in California.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Non-metropolitan Assessment Area			
Assessment Areas	Lending Test	Investment Test	Service Test
Amador-Calaveras-Tuolome	Not Consistent (Below)	Not Consistent (Below)	Consistent

For the lending test, Compass Bank received a rating of high satisfactory for the State of California. Although below the state performance, lending levels were very poor in Amador-Calaveras-Tuolome for the geographic distribution of loans, while excellent for the borrower distribution of loans. The absence of community development lending in the Amador-Calaveras-Tuolome assessment area was also a factor in the weaker performance for this assessment area.

For the investment test, Compass Bank received a rating of outstanding for the State of California. Performance in the Amador-Calaveras-Tuolome non-metropolitan limited scope assessment area was weaker than the state performance; the bank had a poor level of investments in assessment area.

For the service test, Compass Bank received a rating of high satisfactory for the State of California. Community development service performance in Amador-Calaveras-Tuolome was consistent with the statewide performance while retail banking services was weaker compared to the bank’s state performance but still considered adequate.

The performance in the non-metropolitan limited-scope assessment area did not affect the overall state rating.

Florida

CRA RATING FOR FLORIDA: SATISFACTORY

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects excellent penetration throughout the assessment areas, and the distribution of loans by borrower income reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes a relatively high level of community development loans in its Florida assessment areas.
- The bank provides a significant level of qualified community development investments and grants that are responsive to several identified community development needs of the Florida assessment areas.
- Retail banking services are adequate in the bank's Florida assessment areas.
- The bank provides a relatively high level of community development services throughout the Florida assessment areas.

Florida

SCOPE OF EXAMINATION

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

- Jacksonville

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

- | | |
|---------------------|-------------|
| • Fort Walton | • Ocala |
| • Gainesville | • Pensacola |
| • Homosassa Springs | • Tampa |

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

As of June 30, 2016, Compass Bank had \$4.8 billion in deposits in Florida accounting for 6.9 percent of the bank's total deposits. Compass Bank operated 45 branch offices in Florida as of December 31, 2016, representing 6.8 percent of the bank's total branches. HMDA-reportable lending in Florida accounted for 5.0 percent of total institutional HMDA-reportable lending by number of loans and 3.8 percent by dollar volume. CRA small business lending in Florida accounted for 6.3 percent of the bank's total CRA small business lending by number of loans and 6.9 percent by dollar volume. Overall, the bank's HMDA-reportable and CRA lending activity in the state was less than the percentage of total institutional deposits.

The following table shows lending activity from January 1, 2015, through December 31, 2016.

Statewide Summary of Lending Activity Assessment Areas Located in Florida

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	648	16.1%	\$161,680	41.6%
HMDA Refinance	249	6.2%	\$62,238	16.0%
HMDA Home Improvement	90	2.2%	\$1,966	0.5%
HMDA Multi-Family	1	0.0%	\$3,100	0.8%
Total HMDA	988	24.5%	\$228,984	58.9%
Total Small Business	3,033	75.3%	\$159,630	41.0%
Total Farm	7	0.2%	\$305	0.1%
TOTAL LOANS	4,028	100.0%	\$388,919	100.0%

Originations and Purchases

Florida

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

Lending Test

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

During the review period, Compass Bank reported 3,033 small business loans and 988 HMDA-reportable loans in Florida. As such, small business lending was given greater weight when determining the lending test rating for Florida. The rating for Florida is based on performance in the Jacksonville full-scope assessment area. Approximately 62.5 percent of the bank's HMDA-reportable and small business lending by number of loans in Florida occurred within this assessment area.

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

Geographic and Borrower Distribution

The geographic distribution of Compass Bank's HMDA-reportable and small business loans is excellent and the distribution of loans by borrower income and revenue size of businesses is good. As noted above, the rating for the state of Florida is derived from the Jacksonville full-scope assessment area. A detailed discussion of the borrower and geographic distribution of lending for this assessment area is included in the next section of this report.

Community Development Lending

Compass Bank makes a relatively high level of community development loans in the state of Florida. The bank originated 52 community development loans totaling \$131.5 million benefiting Florida assessment areas during the review period, including 12 loans for \$30.4 million in the Jacksonville full-scope assessment area. Performance was good in Jacksonville. Performance in the limited-scope assessment areas was excellent. Statewide community development lending performance was driven by performance in the full-scope assessment area. More information on community development loans can be found in the full-scope assessment area section of this report.

Investment Test

The investment test rating for Florida is high satisfactory.

The bank made a significant level of qualified investments and contributions totaling \$62.8 million that directly benefited the Florida assessment areas. The bank's investment portfolio for the state included LIHTC investments, mortgage-backed securities, EQ2 investments in CDFIs, investments in SBA loan pools, and grants.

Florida

The bank also had contributions totaling \$97,250 to organizations that serve the entire state, including statewide coalitions focused on affordable housing, community development, and financial stability. Lastly, the bank had investments that benefited all states within the bank's footprint, including Florida; these investments are described in the institution overview.

The bank's performance in the Jacksonville full-scope assessment area was good. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section, and a summary of the bank's investments and contributions for all assessment areas can be found in Appendix F.

Service Test

The service test rating for Florida is high satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. Statewide, banking services and hours of operation do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. During the review period, the bank opened one branch office in a moderate-income tract and closed one branch office located in a middle-income tract in the state of Florida. Overall, the bank's record of opening and closing of branch offices has not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or low- and moderate-income individuals.

Community Development Services

The bank provides a relatively high level of community development services that benefit low- and moderate income residents and small businesses in Florida. During the examination period, the bank facilitated a total of 2,495 qualified service hours, including 1,045 hours in the Jacksonville full-scope assessment area. Performance in Jacksonville, the only full-scope assessment area, was good. Additionally, employees engaged in 1,450 total service hours in the six limited-scope assessment areas. Finally, bank employees engaged in 14 service hours at a statewide organization that benefited a broader statewide or regional area, including the bank's assessment areas.

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

Jacksonville, Florida

METROPOLITAN AREA

(Full-Scope Review)

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

Overview

The Jacksonville assessment area contains four of the five counties in the Jacksonville, FL MSA: Clay, Duval, Nassau, and St. Johns. As of December 31, 2016, Compass Bank operated 25 branches in the assessment area. The bank's branch presence in the assessment area represents 55.6 percent of branches and 58.7 percent of deposits in Florida. Additionally, the market represents the bank's largest concentration of both HMDA-reportable and CRA small business lending in the state, with 55.9 percent of combined HMDA-reportable and CRA small business lending by dollar volume.

Two financial institutions, Bank of America and EverBank, hold 69.8 percent of deposits in the assessment area. According to the June 30, 2016 FDIC Summary of Deposits Report, Compass Bank ranked 4th in the market with 4.8 percent of deposits (\$2.8 billion). Overall, there are 37 banks active in the market operating 313 branches and holding a total of \$58.4 billion in deposits.

Compass Bank's 2015 and 2016 residential loan production accounted for less than 1.0 percent of total HMDA-reportable lending activity in the assessment area, ranking 34th in 2015 and 56th in 2016. For 2016, Wells Fargo, Vystar, and EverBank were the top three HMDA lenders in the assessment area.

Compass Bank ranked 8th in 2015 and 7th in 2016 in CRA lending. Out of 133 CRA reporters, the bank made 3.3 percent of total CRA loans in 2016. The assessment area lending was dominated by American Express Bank, Citibank, and Bank of America in both years.

Population and Income Characteristics

From 2010 to 2017, the estimated assessment area population grew by approximately 11.2 percent, while the statewide population grew by 11.6 percent.²³³ Growth was uneven though, with St. Johns County experiencing the largest influx of residents at a growth rate of 28.4 percent during this period whereas Duval County grew by only 8.5 percent. The assessment area population was estimated at 1.5 million as of 2017, and the city of Jacksonville represents nearly 60.0 percent of the assessment area total.²³⁴ Jacksonville, located in Duval County, is the economic center of the region and the largest city in the state of Florida by population.²³⁵

The assessment area is made up of 258 census tracts: 17 tracts are low-income (6.6 percent), 59 tracts are moderate-income (22.9 percent), 109 tracts are middle-income (42.2 percent), 69 tracts are upper-income (26.7 percent), and 4 tracts are unknown income (1.6 percent).

²³³ QuickFacts. U.S. Census Bureau, n.d. Web. 19 April 2018. <http://quickfacts.census.gov>

²³⁴ Ibid

²³⁵ *City and Town Population Totals: 2010-2016*, U.S. Census Bureau, www.census.gov/data/tables/2016/demo/pepopt/total-cities-and-towns.html

Jacksonville, Florida

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Jacksonville MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for the MSA increased from \$63,300 in 2015 to \$64,900 in 2016. Data shows that the median family income varies widely amongst the counties in the assessment area. Duval County has the lowest median family income (\$60,669), while St. Johns County has highest median family income (\$88,193)²³⁶ Also, 38.1 percent of families in the assessment area are considered low- to moderate-income.²³⁷

Borrower Income Levels Jacksonville, FL MSA

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2015	\$63,300	0 - \$31,649	\$31,650 - \$50,639	\$50,640 - \$75,959	\$75,960 - & above
2016	\$64,900	0 - \$32,449	\$32,450 - \$51,919	\$51,920 - \$77,879	\$77,880 - & above

The Jacksonville MSA has experienced lower rates of poverty than the national rate in the past few years; however, there still is considerable variation in the rates throughout the assessment area. Between 2012 and 2016, St. Johns County had the lowest percentage of people living below the federal poverty line at 8.9 percent, while Duval County had the highest with 16.6 percent of residents in poverty.²³⁸ In addition, 34.1 percent of families living in low-income census tracts live below the poverty level and 16.0 percent of families living in moderate-income census tracts live below the poverty level.²³⁹

Economic Conditions

The Jacksonville MSA has a well-diversified economic base and benefits from its location along the Atlantic Coast. Consisting of three public marine terminals and a cruise terminal, the Port of Jacksonville, or JAXPORT, is the leading container port complex in Florida and the third busiest port in the state.²⁴⁰ The area also benefits from the presence of multiple naval facilities including Naval Air Station Jacksonville, Naval Station Mayport, and Camp Blanding Joint Training Center. The U.S. Navy is the largest employer in the MSA, employing 37,050 military personnel and civilians. Other leading industries in the assessment area include retail trade, professional and business services, education and health services, and leisure and hospitality services.²⁴¹ In terms of wages for the area, it is worth noting that the average hourly wage in Jacksonville exceeds the U.S. average for the first

²³⁶ "Jacksonville, FL MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 18 April 2018. <http://www.policymap.com/>

²³⁷ FRB Atlanta Calculations of 2016 Census Data

²³⁸ "Jacksonville, FL MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

²³⁹ FRB Atlanta Calculations of 2016 Census Data

²⁴⁰ "HUD USER." Office of Policy Development and Research. U.S. Department of Housing and Urban Development, n.d. Web. 18 April 2018. <https://www.huduser.gov/portal/ushmc/home.html>

²⁴¹ Ibid

Jacksonville, Florida

time since 2007 and leads all other metro areas in Florida.²⁴² There are, however, two sectors in which the average annual earnings lag behind Florida and the U.S.--leisure and hospitality and the retail trade sector--which combined represent 24.0 percent of total employment, or 164,400 jobs.²⁴³

Small businesses are vitally important to the Jacksonville economy. According to 2016 Dun & Bradstreet information, there were 80,909 businesses within the Jacksonville assessment area; 92.9 percent had total annual revenues less than or equal to \$1 million.²⁴⁴ Additionally, 18.1 percent of small businesses with revenues less than or equal to \$1 million are located in moderate-income tracts and 3.4 percent are in low-income tracts. Throughout the assessment area, lending to small businesses has notably increased. According to an analysis of CRA loan data for Duval County in particular, the number of small business loans increased by 23.3 percent between 2014 and 2016, with 17,200 loans made in 2016.²⁴⁵ However, small business lending still remains nearly 53.0 percent below peak lending levels. Loans made to firms with revenues of \$1.0 million or less averaged 53.3 percent of total small business loans during 2015 and 2016, which was the highest percentage posted in the last decade.²⁴⁶ This may be an indication that there are fewer obstacles for smaller firms to access credit in the market.

The assessment area has experienced economic recovery during the evaluation period as evidenced by the declining trend in the unemployment rate. According to the Bureau of Labor Statistics, the unemployment rate for the Jacksonville MSA was 4.7 percent in 2016. This compares favorably to the statewide rate of 4.8 percent. All four counties in the assessment area experienced a decline in their unemployment rate between 2015 and 2016.

²⁴² Donaldson, Kwame. "Jacksonville FL" Précis U.S. Metro. Moody's Analytics, December 2017. Web. 17 April 2018.
<https://www.economy.com/precismetro>

²⁴³ Ibid

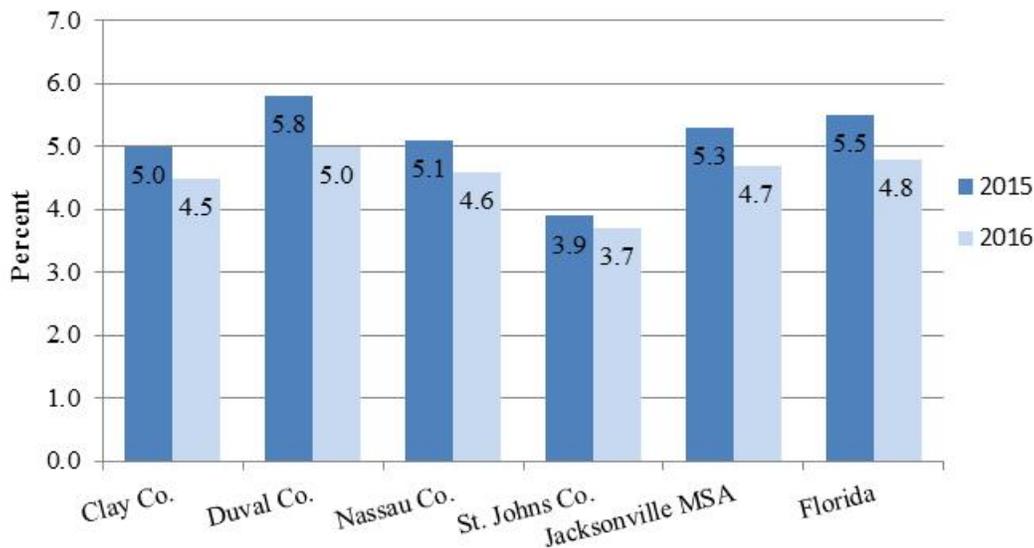
²⁴⁴ FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

²⁴⁵ "Duval County, FL (CRA Loan Data)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 18 April 2018.
<http://www.policymap.com/>

²⁴⁶ Ibid

Jacksonville, Florida

Unemployment Rates - FL Jacksonville



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

There were 578,044 housing units in the assessment area according to the 2016 census data, of which 58.3 percent were owner-occupied, 27.4 percent were rental units and 14.3 percent were vacant. More specifically, the census data shows that 5.1 percent of the housing stock in the assessment area is located in low-income tracts and 20.5 percent is in moderate-income tracts. While housing in low- and moderate-income tracts is disproportionately rental and vacant units, 44.1 percent and 33.5 percent of the housing stock is owner-occupied in moderate-income tracts and low-income tracts, respectively.

Home prices have been steadily rising in the assessment area for the past several years. According to data from the Florida Association of Realtors, the median single-family housing sales price in the Jacksonville MSA for 2017 was \$228,900, which was an increase of 24.8 percent over the 2014 median price.²⁴⁷ Duval County had the lowest single-family sales price of \$175,000 and St. Johns County had the highest at \$285,000 as of 2016 data.²⁴⁸ While positive overall, price increases make it more difficult for potential homeowners with low to moderate incomes to enter into the market. The minimum annual income needed to afford a median-priced home in the Jacksonville MSA was \$50,957.²⁴⁹ In the Jacksonville MSA, 20.5 percent of families are low-income, earning at or below \$32,449, and 17.6 percent are moderate-income, earning between \$32,450 and \$51,919. It is also worth noting that between 2012 and 2016, one out of every two households earning less than \$50,000 in the Jacksonville MSA were likely to suffer from housing cost burden. Housing cost burden is defined as the need for a household to pay more than 30.0 percent of its income for housing, while a severe housing cost burden is the need for a household to pay more than 50.0 percent for housing costs.²⁵⁰

²⁴⁷ Florida Market Reports. Florida Association of Realtors. Web. 7 April 2018. <http://www.floridarealtors.org/ResearchAndStatistics/Florida-Market-Reports/Index.cfm>

²⁴⁸ Regional & Local Profiles, Florida Housing Data Clearinghouse, flhousingdata.shimberg.ufl.edu/a/profiles?action=geo.

²⁴⁹ "The Salary You Must Earn to Buy a Home in the 50 Largest Metros." *HSH.com*, HSH Associates, Financial Publishers, 22 Feb. 2018, www.hsh.com/finance/mortgage/salary-home-buying-25-cities.html#miami.

²⁵⁰ "Jacksonville, FL MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 30 July 2018. <http://www.policymap.com/>.

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Recent HMDA data shows home lending improved in the assessment area during the review period. The number of loans originated inside the assessment area increased by 50.6 percent from 2014 to 2016 driven by refinances.²⁵¹ Between 2014 and 2016, the number of home refinance loans increased by 72.7 percent, while the number of home purchase loans increased by 39.8 percent.²⁵²

Similar to home ownership affordability for the lowest income residents, rental housing costs are an issue in the Jacksonville MSA. For a four-person family earning 30.0 percent of the area median income (considered to be extremely low-income) in Duval County in particular, 5.0 percent of all rental units are likely affordable. This figure increases to 22.1 percent of all rental units that are likely affordable for a four-person family earning 50.0 percent of the area median income.²⁵³ Moreover, nearly half of all households in the MSA were considered cost-burdened as of 2012-2016 data; nearly a quarter of households were considered severely cost-burdened during the same time period.

The 2017 Out of Reach study by the National Low Income Housing Coalition indicates that an individual would need to earn an hourly wage of \$18.63 or an annual income of \$38,760 to afford the fair market rent (\$969) for a two-bedroom apartment in the Jacksonville MSA.²⁵⁴ As mentioned previously, 24.0 percent of the workforce is in retail trade and the leisure and hospitality sectors, which have average annual earnings of \$33,371 and \$26,737, respectively.

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

²⁵¹ "Jacksonville, FL MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

²⁵² Ibid

²⁵³ "Duval County, FL (U.S. Census Bureau)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 7 Apr. 2018. <http://www.policymap.com/>

²⁵⁴ *Out of Reach 2017*. National Low Income Housing Coalition, *Out of Reach 2017*, <http://www.nlihc.org/oor/>

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Combined Demographics Report

Assessment Area: FL Jacksonville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	17	6.6	13,392	4.1	4,572	34.1	67,215	20.5
Moderate-income	59	22.9	58,680	17.9	9,375	16.0	57,844	17.6
Middle-income	109	42.2	153,478	46.7	12,011	7.8	71,463	21.8
Upper-income	69	26.7	102,813	31.3	3,410	3.3	131,841	40.2
Unknown-income	4	1.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	258	100.0	328,363	100.0	29,368	8.9	328,363	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	29,546	9,912	2.9	33.5	13,742	46.5	5,892	19.9
Moderate-income	118,250	52,104	15.5	44.1	46,828	39.6	19,318	16.3
Middle-income	259,758	159,802	47.4	61.5	64,617	24.9	35,339	13.6
Upper-income	170,490	115,259	34.2	67.6	33,084	19.4	22,147	13.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	578,044	337,077	100.0	58.3	158,271	27.4	82,696	14.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,906	3.6	2,524	3.4	363	7.0	19	3.6
Moderate-income	15,079	18.6	13,603	18.1	1,391	26.7	85	16.3
Middle-income	34,763	43.0	32,647	43.4	1,921	36.9	195	37.4
Upper-income	28,161	34.8	26,409	35.1	1,530	29.4	222	42.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	80,909	100.0	75,183	100.0	5,205	100.0	521	100.0
Percentage of Total Businesses:			92.9		6.4		.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.6	2	0.4	1	4.3	0	0.0
Moderate-income	57	10.9	51	10.2	6	26.1	0	0.0
Middle-income	277	53.1	268	53.7	9	39.1	0	0.0
Upper-income	185	35.4	178	35.7	7	30.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	522	100.0	499	100.0	23	100.0	0	.0
Percentage of Total Farms:			95.6		4.4		.0	

2016 FFIEC Census Data and 2016 D&B Information

Jacksonville, Florida

Credit and Community Development Needs

During the examination, examiners reviewed the City of Jacksonville's 2016-2021 Consolidated Plan, as well as contacted local organizations to identify credit needs in the community and opportunities for financial institutions in the Jacksonville MSA. Those identified needs and opportunities are discussed in this section. The major recurring themes, however, were the need for more affordable housing, neighborhood revitalization and access to employment opportunities.

While the overall opinion of bank involvement in the area appears to be favorable, contacts noted opportunities still remain for banks to engage in more community development activities. These include, but are not limited to, funding reserves to maintain affordable housing quality, financing multifamily construction projects, providing grants for housing development, funding supportive (wrap-around) services to low- and moderate-income families, and underwriting ongoing operational expenses of nonprofits serving underserved populations. Bank involvement, according to community interviews, is particularly critical given diminishing public funding and financially strapped nonprofit organizations. Additionally, contacts indicated that having bankers' perspectives in the early stages of community planning for low- and moderate-income housing and neighborhoods is both beneficial and needed. Contacts suggested that bankers should consider attending meetings or participating on local affordable housing advisory committees and task forces.

In addition to opportunities identified by representatives of local organizations, the City's consolidated plan found that the highest priorities in the area are a shortage of affordable housing in good condition, leading to severe cost burdens for low- and extremely low-income renters; low wages and limited access to low- and moderate-income wage jobs; high foreclosure rates and resulting high levels of vacant and blighted properties; homelessness, particularly among families with children; and the need for more services for elderly, disabled and other special needs populations.²⁵⁵ The plan further discusses several strategies that the City intends to employ during the five-year period including neighborhood revitalization, housing preservation through rehabilitation, and economic development. The City acknowledges that collaboration between with nonprofit providers is critical to serving the needs of Jacksonville's citizens; therefore, an additional priority for the City over the course of the five-year consolidated plan is to continue to build capacity among Jacksonville's public and private organizations.

Beyond the City's efforts, residents and community-based organizations are actively engaged in revitalization and stabilization activities. For example, LISC Jacksonville launched EPIC Communities in two neighborhoods in 2012 -- Historic Eastside/Springfield and Northwest Jacksonville. The convening agencies leading the work in each neighborhood are Operation New Hope in Historic Springfield and Historic East Jacksonville and Northwest Jacksonville Community Development Corporation in Northwest Jacksonville. The EPIC Communities Initiative is a comprehensive community development approach that leverages local resources to improve access to quality education; foster livable, healthy environments; increase family income and wealth; and stimulate economic activity. Three other neighborhoods that LISC has invested in are New Town, a community immediately northwest of downtown, the Rail Yard District, and downtown Jacksonville. Multiple contacts commented that local financial institutions do not appear highly participatory when it comes to providing

²⁵⁵ 2016-2021 Consolidated Plan, Community Development Division, City of Jacksonville, <http://www.coj.net/departments/neighborhoods/housing-and-community-development/community-development>

Jacksonville, Florida

grants or utilizing other creative means to help fund revitalization efforts. Financial institutions, therefore, should note the ample opportunities for engagement and community development planning in each of these neighborhoods.

In Jacksonville, there are several community redevelopment areas (CRAs) with identified needs as well. A community redevelopment area is a special funding district created by local municipalities for the purpose of promoting and facilitating the redevelopment of areas designated as having slum and blight, or when certain conditions exist, such as the presence of substandard or inadequate structures, a shortage of affordable housing, inadequate infrastructure, insufficient roadways and inadequate parking. There are five CRAs in Jacksonville: Jacksonville International Airport (JIA), KingSoutel Crossing, Renew Arlington, Downtown Northbank, and Downtown Southbank.²⁵⁶ The two Downtown CRAs are governed separately, by the Downtown Investment Authority, while the Jacksonville City Council governs the other three CRAs. With comprehensive redevelopment plans in place, the CRAs provide financial institutions with lending and investment opportunities in designated low- and moderate-income communities as well as partnership opportunities with organizations working within the areas.

²⁵⁶ *Community Redevelopment Agencies*. Office of Economic Development, City of Jacksonville, [www.coj.net/departments/office-of-economic-development/community-redevelopment-agency-\(cra\)](http://www.coj.net/departments/office-of-economic-development/community-redevelopment-agency-(cra))

Jacksonville, Florida

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Jacksonville assessment area is good. The geographic distribution of loans reflects excellent penetration throughout the assessment area, while the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes a relatively high level of community development loans.

During the review period, the bank reported 491 HMDA-reportable loans compared to 2,023 small business loans in the Jacksonville assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in determining the bank's lending test rating in the assessment area. The Jacksonville assessment area contains 2.5 percent of the bank's total HMDA-reportable lending by number of loans and 1.9 percent by dollar volume, and 4.2 percent of its total small business lending by number of loans and 4.6 percent by dollar volume. In comparison, 4.1 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low- and moderate-income tracts is excellent overall. In low-income tracts, Compass Bank originated 4.1 percent of its small business loans where 3.4 percent of small businesses in the assessment area are located, and outperformed aggregate in 2015 and 2016. Additionally, the bank originated 21.0 percent of its small business loans in moderate-income tracts, where 18.1 percent of small businesses in the assessment area are located, and exceeded aggregate performance in both years.

Home Purchase Loans

Fewer than 1.0 percent of aggregate loans were made in low-income tracts, which contain 2.9 percent of the owner-occupied housing units in the Jacksonville assessment area. Therefore, home purchase lending in low-income tracts was not evaluated as part of the lending test in this assessment area.

Jacksonville, Florida

Home purchase lending in moderate-income census tracts is good. Compass Bank's home purchase lending in moderate-income census tracts (16.0 percent) was slightly above the percentage of owner-occupied units in these tracts (15.5 percent). The bank outperformed aggregate lenders in moderate-income tracts for 2015 and performed similarly to aggregate lenders in 2016.

Home Refinance Loans

During the review period, Compass Bank did not originate any refinance loans in low-income census tracts, where 2.9 percent of owner-occupied units are located. Aggregate lenders also exhibited low lending levels for home refinance loans compared to the percentage of owner-occupied units in low-income census tracts. As such, an assessment of home refinance lending in low-income tracts is not included in the evaluation of this assessment area.

Home refinance lending in moderate-income census tracts is good. The percentage of home refinance loans originated in moderate-income census tracts (12.0 percent) was slightly less than the percentage of owner-occupied units in these tracts, and the bank's performance exceeded the aggregate lending performance in 2015 and 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is good. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good. For the review period, 65.0 percent of the bank's loans were originated to businesses with revenues of \$1 million or less. By comparison, 92.9 percent of total businesses in the assessment area are classified as small businesses. In both years, the bank outperformed aggregate lenders in the percentage of loans to small businesses. Additionally, 97.9 percent of small business loans were originated in amounts of \$250,000 or less, indicating a willingness to lend in the smaller amounts that are typically requested by small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is good. Compass Bank's home purchase lending to low-income borrowers (9.3 percent) was less than the percentage of low-income families (20.5 percent) living in the assessment area; however, the bank's home purchase lending to low-income borrowers exceeded aggregate in both years.

Home purchase lending to moderate-income borrowers is excellent. Compass Bank's home purchase lending to moderate-income borrowers (35.3 percent) was significantly greater than the percentage of moderate-income families (17.6 percent) living in the assessment area. Additionally, the bank's home purchase lending to moderate-income borrowers exceeded aggregate in both years.

Home Refinance Loans

Jacksonville, Florida

Home refinance lending to low- and moderate-income borrowers is excellent. Compass Bank's home refinance lending to low-income borrowers (9.9 percent) was less than the percentage of low-income families living in the assessment area, while home refinance lending to moderate-income borrowers (20.4 percent) was greater than the percentage of moderate-income families in the assessment area. The bank's home refinance lending to low- and moderate-income borrowers exceeded aggregate in both years.

Community Development Lending

Compass Bank makes a relatively high level of community development loans in the Jacksonville assessment area. The bank originated 12 community development loans totaling \$30.4 million during the review period. Notably, the bank made a loan for \$5.6 million to finance the redevelopment of a vacant department store in a moderate-income geography into an indoor community space for mentoring, tutoring, and crisis intervention. Other loans financed small businesses, creating 100 jobs for low- and moderate-income individuals. Compass Bank also financed two Low-Income Housing Tax Credit projects that provided over 200 units of affordable housing, a portion of which is dedicated for low-income veterans. Additionally, the bank originated 21 community development loans for \$3.6 million at the broader state or regional level with a purpose that includes serving the Jacksonville assessment area. These loans met the affordable housing and community service needs of the area. This volume of community development lending is considered good given the bank's size and presence in the assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Jacksonville assessment area is good. The bank made a significant level of qualified community development investments that exhibited good responsiveness to credit and community development needs in the assessment area.

The bank invested approximately \$30.8 million in the Jacksonville assessment area, including \$12.1 million in new investments during the review period and \$18.5 million in prior period investments. The total also includes \$234,800 in contributions made during the review period. The bank leveraged several different investment vehicles in the Jacksonville assessment area, including Low-Income Housing Tax Credits, EQ2 investments in CDFIs, and mortgage-backed securities; these investments financed affordable housing and economic development. The bank's contributions also demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$182,300 for community services to low- and moderate-income individuals, \$39,500 for affordable housing and \$13,000 to support economic development. The bank also had contributions that served a broader regional area that includes the Jacksonville assessment area.

Notable examples of the bank's investments include the following:

- A \$7.1 million LIHTC investment to fund the rehabilitation of a 207-unit affordable housing project in Jacksonville.
- A \$1.0 million investment in the local chapter of a national CDFI that is working to build resilient and inclusive communities, with a focus on financing affordable housing and community services. Additionally, the bank provided grants totaling \$20,000 to this organization to support the establishment

Jacksonville, Florida

of the state's first Financial Opportunity Center, which is a neighborhood-based employment and personal financial service center. The grant funding will help provide services to at least 55 low- to moderate-income clients.

- A \$4.0 million investment in a statewide CDFI that will provide financing specifically for small businesses within the Jacksonville assessment area.
- The bank provided \$14,000 in grants to a local community development corporation (CDC) to support its financial literacy campaign in a targeted low- and moderate-income community. Additionally, the bank provided a \$12,000 grant to a national community development intermediary to conduct an assessment of the CDC to help build its organizational capacity and financial sustainability.

SERVICE TEST

Compass Bank's service test performance in the Jacksonville assessment area is good.

Retail Services

Retail banking services are adequate. The distribution of 25 branch offices and 27 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has one branch in a low-income tract; thus, the percentage of branches in low-income tracts (4.0 percent) was comparable to both the percentage of households (4.8 percent) and the percentage of businesses (3.6 percent) in the same geography. The distribution of the bank's five branches (20.0 percent) in moderate-income tracts was equal to the percentage of households (20.0 percent) and greater than the percentage of businesses (18.6 percent) in the same geography. Overall, delivery systems are reasonably accessible within the bank's geographies and to individuals of different income levels.

During the examination period, the bank opened one branch office and a full-service ATM in a moderate-income tract and closed one branch office and a full-service ATM in a middle-income tract in the assessment area. Overall, the bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals in the assessment area.

Compass offers extended hours, but no weekend hours, at its branch located in a low-income tract. Although the bank offers extended and weekend hours at branch offices located in moderate-income tracts, it is at a lower rate compared to those branches located in middle- and upper-income tracts. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

Jacksonville, Florida

Geographic Distribution of Branches & ATMS

Assessment Area: FL Jacksonville

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	1	4.0%	0	0	1	1	0	Total	1	3.6%	1	3.7%	0	0	0	0.0%	0	0	17	6.6%	4.8%	3.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	5	20.0%	1	0	4	2	2	Total	5	17.9%	5	18.5%	1	0	0	0.0%	0	0	59	22.9%	20.0%	18.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	11	44.0%	0	1	11	7	6	Total	13	46.4%	12	44.4%	0	1	1	100.0%	1	0	109	42.2%	45.3%	43.0%
DTO	0		0	0				SA	1		0		0	0	1		1	0				
Upper	8	32.0%	0	0	8	4	5	Total	9	32.1%	9	33.3%	0	0	0	0.0%	0	2	69	26.7%	29.9%	34.8%
DTO	0		0	0				SA	0		0		0	0	0		0	2				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	1.6%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	25	100.0%	1	1	24	14	13	Total	28	100.0%	27	100.0%	1	1	1	100.0%	1	2	258	100.0%	100.0%	100.0%
DTO	0		0	0				SA	1		0		0	0	1		1	2				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides a relatively high level of community development services in the Jacksonville assessment area. Employees provided 1,045 service hours to qualified organizations by participating in 100 community development service activities.

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development activities. Of the bank's total service hours, 797 were committed to financial education. Bank staff engaged in 174 hours of board or committee service to qualified, nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- Over 25 bank employees provided adult homebuyer education as an asset building tool to low- and moderate-income participants of a HUD-certified housing counseling agency.
- A bank lending officer served as board member of a local community development corporation that supports affordable housing and commercial development projects in a low-income geography.
- Bank employees provided over 100 hours of small business education at branches located in low- and moderate-income geographies.

While there were no bank services benefiting revitalization and stabilization during the review period, given the bank's size and capacity, it demonstrated a good level of engagement in community development services, as well as responsiveness to identified affordable housing and economic development needs in the Jacksonville assessment area. Overall, the bank's performance is considered good.

Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FLORIDA METROPOLITAN ASSESSMENT AREAS

- **Fort Walton Assessment Area (Okaloosa County)**
 - As of December 31, 2016, Compass Bank operated five branches in the assessment area, representing 11.1 percent of its branches in Florida.
 - As of June 30, 2016, the bank had \$236.8 million in deposits in this assessment area, representing a market share of 6.3 percent and 5.0 percent of Compass Bank's total deposits in Florida.
- **Gainesville Assessment Area (Alachua County)**
 - As of December 31, 2016, Compass Bank operated four branches in the assessment area, representing 8.9 percent of its branches in Florida.
 - As of June 30, 2016, the bank had \$450.0 million in deposits in this assessment area, representing a market share of 11.4 percent and 9.5 percent of Compass Bank's total deposits in Florida.
- **Homosassa Springs Assessment Area (Citrus County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 2.2 percent of its branches in Florida.
 - As of June 30, 2016, the bank had \$69.2 million in deposits in this assessment area, representing a market share of 3.2 percent and 1.5 percent of Compass Bank's total deposits in Florida.
- **Ocala Assessment Area (Marion County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 6.7 percent of its branches in Florida.
 - As of June 30, 2016, the bank had \$668.9 million in deposits in this assessment area, representing a market share of 11.7 percent and 14.1 percent of Compass Bank's total deposits in Florida.
- **Pensacola Assessment Area (Escambia and Santa Rosa counties)**
 - As of December 31, 2016, Compass Bank operated five branches in the assessment area, representing 11.1 percent of its branches in Florida.
 - As of June 30, 2016, the bank had \$327.9 million in deposits in this assessment area, representing a market share of 6.1 percent and 6.9 percent of Compass Bank's total deposits in Florida.
- **Tampa Assessment Area (Hernando County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 4.4 percent of its branches in Florida.
 - As of June 30, 2016, the bank had \$212.7 million in deposits in this assessment area, representing a market share of 8.3 percent and 4.5 percent of Compass Bank's total deposits in Florida.

Metropolitan Areas (Limited Review)

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Fort Walton	Not Consistent (Above)	Not Consistent (Below)	Not Consistent (Below)
Gainesville	Consistent	Not Consistent (Above)	Consistent
Homosassa Springs	Consistent	Not Consistent (Below)	Not Consistent (Below)
Ocala	Consistent	Consistent	Not Consistent (Below)
Pensacola	Not Consistent (Above)	Not Consistent (Below)	Not Consistent (Above)
Tampa	Consistent	Consistent	Not Consistent (Below)

For the lending test, Compass Bank received a rating of high satisfactory for the State of Florida. Performance in six metropolitan limited-scope assessment areas was consistent with or better than, in the cases of Fort Walton and Pensacola, the statewide lending test performance. Lending levels for the geographic distribution of loans were excellent in Ft. Walton and Homosassa Springs, adequate in Ocala, and good in the remaining four assessment areas. For the borrower distribution of loans, lending levels were excellent in Tampa and good in the remaining assessment areas. In addition, there was a good level of community development loans in the Homosassa Springs assessment area and an adequate level of community development loans in the Ocala assessment area. The excellent level of community development lending in the remaining four assessment areas was also a factor in the strong performance in these assessment areas.

For the investment test, Compass Bank received a rating of high satisfactory for the State of Florida. The bank had an excellent level of investments in the Gainesville metropolitan limited-scope assessment areas and performance exceeded the state performance. The bank had a significant level of investments in the Ocala and Tampa metropolitan limited-scope assessment areas and performance was consistent with the state. Performance in the Fort Walton, Homosassa Springs and Pensacola assessment areas was weaker than statewide performance; the bank had an adequate level of investments in Fort Walton and Pensacola and a poor level of investments in Homosassa Springs.

For the service test, Compass Bank received a rating of high satisfactory for the State of Florida. Performance in the Pensacola metropolitan assessment area was stronger than the performance for the state because of its excellent performance in both community development and retail delivery services. Performance in the Gainesville metropolitan assessment area was consistent with the performance for the state. Although performance in the Fort Walton, Homosassa Springs, Ocala, and Tampa metropolitan assessment areas was below the bank's state performance, service test performance in these assessment areas was still considered adequate.

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

Colorado

CRA RATING FOR COLORADO: OUTSTANDING

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects excellent throughout the assessment areas, and the distribution of loans by borrower income reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an excellent level of community development loans in its Colorado assessment areas.
- The bank provides a significant level of qualified community development investments and grants that are responsive to several identified community development needs of the Colorado assessment areas.
- Retail banking services are adequate in the bank's Colorado assessment areas.
- The bank provides a relatively high level of community development services throughout the Colorado assessment areas.

Colorado

SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment area in Colorado:

- Denver

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

- Boulder
- Colorado Springs
- Fort Collins
- Greeley

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLORADO

As of June 30, 2016, Compass Bank had \$2.4 billion in deposits in Colorado accounting for 3.5 percent of the bank's total deposits. Compass Bank operated 38 branch offices in Colorado as of December 31, 2016, representing 5.7 percent of the bank's total branches. HMDA-reportable lending in Colorado accounted for 9.0 percent of total institutional HMDA-reportable lending by number of loans and 10.2 percent by dollar volume. CRA small business lending in Colorado accounted for 5.2 percent of the bank's total CRA small business lending by number of loans and 4.7 percent by dollar volume. Overall, the bank's HMDA-reportable and CRA lending activity in the state was greater than the percentage of total institutional deposits.

The following table shows lending activity from January 1, 2015, through December 31, 2016.

Statewide Summary of Lending Activity Assessment Areas Located in Colorado

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	1,182	27.6%	\$439,941	61.2%
HMDA Refinance	519	12.1%	\$162,112	22.5%
HMDA Home Improvement	74	1.7%	\$8,051	1.1%
HMDA Multi-Family	0	0.0%	\$0	0.0%
Total HMDA	1,775	41.5%	\$610,104	84.8%
Total Small Business	2,503	58.5%	\$108,956	15.2%
Total Farm	0	0.0%	\$0	0.0%
TOTAL LOANS	4,278	100.0%	\$719,060	100.0%

Originations and Purchases

Colorado

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

Lending Test

The lending test rating in the state of Colorado is outstanding. Overall, performance in Colorado with regard to the geographic distribution of loans reflects excellent penetration throughout the assessment areas. The distribution of loans by borrower income reflects good penetration among customers of different income levels and businesses of different sizes. Additionally, Compass made an excellent level of community development loans in Colorado.

During the review period, Compass Bank reported 2,503 small business loans and 1,775 HMDA-reportable loans in Colorado. As such, small business lending was given greater weight when determining the lending test rating for Colorado. The rating for Colorado is based on performance in the Denver full-scope assessment area. Approximately 72.5 percent of the bank's HMDA-reportable and small business lending by number of loans in Colorado occurred within this assessment area.

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

Geographic and Borrower Distribution

The geographic distribution of Compass Bank's HMDA-reportable and small business loans is excellent, and the distribution of loans by borrower income and revenue size of businesses is good. As noted above, the rating for the state of Colorado is derived from the Denver full-scope assessment area. A detailed discussion of the borrower and geographic distribution of lending for this assessment area is included in the next section of this report.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the state of Colorado. The bank originated 26 community development loans totaling \$91.7 million in Colorado assessment areas during the review period, including 15 loans for \$51.5 million in the Denver full-scope assessment area. Performance was excellent in Denver. Performance in the limited-scope assessment areas was also excellent. Statewide community development lending performance was driven by performance in the full-scope assessment area. More information on community development loans can be found in the full-scope assessment area section of this report.

Investment Test

The investment test rating for Colorado is high satisfactory.

The bank made a significant level of qualified investments and contributions totaling \$42.1 million that directly benefited the Colorado assessment areas. The bank's investment portfolio for the state included LIHTC investments, mortgage-backed securities, Equity Equivalent (EQ2) investments, and stock purchases in CDFIs, investments in SBA loan pools, and grants. The bank also had contributions totaling \$27,500 to organizations that serve the entire state, including a statewide small business loan fund and an organization that provides

Colorado

educational services for low- and moderate-income children. Lastly, the bank had investments that benefited all states within the bank's footprint, including Colorado; these investments are described in the institution overview.

The bank's performance in the Denver full-scope assessment area was good. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section, and a summary of the bank's investments and contributions for all assessment areas can be found in Appendix F.

Service Test

The service test rating for Colorado is high satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. Statewide, banking services and hours of operation do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. During the review period, the bank did not open or close any branch offices in the state of Colorado. Overall, the bank's record of opening and closing of branch offices has generally not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or low- and moderate-income individuals.

Community Development Services

The bank provides a relatively high level of community development services that benefit low- and moderate-income residents and small businesses in Colorado. The bank provided a total of 1,553 qualified service hours during the examination period, including 1,247 service hours in the Denver full-scope assessment area. Performance in Denver, the only full-scope assessment area in the state, was good. Additionally, employees engaged in 306 total service hours in the four limited-scope assessment areas. Furthermore, bank employees engaged in 20 service hours at statewide organizations that benefited a broader statewide or regional area, including the bank's assessment areas.

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

Denver, Colorado

METROPOLITAN AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DENVER, COLORADO ASSESSMENT AREA

Overview

The Denver assessment area includes Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson counties, which are 6 of the 10 counties that make up the Denver-Aurora-Lakewood, CO MSA. As of December 31, 2016, Compass Bank operated 28 branch offices in the assessment area. The bank's branch presence in the assessment area represents 73.7 percent of branches and 84.4 percent of deposits in Colorado. In addition, the market represents the largest concentration of combined HMDA-reportable and CRA small business lending in the state, at 69.3 percent by dollar volume.

Denver is a very active banking market. According to the June 30, 2016 FDIC Summary of Deposits Report, there were 70 financial institutions operating 649 branch locations in the assessment area with \$75.6 billion in total deposits. Compass Bank was ranked 7th in the market with 2.5 percent of deposits (\$1.9 billion). Wells Fargo Bank had the largest deposit market share at 26.8 percent, followed by U.S. Bank with 13.6 percent, and FirstBank with 13.4 percent.

HMDA-reportable and CRA small business lending are similarly competitive. Compass Bank's HMDA-reportable lending accounted for 0.5 percent of total HMDA-reportable lending activity in the market in 2015 and 0.2 percent in 2016, ranking 46th and 78th, respectively. In 2016, Wells Fargo, JPMorgan Chase, Quicken Loans, and U.S. Bank were the top HMDA lenders in the assessment area. CRA small business lending in 2016 was led by Citibank, American Express, Chase Bank, and Wells Fargo Bank. Compass ranked 12th in 2015 and 13th in 2016 with 1.3 percent and 1.1 percent of the total CRA small business loans, respectively.

Population and Income Characteristics

According to 2017 U.S. census data, the population of the Denver assessment area was estimated at approximately 2.8 million people. From 2010 to 2016, the assessment area population grew by 12.3 percent, which was greater than the statewide population growth rate of 6.5 percent. Since 2010, all of the counties in the assessment area have posted population gains ranging from 6.9 percent to 19.1 percent.²⁵⁷

The assessment area is made up of 605 census tracts: 69 tracts are low-income (11.4 percent), 137 tracts are moderate-income (22.6 percent), 197 tracts are middle-income (32.6 percent), 195 tracts are upper-income (32.2 percent), and 7 tracts have unknown income (1.2 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Denver-Aurora-Lakewood MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for

²⁵⁷ QuickFacts. U.S. Census Bureau, n.d. Web. 1 May 2018. <http://quickfacts.census.gov>

Denver, Colorado

the MSA increased from \$79,900 in 2015 to \$80,100 in 2016. Data shows that the median family income was highest in Douglas County (\$108,613) and lowest in Denver County (\$57,182).²⁵⁸

Borrower Income Levels Denver-Aurora-Lakewood, CO MSA

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2015	\$79,900	0 - \$39,949	\$39,950 - \$63,919	\$63,920 - \$95,879	\$95,880 - & above
2016	\$80,100	0 - \$40,049	\$40,050 - \$64,079	\$64,080 - \$96,119	\$96,120 - & above

2016 FFIEC census data indicates that 39.2 percent of families in the assessment area are considered low- to moderate-income.²⁵⁹ Denver County had the highest rate of poverty at 16.4 percent between 2012 and 2016.²⁶⁰ Comparatively during the same time, the national poverty rate was 15.1 percent.²⁶¹ Although Denver County had a decline in the percentage of people living in poverty from one five-year period to the next (2007-2011 to 2012-2016), the state poverty rate increased by 5.0 percent. While Douglas County and Broomfield County had the lowest percentages of people living in poverty, 3.8 percent and 5.9 percent, respectively, the two counties inversely had the most significant increase in the number of people living in poverty, a 22.2 percent increase in Douglas County and a 17.8 percent increase in Broomfield County.²⁶² Overall, 29.1 percent of families living in low-income census tracts in the assessment area live below the poverty level and 15.1 percent of families living in moderate-income census tracts live below the poverty level.²⁶³

Economic Conditions

Denver, Colorado is recognized as the Mile High City for its high elevation; the city was initially founded as a mining hub.²⁶⁴ In Denver, average annual earnings in the mining sector are over 2.5 times the U.S. earnings in this sector. Further, the share of high-wage jobs in Denver is 50.0 percent higher than the national average,²⁶⁵ primarily driven by the technology sector, specifically the aerospace industry, which forms a large and growing cluster within the sector. In 2018, the Colorado Economic Development Commission committed \$14 million in tax incentives to Maxar Technologies to move its headquarters to Denver in the next eight years, bringing 800 technology jobs at an annual wage of \$116,917.²⁶⁶ Top employers in Denver include HealthOne, University of Colorado Hospital, Lockheed Martin, and Centura Health.²⁶⁷

²⁵⁸ FRB Atlanta Calculations of 2016 Census Data

²⁵⁹ FRB Atlanta Calculations of 2015 FFIEC Census Data

²⁶⁰ "Denver, CO MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 1 May 2018. <http://www.policymap.com/>

²⁶¹ Ibid

²⁶² Ibid

²⁶³ FRB Atlanta Calculations of 2016 Census Data

²⁶⁴ Denver, Colorado. Best Places to Live. U.S. News & World Report, Real Estate. n.d. Web. 9 May 2018.

<https://realestate.usnews.com/places/colorado/denver>

²⁶⁵ Precis U.S. Metro. Denver-Aurora-Lakewood CO. Moody's Analytics, February 2018. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

²⁶⁶ Job alert: Maxar Technologies announces plan to bring HQ and 800 new jobs to Colorado. Built in Colorado. N.d. Web. 26 June 2018.

<https://www.builtincolorado.com/2018/02/15/maxar-technologies-new-headquarters-hiring-Colorado>

²⁶⁷ Precis U.S. Metro. Denver-Aurora-Lakewood CO. Moody's Analytics, February 2018. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

Denver, Colorado

In terms of economic conditions for small businesses, Moody's predicts that small businesses will fuel job creation in Denver's future.²⁶⁸ Correspondingly, venture capital funding for entrepreneurial start-ups has grown by two thirds since 2017, along with shared workspace resources.²⁶⁹ According to 2016 Dun & Bradstreet information, there were 166,018 businesses within the Denver assessment area, 91.9 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses.²⁷⁰ Additionally, 19.4 percent of small businesses in the assessment area were located in moderate-income tracts, while there were far fewer in low-income tracts at 7.9 percent.

According to an analysis of CRA loan data, there were 70,499 small business loans made in 2016.²⁷¹ Loans made to firms with revenues of \$1 million or less represented 50.2 percent of these total small business loans.²⁷² While lending to small businesses grew in all counties over the review period, between 2013 and 2016 there was a 19.4 percent drop in the growth of loans to businesses with revenues of \$1 million or less.²⁷³ This may be an indication that smaller firms are utilizing alternative lending sources in the market.

The Colorado Enterprise Zone (EZ) Program promotes business development and growth through the provision of state income tax incentives.²⁷⁴ Businesses that may qualify for the EZ designation are located in or plan to expand in economically distressed areas characterized by high unemployment, low per capita income, or slow population growth below 25.0 percent of the state average. Since January 2014, businesses that participate in qualified economic development projects can earn tax credits for related purchase of equipment or commercial vehicles related to the project or for job training expenses, employer sponsored health insurance, research and development, or rehabilitation of vacant buildings benefiting Enterprise Zones.²⁷⁵ The assessment area's strong manufacturing mining sector can also earn sales tax exemption for expansion in designated areas.

Local businesses and their employees may also benefit from tax incentives such as tax abatement, low-interest loans, employee relocation assistance, mass transit employee payroll tax savings, and one-on-one business counseling at the city's Small Business Development Centers at Johnson & Wales University and at the Denver Metro Chamber of Commerce.²⁷⁶

A low unemployment rate is evidence of the effectiveness of economic development and workforce resources in the Denver assessment area. As shown in the following chart, the unemployment rate in the Denver MSA fell from 3.7 percent in 2015 to 3.1 percent in 2016. This was well below the national rate at 4.7 percent for this period and slightly below the statewide unemployment rate of 3.3 percent.²⁷⁷ While the existing Denver

²⁶⁸ Ibid

²⁶⁹ Ibid

²⁷⁰ FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

²⁷¹ Denver, CO MSA (U.S. Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 1 May 2018. <http://www.policymap.com/>

²⁷² Ibid

²⁷³ Ibid

²⁷⁴ Colorado Enterprise Zone Program Fact Sheet. Colorado Office of Economic Development & International Trade: Business funding & incentives. n.d. Web. 27 June 2018. <http://www.metrodenver.org/do-business/incentives/enterprise-zones/#>

²⁷⁵ Ibid

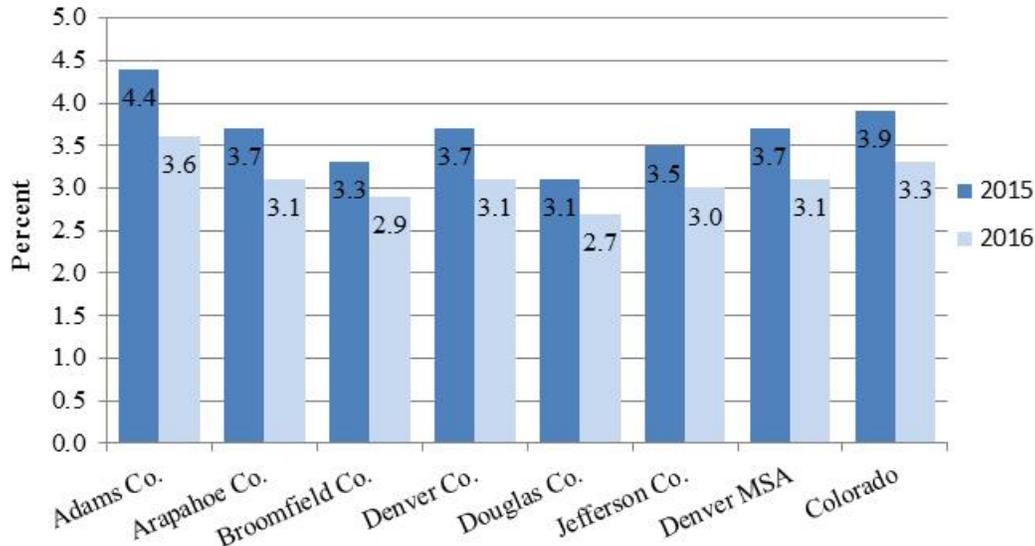
²⁷⁶ "About Us." Denver Metro Small Business Development Center, www.denversbdc.org/about-us.

²⁷⁷ "At a Glance Tables." U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 16 Oct. 2017. <http://www.bls.gov/eag/home.htm>

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workforce is highly skilled and there are diverse employment opportunities and industries, future job growth may be inhibited by labor constraints due to an unqualified new workforce.²⁷⁸

Unemployment Rates - CO Denver



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

According to the 2016 census data, there were 1,031,169 housing units located in the assessment area, of which 61.2 percent were owner-occupied, 31.5 percent were rental units, and 7.2 percent were vacant. While a majority of units were owner-occupied, a disproportionately higher percentage of housing units in low- and moderate-income tracts were rental units or vacant. In low-income census tracts, approximately 65.8 percent of all housing units were rentals or vacant; in moderate-income census tracts, 51.3 percent of the units were rental or vacant. The median age of the housing stock was 33 years, though the median age of housing was older, 39 years, in both low- and moderate-income census tracts compared to the assessment area overall.²⁷⁹ These factors suggest that HMDA-reportable lending opportunities in the low- and moderate-income tracts may be limited.

During the review period, home prices continued to rise steadily. In 2015, Douglas County had the highest median annual home sales price followed by Broomfield County and Denver County.²⁸⁰ The median home price for a detached single-family home in the city of Denver in 2016 was \$378,000, a 43.3 percent increase from \$263,800 in 2011.²⁸¹ Attached single-family homes are more affordable in the assessment area overall than compared to the city of Denver; the assessment area median home sales price is \$300,940, which represents a 96.0 percent

²⁷⁸ Precip U.S. Metro. Denver-Aurora-Lakewood CO. Moody's Analytics, February 2018. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

²⁷⁹ *Housing an Inclusive Denver: Setting Housing Policy, Strategy Investment Priorities (2018-2023)*. Enterprise Community Partners. n.d. Web. 1 May 2018. [https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing%20Advisory%20Committee/Housing%20an%20Inclusive%20Denver%20Public%20Review%20Draft%20--%20final%20\(2017%2009-29\).pdf](https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing%20Advisory%20Committee/Housing%20an%20Inclusive%20Denver%20Public%20Review%20Draft%20--%20final%20(2017%2009-29).pdf)

²⁸⁰ "Denver Colorado (HUD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 1 May 2018. <http://www.policymap.com/>

²⁸¹ *Housing an Inclusive Denver: Setting Housing Policy, Strategy Investment Priorities (2018-2023)*. Enterprise Community Partners. n.d. Web. 1 May 2018. [https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing%20Advisory%20Committee/Housing%20an%20Inclusive%20Denver%20Public%20Review%20Draft%20--%20final%20\(2017%2009-29\).pdf](https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing%20Advisory%20Committee/Housing%20an%20Inclusive%20Denver%20Public%20Review%20Draft%20--%20final%20(2017%2009-29).pdf)

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increase in median sales prices for attached homes from 2011 and 2016. Affordable housing availability is complicated by the over-valuation of the housing market in the assessment area, with housing prices rising 59.0 percent over the pre-recession peak. This is the largest gain in any metro area nationally.²⁸² Increasing housing prices result in higher assessed property values which precipitate higher tax bills. Between 2013 and 2015, property values increased by approximately 30.0 percent and by an additional 26.0 percent between 2015 and 2017. Increased taxes could impact current owners' ability to afford and retain their homes.²⁸³

Rents in the apartment market have increased progressively during the review period. However, median incomes have not increased at the same rate, resulting in cost burden (paying more than 30.0 percent of income towards housing costs). The city of Denver is estimated to have one of the highest median rent growths forecast in the nation.²⁸⁴ From 2011 to 2016, rents in the city increased on average by 46.0 percent. Rent increases contributed to the 5.0 percent jump in the number of cost-burdened renters in the assessment area from 2010 to 2015. City-wide, 36.0 percent of residents are cost-burdened, with renters at a rate twice as high as cost-burdened homeowners.²⁸⁵

Rental housing is least affordable in Douglas County, where only 10.3 percent of two-bedroom rental units were affordable for a family of four earning 50.0 percent of the area median income between 2012 and 2016. Two-bedroom rental housing units are more affordable in Adams County and Jefferson County, where 41.0 percent and 40.4 percent of units, respectively, are affordable for a four-person family.²⁸⁶

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

²⁸² Precip U.S. Metro. Denver-Aurora-Lakewood CO. Moody's Analytics, February 2018. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

²⁸³ *Housing an Inclusive Denver: Setting Housing Policy, Strategy Investment Priorities (2018-2023)*. Enterprise Community Partners. n.d. Web. 1 May 2018. [https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing%20Advisory%20Committee/Housing%20an%20Inclusive%20Denver%20Public%20Review%20Draft%20--%20final%20\(2017%2009-29\).pdf](https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing%20Advisory%20Committee/Housing%20an%20Inclusive%20Denver%20Public%20Review%20Draft%20--%20final%20(2017%2009-29).pdf)

²⁸⁴ "2017's Best & Worst Places to Rent in America." Wallet Hub. N.d. Web. 2 May 2018. <https://wallethub.com/edu/best-cities-for-renters/23010/>

²⁸⁵ *Housing an Inclusive Denver: Setting Housing Policy, Strategy Investment Priorities (2018-2023)*. Enterprise Community Partners. n.d. Web. 1 May 2018. [https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing%20Advisory%20Committee/Housing%20an%20Inclusive%20Denver%20Public%20Review%20Draft%20--%20final%20\(2017%2009-29\).pdf](https://www.denvergov.org/content/dam/denvergov/Portals/690/Housing%20Advisory%20Committee/Housing%20an%20Inclusive%20Denver%20Public%20Review%20Draft%20--%20final%20(2017%2009-29).pdf)

²⁸⁶ "Denver, CO." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 30 Apr. 2018. <http://www.policymap.com/>

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Combined Demographics Report

Assessment Area: CO Denver

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	69	11.4	59,407	9.8	17,302	29.1	133,705	22.1
Moderate-income	137	22.6	132,205	21.8	19,977	15.1	103,547	17.1
Middle-income	197	32.6	196,712	32.5	10,576	5.4	122,139	20.2
Upper-income	195	32.2	216,904	35.8	4,979	2.3	245,837	40.6
Unknown-income	7	1.2	0	0.0	0	0.0	0	0.0
Total Assessment Area	605	100.0	605,228	100.0	52,834	8.7	605,228	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	119,985	41,061	6.5	34.2	65,821	54.9	13,103	10.9
Moderate-income	250,967	122,314	19.4	48.7	107,811	43.0	20,842	8.3
Middle-income	348,604	222,183	35.2	63.7	103,142	29.6	23,279	6.7
Upper-income	311,613	246,018	39.0	78.9	48,550	15.6	17,045	5.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	1,031,169	631,576	100.0	61.2	325,324	31.5	74,269	7.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	13,720	8.3	12,042	7.9	1,581	13.1	97	7.3
Moderate-income	33,315	20.1	29,656	19.4	3,467	28.7	192	14.5
Middle-income	50,342	30.3	47,016	30.8	2,964	24.5	362	27.3
Upper-income	68,223	41.1	63,665	41.7	3,892	32.2	666	50.2
Unknown-income	418	0.3	229	0.2	178	1.5	11	0.8
Total Assessment Area	166,018	100.0	152,608	100.0	12,082	100.0	1,328	100.0
Percentage of Total Businesses:			91.9		7.3		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	61	4.4	60	4.4	1	3.1	0	0.0
Moderate-income	175	12.6	166	12.2	9	28.1	0	0.0
Middle-income	443	31.8	433	31.8	10	31.3	0	0.0
Upper-income	709	50.9	697	51.3	12	37.5	0	0.0
Unknown-income	4	0.3	4	0.3	0	0.0	0	0.0
Total Assessment Area	1,392	100.0	1,360	100.0	32	100.0	0	.0
Percentage of Total Farms:			97.7		2.3		.0	

2016 FFIEC Census Data and 2016 D&B Information

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Credit and Community Development Needs

To better understand the community development and economic landscapes, several community development practitioners were contacted. These individuals discussed the various needs and opportunities across the region as well as how financial institutions can be responsive to local community development needs. Information from these conversations is included in the appropriate sections of this report. Several themes emerged from the discussions; in particular, contacts noted that low- to moderate-income communities require increased modes of transportation to access economic centers; increased transit-oriented, affordable housing units; innovations to increase opportunities for homeownership; and increased lending to small businesses.

Younger families are migrating into the Denver metropolitan area from southern, eastern, and the Western Slope of Colorado due to poor agricultural conditions. With increased population, economic development issues have emerged which are impacting housing, transportation, and the workforce. In-migrants to Denver are faced with decreased affordability due to rising rents and cost of living. Community contacts would like to see an increase in affordable, multifamily rental housing units. According to the City's Transit Oriented Development Strategic Plan, 70.0 percent of all households in Denver desire housing aligned with transit-oriented development.²⁸⁷ The plan also includes business recruitment, housing and neighborhood development, strategic lending tools, and key strategic projects.²⁸⁸ The City's 2002 community revitalization and stabilization plan, *Blueprint Denver*, is being updated to *Denverright* to continue to address multi-modal transportation access and land development.²⁸⁹ Financial institutions have an opportunity to lead or provide technical assistance through service on committees and work groups that are undertaking these issues.

Populations such as seniors, veterans, the disabled, and non-English speaking populations without savings and financial stability are most vulnerable to increasing housing and transportation costs. Public transit riders face rising fares while East Denver residents reside in a "transportation desert," pending expansion of services to this geography. Banks have an opportunity to increase housing stability by contributing to nonprofit operational support, investing in loan funds, or participating in financing affordable housing acquisition and development, particularly since the City's Inclusionary Housing Ordinance (IHO) is no longer effective for new construction after January 2017.

One community contact indicated that qualified mortgage rules, increased property taxes, and lack of available real estate in Colorado have adversely impacted low- and moderate-income aspiring homeowners, retired individuals, and small businesses, who typically use home equity for business capital. These obstacles contribute to extended times to close home purchase loans and also present appraisal challenges. According to the Denver Office of Economic Development's study, low- and moderate-income residents in western Denver neighborhoods such as Villa Park, Ruby Hill, and Mar Lee are particularly vulnerable to gentrification and displacement as higher wage earners purchase home inventory in these neighborhoods and property values increase.²⁹⁰ The City is trying to increase low- and moderate-income homebuyer opportunities and homeowner retention through down payment

²⁸⁷ Transit Oriented Development Strategic Plan 2014: Executive Summary. Transit Oriented Denver. n.d. 12 Apr. 2018.

https://www.denvergov.org/content/dam/denvergov/Portals/193/documents/TOD_Plan/TOD_Strategic_Plan_Executive_Summary.pdf

²⁸⁸ Ibid

²⁸⁹ Blueprint Denver. n.d. Web. 12 Apr. 2018. <https://www.denvergov.org/content/denvergov/en/community-planning-and-development/planning-and-design/blueprint-denver.html>

²⁹⁰ *Gentrification Study: Mitigating involuntary displacement (May 2016)*. City of Denver, Office of Economic Development. n.d. Web. 6 July 2018. <https://www.denvergov.org/content/dam/denvergov/Portals/690/Reports%20and%20Studies/GENT%20STUDY%20051816.pdf>

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and closing cost assistance, redevelopment of blighted properties, financial assistance for single-family home rehabilitation, emergency home repair, historic preservation, brownfield redevelopment, and infill development.²⁹¹

Neighborhood revitalization has the potential to positively impact small business startups and expansions and increase demand for access to business capital. According to one contact, the area has noted a decrease in SBA 504 loans. Local smaller, family-owned banks are making credit decisions centrally due to capacity challenges. Some banks may not lend due to perceived risks or increased loan processing times. The contact recommends that banks take advantage of the SBA streamlined application process. Small businesses have access to free or low-cost counseling and technical assistance within the market through SBA resources partners, including 14 SBDCs, SCORE chapters, VBOCs, Procurement TACs, SBA women's business centers, microbusiness developers, micro-lenders, and revolving loan funds. Community contacts see opportunities for banks to participate in lending programs, increase direct lending, and provide technical assistance through event panels, small business education, and assignment of bank loan officers to small business development offices.

²⁹¹ About. DURA. Renew Denver. n.d. 9 May 2018. <http://renewdenver.org/about-dura/>

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Denver assessment area is excellent. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes an excellent level of community development loans.

During the review period, the bank reported 1,242 HMDA-reportable loans compared to 1,859 small business loans in the Denver assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in evaluating the bank's lending test performance. The Denver assessment area contains 6.3 percent of the bank's total HMDA-reportable lending by number of loans and 6.9 percent by dollar volume, and 3.9 percent of its total small business lending by number of loans and 3.7 percent by dollar volume. In comparison, 3.9 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low- and moderate-income tracts is excellent overall. In low-income tracts, Compass Bank originated 12.6 percent of its small business loans where 7.9 percent of small businesses in the assessment area are located and outperformed aggregate in 2015 and 2016. Additionally, the bank originated 24.8 percent of its small business loans in moderate-income tracts, where 19.4 percent of small businesses in the assessment area are located, and exceeded aggregate performance in both years.

Home Purchase Loans

Home purchase lending in low- and moderate-income census tracts is excellent. For the review period, Compass Bank's home purchase lending in low- and moderate-income census tracts (37.3 percent) exceeded the percentage

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of owner-occupied units (25.9 percent) in these tracts. In addition, the bank's performance was greater than the aggregate lending performance in low- and moderate-income tracts for both years.

Home Refinance Loans

Home refinance lending in low-income census tracts is excellent. The percentage of home refinance loans originated in low-income census tracts (8.0 percent) was greater than the percentage of owner-occupied units in these tracts (6.5 percent), and performance was greater than the aggregate lending performance in 2015 and 2016.

Home refinance lending in moderate-income census tracts is good. The percentage of home refinance loans originated in moderate-income census tracts (18.0 percent) was slightly less than the percentage of owner-occupied units (19.4 percent) in these tracts; however, the bank's performance exceeded aggregate lenders over the review period.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is good. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes is good. For the review period, 63.9 percent of the bank's loans were originated to businesses with revenues of \$1 million or less. By comparison, 91.9 percent of total businesses in the assessment area are classified as small businesses. Compass Bank's performance was greater than the aggregate lending performance in both years. Additionally, 98.4 percent of small business loans were originated in amounts of \$250,000 or less, indicating a willingness to lend in the smaller amounts that are typically requested by small businesses.

Home Purchase Loans

Home purchase lending to low- and moderate-income borrowers is excellent. Compass Bank's home purchase lending to low-income borrowers (12.3 percent) was less than the percentage of low-income families living in the assessment area (22.1 percent), while home purchase lending to moderate-income borrowers (30.6 percent) was far greater than the percentage of moderate-income families (17.1 percent) in the assessment area. The bank's home purchase lending to low- and moderate-income borrowers exceeded aggregate in both years.

Home Refinance Loans

Home refinance lending to low-income borrowers is good. While the bank's home refinance lending to low-income borrowers (8.3 percent) was significantly less than the percentage of low-income families, the bank's performance exceeded aggregate lenders in 2015 and 2016.

Home refinance lending to moderate-income borrowers is excellent. Compass Bank's home refinance lending to moderate-income borrowers (21.9 percent) was greater than the percentage of moderate-income families in the assessment area and exceeded aggregate lending in both years of the review period.

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Community Development Lending

Compass Bank makes an excellent level of community development loans in the Denver assessment area. The bank originated 15 community development loans totaling \$51.5 million during the review period, including a loan for \$15.5 million to finance infrastructure improvements in a moderate-income geography associated with a mixed-use redevelopment project with affordable housing unit set-asides. Other loans financed small businesses, creating over 100 jobs for low- and moderate-income individuals. Compass Bank also financed two Low-Income Housing Tax Credit projects that provided over 140 units of affordable housing, a portion of which is dedicated for homeless veterans while another portion is for seniors earning less than 60 percent of the area median income. Additionally, Compass Bank made two loans funding a charter school with 68 percent of students receiving free or reduced-price lunches. Given Compass Bank's high volume of community development loans strengthened by the diversity of loan purposes responding to the needs of the community, Compass Bank is a leader in providing community development loans in the Denver assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Denver assessment area is good. The bank made a significant level of qualified community development investments that exhibited good responsiveness to credit and community development needs in the assessment area.

The bank invested approximately \$33.1 million in the Denver assessment area, including \$24.9 million in new investments during the review period and \$7.8 million in prior period investments. The total also includes \$380,940 in contributions made during the review period. The bank leveraged several different investment vehicles in the Denver assessment area, including Low-Income Housing Tax Credits, EQ2 investments in CDFIs, and mortgage-backed securities; these investments financed affordable housing and community services for low- and moderate-income individuals. Notably, the bank invested \$20.3 million in two LIHTC projects, which generated about 150 new affordable housing rental units; these investments were responsive to the region's significant need for new affordable housing.

The bank's contributions also demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$260,675 for community services to low- and moderate-income individuals, \$80,265 for affordable housing and \$40,000 to support economic development. The bank also had contributions that served a broader regional area that includes the Denver assessment area.

Notable examples of the bank's investments include the following:

- A \$1.5 million dollar investment and \$18,000 in grants to a local affordable housing CDFI; the support of this organization addresses the critical need for more affordable housing for low- and moderate-income residents in the assessment area.
- A \$500,000 investment in a CDFI focused on creating healthy and sustainable communities through investments in housing and community facilities.

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- Grants totaling \$25,000 to support a small business development program operated by an SBA-certified Women's Business Center; this organization targets low-income, Latino, female and other underserved business owners and entrepreneurs.
- \$20,000 in grants to support a local asset building coalition; the funds will be used for providing financial education and free tax assistance to low- and moderate-income individuals.

SERVICE TEST

Compass Bank's service test performance in the Denver assessment area is good.

Retail Services

Retail banking services are adequate. The distribution of 28 branch offices and 30 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has two branches in low-income tracts; thus the percentage of branches in low-income tracts (7.1 percent) was less than both the percentage of households (11.2 percent) and percentage of businesses (8.3 percent) in the same geography. The distribution of the bank's eight branches (28.6 percent) in moderate-income tracts exceeded both the percentage of households (24.0 percent) and the percentage of businesses (20.1 percent) in the same geography. Overall, delivery systems are reasonably accessible within the bank's geographies and to individuals of different income levels.

During the examination period, the bank neither opened nor closed any branches in the assessment area. Additionally, the bank did not open any full-service ATMs, but closed one in a middle-income tract. Notably, a total of 66 stand-alone, cash-only ATMs were closed and two opened during the review period. The bank's relationship with third-party vendors necessitated closure, relocation, or non-renewal of ATM contracts. Overall, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.

Compass offers extended hours in all of its branch offices located in low- and moderate-income tracts. No weekend hours are offered at any of the branch locations in this assessment area. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

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Geographic Distribution of Branches & ATMS

Assessment Area: CO Denver

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	2	7.1%	0	0	2	2	0	Total	13	11.5%	2	6.7%	0	0	11	13.3%	0	3	69	11.4%	11.2%	8.3%
DTC	0		0	0				SA	11		0		0	0	11		0	3				
Moderate	8	28.6%	0	0	7	8	0	Total	25	22.1%	8	26.7%	0	0	17	20.5%	0	18	137	22.6%	24.0%	20.1%
DTC	0		0	0				SA	17		0		0	0	17		0	18				
Middle	7	25.0%	0	0	7	7	0	Total	37	32.7%	9	30.0%	0	1	28	33.7%	1	24	197	32.6%	34.0%	30.3%
DTC	0		0	0				SA	28		0		0	0	28		1	24				
Upper	11	39.3%	0	0	9	10	0	Total	38	33.6%	11	36.7%	0	0	27	32.5%	1	21	195	32.2%	30.8%	41.1%
DTC	0		0	0				SA	27		0		0	0	27		1	21				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	7	1.2%	0.0%	0.3%
DTC	0		0	0				SA	0		0		0	0	0		0	0				
Total	28	100.0%	0	0	25	27	0	Total	113	100.0%	30	100.0%	0	1	83	100.0%	2	66	605	100.0%	100.0%	100.0%
DTC	0		0	0				SA	83		0		0	0	83		2	66				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTC - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides a relatively high level of community development services in the Denver assessment area. Employees provided 1,247 service hours to qualified organizations by participating in 139 community development services.

Compass Bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development to support low- and moderate-income individuals, communities, and small businesses in the Denver assessment area. Of the bank's total service hours, 789 hours were committed to financial education. Additionally, bank staff engaged in 258 hours of board or committee service to qualified, nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- Over 20 bank employees provided small business education at bank branches and at a small business development organization serving Latino entrepreneurs in low- and moderate-income geographies.
- A bank leader provided board and Finance Committee service to a community load fund which provides real estate loans to support affordable housing preservation, revitalization, and construction for low- and moderate-income individuals and communities.

Compass demonstrated a good level of engagement in community development services, as well as responsiveness to identified affordable housing and economic development needs in the Denver assessment area. Overall, the bank's performance is considered good.

Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLORADO METROPOLITAN ASSESSMENT AREAS

- **Boulder Assessment Area (Boulder County)**
 - As of December 31, 2016, Compass Bank operated four branches in the assessment area, representing 10.5 percent of its branches in Colorado.
 - As of June 30, 2016, the bank had \$264.6 million in deposits in this assessment area, representing a market share of 2.9 percent and 11.0 percent of Compass Bank's total deposits in Colorado.
- **Colorado Springs Assessment Area (El Paso County)**
 - As of December 31, 2016, Compass Bank operated two branches in the assessment area, representing 5.3 percent of its branches in Colorado.
 - As of June 30, 2016, the bank had \$77.9 million in deposits in this assessment area, representing a market share of 1.1 percent and 3.2 percent of Compass Bank's total deposits in Colorado.
- **Fort Collins Assessment Area (Larimer County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 7.9 percent of its branches in Colorado.
 - As of June 30, 2016, the bank had \$90.1 million in deposits in this assessment area, representing a market share of 1.2 percent and 3.7 percent of Compass Bank's total deposits in Colorado.
- **Greeley Assessment Area (Weld County)**
 - As of December 31, 2016, Compass Bank operated one branch in the assessment area, representing 2.6 percent of its branches in Colorado.
 - As of June 30, 2016, the bank had \$62.4 million in deposits in this assessment area, representing a market share of 1.8 percent and 2.6 percent of Compass Bank's total deposits in Colorado.

Metropolitan Areas (Limited Review)

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Boulder	Not Consistent (Below)	Consistent	Not Consistent (Below)
Colorado Springs	Not Consistent (Below)	Not Consistent (Above)	Not Consistent (Below)
Fort Collins	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Greeley	Not Consistent (Below)	Consistent	Not Consistent (Below)

For the lending test, Compass Bank received a rating of outstanding for the State of Colorado. Although below the overall state performance, lending levels for the geographic distribution of loans were excellent in Boulder and good in the remaining three metropolitan limited-scope assessment areas. Lending levels were good for the borrower distribution of loans in all four assessment areas. There was an adequate level of community development loans in the Boulder assessment area, and an excellent level of community development loans in the Colorado Springs, Fort Collins, and Greeley assessment areas.

For the investment test, Compass Bank received a rating of high satisfactory for the State of Colorado. The bank had an excellent level of investments in the Colorado Springs metropolitan limited-scope assessment areas and performance was stronger than the state performance. Performance in the Boulder and Greeley metropolitan limited-scope assessment areas was consistent with the statewide performance. The bank had an adequate level of investments in the Fort Collins assessment area and performance was weaker than performance for the state.

For the service test, Compass Bank received a rating of high satisfactory for the State of Colorado. Although performance in all four metropolitan assessment areas was below the bank's state performance, service test performance in these assessment areas was still considered adequate.

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

New Mexico

CRA RATING FOR NEW MEXICO: OUTSTANDING

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects good penetration throughout the assessment areas and the distribution of loans by borrower income reflects excellent penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an excellent level of community development loans in its New Mexico assessment areas.
- The bank provides a significant level of qualified community development investments and grants that are responsive to several identified community development needs of the New Mexico assessment areas.
- Retail banking services are good in the bank's New Mexico assessment areas.
- The bank provides a relatively high level of community development services throughout the New Mexico assessment areas.

New Mexico

SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment area in New Mexico:

- Albuquerque

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

- Las Cruces
- Southern New Mexico

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW MEXICO

As of June 30, 2016, Compass Bank had \$690.9 million in deposits in New Mexico accounting for 1.0 percent of Compass' total deposits. Compass Bank operated 19 branch offices in New Mexico, as of December 31, 2016, representing 2.9 percent of the bank's total branches. HMDA-reportable lending in New Mexico accounted for 2.4 percent of total institutional HMDA-reportable lending by number of loans and 1.9 percent by dollar volume. CRA small business lending in New Mexico accounted for 2.3 percent of the bank's total CRA small business lending by number of loans and 2.1 percent by dollar volume. Overall, the bank's HMDA-reportable and CRA lending activity was greater than the percentage of total institutional deposits in the state.

The following table shows lending activity from January 1, 2015, through December 31, 2016.

Statewide Summary of Lending Activity Assessment Areas Located in New Mexico

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	292	18.5%	\$72,569	44.4%
HMDA Refinance	169	10.7%	\$41,149	25.2%
HMDA Home Improvement	17	1.1%	\$249	0.2%
HMDA Multi-Family	0	0.0%	\$0	0.0%
Total HMDA	478	30.3%	\$113,967	69.7%
Total Small Business	1,093	69.4%	\$49,447	30.2%
Total Farm	5	0.3%	\$190	0.1%
TOTAL LOANS	1,576	100.0%	\$163,604	100.0%

Originations and Purchases

New Mexico

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW MEXICO

Lending Test

The lending test rating in the state of New Mexico is outstanding. Overall, performance in New Mexico with regard to the geographic distribution of loans reflects good penetration throughout the assessment areas. The distribution of loans by borrower income reflects excellent penetration among customers of different income levels and businesses of different sizes. Additionally, Compass made an excellent level of community development loans in New Mexico.

During the review period, Compass Bank reported 1,093 small business loans and 478 HMDA-reportable loans in New Mexico. As such, small business lending was given greater weight when determining the lending test rating for New Mexico. The rating for New Mexico is based on performance in the Albuquerque full-scope assessment area. Approximately 2.0 percent of the bank's HMDA-reportable and small business lending by number of loans in New Mexico occurred within this assessment area.

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

Geographic and Borrower Distribution

The geographic distribution of Compass Bank's HMDA-reportable and small business loans is good and the distribution of loans by borrower income and revenue size of businesses is excellent. As noted above, the rating for the state of New Mexico is derived from the Albuquerque full-scope assessment area. A detailed discussion of the borrower and geographic distribution of lending for this assessment area is included in the next section of this report.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the state of New Mexico. The bank originated 13 community development loans totaling \$57.5 million in New Mexico assessment areas during the review period, including four loans for \$30.9 million in the Albuquerque full-scope assessment area. Performance was excellent in Albuquerque. Statewide community development lending performance was driven by performance in the full-scope assessment area. More information on community development loans can be found in the full-scope assessment area section of this report.

Investment Test

The investment test rating for New Mexico is high satisfactory.

The bank made a significant level of qualified investments and contributions totaling \$9.3 million that directly benefited the New Mexico assessment areas. The bank's investment portfolio for the state included mortgage-backed securities, EQ2 investments in CDFIs, investments in SBA loan pools, and grants. The bank also had contributions totaling \$8,500 to organizations that serve the entire state, including a statewide CDFI and small business technical assistance provider. Lastly, the bank had investments that benefited all states within the bank's footprint, including New Mexico; these investments are described in the institution overview.

New Mexico

The bank's performance in the Albuquerque full-scope assessment area was good. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section and a summary of the bank's investments and contributions for all assessment areas can be found in Appendix F.

Service Test

The service test rating for New Mexico is high satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank's geographies and individuals of different income levels in its assessment areas. Statewide, banking services and hours of operation do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. During the review period, the bank did not open any branch offices but closed one branch office located in a moderate-income tract in the state. Overall, the bank's record of opening and closing of branch offices has generally not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or low- and moderate-income individuals.

Community Development Services

The bank provides a relatively high level of community development services that benefit low- and moderate-income residents and small businesses in New Mexico. The bank provided a total of 875 qualified service hours during the examination period, including 661 service hours in the Albuquerque full-scope assessment area. Performance in Albuquerque, the only full-scope assessment area in the state, was good. Additionally, employees engaged in 214 total service hours in the two limited-scope assessment areas.

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

Albuquerque, New Mexico

METROPOLITAN AREA (Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ALBUQUERQUE, NEW MEXICO ASSESSMENT AREA

Overview

The Albuquerque assessment area includes Bernalillo and Sandoval counties, two of the four counties in the Albuquerque, NM MSA. As of December 31, 2016, Compass Bank operated 12 branches in the Albuquerque assessment area, which represents 63.2 percent of the branches statewide and 76.5 percent of its deposits in New Mexico. Additionally, the Albuquerque assessment area represents the largest concentration by number of loans of the bank's combined HMDA-reportable and CRA small business lending in the state, at 86.4 percent.

Albuquerque is a reasonably active banking market consisting of national and regional banks. According to the June 30, 2016 FDIC Summary of Deposits Report, there were 23 financial institutions operating 149 branch offices in the Albuquerque assessment area with a total of \$13.9 billion in deposits. Compass Bank ranked 7th with \$528.8 million in deposits and 3.8 percent of total deposits. Top competitor banks in the assessment area, respectively, include Wells Fargo Bank, Bank of America and BOK Financial, which collectively hold 69.6 percent of all deposits in the Albuquerque assessment area.

HMDA-reportable and CRA small business lending are very competitive in the Albuquerque market. Compass Bank's 2015 and 2016 residential loan production accounted for less than 1.0 percent of total HMDA-reportable loan activity in each year, ranking 34th and 33rd, respectively. For 2016, Wells Fargo, First Mortgage Company, BOK Financial, and Quicken Loans were the top HMDA lenders with approximately 22.0 percent market share. In 2016 Compass Bank ranked 9th in CRA small business loan production, accounting for 2.9 percent market share. The top three CRA small business lenders, Citibank, American Express, and Wells Fargo, accounted for nearly 52.0 percent market share.

Population and Income Characteristics

The estimated population in the Albuquerque assessment area was 819,280 as of July 2017, representing approximately 39.0 percent of the state's total population.²⁹² Nearly 83.0 percent of the assessment area population resides in Bernalillo County. The city of Albuquerque, which is the Bernalillo County seat, is the most populous city in New Mexico. The population in the city of Albuquerque increased by 2.4 percent from 2010 to 2016.²⁹³ A majority of the growth, however, occurred in Sandoval County, which grew by 7.9 percent, notably higher than the state population growth of 1.1 percent during the same time.

The assessment area is made up of 181 census tracts: 10 tracts are low-income (5.5 percent), 48 tracts are moderate-income (26.5 percent), 62 tracts are middle-income (34.3 percent), 60 tracts are upper-income (33.2 percent), and 1 tract has unknown income level (0.6 percent).

²⁹² QuickFacts. US Census Bureau, n.d. Web. 27 Apr 2018. <http://quickfacts.census.gov>

²⁹³ Ibid

Albuquerque, New Mexico

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Albuquerque MSA. As shown, the median family income increased from \$59,400 in 2015 to \$61,600 in 2016. Data shows that the median family income was considerably higher in Sandoval County (\$65,906) than in Bernalillo County (\$59,809).²⁹⁴ In addition, 34.1 percent of families in the assessment area are considered low-to moderate-income.²⁹⁵

Borrower Income Levels Albuquerque, NM MSA

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	49.99%	50%	79.99%	80%	119.99%	120%	& above
2015	\$59,400	0	\$29,699	\$29,700	\$47,519	\$47,520	\$71,279	\$71,280	& above
2016	\$61,600	0	\$30,799	\$30,800	\$49,279	\$49,280	\$73,919	\$73,920	& above

The level of poverty in the assessment area has increased significantly in the last few years. The estimated percent change in the number of people living below the poverty line between 2000 and the period of 2012-2016 was 66.3 percent in Bernalillo County and 82.0 percent in Sandoval County.²⁹⁶ Between 2012 and 2016, the percentage of people living in poverty in Bernalillo County was 18.7 percent and 14.4 percent in Sandoval County.²⁹⁷

A significant percent of families in the assessment area who live below the poverty level also live in low- and moderate-income areas. Specifically, 32.6 percent of families living in low-income census tracts live below the poverty level and 19.7 percent of families living in moderate-income census tracts live below the poverty level.²⁹⁸

Economic Conditions

Albuquerque sits along the Rio Grande River and is in close proximity to the Sandia Mountains.²⁹⁹ The city is a national mecca for the arts and boasts a diverse ethnic population; the cost of living and median home sales price are near or below the national averages.

Employment in the Albuquerque metro region is dominated by government, educational and health services, professional and business services and leisure and hospitality.³⁰⁰ The most significant growth industry between October 2016 and April 2017 was in information services, which grew by 6.3 percent. During the same time

²⁹⁴ "Albuquerque, NM MSA (US Census)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

²⁹⁵ FRB Atlanta Calculations of 2016 Census Data

²⁹⁶ "Albuquerque, NM MSA (US Census)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

²⁹⁷ Ibid

²⁹⁸ FRB Atlanta Calculations of 2016 Census Data

²⁹⁹ "Albuquerque MSA Quality Living, January 2017." Albuquerque Economic Development. n.d. Web. 15 May. 2018.

https://www.abq.org/uploads/files/Albuquerque%20MSA%20Quality%20Living%20PDF-EBook_1-1-2017.pdf

³⁰⁰ "Precis U.S. Metro. Albuquerque NM." Moody's Analytics, November 2017. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

Albuquerque, New Mexico

frame, the greatest contraction occurred in the manufacturing and mining sectors. Employment in the region comprises 45.0 percent of the state employment.³⁰¹

The major industry sectors in the region are aerospace and aviation, renewable technologies, semiconductors and electronics, nanotechnology and microsystems, optics and directed energy, and shared services.³⁰² In 2017 the top employers in the region, in order of number of employees were University of New Mexico, Kirtland Air Force Base, Sandia National Labs, Presbyterian Healthcare Services, and University of New Mexico Hospital.³⁰³ Kirtland Air Force Base is an anchor institution and a significant economic driver in the assessment area.³⁰⁴ According to a community contact, the economy in the Albuquerque region is very dependent on federal government spending, so swings in the federal budget can have significant impacts on the local economy.

Small businesses traditionally fuel job creation in the U.S. According to the U.S. Small Business Administration (SBA) Office of Advocacy, in 2013, 95.6 percent of New Mexico businesses were small and 55.5 percent of New Mexico employees were employed by small businesses.³⁰⁵ According Dun & Bradstreet information, there were 35,821 businesses within the Albuquerque assessment area; 91.6 percent had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses.³⁰⁶ Additionally, 25.4 percent of small businesses in the assessment area were located in moderate-income tracts, while there were far fewer in low-income tracts at 6.6 percent. Lending opportunities to this segment improved between 2014 and 2016 in the assessment area; small business loans grew by 6.6 percent in Bernalillo County and 10.4 percent in Sandoval County during this time period.³⁰⁷ In 2016 loans made to firms with revenues of \$1.0 million or less represented 51.5 percent of total small business loans in Bernalillo County and 55.9 percent in Sandoval County. This is an indication that there may be fewer obstacles for smaller firms to access credit in the market.

Support for small businesses in Albuquerque has increased with the establishment of the city's Economic Development Action Account (EDAct).³⁰⁸ The fund was started with \$5.5 million dollars and according to the EDAct Account Enabling Resolution, from 2013 to 2017 the fund supported 20 programs and assisted 1,000 business and entrepreneurs while growing to \$20 million to continue support to startups in the area.³⁰⁹

³⁰¹ "Albuquerque MSA Business Location Overview, May 2017." Albuquerque Economic Development. n.d. Web. 23 Mar. 2018. https://www.abq.org/uploads/files/Albuquerque%20MSA%20Business%20Location%20Overview%20PDF_5-15-2017.pdf

³⁰² "Albuquerque MSA Business Location Overview, May 2017." Albuquerque Economic Development. n.d. Web. 23 Mar. 2018. https://www.abq.org/uploads/files/Albuquerque%20MSA%20Business%20Location%20Overview%20PDF_5-15-2017.pdf

³⁰³ "Precis U.S. Metro. Albuquerque NM." Moody's Analytics, November 2017. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

³⁰⁴ "Aerospace and Aviation." Albuquerque Economic Development. n.d. Web. 31 Oct 2018. <https://www.abq.org/aerospace-and-aviation.aspx>

³⁰⁵ "New Mexico Small Business Profile, 2016." U.S. Small Business Administration Office of Advocacy. n.d. Web. 15 May 2018. https://www.sba.gov/sites/default/files/advocacy/New_Mexico.pdf

³⁰⁶ FRB Atlanta Calculations of 2016 Census Data

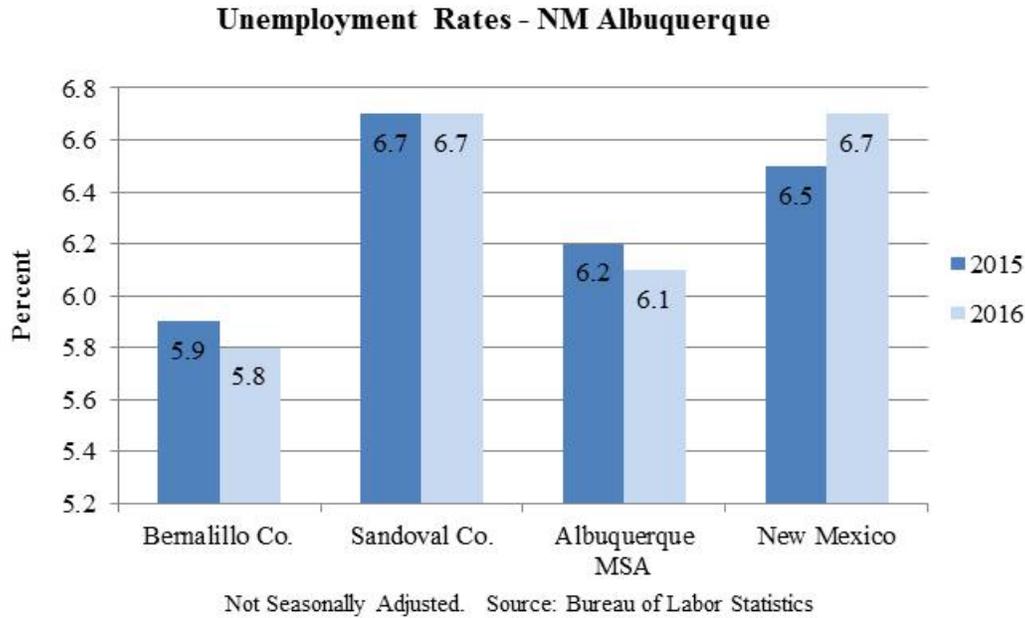
³⁰⁷ "Albuquerque, NM MSA (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 2 April 2018. <http://www.policymap.com/>

³⁰⁸ "Economic Development Action Account (EDAct)." City of Albuquerque. n.d. Web. 31 Oct 2018. <https://www.cabq.gov/economicdevelopment/economic-development-action-account-edact>

³⁰⁹ *Fund generates \$20 million for ABQ startups, city officials say.* Albuquerque Business First. N.d. Wb. 15 May 2018. <https://www.bizjournals.com/albuquerque/news/2017/08/29/city-fund-generates-20-million-for-abq-startups.html>

Albuquerque, New Mexico

Economic conditions have been relatively stable in the Albuquerque MSA though unemployment is elevated relative to the nation overall. As shown in the following table, the unemployment rate in the Albuquerque MSA fell from 6.2 percent in 2015 to 6.1 percent in 2016. This is above the national rate at 4.7 percent for this period, but below the 2016 statewide unemployment rate of 6.7 percent.³¹⁰



Job creation and workforce training are important priorities in the assessment area. Employers that offer job training programs and are expanding or relocating to create new jobs may be eligible for funds through the State of New Mexico Job Training Incentive Program.³¹¹ Collectively, 12 employer expansions created 865 jobs in 2015, which grew to 1,074 new jobs in 2016 and another 1,200 jobs in 2017. The region struggles with the lack of a skilled workforce. According to a community contact, the skilled workforce is likely to leave New Mexico for more economically vibrant regions in surrounding states. According to a 2017 report by the Albuquerque Economic Development, Inc. only 31.0 percent of adults over the age of 25 years in the assessment area have a bachelor’s, graduate, or professional degree, which is needed in order to meet the high skill demand of the growing high-tech industry sectors.³¹²

Additionally, many workers are employed in low-wage jobs. The average annual earnings of the top five employment sectors, comprising 74.8 percent of total Albuquerque MSA employment, are consistently less than national average wages and less than the assessment area median income. The one exception is the Albuquerque government, which provides jobs above national average annual wages.³¹³ The region does have strong workforce development initiatives led by the Central New Mexico Community College Workforce Training Center, head-quartered in Albuquerque and at various University of New Mexico campuses through the New Mexico Department of Workforce Solutions (NMDWS).

³¹⁰ "At a Glance Tables." U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 16 Oct. 2017. <http://www.bls.gov/eag/home.htm>
³¹¹ "Albuquerque MSA Business Location Overview, May 2017." Albuquerque Economic Development. n.d. Web. 23 Mar. 2018. https://www.abq.org/uploads/files/Albuquerque%20MSA%20Business%20Location%20Overview%20PDF_5-15-2017.pdf
³¹² Ibid
³¹³ "Precis U.S. Metro. Albuquerque NM." Moody’s Analytics, November 2017. n.d. Web. 3 Apr. 2018. <https://www.moodyanalytics.com/>

Albuquerque, New Mexico

According to census data, there were 330,749 housing units located in the assessment area in 2010, 62.6 percent of which were owner-occupied, 24.6 percent were rental units, and 12.8 percent were vacant.³¹⁴ Rental and vacant units were more concentrated in low- and moderate-income tracts. In low-income census tracts, approximately 67.2 percent of all housing units were rentals or vacant; in moderate-income census tracts, 49.8 percent of the units were rental or vacant. The median age of the housing stock was 29 years, though housing was much older in the low- and moderate-income census tracts (40 years and 34 years, respectively) compared to the assessment area overall. These factors suggest that HMDA-reportable lending opportunities in the low- and moderate-income tracts may be limited.

Home sales decreased by 8.2 percent from 2014 to 2015 in the assessment area while sales prices remained stable or slightly increased. By county, the annual median sales prices remained stable from 2012 to 2015 in Sandoval County at \$171,457 but increased in Bernalillo County from \$170,484 in 2012 to \$181,700 in 2015.³¹⁵ In terms of affordability, the Albuquerque assessment area has a low percentage of homes affordable to low-income families (those earning less than 50.0 percent of the area median income) to purchase. Between 2012 and 2016, only 10.4 percent of homes in Sandoval County and 8.8 percent of homes in Bernalillo County were likely affordable for low-income families compared 20.5 percent of homes in New Mexico.³¹⁶

Increasing home sales prices and decreasing affordability have not hindered improvements in the housing market, evidenced by increased home purchase lending volume. An analysis of HMDA lending indicates that the percent of home purchase loans increased by 25.7 percent from 2012 to 2016. Conversely the percent of refinance loans during the same time declined. Overall 53.6 percent of loans in the assessment area were for home purchase while 46.4 percent were for refinance in 2016. Originations to borrowers 50.0 to 80.0 percent of the area median income increased by 3.4 percent over the same time period, which indicates housing affordability and financing for moderate-income borrowers may be improving.³¹⁷

The availability of rental housing that is affordable for a low-income family is limited, though better than the availability of homes available for purchase. From 2012 to 2016, 37.1 percent of units in Bernalillo County were affordable to families earning less were 50.0 percent of the area median income while just 22.4 percent of rental units were affordable to this population in Sandoval County.³¹⁸ Comparatively, 49.0 percent of rental units statewide are considered affordable to low-income families.

Demographic Characteristics by Census Tract

The following table based on 2016 FFIEC Census data and 2016 Dun & Bradstreet information presents key demographic and business information used to help develop a performance context for the assessment area.

³¹⁴ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic

³¹⁵ Ibid

³¹⁶ "Albuquerque, AL (HMDA Data)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 27 Apr.2018. <http://www.policymap.com/>

³¹⁷ "Albuquerque, AL (HMDA Data)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 27 Apr.2018. <http://www.policymap.com/>

³¹⁸ Ibid

Albuquerque, New Mexico

Combined Demographics Report

Assessment Area: NM Albuquerque

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	5.5	7,368	3.8	2,405	32.6	41,072	21.4
Moderate-income	48	26.5	54,039	28.1	10,630	19.7	33,393	17.4
Middle-income	62	34.3	62,655	32.6	5,648	9.0	36,816	19.2
Upper-income	60	33.1	67,962	35.4	2,784	4.1	80,743	42.0
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	181	100.0	192,024	100.0	21,467	11.2	192,024	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	18,762	5,142	2.5	27.4	10,959	58.4	2,661	14.2
Moderate-income	95,311	52,116	25.6	54.7	35,374	37.1	7,821	8.2
Middle-income	111,396	67,959	33.3	61.0	34,083	30.6	9,354	8.4
Upper-income	105,280	78,562	38.6	74.6	19,830	18.8	6,888	6.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	330,749	203,779	100.0	61.6	100,246	30.3	26,724	8.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	2,369	6.6	1,930	5.9	429	15.4	10	4.8
Moderate-income	9,116	25.4	8,010	24.4	1,043	37.3	63	30.0
Middle-income	11,824	33.0	10,982	33.5	770	27.6	72	34.3
Upper-income	12,512	34.9	11,895	36.2	552	19.8	65	31.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35,821	100.0	32,817	100.0	2,794	100.0	210	100.0
Percentage of Total Businesses:			91.6		7.8		.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	7	2.5	7	2.6	0	0.0	0	0.0
Moderate-income	51	18.5	50	18.4	1	25.0	0	0.0
Middle-income	90	32.6	88	32.4	2	50.0	0	0.0
Upper-income	128	46.4	127	46.7	1	25.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	276	100.0	272	100.0	4	100.0	0	.0
Percentage of Total Farms:			98.6		1.4		.0	

2016 FFIEC Census Data and 2016 D&B Information

Albuquerque, New Mexico

Credit and Community Development Needs

To better understand the community development and economic landscape, community development practitioners are contacted. Individuals discuss the various needs and opportunities across the region as well as how financial institutions can be responsive to local community development needs. Information from these conversations is included in the appropriate sections of this report. Several key themes emerged from these discussions, including the need for more affordable housing and workforce development as well as support for small businesses. One community contact perceived larger banks to be more responsive to identified community development needs than smaller banks.

One community contact noted the challenges of working in a community with a high rate of poverty. The lower-income population in the region is heavily reliant on public assistance due to gaps in workforce skills along with poor credit and low financial literacy, which limits their job opportunities. Furthermore, according to the FDIC in 2015, 30.2 percent of the population in Albuquerque was unbanked or underbanked.³¹⁹ The contact asserted that the majority of the population is still somewhat dependent on the presence of brick and mortar financial institutions in the community to access bank services. Financial institutions, large and small, can engage in education outreach activities targeting low- and moderate-income individuals and serve in leadership roles on community service boards and committees that promote financial capability and access to financial services.

Increasing the supply of affordable housing in the region is another community need. The City of Albuquerque estimates that 68.0 percent of households earning less than 80.0 percent of the area median income are cost-burdened or severely cost-burdened because they spend 30 to 50 percent of their income for housing.³²⁰ With high housing costs, households have limited opportunity to save for a down payment. In addition, rising home prices decreases the opportunities for low- and moderate-income families to purchase homes. An additional challenge noted by a community contact is the age of the housing stock, and the lack of energy efficient housing. As a result, many homeowners struggle with utility costs. One community contact indicated that low- and moderate-income communities need banks to mitigate these challenges by prioritizing investment in single family housing development, partnering with affordable housing counseling agencies, providing down payment assistance, and participating in homebuyer education targeting low- and moderate-income individuals and families in Albuquerque.

The affordable housing challenges in the area are compounded by low funding levels for the highly competitive state housing trust fund and diminishing federal funding for housing. The city, however, is actively trying to address affordable housing with a specific focus on increasing the supply of affordable rental housing. In the Albuquerque Proposed Consolidated Plan: 2018 to 2020, the City specifies the intent to make affordable housing investments in geographic priority areas.³²¹ The city has identified 39 census tracts that require significant reinvestment in education, income, and health due poor housing and economic conditions. Banks can partner with the city and local organizations to invest in revitalization of these geographic areas while preserving

³¹⁹ "EconomicInclusion.gov". FDIC. N.d. Web. 1 May 2018. https://www.economicinclusion.gov/surveys/place-data.html?where=Albuquerque_NM&w

³²⁰ "Albuquerque Proposed Consolidated Plan: 2018-2022." The City of Albuquerque. n.d. Web. 15 May 2018. <http://www.cabq.gov/family/documents/publications/albuquerque-proposed-consolidated-plan-2018-2022.pdf/view>

³²¹ "Albuquerque Proposed Consolidated Plan: 2018-2022." The City of Albuquerque. n.d. Web. 15 May 2018. <http://www.cabq.gov/family/documents/publications/albuquerque-proposed-consolidated-plan-2018-2022.pdf/view>

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affordable housing. The city has designated a majority of its funds from the Community Development Block Grant (CDBG), Home Investment Partnership Program (HOME) and the Workforce Housing Trust Fund (WFHTF) to support affordable housing rental development and preservation, followed by homelessness intervention and rapid rehousing.³²²

Finally, a community contact provided a perspective on the need for small business assistance. According to the contact, while there is capital available for small businesses, many small business owners lack the knowledge and financial capacity to meet the underwriting demands for bank financing. The contact stated that small business owners are in need of personal financial education and small business education on business taxes and accounting. Additionally, aspiring small business owners need tools from financial institutions for start-up capital and to build credit. Most small business owners do not have sufficient savings and rely on the growing pool of online lenders offering high cost financing.

Overall the contact affirmed that small businesses in Albuquerque have access to financing through banks, CDFIs and government sponsored lending programs. Banks and credit unions are perceived to be supportive of small business growth through their partnerships with small business development organizations, and participation in SBA loan programs; credit unions were noted as providing new financial products to help address some of the small business financing needs.

³²² Ibid

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Compass Bank's lending performance in the Albuquerque assessment area is excellent. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes an excellent level of community development loans.

During the review period, the bank reported 387 HMDA-reportable loans compared to 970 small business loans in the Albuquerque assessment area. Therefore, small business lending is weighted more heavily than HMDA-reportable lending in evaluating the bank's lending test performance. The Albuquerque assessment area contains 2.0 percent of the bank's total HMDA-reportable lending by number of loans and 1.6 percent by dollar volume, and 2.0 percent of its total small business lending by number of loans and 1.8 percent by dollar volume. In comparison, 0.8 percent of the bank's total deposits are in this assessment area.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses. Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix G.

Geographic Distribution of Loans

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

Small Business Loans

Small business lending in low- and moderate-income tracts is excellent overall. In low-income tracts, Compass Bank originated 9.9 percent of its small business loans where 5.9 percent of small businesses in the assessment area are located. In addition, the bank originated 26.0 percent of its small business loans in moderate-income tracts where 24.4 percent of small businesses in the assessment area are located. For both years, the bank outperformed aggregate in low- and moderate-income tracts.

Home Purchase Loans

Home purchase lending in low-income census tracts is adequate. For the review period, Compass Bank's home purchase lending in low- income census tracts (1.3 percent) was below the percentage of owner-occupied units (2.5 percent) in these tracts. In 2015 and 2016, the bank's lending underperformed aggregate lending performance in low-income tracts. While the bank's performance was below demographic and aggregate performance in low-

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income tracts, performance was considered adequate given the competition and dominance by national lenders in the assessment area and the bank's small market share.

Home purchase lending in moderate-income census tracts is excellent. Compass Bank's home purchase lending in moderate-income census tracts (28.2 percent) exceeded the percentage of owner-occupied units (25.6 percent) in these tracts, and was significantly above aggregate lending performance over the review period.

Home Refinance Loans

Home refinance lending in low- and moderate-income census tracts is adequate. The percentage of home refinance loans (23.1 percent) originated was less than the percentage of owner-occupied units (31.9 percent) in these tracts. In 2015, the bank's performance was less than the aggregate lending performance in low- and moderate-income tracts, but outperformed aggregate lenders in both geographies in 2016.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income or revenue size of businesses is excellent. For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different revenue sizes is excellent. For the review period, 69.2 percent of the bank's loans were originated to businesses with revenues of \$1 million or less. By comparison, 91.6 percent of total businesses in the assessment area are classified as small businesses. Compass Bank's performance was greater than the aggregate lending performance in both years. Additionally, 98.8 percent of small business loans were originated in amounts of \$250,000 or less, indicating a willingness to lend in the smaller amounts that are typically requested by small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers is good. Compass Bank's home purchase lending to low-income borrowers (10.1 percent) was less than the percentage of low-income families living in the assessment area (21.4 percent); however, the bank's home purchase lending to low-income borrowers exceeded aggregate in both years.

Home purchase lending to moderate-income borrowers is excellent. Compass Bank's home purchase lending to moderate-income borrowers (28.6 percent) was significantly greater than the percentage of moderate-income families living in the assessment area (17.4 percent). Additionally, the bank's home purchase lending to moderate-income borrowers outperformed aggregate lenders in both years.

Home Refinance Loans

Home refinance lending to low- and moderate-income borrowers is good. Compass Bank's home refinance lending to low-income borrowers (8.6 percent) was much less than the percentage of low-income families living in the assessment area, while home refinance lending to moderate-income borrowers (16.5 percent) was slightly

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less than the percentage of moderate-income families in the assessment area. However, the bank's home refinance lending to low-and moderate-income borrowers exceeded aggregate in both years.

Community Development Lending

Compass Bank makes an excellent level of community development loans in the Albuquerque assessment area. The bank originated four community development loans totaling \$30.9 million during the review period. The largest loan provided \$25 million to finance the retrofitting of public buildings mainly located in low- and moderate-income geographies with solar panels saving the state government \$20 million over 30 years. One loan financed a non-profit youth service organization that provides educational, developmental, and humanitarian assistance to children, youth, and families in need. Another \$4.1 million of loans financed small businesses to create and retain over 30 jobs for low- and moderate-income individuals. Additionally, the bank originated six community development loans for \$7.2 million at the broader state or regional level with a purpose that includes serving the Albuquerque assessment area. These loans met the community service needs of the area by financing a food bank. This volume of community development lending is considered excellent given the bank's size and presence in the assessment area.

INVESTMENT TEST

Compass Bank's investment performance in the Albuquerque assessment area is good. The bank made a significant level of qualified community development investments relative to the bank's presence in this assessment area and available community development opportunities.

The bank invested \$8.1 million in the Albuquerque assessment area, including approximately \$2.4 million in new investments during the review period and \$5.6 million in prior period investments. The total also includes \$115,000 in contributions made during the review period. The bank invested \$2.2 million in EQ2s for CDFIs during the review period, with \$1.7 million going to support an affordable housing CDFI and \$500,000 for a CDFI that provides small business financing. The bank also provided grants for operating assistance and education programs offered by these two CDFIs.

The bank's contributions demonstrated support for a range of different community activities. Specifically, the bank provided grants totaling \$53,000 to support community services for low- and moderate-income individuals, \$39,500 for affordable housing, and \$22,500 to support economic development. To help build nonprofit capacity in this market, the bank provided a \$12,000 grant to a national community development intermediary to conduct an organizational assessment of a local community land trust. The assessment will help the organization improve its service delivery to low- and- moderate-income clients. In addition, as noted earlier, the bank had contributions that served a broader regional area that includes the Albuquerque assessment area.

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SERVICE TEST

Compass Bank's service test performance in the Albuquerque assessment area is good.

Retail Services

Retail banking services are good. The distribution of 12 branch offices and 13 full-service ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. Although, the bank only has one branch in a low-income tract, the percentage of branches in these tracts (8.3 percent) was greater than both the percentage of households (5.3 percent) and businesses (6.6 percent) in the same geography. The distribution of the bank's four branches (33.3 percent) in moderate-income tracts also exceeded the percentage of households (28.8 percent) and businesses (25.4 percent) in the same geography. Overall, delivery systems are accessible within the bank's geographies and to individuals of different income levels.

During the examination period, the bank did not open any branches or full-service ATMs in the assessment area. However, the bank closed one branch office and one full-service ATM in moderate-income tracts. The branch was closed at the expiration of the lease. The lease was not renewed because of low profitability and a small customer base. Overall, the bank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals in the assessment area.

Compass Bank offers extended hours at all of its branches located in low- and moderate-income tracts, excluding one branch office located in a moderate-income tract. The bank does not offer weekend hours in any branch offices in this assessment area. Overall, retail services do not vary in a way that inconveniences any portion of the bank's assessment area, including low- and moderate-income geographies and/or low- and moderate-income individuals.

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Geographic Distribution of Branches & ATMS

Assessment Area: NM Albuquerque

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	1	8.3%	0	0	1	1	0	Total	1	7.7%	1	7.7%	0	0	0	0.0%	0	0	10	5.5%	5.3%	6.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	4	33.3%	0	1	3	3	0	Total	4	30.8%	4	30.8%	0	1	0	0.0%	0	0	48	26.5%	28.8%	25.4%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	5	41.7%	0	0	4	5	0	Total	5	38.5%	5	38.5%	0	0	0	0.0%	0	0	62	34.3%	33.6%	33.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	2	16.7%	0	0	2	2	0	Total	3	23.1%	3	23.1%	0	0	0	0.0%	0	0	60	33.1%	32.4%	34.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	0.6%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	12	100.0%	0	1	10	11	0	Total	13	100.0%	13	100.0%	0	1	0	0.0%	0	0	181	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

2016 FFIEC Census Data, 2010 ACS Data, and 2016 D&B Information

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

Compass Bank provides a relatively high level of community development services in the Albuquerque assessment area. Employees provided 661 service hours to qualified organizations by participating in 52 community development service activities.

The bank's community development service activities benefited organizations that provide affordable housing, community services, and economic development to support low- and moderate-income individuals, communities, and small businesses in the Albuquerque assessment area. Of the bank's total service hours, 481 were committed to financial education. Bank staff also engaged in 180 hours of board or committee service to qualified, nonprofit organizations.

During the review period, the following community development activities were observed as particularly responsive in the assessment area:

- Bank business loan officers and retail executives presented several small business financial education workshops to small business owners and food entrepreneurs who are clients of a community development corporation and business incubator in the assessment area.
- As part of the bank's Day of Service Campaign, 24 employee volunteers facilitated homebuyer and financial education for 100 low- and moderate-income individuals purchasing their first home.

Compass demonstrated a good level of engagement in community development services, as well as responsiveness to identified affordable housing and economic development needs in the Albuquerque assessment area. Overall, the bank's performance is considered good, particularly in light of the bank's low market share and limited branch network in the assessment area.

Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NEW MEXICO METROPOLITAN ASSESSMENT AREAS

- **Las Cruces Assessment Area (Dona Ana County)**
 - As of December 31, 2016, Compass Bank operated three branches in the assessment area, representing 15.8 percent of its branches in New Mexico.
 - As of June 30, 2016, the bank had \$88.8 million in deposits in this assessment area, representing a market share of 4.5 percent and 12.9 percent of Compass Bank’s total deposits in New Mexico.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Metropolitan Assessment Area			
Assessment Areas	Lending Test	Investment Test	Service Test
Las Cruces	Not Consistent (Below)	Not Consistent (Below)	Consistent

For the lending test, Compass Bank received a rating of outstanding for the State of New Mexico. Although below the state performance, lending levels were good in Las Cruces for the geographic and borrower distribution of loans. In addition, there was an excellent level of community development loans in the Las Cruces assessment area.

For the investment test, Compass Bank received a rating of high satisfactory for the State of New Mexico. The bank had an adequate level of investments in the Las Cruces assessment area and performance was weaker than the bank’s statewide performance.

For the service test, Compass Bank received a rating of high satisfactory for the State of New Mexico. Performance in the Las Cruces metropolitan assessment area was consistent with the bank’s state performance.

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

Non-Metropolitan Areas (Limited Review)

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

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NEW MEXICO NON-METROPOLITAN ASSESSMENT AREAS

- **Southern New Mexico Assessment Area (Lincoln, Otero, and Sierra counties)**
 - As of December 31, 2016, Compass Bank operated four branches in the assessment area, representing 21.1 percent of its branches in New Mexico.
 - As of June 30, 2016, the bank had \$73.3 million in deposits in this assessment area, representing a market share of 7.0 percent and 10.6 percent of Compass Bank’s total deposits in New Mexico.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Nonmetropolitan Assessment Area			
Assessment Areas	Lending Test	Investment Test	Service Test
Southern New Mexico	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)

For the lending test, Compass Bank received a rating of outstanding for the State of New Mexico. Although below the state performance, lending levels were good in Southern New Mexico for the geographic distribution and excellent for the borrower distribution of loans. In addition, there was an excellent level of community development loans in the Southern New Mexico assessment area.

For the investment test, Compass Bank received a rating of high satisfactory for the State of New Mexico. The bank had an adequate level of investments in the Southern New Mexico non-metropolitan assessment area and performance was weaker than the bank’s statewide performance.

For the service test, Compass Bank received a rating of high satisfactory for the State of New Mexico. Performance in the Southern New Mexico non-metropolitan assessment area was below the bank’s statewide performance due to limited community development performance and adequate retail delivery services.

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

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APPENDIX A - SCOPE OF THE EXAMINATION

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
HMDA-reportable and CRA Small Business Lending: January 1, 2015, to December 31, 2016			
Community Development Lending, Investments and Services: April 1, 2015 to December 31, 2017			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Compass Bank – Birmingham, Alabama		HMDA-reportable loans & CRA small business loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	None	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
ALABAMA			
Anniston, MSA#11500	Limited-Scope Review		
Auburn, MSA#12220	Limited-Scope Review		
Birmingham, MSA#13820	Full-Scope Review		
Daphne-Fairhope-Foley, MSA#19300	Limited-Scope Review		
Decatur, MSA#19460	Limited-Scope Review		
Dothan, MSA#20020	Limited-Scope Review		
Eufaula	Limited-Scope Review		
Florence, MSA#22520	Limited-Scope Review		
Gadsden, MSA#23460	Limited-Scope Review		
Huntsville, MSA#26620	Full-Scope Review		
Mobile, MSA#33660	Limited-Scope Review		
Montgomery, MSA#33860	Limited-Scope Review		

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Northeast Alabama	Limited-Scope Review		
Tuscaloosa, MSA#46220	Limited-Scope Review		
ARIZONA			
Flagstaff, MSA#22380	Limited-Scope Review		
Lake Havasu, MSA#29420	Limited-Scope Review		
Northern Arizona	Limited-Scope Review		
Phoenix, MSA#38060	Full-Scope Review		
Prescott, MSA#39140	Limited-Scope Review		
Sierra Vista-Douglas, MSA#43420	Limited-Scope Review		
Tucson, MSA#46060	Limited-Scope Review		
CALIFORNIA			
Amador-Calaveras-Tuolome	Limited-Scope Review		
Bakersfield, MSA#12540	Limited-Scope Review		
Fresno, MSA#23420	Limited-Scope Review		
Los Angeles, MSA#31084	Limited-Scope Review		
Merced, MSA#32900	Limited-Scope Review		
Modesto, MSA#33700	Full-Scope Review		
Oakland, MSA#36084	Limited-Scope Review		
Riverside, MSA#40140	Full-Scope Review		
Sacramento, MSA#40900	Limited-Scope Review		
San Diego, MSA#41740	Limited-Scope Review		
San Francisco, MSA#41884	Limited-Scope Review		
San Jose, MSA#41940	Limited-Scope Review		

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Stockton, MSA#44700	Limited-Scope Review		
COLORADO			
Boulder, MSA#14500	Limited-Scope Review		
Colorado Springs, MSA#17820	Limited-Scope Review		
Denver, MSA#19740	Full-Scope Review		
Fort Collins, MSA#22660	Limited-Scope Review		
Greeley, MSA#24540	Limited-Scope Review		
FLORIDA			
Fort Walton Beach, MSA#18880	Limited-Scope Review		
Gainesville, MSA#23540	Limited-Scope Review		
Homosassa Springs, MSA#26140	Limited-Scope Review		
Jacksonville, MSA#27260	Full-Scope Review		
Ocala, MSA#36100	Limited-Scope Review		
Pensacola, MSA#37860	Limited-Scope Review		
Tampa, MSA#45300	Limited-Scope Review		
NEW MEXICO			
Albuquerque, MSA#10740	Full-Scope Review		
Las Cruces, MSA#29740	Limited-Scope Review		
Southern New Mexico	Limited-Scope Review		
TEXAS			
Abilene, MSA#10180	Limited-Scope Review		
Austin, MSA#12420	Full-Scope Review		
Beaumont, MSA#13140	Limited-Scope Review		

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Brownsville, MSA#15180	Limited-Scope Review		
Bryan-College Station, MSA#17780	Limited-Scope Review		
Burnet-Gillespie-Kerr	Limited-Scope Review		
Corpus Christi, MSA#18580	Limited-Scope Review		
Dallas, MSA#19124	Full-Scope Review		
East Texas	Limited-Scope Review		
El Paso, MSA#21340	Limited-Scope Review		
Grimes-Walker-Washington	Limited-Scope Review		
Hale	Limited-Scope Review		
Harrison	Limited-Scope Review		
Houston, MSA#26420	Full-Scope Review	2200 Post Oak Blvd Houston, TX 77056	
Howard-Runnels	Limited-Scope Review		
Killeen-Temple, MSA#28660	Limited-Scope Review		
Kleberg	Limited-Scope Review		
Laredo, MSA#29700	Full-Scope Review		
Limestone	Limited-Scope Review		
Longview, MSA#30980	Limited-Scope Review		
Lubbock, MSA#31180	Limited-Scope Review		
McAllen, MSA#32580	Limited-Scope Review		
Odessa, MSA#26220	Limited-Scope Review		
San Angelo, MSA#41660	Limited-Scope Review		
San Antonio, MSA#41700	Limited-Scope Review		
Starr-Willacy	Limited-Scope Review		

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Tyler, MSA#46340	Limited-Scope Review		
Val Verde-Maverick	Limited-Scope Review		
Waco, MSA#47380	Limited-Scope Review		

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APPENDIX B - SUMMARY OF STATE RATINGS

State Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Texas	Outstanding	Outstanding	High Satisfactory	Outstanding
Alabama	Outstanding	Outstanding	Outstanding	Outstanding
Arizona	Outstanding	High Satisfactory	High Satisfactory	Outstanding
California	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Florida	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Colorado	Outstanding	High Satisfactory	High Satisfactory	Outstanding
New Mexico	Outstanding	High Satisfactory	High Satisfactory	Outstanding

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APPENDIX C – CRA ABBREVIATIONS

Abbreviations

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

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APPENDIX D - GLOSSARY

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

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

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

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

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

Consistent: This term is used to describe the performance of an institution in an assessment area reviewed not using full-scope procedures when the performance is the same as the performance in the state overall.

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

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family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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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.

Not Consistent: This term is used to describe the performance of an institution in an assessment area reviewed not using full-scope procedures when the performance is not the same as the performance in the state overall.

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

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

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

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

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

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

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

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APPENDIX E - GENERAL INFORMATION

General Information

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

This document is an evaluation of the CRA performance of **Compass Bank** prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **April 2, 2018**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

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APPENDIX F – INSTITUTION INVESTMENT TABLES Summary of Qualified Investments and Contributions by State and Assessment Area

Assessment Area	Investments				Contributions	Investments + Contributions		
	Prior Period (\$)	Current Period (\$)	Total (\$)	Current % of Total	Total (\$)	Total (\$)	AA % of State	State % of Total Institution
ALABAMA								
Birmingham	\$20,380,319	\$60,148,994	\$80,529,313	74.7%	\$1,448,250	\$81,977,563	45.2%	--
Huntsville	\$4,729,116	\$8,216,978	\$12,946,094	63.5%	\$142,000	\$13,088,094	7.2%	--
Anniston	\$358,638	\$750,000	\$1,108,638	67.7%	\$52,500	\$1,161,138	0.6%	--
Auburn	\$2,966,919	\$1,905,682	\$4,872,601	39.1%	\$32,500	\$4,905,101	2.7%	--
Daphne-Fairhope-Foley	\$11,357,472	\$5,763,252	\$17,120,724	33.7%	\$22,000	\$17,142,724	9.5%	--
Decatur	\$14,438	\$1,360,001	\$1,374,439	98.9%	\$44,500	\$1,418,939	0.8%	--
Dothan	\$3,052,848	\$1,501,947	\$4,554,795	33.0%	\$27,500	\$4,582,295	2.5%	--
Eufaula	\$11,742	\$600,000	\$611,742	98.1%	\$10,000	\$621,742	0.3%	--
Florence	\$2,386,594	\$743,994	\$3,130,588	23.8%	\$22,500	\$3,153,088	1.7%	--
Gadsden	\$11,742	\$1,479,701	\$1,491,443	99.2%	\$5,000	\$1,496,443	0.8%	--
Mobile	\$5,554,182	\$10,588,463	\$16,142,645	65.6%	\$143,250	\$16,285,895	9.0%	--
Montgomery	\$3,760,390	\$5,326,400	\$9,086,790	58.6%	\$91,500	\$9,178,290	5.1%	--
Northeast	\$22,235	\$2,099,250	\$2,121,485	99.0%	\$5,000	\$2,126,485	1.2%	--
Tuscaloosa	\$9,821,024	\$14,071,854	\$23,892,878	58.9%	\$23,000	\$23,915,878	13.2%	--
<i>Statewide-with purpose, mandate or function to serve AAs</i>	--	--	--	--	\$149,000	\$149,000	0.1%	--
State Total	\$64,427,659	\$114,556,516	\$178,984,175	64.0%	\$2,218,500	\$181,202,675	100.0%	16.9%

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Assessment Area	Investments				Contributions	Investments + Contributions		
	Prior Period (\$)	Current Period (\$)	Total (\$)	Current % of Total	Total (\$)	Total (\$)	AA % of State	State % of Total Institution
ARIZONA								
Phoenix	\$11,216,869	\$18,021,407	\$29,238,276	61.6%	\$644,500	\$29,882,776	53.5%	--
Flagstaff	\$0	\$2,481,988	\$2,481,988	100.0%	\$47,500	\$2,529,488	4.5%	--
Lake Havasu City	\$0	\$1,455,983	\$1,455,983	100.0%	\$2,500	\$1,458,483	2.6%	--
Northern	\$0	\$800,000	\$800,000	100.0%	\$7,500	\$807,500	1.4%	--
Prescott	\$0	\$1,742,999	\$1,742,999	100.0%	\$5,000	\$1,747,999	3.1%	--
Sierra Vista-Douglas	\$0	\$870,017	\$870,017	100.0%	\$2,500	\$872,517	1.6%	--
Tucson	\$1,703,075	\$13,899,647	\$15,602,722	89.1%	\$265,000	\$15,867,722	28.4%	--
<i>Statewide-with purpose, mandate or function to serve AAs</i>	--	--	--	--	\$2,722,500	\$2,722,500	4.9%	--
State Total	\$12,919,944	\$39,272,041	\$52,191,985	75.2%	\$3,697,000	\$55,888,985	100.0%	5.2%
CALIFORNIA								
Modesto	\$0	\$4,681,944	\$4,681,944	100.0%	\$7,500	\$4,689,444	5.2%	--
Riverside	\$11,412,360	\$20,960,948	\$32,373,308	64.7%	\$112,950	\$32,486,258	36.2%	--
Amador-laveras-Tuolome	\$0	\$655,974	\$655,974	100.0%	\$8,750	\$664,724	0.7%	--
Bakersfield	\$0	\$500,000	\$500,000	100.0%	\$5,000	\$505,000	0.6%	--
Fresno	\$0	\$2,452,000	\$2,452,000	100.0%	\$19,000	\$2,471,000	2.8%	--
Los Angeles	\$2,475,079	\$0	\$2,475,079	0.0%	\$91,000	\$2,566,079	2.9%	--
Merced	\$1,515,912	\$725,056	\$2,240,968	32.4%	\$3,750	\$2,244,718	2.5%	--
Oakland	\$3,354,020	\$10,335,498	\$13,689,518	75.5%	\$134,000	\$13,823,518	15.4%	--
Sacramento	\$377,250	\$3,456,309	\$3,833,559	90.2%	\$51,600	\$3,885,159	4.3%	--
San Diego	\$4,788,680	\$5,232,832	\$10,021,512	52.2%	\$76,750	\$10,098,262	11.2%	--
San Francisco	\$0	\$2,837,815	\$2,837,815	100.0%	\$47,000	\$2,884,815	3.2%	--
San Jose	\$0	\$1,761,988	\$1,761,988	100.0%	\$38,000	\$1,799,988	2.0%	--
Stockton	\$3,440,631	\$7,921,096	\$11,361,727	69.7%	\$29,000	\$11,390,727	12.7%	--
<i>Statewide-with purpose, mandate or function to serve AAs</i>	--	--	--	--	\$281,750	\$281,750	0.3%	--
State Total	\$27,363,932	\$61,521,460	\$88,885,392	69.2%	\$906,050	\$89,791,442	100.0%	8.4%

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Assessment Area	Investments				Contributions	Investments + Contributions		
	Prior Period (\$)	Current Period (\$)	Total (\$)	Current % of Total	Total (\$)	Total (\$)	AA % of State	State % of Total Institution
COLORADO								
Denver	\$7,814,161	\$24,916,055	\$32,730,216	76.1%	\$380,940	\$33,111,156	78.6%	--
Boulder	\$2,060,919	\$720,000	\$2,780,919	25.9%	\$21,500	\$2,802,419	6.7%	--
Colorado Springs	\$3,984,082	\$625,000	\$4,609,082	13.6%	\$50,000	\$4,659,082	11.1%	--
Ft. Collins	\$0	\$630,000	\$630,000	100.0%	\$33,000	\$663,000	1.6%	--
Greeley	\$0	\$825,000	\$825,000	100.0%	\$14,500	\$839,500	2.0%	--
<i>Statewide-with purpose, mandate or function to serve AAs</i>	--	--	--	--	\$27,500	\$27,500	0.1%	--
State Total	\$13,859,162	\$27,716,055	\$41,575,217	66.7%	\$527,440	\$42,102,657	100.0%	3.9%
FLORIDA								
Jacksonville	\$18,453,881	\$12,082,799	\$30,536,680	39.6%	\$234,800	\$30,771,480	49.0%	--
Ft. Walton	\$0	\$1,603,257	\$1,603,257	100.0%	\$27,000	\$1,630,257	2.6%	--
Gainesville	\$0	\$14,086,267	\$14,086,267	100.0%	\$62,000	\$14,148,267	22.5%	--
Homosassa Springs	\$0	\$420,746	\$420,746	100.0%	\$14,000	\$434,746	0.7%	--
Ocala	\$0	\$8,758,074	\$8,758,074	100.0%	\$28,500	\$8,786,574	14.0%	--
Pensacola	\$120,500	\$2,500,000	\$2,620,500	95.4%	\$20,400	\$2,640,900	4.2%	--
Tampa	\$0	\$4,260,000	\$4,260,000	100.0%	\$14,700	\$4,274,700	6.8%	--
<i>Statewide-with purpose, mandate or function to serve AAs</i>	--	--	--	--	\$97,250	\$97,250	0.2%	--
State Total	\$18,574,381	\$43,711,143	\$62,285,524	70.2%	\$498,650	\$62,784,174	100.0%	5.8%
NEW MEXICO								
Albuquerque	\$5,607,593	\$2,408,054	\$8,015,647	30.0%	\$115,000	\$8,130,647	87%	--
Las Cruces	\$175,269	\$441,013	\$616,282	71.6%	\$17,000	\$633,282	7%	--
Southern NM	\$0	\$550,000	\$550,000	100.0%	\$5,000	\$555,000	6%	--
<i>Statewide-with purpose, mandate or function to serve AAs</i>	--	--	--	--	\$8,500	\$8,500	0%	--
State Total	\$5,782,862	\$3,399,067	\$9,181,929	37.0%	\$145,500	\$9,327,429	100%	0.9%

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Assessment Area	Investments				Contributions	Investments + Contributions		
	Prior Period (\$\$)	Current Period (\$\$)	Total (\$\$)	Current % of Total	Total (\$\$)	Total (\$\$)	AA % of State	State % of Total Institution
TEXAS								
Austin	\$22,173,619	\$37,281,142	\$59,454,761	62.7%	\$785,200	\$60,239,961	9.9%	--
Dallas	\$83,041,604	\$105,442,278	\$188,483,882	55.9%	\$1,417,050	\$189,900,932	31.4%	--
Houston	\$66,134,994	\$101,628,688	\$167,763,682	60.6%	\$3,709,100	\$171,472,782	28.3%	--
Laredo	\$250,000	\$27,685,658	\$27,935,658	99.1%	\$256,000	\$28,191,658	4.7%	--
Abilene	\$76,000	\$5,381,604	\$5,457,604	98.6%	\$11,000	\$5,468,604	0.9%	--
Beaumont	\$6,165,458	\$17,190,333	\$23,355,791	73.6%	\$117,500	\$23,473,291	3.9%	--
Brownsville	\$6,195,318	\$2,657,260	\$8,852,578	30.0%	\$167,833	\$9,020,411	1.5%	--
Bryan-College Station	\$172	\$4,080,051	\$4,080,223	100.0%	\$35,150	\$4,115,373	0.7%	--
Burnet-Gillespie-Kerr	\$1,688,476	\$1,375,034	\$3,063,510	44.9%	\$15,500	\$3,079,010	0.5%	--
Corpus Christi	\$0	\$1,331,988	\$1,331,988	100.0%	\$39,000	\$1,370,988	0.2%	--
East	\$0	\$600,000	\$600,000	100.0%	\$0	\$600,000	0.1%	--
El Paso	\$609,157	\$16,602,138	\$17,211,295	96.5%	\$109,000	\$17,320,295	2.9%	--
Grimes-Walker-Washington	\$2,110,770	\$0	\$2,110,770	0.0%	\$13,500	\$2,124,270	0.4%	--
Hale	\$0	\$120,998	\$120,998	100.0%	\$10,000	\$130,998	0.0%	--
Harrison	\$0	\$491,256	\$491,256	100.0%	\$0	\$491,256	0.1%	--
Howard-Runnels	\$0	\$400,000	\$400,000	100.0%	\$2,500	\$402,500	0.1%	--
Killeen-Temple	\$0	\$3,895,171	\$3,895,171	100.0%	\$55,000	\$3,950,171	0.7%	--
Kleberg	\$0	\$437,987	\$437,987	100.0%	\$0	\$437,987	0.1%	--
Limestone	\$0	\$300,000	\$300,000	100.0%	\$0	\$300,000	0.0%	--
Longview	\$0	\$699,003	\$699,003	100.0%	\$2,500	\$701,503	0.1%	--
Lubbock	\$238,735	\$1,950,012	\$2,188,747	89.1%	\$64,500	\$2,253,247	0.4%	--
McAllen	\$2,889,783	\$40,837,195	\$43,726,978	93.4%	\$444,806	\$44,171,784	7.3%	--
Odessa	\$0	\$177,500	\$177,500	100.0%	\$7,500	\$185,000	0.0%	--
San Angelo	\$171	\$149,995	\$150,166	99.9%	\$27,100	\$177,266	0.0%	--
San Antonio	\$11,103,532	\$11,965,137	\$23,068,669	51.9%	\$1,442,500	\$24,511,169	4.0%	--
Starr-Willacy	\$250,000	\$400,000	\$650,000	61.5%	\$50,111	\$700,111	0.1%	--
Tyler	\$0	\$2,039,457	\$2,039,457	100.0%	\$35,000	\$2,074,457	0.3%	--
Val Verde-Maverick	\$339,300	\$2,762,921	\$3,102,221	89.1%	\$10,000	\$3,112,221	0.5%	--
Waco	\$2,007,263	\$3,280,000	\$5,287,263	62.0%	\$51,000	\$5,338,263	0.9%	--
<i>Statewide-with purpose, mandate or function to serve AAs</i>	--	--	--	--	\$262,500	\$262,500	0.0%	--
State Total	\$205,274,352	\$391,162,806	\$596,437,158	65.6%	\$9,140,850	\$605,578,008	100.0%	56.4%

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Assessment Area	Investments				Contributions	Investments + Contributions		
	Prior Period (\$)	Current Period (\$)	Total (\$)	Current % of Total	Total (\$)	Total (\$)	AA % of State	State % of Total Institution
TOTAL INSTITUTION								
State Investments	\$348,202,292	\$681,339,088	\$1,029,541,380	--	\$17,133,990	\$1,046,675,370	--	97.5%
Institution Investments	--	--	--	--	--	--	--	--
<i>Institution-with purpose, mandate or function to serve AAs</i>	--	--	\$7,336,315	--	\$2,108,000	\$9,444,315	--	0.9%
<i>Institution-without purpose, mandate or function to serve AAs</i>	--	--	\$17,661,027	--	--	\$17,661,027	--	1.6%
TOTAL INVESTMENTS (STATE AND INSTITUTION)	\$348,202,292	\$681,339,088	\$1,054,538,722	64.6%	\$19,241,990	\$1,073,780,712	--	100.0%

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APPENDIX G – FULL-SCOPE ASSESSMENT AREA LENDING TABLES

Geographic Distribution of HMDA Loans

Assessment Area: AL Birmingham

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	10	1.4%	\$777	0.5%	4.5%	7	1.9%	0.9%	\$675	0.8%	0.4%	3	0.8%	0.7%	\$102	0.1%	0.4%
	Moderate	55	7.6%	\$5,612	3.5%	18.1%	27	7.3%	7.6%	\$2,749	3.5%	4.5%	28	7.9%	7.7%	\$2,863	3.6%	4.5%
	Middle	236	32.6%	\$36,631	23.1%	41.4%	117	31.7%	38.0%	\$16,680	21.0%	28.8%	119	33.6%	39.2%	\$19,951	25.1%	30.4%
	Upper	422	58.4%	\$115,884	72.9%	36.0%	218	59.1%	53.6%	\$59,442	74.7%	66.4%	204	57.6%	52.4%	\$56,442	71.1%	64.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	723	100.0%	\$158,904	100.0%	100.0%	369	100.0%	100.0%	\$79,546	100.0%	100.0%	354	100.0%	100.0%	\$79,358	100.0%	100.0%
REFINANCE	Low	2	0.5%	\$351	0.4%	4.5%	1	0.5%	1.1%	\$71	0.2%	0.5%	1	0.6%	1.1%	\$280	0.7%	0.5%
	Moderate	32	8.5%	\$3,508	4.1%	18.1%	21	10.4%	8.5%	\$2,306	5.1%	5.1%	11	6.3%	8.8%	\$1,202	2.9%	5.1%
	Middle	117	31.0%	\$15,289	17.8%	41.4%	56	27.9%	37.5%	\$7,018	15.6%	28.4%	61	34.7%	36.8%	\$8,271	20.2%	27.6%
	Upper	226	59.9%	\$66,649	77.7%	36.0%	123	61.2%	52.9%	\$35,533	79.1%	66.0%	103	58.5%	53.4%	\$31,116	76.1%	66.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	377	100.0%	\$85,797	100.0%	100.0%	201	100.0%	100.0%	\$44,928	100.0%	100.0%	176	100.0%	100.0%	\$40,869	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	3.4%	\$0	0.0%	1.1%	0	0.0%	3.4%	\$0	0.0%	1.0%
	Moderate	8	14.3%	\$79	4.3%	18.1%	5	13.9%	16.4%	\$57	5.1%	9.2%	3	15.0%	14.4%	\$22	3.0%	5.1%
	Middle	17	30.4%	\$420	22.9%	41.4%	10	27.8%	41.5%	\$272	24.5%	33.5%	7	35.0%	43.1%	\$148	20.3%	31.7%
	Upper	31	55.4%	\$1,338	72.8%	36.0%	21	58.3%	38.8%	\$779	70.3%	56.1%	10	50.0%	39.0%	\$559	76.7%	62.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	56	100.0%	\$1,837	100.0%	100.0%	36	100.0%	100.0%	\$1,108	100.0%	100.0%	20	100.0%	100.0%	\$729	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	13.6%	0	0.0%	14.3%	\$0	0.0%	4.5%	0	0.0%	18.8%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	28.1%	0	0.0%	18.2%	\$0	0.0%	16.0%	0	0.0%	23.8%	\$0	0.0%	20.3%
	Middle	0	0.0%	\$0	0.0%	31.5%	0	0.0%	41.6%	\$0	0.0%	41.2%	0	0.0%	36.3%	\$0	0.0%	17.4%
	Upper	0	0.0%	\$0	0.0%	26.8%	0	0.0%	26.0%	\$0	0.0%	38.2%	0	0.0%	21.3%	\$0	0.0%	59.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	12	1.0%	\$1,128	0.5%	4.5%	8	1.3%	1.1%	\$746	0.6%	0.7%	4	0.7%	1.0%	\$382	0.3%	0.6%
	Moderate	95	8.2%	\$9,199	3.7%	18.1%	53	8.7%	8.4%	\$5,112	4.1%	5.6%	42	7.6%	8.5%	\$4,087	3.4%	5.7%
	Middle	370	32.0%	\$52,340	21.2%	41.4%	183	30.2%	38.0%	\$23,970	19.1%	29.6%	187	34.0%	38.5%	\$28,370	23.5%	28.6%
	Upper	679	58.7%	\$183,871	74.6%	36.0%	362	59.7%	52.5%	\$95,754	76.2%	64.0%	317	57.6%	52.1%	\$88,117	72.9%	65.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1,156	100.0%	\$246,538	100.0%	100.0%	606	100.0%	100.0%	\$125,582	100.0%	100.0%	550	100.0%	100.0%	\$120,956	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Borrower Distribution of HMDA Loans Assessment Area: AL Birmingham

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg			
#	%	\$(000s)	%	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	54	7.5%	\$4,743	3.0%	21.8%	36	9.8%	6.4%	\$3,029	3.8%	3.0%	18	5.1%	6.3%	\$1,714	2.2%	3.0%
	Moderate	237	32.8%	\$31,385	19.8%	17.0%	120	32.5%	18.7%	\$15,892	20.0%	12.7%	117	33.1%	17.9%	\$15,493	19.5%	11.8%
	Middle	122	16.9%	\$21,104	13.3%	19.5%	55	14.9%	20.8%	\$9,248	11.6%	18.3%	67	18.9%	21.2%	\$11,856	14.9%	18.5%
	Upper	310	42.9%	\$101,672	64.0%	41.7%	158	42.8%	35.0%	\$51,377	64.6%	48.7%	152	42.9%	35.2%	\$50,295	63.4%	49.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.0%	\$0	0.0%	17.3%	0	0.0%	19.3%	\$0	0.0%	17.7%
	<i>Total</i>	<i>723</i>	<i>100.0%</i>	<i>\$158,904</i>	<i>100.0%</i>	<i>100.0%</i>	<i>369</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$79,546</i>	<i>100.0%</i>	<i>100.0%</i>	<i>354</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$79,358</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	19	5.0%	\$1,525	1.8%	21.8%	10	5.0%	5.7%	\$667	1.5%	2.6%	9	5.1%	5.4%	\$858	2.1%	2.5%
	Moderate	63	16.7%	\$7,342	8.6%	17.0%	38	18.9%	11.4%	\$4,638	10.3%	7.2%	25	14.2%	11.1%	\$2,704	6.6%	6.7%
	Middle	63	16.7%	\$8,687	10.1%	19.5%	36	17.9%	17.7%	\$4,993	11.1%	13.6%	27	15.3%	16.3%	\$3,694	9.0%	12.6%
	Upper	232	61.5%	\$68,243	79.5%	41.7%	117	58.2%	38.4%	\$34,630	77.1%	51.2%	115	65.3%	39.3%	\$33,613	82.2%	51.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	26.9%	\$0	0.0%	25.3%	0	0.0%	28.0%	\$0	0.0%	26.3%
	<i>Total</i>	<i>377</i>	<i>100.0%</i>	<i>\$85,797</i>	<i>100.0%</i>	<i>100.0%</i>	<i>201</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$44,928</i>	<i>100.0%</i>	<i>100.0%</i>	<i>176</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$40,869</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	6	10.7%	\$65	3.5%	21.8%	3	8.3%	10.9%	\$39	3.5%	3.4%	3	15.0%	11.1%	\$26	3.6%	3.0%
	Moderate	6	10.7%	\$59	3.2%	17.0%	3	8.3%	18.2%	\$22	2.0%	9.5%	3	15.0%	16.2%	\$37	5.1%	8.0%
	Middle	15	26.8%	\$351	19.1%	19.5%	11	30.6%	25.0%	\$248	22.4%	19.8%	4	20.0%	22.9%	\$103	14.1%	16.4%
	Upper	29	51.8%	\$1,362	74.1%	41.7%	19	52.8%	39.3%	\$799	72.1%	54.5%	10	50.0%	42.4%	\$563	77.2%	64.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.6%	\$0	0.0%	12.8%	0	0.0%	7.4%	\$0	0.0%	8.6%
	<i>Total</i>	<i>56</i>	<i>100.0%</i>	<i>\$1,837</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,108</i>	<i>100.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$729</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	79	6.8%	\$6,333	2.6%	21.8%	49	8.1%	6.4%	\$3,735	3.0%	2.6%	30	5.5%	6.2%	\$2,598	2.1%	2.6%
	Moderate	306	26.5%	\$38,786	15.7%	17.0%	161	26.6%	15.9%	\$20,552	16.4%	9.7%	145	26.4%	15.2%	\$18,234	15.1%	9.2%
	Middle	200	17.3%	\$30,142	12.2%	19.5%	102	16.8%	19.8%	\$14,489	11.5%	15.3%	98	17.8%	19.4%	\$15,653	12.9%	15.2%
	Upper	571	49.4%	\$171,277	69.5%	41.7%	294	48.5%	36.4%	\$86,806	69.1%	46.1%	277	50.4%	37.0%	\$84,471	69.8%	47.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.6%	\$0	0.0%	26.3%	0	0.0%	22.2%	\$0	0.0%	25.4%
	<i>Total</i>	<i>1,156</i>	<i>100.0%</i>	<i>\$246,538</i>	<i>100.0%</i>	<i>100.0%</i>	<i>606</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$125,582</i>	<i>100.0%</i>	<i>100.0%</i>	<i>550</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$120,956</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: AL Birmingham

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Dollar		Small Businesses	Count		Dollar		Agg	Count		Dollar		Agg		
		Count	%	\$ (000s)	\$ %		Bank	%	\$ 000s	\$ %		Bank	%	Bank	%		\$ 000s	\$ %
#	%			%	#	%	%		%	#	%	%		%	%			
SMALL BUSINESSES	Low	127	8.5%	\$5,139	7.8%	7.3%	68	9.1%	7.3%	\$2,806	7.9%	9.7%	59	7.8%	7.0%	\$2,333	7.8%	10.4%
	Moderate	261	17.4%	\$11,543	17.6%	17.0%	123	16.5%	14.3%	\$5,904	16.6%	17.4%	138	18.3%	14.0%	\$5,639	18.8%	16.1%
	Middle	413	27.5%	\$17,440	26.6%	35.0%	203	27.2%	30.6%	\$9,445	26.6%	30.0%	210	27.8%	29.6%	\$7,995	26.6%	28.4%
	Upper	701	46.7%	\$31,447	48.0%	40.7%	353	47.3%	46.5%	\$17,347	48.9%	42.4%	348	46.1%	47.7%	\$14,100	46.9%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.4%	0	0.0%	1.7%	\$0	0.0%	0.7%
	Total	1,502	100.0%	\$65,569	100.0%	100.0%	747	100.0%	100.0%	\$35,502	100.0%	100.0%	755	100.0%	100.0%	\$30,067	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.2%	0	0.0%	2.2%	\$0	0.0%	7.7%	0	0.0%	0.8%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	25.0%	0	0.0%	34.1%	\$0	0.0%	30.7%	0	0.0%	39.5%	\$0	0.0%	47.3%
	Middle	0	0.0%	\$0	0.0%	44.1%	0	0.0%	49.6%	\$0	0.0%	36.0%	0	0.0%	45.7%	\$0	0.0%	40.3%
	Upper	1	100.0%	\$10	100.0%	30.6%	0	0.0%	14.1%	\$0	0.0%	25.6%	1	100.0%	13.2%	\$10	100.0%	11.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.3%
Total	1	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: AL Birmingham

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2015			2016									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	1,089	72.5%	\$42,237	64.4%	88.9%	542	72.6%	52.4%	\$22,522	63.4%	40.8%	547	72.5%	46.0%	\$19,715	65.6%	38.0%
		Over \$1 Million	293	19.5%	\$20,608	31.4%	10.1%	149	19.9%					144	19.1%				
		Total Rev. available	1,382	92.0%	\$62,845	95.8%	99.0%	691	92.5%					691	91.6%				
		Rev. Not Known	120	8.0%	\$2,724	4.2%	1.0%	56	7.5%					64	8.5%				
		Total	1,502	100.0%	\$65,569	100.0%	100.0%	747	100.0%					755	100.0%				
	Loan Size	\$100,000 or Less	1,453	96.7%	\$53,117	81.0%		714	95.6%	89.3%	\$26,311	74.1%	27.4%	739	97.9%	90.9%	\$26,806	89.2%	32.4%
		\$100,001 - \$250,000	33	2.2%	\$5,583	8.5%		21	2.8%	4.8%	\$3,666	10.3%	15.6%	12	1.6%	4.4%	\$1,917	6.4%	15.9%
		\$250,001 - \$1 Million	16	1.1%	\$6,869	10.5%		12	1.6%	5.9%	\$5,525	15.6%	56.9%	4	0.5%	4.7%	\$1,344	4.5%	51.7%
		Total	1,502	100.0%	\$65,569	100.0%		747	100.0%	100.0%	\$35,502	100.0%	100.0%	755	100.0%	100.0%	\$30,067	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,063	97.6%	\$35,355	83.7%													
\$100,001 - \$250,000		15	1.4%	\$2,363	5.6%														
\$250,001 - \$1 Million		11	1.0%	\$4,519	10.7%														
Total		1,089	100.0%	\$42,237	100.0%														
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 96.2%	0	0.0%	40.7%	\$0	0.0%	75.3%	0	0.0%	39.5%	\$0	0.0%	66.2%
		Over \$1 Million	0	0.0%	\$0	0.0%	3.8%	0	0.0%					0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
		Not Known	1	100.0%	\$10	100.0%	0.0%	0	0.0%					1	100.0%				
		Total	1	100.0%	\$10	100.0%	100.0%	0	0.0%					1	100.0%				
	Loan Size	\$100,000 or Less	1	100.0%	\$10	100.0%		0	0.0%	91.9%	\$0	0.0%	46.9%	1	100.0%	89.1%	\$10	100.0%	35.4%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.2%	\$0	0.0%	27.2%	0	0.0%	4.7%	\$0	0.0%	15.5%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.0%	\$0	0.0%	25.9%	0	0.0%	6.2%	\$0	0.0%	49.1%
		Total	1	100.0%	\$10	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
	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%														
Total		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 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: AL Huntsville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015					2016						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	%	%	
#	%			#	%	%				#	%	%						
HOME PURCHASE	Low	4	3.7%	\$331	1.6%	3.6%	2	3.9%	1.9%	\$180	1.8%	0.8%	2	3.6%	1.8%	\$151	1.5%	0.9%
	Moderate	19	17.8%	\$2,495	12.3%	23.6%	7	13.7%	14.7%	\$681	6.7%	10.1%	12	21.4%	15.2%	\$1,814	18.0%	10.5%
	Middle	43	40.2%	\$6,464	31.9%	39.5%	19	37.3%	45.7%	\$2,701	26.5%	43.7%	24	42.9%	46.2%	\$3,763	37.4%	44.3%
	Upper	41	38.3%	\$10,957	54.1%	33.4%	23	45.1%	37.6%	\$6,620	65.0%	45.4%	18	32.1%	36.7%	\$4,337	43.1%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>107</i>	<i>100.0%</i>	<i>\$20,247</i>	<i>100.0%</i>	<i>100.0%</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,182</i>	<i>100.0%</i>	<i>100.0%</i>	<i>56</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,065</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	2	2.7%	\$156	1.1%	3.6%	0	0.0%	1.7%	\$0	0.0%	1.0%	2	5.4%	1.5%	\$156	2.4%	0.6%
	Moderate	16	21.9%	\$2,001	14.1%	23.6%	10	27.8%	17.0%	\$1,320	17.4%	12.3%	6	16.2%	15.6%	\$681	10.4%	11.0%
	Middle	25	34.2%	\$4,321	30.5%	39.5%	9	25.0%	43.1%	\$1,333	17.5%	39.6%	16	43.2%	42.7%	\$2,988	45.4%	40.5%
	Upper	30	41.1%	\$7,707	54.3%	33.4%	17	47.2%	38.1%	\$4,953	65.1%	47.1%	13	35.1%	40.3%	\$2,754	41.9%	47.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>73</i>	<i>100.0%</i>	<i>\$14,185</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,606</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,579</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	6.3%	\$3	0.4%	3.6%	1	8.3%	2.7%	\$3	0.4%	1.5%	0	0.0%	2.9%	\$0	0.0%	1.2%
	Moderate	4	25.0%	\$77	10.5%	23.6%	3	25.0%	23.6%	\$67	10.0%	16.5%	1	25.0%	22.8%	\$10	15.2%	18.1%
	Middle	6	37.5%	\$277	37.7%	39.5%	4	33.3%	44.7%	\$246	36.8%	36.5%	2	50.0%	47.8%	\$31	47.0%	41.6%
	Upper	5	31.3%	\$377	51.4%	33.4%	4	33.3%	29.0%	\$352	52.7%	45.5%	1	25.0%	26.5%	\$25	37.9%	39.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$734</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$66</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	24.8%	0	0.0%	34.2%	\$0	0.0%	4.9%	0	0.0%	33.3%	\$0	0.0%	8.1%
	Moderate	0	0.0%	\$0	0.0%	33.6%	0	0.0%	26.3%	\$0	0.0%	26.2%	0	0.0%	39.4%	\$0	0.0%	37.7%
	Middle	0	0.0%	\$0	0.0%	26.9%	0	0.0%	23.7%	\$0	0.0%	24.1%	0	0.0%	12.1%	\$0	0.0%	20.8%
	Upper	0	0.0%	\$0	0.0%	14.8%	0	0.0%	15.8%	\$0	0.0%	44.9%	0	0.0%	15.2%	\$0	0.0%	33.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	7	3.6%	\$490	1.4%	3.6%	3	3.0%	2.0%	\$183	1.0%	1.1%	4	4.1%	1.9%	\$307	1.8%	1.3%
	Moderate	39	19.9%	\$4,573	13.0%	23.6%	20	20.2%	16.4%	\$2,068	11.2%	11.8%	19	19.6%	16.1%	\$2,505	15.0%	12.7%
	Middle	74	37.8%	\$11,062	31.5%	39.5%	32	32.3%	44.7%	\$4,280	23.2%	41.1%	42	43.3%	45.0%	\$6,782	40.6%	41.1%
	Upper	76	38.8%	\$19,041	54.1%	33.4%	44	44.4%	36.9%	\$11,925	64.6%	46.0%	32	33.0%	37.0%	\$7,116	42.6%	44.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>196</i>	<i>100.0%</i>	<i>\$35,166</i>	<i>100.0%</i>	<i>100.0%</i>	<i>99</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,456</i>	<i>100.0%</i>	<i>100.0%</i>	<i>97</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,710</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Borrower Distribution of HMDA Loans Assessment Area: AL Huntsville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	%	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	24	22.4%	\$2,238	11.1%	22.8%	14	27.5%	12.5%	\$1,289	12.7%	6.9%	10	17.9%	10.2%	\$949	9.4%	5.4%
	Moderate	28	26.2%	\$3,672	18.1%	16.8%	9	17.6%	18.4%	\$1,390	13.7%	14.3%	19	33.9%	19.0%	\$2,282	22.7%	14.0%
	Middle	19	17.8%	\$3,376	16.7%	18.5%	8	15.7%	18.9%	\$1,304	12.8%	19.0%	11	19.6%	19.7%	\$2,072	20.6%	19.0%
	Upper	36	33.6%	\$10,961	54.1%	41.8%	20	39.2%	28.8%	\$6,199	60.9%	40.8%	16	28.6%	31.8%	\$4,762	47.3%	44.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.4%	\$0	0.0%	19.1%	0	0.0%	19.3%	\$0	0.0%	17.1%
	Total	107	100.0%	\$20,247	100.0%	100.0%	51	100.0%	100.0%	\$10,182	100.0%	100.0%	56	100.0%	100.0%	\$10,065	100.0%	100.0%
REFINANCE	Low	10	13.7%	\$908	6.4%	22.8%	6	16.7%	8.5%	\$500	6.6%	4.3%	4	10.8%	6.5%	\$408	6.2%	3.2%
	Moderate	16	21.9%	\$1,773	12.5%	16.8%	6	16.7%	12.6%	\$784	10.3%	8.7%	10	27.0%	12.1%	\$989	15.0%	7.7%
	Middle	13	17.8%	\$1,476	10.4%	18.5%	6	16.7%	16.6%	\$549	7.2%	14.4%	7	18.9%	14.3%	\$927	14.1%	12.0%
	Upper	34	46.6%	\$10,028	70.7%	41.8%	18	50.0%	29.9%	\$5,773	75.9%	38.6%	16	43.2%	33.2%	\$4,255	64.7%	41.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	32.5%	\$0	0.0%	34.0%	0	0.0%	33.8%	\$0	0.0%	35.6%
	Total	73	100.0%	\$14,185	100.0%	100.0%	36	100.0%	100.0%	\$7,606	100.0%	100.0%	37	100.0%	100.0%	\$6,579	100.0%	100.0%
HOME IMPROVEMENT	Low	2	12.5%	\$35	4.8%	22.8%	2	16.7%	20.0%	\$35	5.2%	6.5%	0	0.0%	16.4%	\$0	0.0%	4.7%
	Moderate	5	31.3%	\$99	13.5%	16.8%	3	25.0%	24.0%	\$68	10.2%	13.5%	2	50.0%	24.8%	\$31	47.0%	9.3%
	Middle	3	18.8%	\$17	2.3%	18.5%	3	25.0%	24.9%	\$17	2.5%	19.6%	0	0.0%	24.1%	\$0	0.0%	17.6%
	Upper	6	37.5%	\$583	79.4%	41.8%	4	33.3%	28.5%	\$548	82.0%	50.2%	2	50.0%	31.0%	\$35	53.0%	52.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.6%	\$0	0.0%	10.3%	0	0.0%	3.7%	\$0	0.0%	16.3%
	Total	16	100.0%	\$734	100.0%	100.0%	12	100.0%	100.0%	\$668	100.0%	100.0%	4	100.0%	100.0%	\$66	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	36	18.4%	\$3,181	9.0%	22.8%	22	22.2%	11.8%	\$1,824	9.9%	5.6%	14	14.4%	9.4%	\$1,357	8.1%	4.2%
	Moderate	49	25.0%	\$5,544	15.8%	16.8%	18	18.2%	16.9%	\$2,242	12.1%	11.5%	31	32.0%	17.0%	\$3,302	19.8%	10.5%
	Middle	35	17.9%	\$4,869	13.8%	18.5%	17	17.2%	18.6%	\$1,870	10.1%	16.4%	18	18.6%	18.1%	\$2,999	17.9%	15.0%
	Upper	76	38.8%	\$21,572	61.3%	41.8%	42	42.4%	29.1%	\$12,520	67.8%	38.1%	34	35.1%	32.2%	\$9,052	54.2%	40.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.6%	\$0	0.0%	28.4%	0	0.0%	23.3%	\$0	0.0%	29.9%
	Total	196	100.0%	\$35,166	100.0%	100.0%	99	100.0%	100.0%	\$18,456	100.0%	100.0%	97	100.0%	100.0%	\$16,710	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: AL Huntsville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
SMALL BUSINESSES	Low	69	14.1%	\$3,292	13.2%	9.8%	32	13.3%	12.1%	\$1,280	10.8%	16.4%	37	14.9%	10.5%	\$2,012	15.3%	13.8%
	Moderate	102	20.8%	\$3,832	15.4%	23.5%	45	18.7%	18.3%	\$1,718	14.6%	19.3%	57	22.9%	17.5%	\$2,114	16.1%	19.0%
	Middle	154	31.4%	\$8,124	32.6%	34.5%	75	31.1%	31.4%	\$4,419	37.4%	27.6%	79	31.7%	31.4%	\$3,705	28.2%	27.3%
	Upper	165	33.7%	\$9,710	38.9%	32.2%	89	36.9%	37.4%	\$4,387	37.2%	36.4%	76	30.5%	38.9%	\$5,323	40.5%	39.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.3%	0	0.0%	1.7%	\$0	0.0%	0.6%
	Total	490	100.0%	\$24,958	100.0%	100.0%	241	100.0%	100.0%	\$11,804	100.0%	100.0%	249	100.0%	100.0%	\$13,154	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.8%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	29.2%	0	0.0%	40.7%	\$0	0.0%	59.9%	0	0.0%	32.8%	\$0	0.0%	42.0%
	Middle	1	100.0%	\$35	100.0%	54.4%	0	0.0%	49.2%	\$0	0.0%	30.1%	1	100.0%	55.5%	\$35	100.0%	45.8%
	Upper	0	0.0%	\$0	0.0%	15.5%	0	0.0%	9.3%	\$0	0.0%	9.3%	0	0.0%	11.7%	\$0	0.0%	12.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	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%
Total	1	100.0%	\$35	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$35	100.0%	100.0%	

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: AL Huntsville

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2015			2016									
		Count		Dollar			#	%	%	Bank		#	%	%	Bank		#	%	%
		#	%	\$ (000s)	\$ %	\$ 000s				\$ %	\$ %				\$ 000s	\$ %			
Small Business	Revenue	\$1 Million or Less	355	72.4%	\$16,137	64.7%	90.7%	178	73.9%	55.0%	\$8,189	69.4%	46.4%	177	71.1%	45.1%	\$7,948	60.4%	41.4%
		Over \$1 Million	96	19.6%	\$8,052	32.3%	8.6%	45	18.7%					51	20.5%				
		Total Rev. available	451	92.0%	\$24,189	97.0%	99.3%	223	92.6%					228	91.6%				
		Rev. Not Known	39	8.0%	\$769	3.1%	0.7%	18	7.5%					21	8.4%				
		Total	490	100.0%	\$24,958	100.0%	100.0%	241	100.0%					249	100.0%				
	Loan Size	\$100,000 or Less	470	95.9%	\$19,004	76.1%		233	96.7%	89.4%	\$9,253	78.4%	28.7%	237	95.2%	91.1%	\$9,751	74.1%	32.2%
		\$100,001 - \$250,000	11	2.2%	\$1,776	7.1%		5	2.1%	5.2%	\$851	7.2%	17.7%	6	2.4%	4.0%	\$925	7.0%	15.0%
		\$250,001 - \$1 Million	9	1.8%	\$4,178	16.7%		3	1.2%	5.4%	\$1,700	14.4%	53.6%	6	2.4%	4.9%	\$2,478	18.8%	52.9%
		Total	490	100.0%	\$24,958	100.0%		241	100.0%	100.0%	\$11,804	100.0%	100.0%	249	100.0%	100.0%	\$13,154	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	344	96.9%	\$12,681	78.6%													
\$100,001 - \$250,000		6	1.7%	\$1,028	6.4%														
\$250,001 - \$1 Million		5	1.4%	\$2,428	15.0%														
Total		355	100.0%	\$16,137	100.0%														
Small Farm	Revenue	\$1 Million or Less	1	100.0%	\$35	100.0%	97.1%	0	0.0%	46.6%	\$0	0.0%	67.6%	1	100.0%	42.2%	\$35	100.0%	66.1%
		Over \$1 Million	0	0.0%	\$0	0.0%	2.9%	0	0.0%					0	0.0%				
		Total Rev. available	1	100.0%	\$35	100.0%	100.0%	0	0.0%					1	100.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
		Total	1	100.0%	\$35	100.0%	100.0%	0	0.0%					1	100.0%				
	Loan Size	\$100,000 or Less	1	100.0%	\$35	100.0%		0	0.0%	77.1%	\$0	0.0%	21.0%	1	100.0%	82.0%	\$35	100.0%	29.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	11.9%	\$0	0.0%	28.5%	0	0.0%	14.1%	\$0	0.0%	43.7%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	11.0%	\$0	0.0%	50.5%	0	0.0%	3.9%	\$0	0.0%	27.4%
		Total	1	100.0%	\$35	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$35	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	\$35	100.0%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		1	100.0%	\$35	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: AZ Phoenix

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2015					2016						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	%	Bank	Agg	%	%	%		
#	%			#	%	%				#	%	%	\$ (000s)	%	%			
HOME PURCHASE	Low	30	2.9%	\$4,402	1.2%	3.7%	20	3.2%	1.9%	\$3,035	1.4%	1.2%	10	2.4%	2.0%	\$1,367	1.0%	1.3%
	Moderate	257	24.7%	\$41,717	11.8%	21.5%	146	23.6%	15.5%	\$23,094	10.9%	10.0%	111	26.4%	15.7%	\$18,623	13.1%	10.7%
	Middle	252	24.3%	\$55,454	15.7%	38.1%	140	22.7%	42.8%	\$30,725	14.5%	35.9%	112	26.6%	42.3%	\$24,729	17.4%	35.9%
	Upper	499	48.0%	\$252,132	71.2%	36.8%	311	50.3%	39.5%	\$154,821	73.0%	52.5%	188	44.7%	39.6%	\$97,311	68.5%	51.5%
	Unknown	1	0.1%	\$271	0.1%	0.0%	1	0.2%	0.3%	\$271	0.1%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.6%
	<i>Total</i>	<i>1,039</i>	<i>100.0%</i>	<i>\$353,976</i>	<i>100.0%</i>	<i>100.0%</i>	<i>618</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$211,946</i>	<i>100.0%</i>	<i>100.0%</i>	<i>421</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$142,030</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	11	1.9%	\$988	0.5%	3.7%	5	1.6%	1.4%	\$459	0.4%	0.8%	6	2.4%	1.2%	\$529	0.7%	0.7%
	Moderate	89	15.8%	\$10,718	5.4%	21.5%	42	13.4%	11.9%	\$4,636	3.9%	7.5%	47	18.7%	11.7%	\$6,082	7.6%	7.4%
	Middle	140	24.8%	\$22,341	11.3%	38.1%	75	24.0%	39.1%	\$12,252	10.4%	31.1%	65	25.8%	38.8%	\$10,089	12.6%	31.2%
	Upper	325	57.5%	\$164,133	82.8%	36.8%	191	61.0%	47.5%	\$100,607	85.3%	60.4%	134	53.2%	48.1%	\$63,526	79.2%	60.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.2%
	<i>Total</i>	<i>565</i>	<i>100.0%</i>	<i>\$198,180</i>	<i>100.0%</i>	<i>100.0%</i>	<i>313</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$117,954</i>	<i>100.0%</i>	<i>100.0%</i>	<i>252</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$80,226</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	0.8%	\$15	0.2%	3.7%	1	1.6%	1.6%	\$15	0.6%	3.0%	0	0.0%	1.7%	\$0	0.0%	1.1%
	Moderate	16	12.7%	\$471	7.7%	21.5%	5	8.1%	11.9%	\$294	11.0%	7.4%	11	17.2%	13.3%	\$177	5.1%	8.8%
	Middle	49	38.9%	\$2,161	35.3%	38.1%	23	37.1%	38.4%	\$1,069	40.1%	30.0%	26	40.6%	38.8%	\$1,092	31.6%	31.4%
	Upper	60	47.6%	\$3,471	56.7%	36.8%	33	53.2%	47.9%	\$1,289	48.3%	59.4%	27	42.2%	46.0%	\$2,182	63.2%	58.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.1%
	<i>Total</i>	<i>126</i>	<i>100.0%</i>	<i>\$6,118</i>	<i>100.0%</i>	<i>100.0%</i>	<i>62</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,667</i>	<i>100.0%</i>	<i>100.0%</i>	<i>64</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,451</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	15.3%	0	0.0%	20.8%	\$0	0.0%	12.8%	0	0.0%	22.7%	\$0	0.0%	8.7%
	Moderate	0	0.0%	\$0	0.0%	37.4%	0	0.0%	43.4%	\$0	0.0%	40.7%	0	0.0%	39.8%	\$0	0.0%	33.4%
	Middle	0	0.0%	\$0	0.0%	28.7%	0	0.0%	25.1%	\$0	0.0%	35.2%	0	0.0%	27.9%	\$0	0.0%	44.0%
	Upper	0	0.0%	\$0	0.0%	18.5%	0	0.0%	10.7%	\$0	0.0%	11.3%	0	0.0%	9.6%	\$0	0.0%	13.9%
	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	42	2.4%	\$5,405	1.0%	3.7%	26	2.6%	1.7%	\$3,509	1.1%	1.6%	16	2.2%	1.7%	\$1,896	0.8%	1.4%
	Moderate	362	20.9%	\$52,906	9.5%	21.5%	193	19.4%	13.9%	\$28,024	8.4%	10.4%	169	22.9%	13.9%	\$24,882	11.0%	10.4%
	Middle	441	25.5%	\$79,956	14.3%	38.1%	238	24.0%	41.1%	\$44,046	13.2%	33.9%	203	27.5%	40.7%	\$35,910	15.9%	34.2%
	Upper	884	51.1%	\$419,736	75.2%	36.8%	535	53.9%	43.1%	\$256,717	77.2%	53.9%	349	47.4%	43.4%	\$163,019	72.2%	53.5%
	Unknown	1	0.1%	\$271	0.0%	0.0%	1	0.1%	0.2%	\$271	0.1%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.4%
	<i>Total</i>	<i>1,730</i>	<i>100.0%</i>	<i>\$558,274</i>	<i>100.0%</i>	<i>100.0%</i>	<i>993</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$332,567</i>	<i>100.0%</i>	<i>100.0%</i>	<i>737</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$225,707</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

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Borrower Distribution of HMDA Loans Assessment Area: AZ Phoenix

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	%	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	86	8.3%	\$10,343	2.9%	21.2%	54	8.7%	5.2%	\$6,107	2.9%	2.6%	32	7.6%	4.3%	\$4,236	3.0%	2.2%
	Moderate	265	25.5%	\$40,691	11.5%	17.8%	139	22.5%	17.2%	\$19,713	9.3%	11.9%	126	29.9%	15.6%	\$20,978	14.8%	10.9%
	Middle	140	13.5%	\$26,536	7.5%	20.5%	72	11.7%	20.3%	\$13,477	6.4%	18.0%	68	16.2%	20.6%	\$13,059	9.2%	18.1%
	Upper	548	52.7%	\$276,406	78.1%	40.6%	353	57.1%	36.7%	\$172,649	81.5%	48.7%	195	46.3%	38.7%	\$103,757	73.1%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.7%	\$0	0.0%	18.8%	0	0.0%	20.8%	\$0	0.0%	18.6%
	Total	1,039	100.0%	\$353,976	100.0%	100.0%	618	100.0%	100.0%	\$211,946	100.0%	100.0%	421	100.0%	100.0%	\$142,030	100.0%	100.0%
REFINANCE	Low	44	7.8%	\$4,051	2.0%	21.2%	22	7.0%	4.9%	\$1,932	1.6%	2.7%	22	8.7%	4.0%	\$2,119	2.6%	2.0%
	Moderate	107	18.9%	\$12,779	6.4%	17.8%	57	18.2%	12.0%	\$6,759	5.7%	7.6%	50	19.8%	11.3%	\$6,020	7.5%	7.2%
	Middle	64	11.3%	\$10,088	5.1%	20.5%	33	10.5%	16.1%	\$5,362	4.5%	13.1%	31	12.3%	17.1%	\$4,726	5.9%	13.8%
	Upper	349	61.8%	\$171,138	86.4%	40.6%	200	63.9%	35.0%	\$103,777	88.0%	44.7%	149	59.1%	40.0%	\$67,361	84.0%	49.7%
	Unknown	1	0.2%	\$124	0.1%	0.0%	1	0.3%	32.0%	\$124	0.1%	31.9%	0	0.0%	27.6%	\$0	0.0%	27.2%
	Total	565	100.0%	\$198,180	100.0%	100.0%	313	100.0%	100.0%	\$117,954	100.0%	100.0%	252	100.0%	100.0%	\$80,226	100.0%	100.0%
HOME IMPROVEMENT	Low	3	2.4%	\$19	0.3%	21.2%	1	1.6%	5.1%	\$6	0.2%	2.8%	2	3.1%	5.1%	\$13	0.4%	2.9%
	Moderate	13	10.3%	\$289	4.7%	17.8%	3	4.8%	14.7%	\$156	5.8%	10.9%	10	15.6%	14.5%	\$133	3.9%	11.3%
	Middle	21	16.7%	\$812	13.3%	20.5%	10	16.1%	20.5%	\$667	25.0%	18.0%	11	17.2%	22.0%	\$145	4.2%	20.6%
	Upper	89	70.6%	\$4,998	81.7%	40.6%	48	77.4%	53.5%	\$1,838	68.9%	57.9%	41	64.1%	53.9%	\$3,160	91.6%	59.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	10.5%	0	0.0%	4.5%	\$0	0.0%	5.3%
	Total	126	100.0%	\$6,118	100.0%	100.0%	62	100.0%	100.0%	\$2,667	100.0%	100.0%	64	100.0%	100.0%	\$3,451	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	133	7.7%	\$14,413	2.6%	21.2%	77	7.8%	5.1%	\$8,045	2.4%	2.5%	56	7.6%	4.2%	\$6,368	2.8%	2.0%
	Moderate	385	22.3%	\$53,759	9.6%	17.8%	199	20.0%	14.9%	\$26,628	8.0%	9.6%	186	25.2%	13.7%	\$27,131	12.0%	8.9%
	Middle	225	13.0%	\$37,436	6.7%	20.5%	115	11.6%	18.5%	\$19,506	5.9%	15.2%	110	14.9%	19.1%	\$17,930	7.9%	15.6%
	Upper	986	57.0%	\$452,542	81.1%	40.6%	601	60.5%	36.4%	\$278,264	83.7%	45.0%	385	52.2%	39.6%	\$174,278	77.2%	47.8%
	Unknown	1	0.1%	\$124	0.0%	0.0%	1	0.1%	25.2%	\$124	0.0%	27.6%	0	0.0%	23.4%	\$0	0.0%	25.7%
	Total	1,730	100.0%	\$558,274	100.0%	100.0%	993	100.0%	100.0%	\$332,567	100.0%	100.0%	737	100.0%	100.0%	\$225,707	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: AZ Phoenix

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		%	Bank	Agg	%	\$ 000s	%	\$ %	#	%	%	\$ 000s	%
SMALL BUSINESSES	Low	366	11.4%	\$23,851	13.7%	6.0%	180	11.7%	7.1%	\$10,296	12.8%	13.0%	186	11.1%	6.2%	\$13,555	14.5%	11.5%
	Moderate	596	18.5%	\$31,929	18.3%	15.9%	293	19.0%	15.2%	\$16,827	20.9%	17.2%	303	18.1%	14.3%	\$15,102	16.1%	16.2%
	Middle	928	28.8%	\$48,813	28.0%	31.3%	452	29.3%	28.9%	\$22,820	28.3%	25.8%	476	28.4%	27.9%	\$25,993	27.8%	25.2%
	Upper	1,303	40.5%	\$67,535	38.8%	46.4%	603	39.1%	47.1%	\$29,373	36.5%	41.9%	700	41.7%	49.4%	\$38,162	40.8%	44.7%
	Unknown	26	0.8%	\$2,006	1.2%	0.4%	14	0.9%	0.4%	\$1,226	1.5%	1.1%	12	0.7%	0.4%	\$780	0.8%	1.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	1.0%	0	0.0%	1.9%	\$0	0.0%	1.3%
	Total	3,219	100.0%	\$174,134	100.0%	100.0%	1,542	100.0%	100.0%	\$80,542	100.0%	100.0%	1,677	100.0%	100.0%	\$93,592	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	3.1%	\$0	0.0%	3.1%	0	0.0%	5.0%	\$0	0.0%	5.3%
	Moderate	0	0.0%	\$0	0.0%	15.3%	0	0.0%	19.3%	\$0	0.0%	28.6%	0	0.0%	16.3%	\$0	0.0%	22.6%
	Middle	2	66.7%	\$200	98.5%	34.9%	1	50.0%	36.0%	\$100	97.1%	41.8%	1	100.0%	39.8%	\$100	100.0%	48.2%
	Upper	1	33.3%	\$3	1.5%	45.4%	1	50.0%	36.8%	\$3	2.9%	24.4%	0	0.0%	33.6%	\$0	0.0%	22.0%
	Unknown	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.7%	\$0	0.0%	2.0%	0	0.0%	4.8%	\$0	0.0%	1.7%
Total	3	100.0%	\$203	100.0%	100.0%	2	100.0%	100.0%	\$103	100.0%	100.0%	1	100.0%	100.0%	\$100	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: AZ Phoenix

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2015			2016									
		Count		Dollar			#	%	%	Bank		#	%	%	Bank		#	%	%
		#	%	\$ (000s)	\$ %	\$ 000s				\$ %	\$ %				\$ 000s	\$ %			
Small Business	Revenue	\$1 Million or Less	1,975	61.4%	\$93,008	53.4%	91.7%	954	61.9%	52.4%	\$43,920	54.5%	32.8%	1,021	60.9%	41.3%	\$49,088	52.4%	29.5%
		Over \$1 Million	976	30.3%	\$75,922	43.6%	7.3%	454	29.4%					522	31.1%				
		Total Rev. available	2,951	91.7%	\$168,930	97.0%	99.0%	1,408	91.3%					1,543	92.0%				
		Rev. Not Known	268	8.3%	\$5,204	3.0%	1.0%	134	8.7%					134	8.0%				
		Total	3,219	100.0%	\$174,134	100.0%	100.0%	1,542	100.0%					1,677	100.0%				
	Loan Size	\$100,000 or Less	3,062	95.1%	\$129,880	74.6%		1,477	95.8%	95.1%	\$62,041	77.0%	41.4%	1,585	94.5%	96.0%	\$67,839	72.5%	48.3%
		\$100,001 - \$250,000	99	3.1%	\$18,002	10.3%		40	2.6%	2.3%	\$7,127	8.8%	12.7%	59	3.5%	1.8%	\$10,875	11.6%	11.1%
		\$250,001 - \$1 Million	58	1.8%	\$26,252	15.1%		25	1.6%	2.7%	\$11,374	14.1%	46.0%	33	2.0%	2.2%	\$14,878	15.9%	40.7%
		Total	3,219	100.0%	\$174,134	100.0%		1,542	100.0%	100.0%	\$80,542	100.0%	100.0%	1,677	100.0%	100.0%	\$93,592	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,906	96.5%	\$72,907	78.4%													
\$100,001 - \$250,000		39	2.0%	\$7,092	7.6%														
\$250,001 - \$1 Million		30	1.5%	\$13,009	14.0%														
Total		1,975	100.0%	\$93,008	100.0%														
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	93.5%	0	0.0%	42.6%	\$0	0.0%	40.3%	0	0.0%	38.1%	\$0	0.0%	34.3%
		Over \$1 Million	2	66.7%	\$200	98.5%	6.5%	1	50.0%					1	100.0%				
		Total Rev. available	2	66.7%	\$200	98.5%	100.0%	1	50.0%					1	100.0%				
		Not Known	1	33.3%	\$3	1.5%	0.0%	1	50.0%					0	0.0%				
		Total	3	100.0%	\$203	100.0%	100.0%	2	100.0%					1	100.0%				
	Loan Size	\$100,000 or Less	3	100.0%	\$203	100.0%		2	100.0%	80.4%	\$103	100.0%	26.3%	1	100.0%	80.7%	\$100	100.0%	26.6%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.7%	\$0	0.0%	24.8%	0	0.0%	10.3%	\$0	0.0%	26.5%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	8.9%	\$0	0.0%	48.8%	0	0.0%	9.0%	\$0	0.0%	46.9%
		Total	3	100.0%	\$203	100.0%		2	100.0%	100.0%	\$103	100.0%	100.0%	1	100.0%	100.0%	\$100	100.0%	100.0%
	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%														
Total		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 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: CA Modesto

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015					2016						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	%	%	
#	%			#	%	%				#	%	%						
HOME PURCHASE	Low	4	4.3%	\$492	2.1%	1.2%	2	3.9%	1.1%	\$223	1.8%	0.8%	2	4.8%	1.4%	\$269	2.4%	1.0%
	Moderate	22	23.7%	\$4,464	19.1%	14.6%	13	25.5%	12.0%	\$2,702	22.0%	8.8%	9	21.4%	12.2%	\$1,762	15.8%	9.2%
	Middle	25	26.9%	\$5,362	22.9%	44.4%	16	31.4%	47.7%	\$3,454	28.1%	45.2%	9	21.4%	47.5%	\$1,908	17.1%	45.1%
	Upper	42	45.2%	\$13,101	55.9%	39.9%	20	39.2%	39.1%	\$5,906	48.1%	45.2%	22	52.4%	38.9%	\$7,195	64.6%	44.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>93</i>	<i>100.0%</i>	<i>\$23,419</i>	<i>100.0%</i>	<i>100.0%</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,285</i>	<i>100.0%</i>	<i>100.0%</i>	<i>42</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,134</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	2	2.2%	\$230	1.3%	1.2%	1	2.2%	0.8%	\$90	1.1%	0.5%	1	2.2%	0.7%	\$140	1.5%	0.5%
	Moderate	13	14.3%	\$1,815	10.4%	14.6%	6	13.3%	9.9%	\$819	9.8%	7.0%	7	15.2%	9.7%	\$996	11.0%	7.1%
	Middle	44	48.4%	\$7,356	42.2%	44.4%	24	53.3%	45.2%	\$3,928	47.1%	41.8%	20	43.5%	44.0%	\$3,428	37.7%	41.5%
	Upper	32	35.2%	\$8,020	46.0%	39.9%	14	31.1%	44.1%	\$3,500	42.0%	50.7%	18	39.1%	45.6%	\$4,520	49.8%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>91</i>	<i>100.0%</i>	<i>\$17,421</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,337</i>	<i>100.0%</i>	<i>100.0%</i>	<i>46</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,084</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.9%	\$0	0.0%	0.9%	0	0.0%	1.1%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	14.6%	0	0.0%	9.3%	\$0	0.0%	7.7%	0	0.0%	9.9%	\$0	0.0%	7.5%
	Middle	4	50.0%	\$63	43.4%	44.4%	3	75.0%	43.8%	\$45	75.0%	41.5%	1	25.0%	43.9%	\$18	21.2%	40.0%
	Upper	4	50.0%	\$82	56.6%	39.9%	1	25.0%	46.0%	\$15	25.0%	49.8%	3	75.0%	45.1%	\$67	78.8%	51.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$145</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$85</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	6.6%	0	0.0%	5.3%	\$0	0.0%	3.0%	0	0.0%	18.2%	\$0	0.0%	17.3%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	36.8%	\$0	0.0%	62.4%	0	0.0%	24.2%	\$0	0.0%	16.9%
	Middle	0	0.0%	\$0	0.0%	50.0%	0	0.0%	42.1%	\$0	0.0%	16.5%	0	0.0%	39.4%	\$0	0.0%	54.0%
	Upper	0	0.0%	\$0	0.0%	25.4%	0	0.0%	15.8%	\$0	0.0%	18.1%	0	0.0%	18.2%	\$0	0.0%	11.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	6	3.1%	\$722	1.8%	1.2%	3	3.0%	0.9%	\$313	1.5%	0.7%	3	3.3%	1.0%	\$409	2.0%	0.9%
	Moderate	35	18.2%	\$6,279	15.3%	14.6%	19	19.0%	10.9%	\$3,521	17.0%	9.0%	16	17.4%	10.8%	\$2,758	13.6%	8.1%
	Middle	73	38.0%	\$12,781	31.2%	44.4%	43	43.0%	46.3%	\$7,427	35.9%	42.9%	30	32.6%	45.5%	\$5,354	26.4%	43.2%
	Upper	78	40.6%	\$21,203	51.7%	39.9%	35	35.0%	41.9%	\$9,421	45.6%	47.4%	43	46.7%	42.7%	\$11,782	58.0%	47.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>192</i>	<i>100.0%</i>	<i>\$40,985</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,682</i>	<i>100.0%</i>	<i>100.0%</i>	<i>92</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,303</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Borrower Distribution of HMDA Loans Assessment Area: CA Modesto

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
				#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%			
HOME PURCHASE	Low	3	3.2%	\$432	1.8%	22.6%	2	3.9%	1.5%	\$280	2.3%	0.8%	1	2.4%	1.1%	\$152	1.4%	0.6%
	Moderate	19	20.4%	\$3,066	13.1%	16.7%	11	21.6%	9.5%	\$1,795	14.6%	6.5%	8	19.0%	11.4%	\$1,271	11.4%	7.9%
	Middle	16	17.2%	\$3,380	14.4%	19.6%	7	13.7%	24.3%	\$1,296	10.5%	20.9%	9	21.4%	26.0%	\$2,084	18.7%	23.1%
	Upper	55	59.1%	\$16,541	70.6%	41.1%	31	60.8%	42.2%	\$8,914	72.6%	50.0%	24	57.1%	44.2%	\$7,627	68.5%	51.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.5%	\$0	0.0%	21.8%	0	0.0%	17.2%	\$0	0.0%	16.5%
	<i>Total</i>	<i>93</i>	<i>100.0%</i>	<i>\$23,419</i>	<i>100.0%</i>	<i>100.0%</i>	<i>51</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,285</i>	<i>100.0%</i>	<i>100.0%</i>	<i>42</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,134</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	8	8.8%	\$896	5.1%	22.6%	5	11.1%	2.7%	\$508	6.1%	1.5%	3	6.5%	3.2%	\$388	4.3%	1.8%
	Moderate	20	22.0%	\$2,706	15.5%	16.7%	10	22.2%	10.1%	\$1,447	17.4%	7.1%	10	21.7%	11.2%	\$1,259	13.9%	8.0%
	Middle	24	26.4%	\$4,036	23.2%	19.6%	12	26.7%	18.2%	\$1,914	23.0%	15.4%	12	26.1%	20.7%	\$2,122	23.4%	17.9%
	Upper	39	42.9%	\$9,783	56.2%	41.1%	18	40.0%	42.9%	\$4,468	53.6%	47.8%	21	45.7%	45.3%	\$5,315	58.5%	50.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	26.1%	\$0	0.0%	28.2%	0	0.0%	19.7%	\$0	0.0%	21.8%
	<i>Total</i>	<i>91</i>	<i>100.0%</i>	<i>\$17,421</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,337</i>	<i>100.0%</i>	<i>100.0%</i>	<i>46</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,084</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	3.5%	\$0	0.0%	1.6%	0	0.0%	3.8%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	12.4%	\$0	0.0%	10.0%	0	0.0%	13.0%	\$0	0.0%	10.4%
	Middle	1	12.5%	\$12	8.3%	19.6%	0	0.0%	22.2%	\$0	0.0%	21.0%	1	25.0%	26.4%	\$12	14.1%	24.3%
	Upper	7	87.5%	\$133	91.7%	41.1%	4	100.0%	53.5%	\$60	100.0%	56.8%	3	75.0%	53.8%	\$73	85.9%	60.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.4%	\$0	0.0%	10.6%	0	0.0%	2.9%	\$0	0.0%	2.7%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$145</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$85</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	11	5.7%	\$1,328	3.2%	22.6%	7	7.0%	2.2%	\$788	3.8%	1.1%	4	4.3%	2.3%	\$540	2.7%	1.2%
	Moderate	39	20.3%	\$5,772	14.1%	16.7%	21	21.0%	9.9%	\$3,242	15.7%	6.8%	18	19.6%	11.4%	\$2,530	12.5%	8.0%
	Middle	41	21.4%	\$7,428	18.1%	19.6%	19	19.0%	21.1%	\$3,210	15.5%	17.9%	22	23.9%	23.3%	\$4,218	20.8%	20.5%
	Upper	101	52.6%	\$26,457	64.6%	41.1%	53	53.0%	43.0%	\$13,442	65.0%	48.2%	48	52.2%	45.2%	\$13,015	64.1%	51.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.8%	\$0	0.0%	26.0%	0	0.0%	17.9%	\$0	0.0%	19.1%
	<i>Total</i>	<i>192</i>	<i>100.0%</i>	<i>\$40,985</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,682</i>	<i>100.0%</i>	<i>100.0%</i>	<i>92</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,303</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: CA Modesto

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
SMALL BUSINESSES	Low	20	8.7%	\$1,443	15.1%	2.5%	7	7.3%	2.3%	\$390	10.2%	2.5%	13	9.7%	2.0%	\$1,053	18.4%	2.3%
	Moderate	28	12.2%	\$1,083	11.3%	18.2%	12	12.5%	17.1%	\$465	12.2%	19.7%	16	11.9%	15.8%	\$618	10.8%	17.9%
	Middle	102	44.3%	\$3,755	39.3%	44.1%	44	45.8%	43.5%	\$1,642	43.0%	45.9%	58	43.3%	41.1%	\$2,113	36.9%	43.6%
	Upper	80	34.8%	\$3,267	34.2%	35.2%	33	34.4%	35.1%	\$1,323	34.6%	30.5%	47	35.1%	37.5%	\$1,944	33.9%	33.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	1.4%	0	0.0%	3.6%	\$0	0.0%	2.3%
	Total	230	100.0%	\$9,548	100.0%	100.0%	96	100.0%	100.0%	\$3,820	100.0%	100.0%	134	100.0%	100.0%	\$5,728	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.6%	0	0.0%	0.6%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	5.1%	0	0.0%	7.4%	\$0	0.0%	5.1%	0	0.0%	5.5%	\$0	0.0%	1.5%
	Middle	1	100.0%	\$50	100.0%	53.5%	0	0.0%	54.4%	\$0	0.0%	56.0%	1	100.0%	55.9%	\$50	100.0%	64.3%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	35.6%	\$0	0.0%	38.0%	0	0.0%	37.3%	\$0	0.0%	33.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.4%	0	0.0%	0.6%	\$0	0.0%	0.2%
Total	1	100.0%	\$50	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: CA Modesto

Product Type	Bank Lending & Demographic Data Comparison 2015, 2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2015			2016										
	Count		Dollar			Count		Dollar		Count		Dollar							
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	150	65.2%	\$5,731	60.0%	91.6%	61	63.5%	55.2%	\$2,192	57.4%	38.2%	89	66.4%	41.7%	\$3,539	61.8%	34.1%
		Over \$1 Million	54	23.5%	\$3,357	35.2%	8.0%	21	21.9%				33	24.6%					
		Total Rev. available	204	88.7%	\$9,088	95.2%	99.6%	82	85.4%				122	91.0%					
		Rev. Not Known	26	11.3%	\$460	4.8%	0.5%	14	14.6%				12	9.0%					
		Total	230	100.0%	\$9,548	100.0%	100.0%	96	100.0%				134	100.0%					
	Loan Size	\$100,000 or Less	227	98.7%	\$8,525	89.3%		95	99.0%	94.1%	\$3,587	93.9%	38.3%	132	98.5%	95.7%	\$4,938	86.2%	46.8%
		\$100,001 - \$250,000	2	0.9%	\$483	5.1%		1	1.0%	2.9%	\$233	6.1%	14.8%	1	0.7%	2.3%	\$250	4.4%	13.4%
		\$250,001 - \$1 Million	1	0.4%	\$540	5.7%		0	0.0%	2.9%	\$0	0.0%	47.0%	1	0.7%	2.0%	\$540	9.4%	39.8%
		Total	230	100.0%	\$9,548	100.0%		96	100.0%	100.0%	\$3,820	100.0%	100.0%	134	100.0%	100.0%	\$5,728	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	149	99.3%	\$5,191	90.6%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$1 Million		1	0.7%	\$540	9.4%														
Total		150	100.0%	\$5,731	100.0%														
Small Farm	Revenue	\$1 Million or Less	1	100.0%	\$50	100.0%	89.5%	0	0.0%	49.3%	\$0	0.0%	39.2%	1	100.0%	51.3%	\$50	100.0%	35.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	10.5%	0	0.0%				0	0.0%					
		Total Rev. available	1	100.0%	\$50	100.0%	100.0%	0	0.0%				1	100.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	1	100.0%	\$50	100.0%	100.0%	0	0.0%				1	100.0%					
	Loan Size	\$100,000 or Less	1	100.0%	\$50	100.0%		0	0.0%	67.7%	\$0	0.0%	13.2%	1	100.0%	77.2%	\$50	100.0%	21.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	14.2%	\$0	0.0%	24.1%	0	0.0%	11.2%	\$0	0.0%	24.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	18.1%	\$0	0.0%	62.7%	0	0.0%	11.6%	\$0	0.0%	54.8%
		Total	1	100.0%	\$50	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	\$50	100.0%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		1	100.0%	\$50	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: CA Riverside

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		#	%		\$ (000s)	%	%	#	%	\$ (000s)	%	%	#	%	\$ (000s)	%	%	
HOME PURCHASE	Low	10	4.3%	\$1,944	2.2%	2.9%	5	3.4%	2.6%	\$834	1.5%	1.7%	5	5.8%	2.8%	\$1,110	3.4%	1.9%
	Moderate	60	25.9%	\$13,436	15.4%	21.6%	30	20.5%	18.1%	\$6,814	12.5%	13.2%	30	34.9%	18.9%	\$6,622	20.1%	14.2%
	Middle	51	22.0%	\$15,240	17.5%	36.3%	33	22.6%	38.9%	\$10,964	20.2%	34.6%	18	20.9%	39.0%	\$4,276	13.0%	35.2%
	Upper	111	47.8%	\$56,648	64.9%	39.2%	78	53.4%	40.4%	\$35,697	65.7%	50.5%	33	38.4%	39.3%	\$20,951	63.6%	48.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>232</i>	<i>100.0%</i>	<i>\$87,268</i>	<i>100.0%</i>	<i>100.0%</i>	<i>146</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$54,309</i>	<i>100.0%</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,959</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	5	3.1%	\$1,003	2.4%	2.9%	2	2.2%	1.6%	\$551	2.3%	1.0%	3	4.2%	1.6%	\$452	2.4%	1.1%
	Moderate	45	27.6%	\$6,303	14.9%	21.6%	23	25.3%	14.0%	\$3,115	13.2%	10.2%	22	30.6%	13.6%	\$3,188	17.0%	9.9%
	Middle	47	28.8%	\$11,039	26.1%	36.3%	25	27.5%	35.5%	\$5,396	22.9%	30.3%	22	30.6%	34.7%	\$5,643	30.1%	30.1%
	Upper	66	40.5%	\$23,963	56.6%	39.2%	41	45.1%	49.0%	\$14,496	61.5%	58.4%	25	34.7%	50.1%	\$9,467	50.5%	59.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>163</i>	<i>100.0%</i>	<i>\$42,308</i>	<i>100.0%</i>	<i>100.0%</i>	<i>91</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,558</i>	<i>100.0%</i>	<i>100.0%</i>	<i>72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,750</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	1.6%	\$0	0.0%	1.1%	0	0.0%	1.7%	\$0	0.0%	1.1%
	Moderate	4	7.5%	\$35	2.2%	21.6%	0	0.0%	13.9%	\$0	0.0%	11.0%	4	19.0%	14.5%	\$35	5.6%	11.8%
	Middle	18	34.0%	\$561	34.6%	36.3%	12	37.5%	35.4%	\$374	37.4%	31.2%	6	28.6%	36.7%	\$187	30.2%	31.4%
	Upper	31	58.5%	\$1,025	63.2%	39.2%	20	62.5%	49.1%	\$627	62.6%	56.6%	11	52.4%	47.2%	\$398	64.2%	55.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$1,621</i>	<i>100.0%</i>	<i>100.0%</i>	<i>32</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,001</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$620</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	11.3%	0	0.0%	22.0%	\$0	0.0%	10.5%	0	0.0%	18.7%	\$0	0.0%	11.2%
	Moderate	0	0.0%	\$0	0.0%	36.1%	0	0.0%	40.2%	\$0	0.0%	32.9%	0	0.0%	44.6%	\$0	0.0%	33.5%
	Middle	0	0.0%	\$0	0.0%	35.4%	0	0.0%	27.4%	\$0	0.0%	35.6%	0	0.0%	26.4%	\$0	0.0%	24.9%
	Upper	0	0.0%	\$0	0.0%	17.2%	0	0.0%	10.4%	\$0	0.0%	21.0%	0	0.0%	10.2%	\$0	0.0%	30.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	15	3.3%	\$2,947	2.2%	2.9%	7	2.6%	2.1%	\$1,385	1.8%	1.7%	8	4.5%	2.1%	\$1,562	3.0%	1.7%
	Moderate	109	24.3%	\$19,774	15.1%	21.6%	53	19.7%	15.8%	\$9,929	12.6%	12.5%	56	31.3%	15.9%	\$9,845	18.8%	12.6%
	Middle	116	25.9%	\$26,840	20.5%	36.3%	70	26.0%	36.9%	\$16,734	21.2%	32.4%	46	25.7%	36.6%	\$10,106	19.3%	32.1%
	Upper	208	46.4%	\$81,636	62.2%	39.2%	139	51.7%	45.2%	\$50,820	64.4%	53.4%	69	38.5%	45.4%	\$30,816	58.9%	53.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>448</i>	<i>100.0%</i>	<i>\$131,197</i>	<i>100.0%</i>	<i>100.0%</i>	<i>269</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$78,868</i>	<i>100.0%</i>	<i>100.0%</i>	<i>179</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$52,329</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

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Borrower Distribution of HMDA Loans Assessment Area: CA Riverside

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg			
HOME PURCHASE	Low	11	4.7%	\$1,266	1.5%	21.8%	6	4.1%	2.2%	\$709	1.3%	0.9%	5	5.8%	1.7%	\$557	1.7%	0.7%
	Moderate	38	16.4%	\$7,141	8.2%	17.5%	27	18.5%	10.5%	\$5,099	9.4%	6.4%	11	12.8%	10.4%	\$2,042	6.2%	6.4%
	Middle	33	14.2%	\$7,486	8.6%	19.8%	18	12.3%	21.1%	\$3,711	6.8%	17.9%	15	17.4%	22.2%	\$3,775	11.5%	18.5%
	Upper	150	64.7%	\$71,375	81.8%	40.8%	95	65.1%	45.1%	\$44,790	82.5%	54.6%	55	64.0%	47.6%	\$26,585	80.7%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.1%	\$0	0.0%	20.1%	0	0.0%	18.1%	\$0	0.0%	17.7%
	<i>Total</i>	<i>232</i>	<i>100.0%</i>	<i>\$87,268</i>	<i>100.0%</i>	<i>100.0%</i>	<i>146</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$54,309</i>	<i>100.0%</i>	<i>100.0%</i>	<i>86</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,959</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	15	9.2%	\$1,308	3.1%	21.8%	9	9.9%	2.7%	\$766	3.3%	1.4%	6	8.3%	2.4%	\$542	2.9%	1.2%
	Moderate	24	14.7%	\$3,147	7.4%	17.5%	15	16.5%	8.5%	\$1,983	8.4%	5.3%	9	12.5%	8.5%	\$1,164	6.2%	5.5%
	Middle	32	19.6%	\$5,798	13.7%	19.8%	12	13.2%	16.2%	\$2,052	8.7%	13.2%	20	27.8%	15.9%	\$3,746	20.0%	13.0%
	Upper	92	56.4%	\$32,055	75.8%	40.8%	55	60.4%	42.4%	\$18,757	79.6%	48.2%	37	51.4%	46.8%	\$13,298	70.9%	52.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	30.1%	\$0	0.0%	31.8%	0	0.0%	26.3%	\$0	0.0%	27.8%
	<i>Total</i>	<i>163</i>	<i>100.0%</i>	<i>\$42,308</i>	<i>100.0%</i>	<i>100.0%</i>	<i>91</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,558</i>	<i>100.0%</i>	<i>100.0%</i>	<i>72</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,750</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	1.9%	\$3	0.2%	21.8%	0	0.0%	3.3%	\$0	0.0%	1.7%	1	4.8%	3.2%	\$3	0.5%	1.7%
	Moderate	6	11.3%	\$77	4.8%	17.5%	4	12.5%	11.7%	\$70	7.0%	8.9%	2	9.5%	12.4%	\$7	1.1%	8.9%
	Middle	7	13.2%	\$154	9.5%	19.8%	2	6.3%	20.9%	\$12	1.2%	19.7%	5	23.8%	21.6%	\$142	22.9%	19.5%
	Upper	39	73.6%	\$1,387	85.6%	40.8%	26	81.3%	57.0%	\$919	91.8%	62.1%	13	61.9%	58.0%	\$468	75.5%	62.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.2%	\$0	0.0%	7.6%	0	0.0%	4.7%	\$0	0.0%	7.0%
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$1,621</i>	<i>100.0%</i>	<i>100.0%</i>	<i>32</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,001</i>	<i>100.0%</i>	<i>100.0%</i>	<i>21</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$620</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	27	6.0%	\$2,577	2.0%	21.8%	15	5.6%	2.5%	\$1,475	1.9%	1.2%	12	6.7%	2.2%	\$1,102	2.1%	1.0%
	Moderate	68	15.2%	\$10,365	7.9%	17.5%	46	17.1%	9.5%	\$7,152	9.1%	5.7%	22	12.3%	9.5%	\$3,213	6.1%	5.8%
	Middle	72	16.1%	\$13,438	10.2%	19.8%	32	11.9%	18.5%	\$5,775	7.3%	14.9%	40	22.3%	18.8%	\$7,663	14.6%	15.1%
	Upper	281	62.7%	\$104,817	79.9%	40.8%	176	65.4%	44.1%	\$64,466	81.7%	49.4%	105	58.7%	47.5%	\$40,351	77.1%	52.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.4%	\$0	0.0%	28.9%	0	0.0%	22.1%	\$0	0.0%	25.3%
	<i>Total</i>	<i>448</i>	<i>100.0%</i>	<i>\$131,197</i>	<i>100.0%</i>	<i>100.0%</i>	<i>269</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$78,868</i>	<i>100.0%</i>	<i>100.0%</i>	<i>179</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$52,329</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

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Geographic Distribution of Small Business & Small Farm Loans Assessment Area: CA Riverside

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Dollar		Small Businesses	Count		Dollar		Agg	Count		Dollar		Agg		
		Count	%	\$ (000s)	\$ %		%	Bank	%	\$ 000s		\$ %	%	Bank	%		\$ 000s	\$ %
#	%			%	#	%	%			\$ %	#	%	%			\$ %	\$ %	
SMALL BUSINESSES	Low	46	3.4%	\$2,918	5.3%	4.3%	21	3.4%	3.2%	\$1,154	4.6%	3.9%	25	3.4%	2.9%	\$1,764	5.9%	3.1%
	Moderate	387	28.7%	\$14,839	26.9%	23.6%	181	29.0%	21.4%	\$7,155	28.4%	26.3%	206	28.4%	20.2%	\$7,684	25.7%	24.7%
	Middle	474	35.1%	\$20,378	37.0%	34.0%	215	34.5%	33.1%	\$9,158	36.4%	32.9%	259	35.7%	31.9%	\$11,220	37.5%	32.8%
	Upper	442	32.8%	\$16,975	30.8%	38.1%	207	33.2%	40.7%	\$7,710	30.6%	35.6%	235	32.4%	42.2%	\$9,265	31.0%	37.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	1.3%	0	0.0%	2.8%	\$0	0.0%	2.1%
	Total	1,349	100.0%	\$55,110	100.0%	100.0%	624	100.0%	100.0%	\$25,177	100.0%	100.0%	725	100.0%	100.0%	\$29,933	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	5.3%	\$0	0.0%	5.6%	0	0.0%	5.3%	\$0	0.0%	4.9%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	15.9%	\$0	0.0%	17.6%	0	0.0%	20.1%	\$0	0.0%	19.3%
	Middle	0	0.0%	\$0	0.0%	33.0%	0	0.0%	31.0%	\$0	0.0%	32.4%	0	0.0%	28.0%	\$0	0.0%	32.5%
	Upper	1	100.0%	\$5	100.0%	45.4%	1	100.0%	44.1%	\$5	100.0%	42.1%	0	0.0%	44.7%	\$0	0.0%	42.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.7%	\$0	0.0%	2.2%	0	0.0%	2.0%	\$0	0.0%	1.2%
Total	1	100.0%	\$5	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

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2016 FFIEC Census Data and 2016 D&B Information

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Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: CA Riverside

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2015			2016									
		Count		Dollar			Count	Dollar		Count		Dollar							
		#	%	\$ (000s)	\$ %	%		Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %
Small Business	Revenue	\$1 Million or Less	930	68.9%	\$33,643	61.0%	92.2%	426	68.3%	54.3%	\$15,815	62.8%	34.5%	504	69.5%	43.6%	\$17,828	59.6%	30.6%
		Over \$1 Million	334	24.8%	\$20,025	36.3%	7.3%	150	24.0%					184	25.4%				
		Total Rev. available	1,264	93.7%	\$53,668	97.3%	99.5%	576	92.3%					688	94.9%				
		Rev. Not Known	85	6.3%	\$1,442	2.6%	0.5%	48	7.7%					37	5.1%				
		Total	1,349	100.0%	\$55,110	100.0%	100.0%	624	100.0%					725	100.0%				
	Loan Size	\$100,000 or Less	1,336	99.0%	\$50,468	91.6%		619	99.2%	95.9%	\$23,220	92.2%	44.1%	717	98.9%	96.8%	\$27,248	91.0%	52.5%
		\$100,001 - \$250,000	7	0.5%	\$1,227	2.2%		2	0.3%	1.9%	\$257	1.0%	11.8%	5	0.7%	1.5%	\$970	3.2%	10.4%
		\$250,001 - \$1 Million	6	0.4%	\$3,415	6.2%		3	0.5%	2.2%	\$1,700	6.8%	44.1%	3	0.4%	1.7%	\$1,715	5.7%	37.1%
		Total	1,349	100.0%	\$55,110	100.0%		624	100.0%	100.0%	\$25,177	100.0%	100.0%	725	100.0%	100.0%	\$29,933	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	925	99.5%	\$31,126	92.5%													
\$100,001 - \$250,000		2	0.2%	\$352	1.0%														
\$250,001 - \$1 Million		3	0.3%	\$2,165	6.4%														
Total		930	100.0%	\$33,643	100.0%														
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	91.4%	0	0.0%	52.7%	\$0	0.0%	32.4%	0	0.0%	49.7%	\$0	0.0%	24.0%
		Over \$1 Million	0	0.0%	\$0	0.0%	8.6%	0	0.0%					0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
		Not Known	1	100.0%	\$5	100.0%	0.0%	1	100.0%					0	0.0%				
		Total	1	100.0%	\$5	100.0%	100.0%	1	100.0%					0	0.0%				
	Loan Size	\$100,000 or Less	1	100.0%	\$5	100.0%		1	100.0%	89.4%	\$5	100.0%	38.2%	0	0.0%	91.4%	\$0	0.0%	41.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	19.6%	0	0.0%	3.9%	\$0	0.0%	15.6%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	42.2%	0	0.0%	4.6%	\$0	0.0%	42.7%
		Total	1	100.0%	\$5	100.0%		1	100.0%	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	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%														
Total		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 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: CO Denver

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015					2016						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	%	Bank	Agg	\$ (000s)	%	%		
#	%			#	%	%				#	%	%						
HOME PURCHASE	Low	101	12.2%	\$21,416	7.3%	6.5%	71	13.1%	6.6%	\$14,328	8.1%	4.8%	30	10.5%	6.6%	\$7,088	6.1%	4.9%
	Moderate	208	25.1%	\$53,257	18.2%	19.4%	140	25.8%	17.9%	\$32,407	18.3%	14.0%	68	23.9%	17.6%	\$20,850	18.1%	14.6%
	Middle	223	26.9%	\$63,221	21.6%	35.2%	142	26.2%	34.5%	\$34,993	19.7%	30.7%	81	28.4%	34.3%	\$28,228	24.5%	30.9%
	Upper	296	35.7%	\$154,747	52.9%	39.0%	190	35.0%	41.0%	\$95,619	53.9%	50.5%	106	37.2%	41.5%	\$59,128	51.3%	49.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>828</i>	<i>100.0%</i>	<i>\$292,641</i>	<i>100.0%</i>	<i>100.0%</i>	<i>543</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$177,347</i>	<i>100.0%</i>	<i>100.0%</i>	<i>285</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$115,294</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	29	8.0%	\$5,139	4.4%	6.5%	17	7.7%	5.0%	\$3,150	4.5%	3.4%	12	8.6%	4.9%	\$1,989	4.3%	3.6%
	Moderate	65	18.0%	\$12,002	10.4%	19.4%	40	18.0%	17.3%	\$7,692	11.0%	13.0%	25	18.0%	17.2%	\$4,310	9.4%	13.4%
	Middle	100	27.7%	\$25,113	21.7%	35.2%	63	28.4%	36.5%	\$15,684	22.4%	32.2%	37	26.6%	36.2%	\$9,429	20.6%	32.1%
	Upper	167	46.3%	\$73,423	63.5%	39.0%	102	45.9%	41.3%	\$43,374	62.1%	51.3%	65	46.8%	41.7%	\$30,049	65.6%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>361</i>	<i>100.0%</i>	<i>\$115,677</i>	<i>100.0%</i>	<i>100.0%</i>	<i>222</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$69,900</i>	<i>100.0%</i>	<i>100.0%</i>	<i>139</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45,777</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	1.9%	\$15	0.3%	6.5%	0	0.0%	5.4%	\$0	0.0%	3.8%	1	3.0%	5.5%	\$15	0.4%	3.8%
	Moderate	8	15.1%	\$700	13.4%	19.4%	2	10.0%	18.5%	\$17	1.2%	14.7%	6	18.2%	16.7%	\$683	18.2%	13.3%
	Middle	23	43.4%	\$1,077	20.7%	35.2%	8	40.0%	36.1%	\$124	8.5%	31.8%	15	45.5%	37.0%	\$953	25.4%	32.6%
	Upper	21	39.6%	\$3,422	65.6%	39.0%	10	50.0%	40.0%	\$1,324	90.4%	49.6%	11	33.3%	40.8%	\$2,098	56.0%	50.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$5,214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,465</i>	<i>100.0%</i>	<i>100.0%</i>	<i>33</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,749</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	29.7%	\$0	0.0%	24.5%	0	0.0%	25.3%	\$0	0.0%	14.4%
	Moderate	0	0.0%	\$0	0.0%	32.1%	0	0.0%	28.8%	\$0	0.0%	32.6%	0	0.0%	32.8%	\$0	0.0%	28.0%
	Middle	0	0.0%	\$0	0.0%	32.6%	0	0.0%	32.5%	\$0	0.0%	25.4%	0	0.0%	33.4%	\$0	0.0%	38.4%
	Upper	0	0.0%	\$0	0.0%	14.6%	0	0.0%	9.1%	\$0	0.0%	17.4%	0	0.0%	8.6%	\$0	0.0%	19.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	131	10.5%	\$26,570	6.4%	6.5%	88	11.2%	5.8%	\$17,478	7.0%	5.3%	43	9.4%	5.7%	\$9,092	5.5%	4.8%
	Moderate	281	22.6%	\$65,959	16.0%	19.4%	182	23.2%	17.6%	\$40,116	16.1%	14.6%	99	21.7%	17.4%	\$25,843	15.7%	14.8%
	Middle	346	27.9%	\$89,411	21.6%	35.2%	213	27.1%	35.6%	\$50,801	20.4%	31.1%	133	29.1%	35.5%	\$38,610	23.4%	32.0%
	Upper	484	39.0%	\$231,592	56.0%	39.0%	302	38.5%	41.0%	\$140,317	56.4%	49.0%	182	39.8%	41.5%	\$91,275	55.4%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,242</i>	<i>100.0%</i>	<i>\$413,532</i>	<i>100.0%</i>	<i>100.0%</i>	<i>785</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$248,712</i>	<i>100.0%</i>	<i>100.0%</i>	<i>457</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$164,820</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Borrower Distribution of HMDA Loans Assessment Area: CO Denver

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	%	Bank	Agg	Bank	Agg				
#	%	\$(000s)	%	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	102	12.3%	\$13,542	4.6%	22.1%	81	14.9%	5.2%	\$10,584	6.0%	2.6%	21	7.4%	4.2%	\$2,958	2.6%	2.1%
	Moderate	253	30.6%	\$50,683	17.3%	17.1%	176	32.4%	18.4%	\$33,327	18.8%	13.3%	77	27.0%	17.6%	\$17,356	15.1%	12.8%
	Middle	126	15.2%	\$34,118	11.7%	20.2%	74	13.6%	22.1%	\$19,274	10.9%	20.5%	52	18.2%	23.5%	\$14,844	12.9%	21.5%
	Upper	347	41.9%	\$194,298	66.4%	40.6%	212	39.0%	36.7%	\$114,162	64.4%	46.6%	135	47.4%	40.4%	\$80,136	69.5%	49.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.6%	\$0	0.0%	16.9%	0	0.0%	14.3%	\$0	0.0%	14.3%
	<i>Total</i>	<i>828</i>	<i>100.0%</i>	<i>\$292,641</i>	<i>100.0%</i>	<i>100.0%</i>	<i>543</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$177,347</i>	<i>100.0%</i>	<i>100.0%</i>	<i>285</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$115,294</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	30	8.3%	\$4,112	3.6%	22.1%	19	8.6%	5.3%	\$2,643	3.8%	2.9%	11	7.9%	5.5%	\$1,469	3.2%	3.1%
	Moderate	79	21.9%	\$12,683	11.0%	17.1%	52	23.4%	16.3%	\$8,521	12.2%	11.9%	27	19.4%	16.4%	\$4,162	9.1%	12.1%
	Middle	57	15.8%	\$12,245	10.6%	20.2%	29	13.1%	21.5%	\$5,866	8.4%	19.4%	28	20.1%	22.2%	\$6,379	13.9%	20.2%
	Upper	195	54.0%	\$86,637	74.9%	40.6%	122	55.0%	34.3%	\$52,870	75.6%	43.3%	73	52.5%	36.0%	\$33,767	73.8%	44.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.6%	\$0	0.0%	22.5%	0	0.0%	19.9%	\$0	0.0%	20.0%
	<i>Total</i>	<i>361</i>	<i>100.0%</i>	<i>\$115,677</i>	<i>100.0%</i>	<i>100.0%</i>	<i>222</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$69,900</i>	<i>100.0%</i>	<i>100.0%</i>	<i>139</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45,777</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	5	9.4%	\$44	0.8%	22.1%	1	5.0%	6.8%	\$12	0.8%	3.7%	4	12.1%	7.6%	\$32	0.9%	4.5%
	Moderate	12	22.6%	\$313	6.0%	17.1%	7	35.0%	19.7%	\$225	15.4%	14.3%	5	15.2%	20.1%	\$88	2.3%	15.3%
	Middle	9	17.0%	\$204	3.9%	20.2%	3	15.0%	27.0%	\$108	7.4%	25.0%	6	18.2%	24.9%	\$96	2.6%	22.8%
	Upper	27	50.9%	\$4,653	89.2%	40.6%	9	45.0%	40.6%	\$1,120	76.5%	48.8%	18	54.5%	43.2%	\$3,533	94.2%	52.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.8%	\$0	0.0%	8.2%	0	0.0%	4.2%	\$0	0.0%	4.8%
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$5,214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,465</i>	<i>100.0%</i>	<i>100.0%</i>	<i>33</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,749</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	137	11.0%	\$17,698	4.3%	22.1%	101	12.9%	5.3%	\$13,239	5.3%	2.6%	36	7.9%	5.0%	\$4,459	2.7%	2.5%
	Moderate	344	27.7%	\$63,679	15.4%	17.1%	235	29.9%	17.3%	\$42,073	16.9%	12.0%	109	23.9%	17.0%	\$21,606	13.1%	11.7%
	Middle	192	15.5%	\$46,567	11.3%	20.2%	106	13.5%	21.9%	\$25,248	10.2%	19.0%	86	18.8%	22.8%	\$21,319	12.9%	19.5%
	Upper	569	45.8%	\$285,588	69.1%	40.6%	343	43.7%	35.5%	\$168,152	67.6%	42.6%	226	49.5%	38.0%	\$117,436	71.3%	43.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.9%	\$0	0.0%	23.9%	0	0.0%	17.2%	\$0	0.0%	22.3%
	<i>Total</i>	<i>1,242</i>	<i>100.0%</i>	<i>\$413,532</i>	<i>100.0%</i>	<i>100.0%</i>	<i>785</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$248,712</i>	<i>100.0%</i>	<i>100.0%</i>	<i>457</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$164,820</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: CO Denver

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Dollar		Small Businesses	Count		Dollar		Agg	Count		Dollar		Agg		
		Count	%	\$ (000s)	\$ %		%	Bank	%	\$ 000s		\$ %	%	Bank	%		\$ 000s	\$ %
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
SMALL BUSINESSES	Low	234	12.6%	\$11,097	13.1%	7.9%	111	11.9%	9.7%	\$4,744	12.0%	13.4%	123	13.3%	8.8%	\$6,353	14.1%	11.7%
	Moderate	461	24.8%	\$21,912	25.9%	19.4%	236	25.3%	21.2%	\$10,506	26.5%	25.6%	225	24.3%	20.3%	\$11,406	25.3%	26.2%
	Middle	506	27.2%	\$22,791	26.9%	30.8%	254	27.2%	28.1%	\$10,434	26.4%	24.3%	252	27.2%	28.2%	\$12,357	27.5%	24.5%
	Upper	649	34.9%	\$28,466	33.7%	41.7%	327	35.0%	39.6%	\$13,745	34.7%	34.8%	322	34.8%	41.1%	\$14,721	32.7%	36.1%
	Unknown	9	0.5%	\$323	0.4%	0.2%	5	0.5%	0.4%	\$160	0.4%	1.2%	4	0.4%	0.3%	\$163	0.4%	0.8%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.6%	0	0.0%	1.3%	\$0	0.0%	0.7%
	Total	1,859	100.0%	\$84,589	100.0%	100.0%	933	100.0%	100.0%	\$39,589	100.0%	100.0%	926	100.0%	100.0%	\$45,000	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	3.8%	\$0	0.0%	4.2%	0	0.0%	1.7%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	10.0%	\$0	0.0%	6.8%	0	0.0%	9.9%	\$0	0.0%	8.0%
	Middle	0	0.0%	\$0	0.0%	31.8%	0	0.0%	36.5%	\$0	0.0%	38.3%	0	0.0%	40.5%	\$0	0.0%	47.7%
	Upper	0	0.0%	\$0	0.0%	51.3%	0	0.0%	48.5%	\$0	0.0%	49.5%	0	0.0%	45.9%	\$0	0.0%	40.9%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	1.3%	0	0.0%	2.1%	\$0	0.0%	1.2%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: CO Denver

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2015			2016									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	1,188	63.9%	\$46,609	55.1%	91.9%	596	63.9%	51.5%	\$23,777	60.1%	34.9%	592	63.9%	43.4%	\$22,832	50.7%	32.4%
		Over \$1 Million	489	26.3%	\$35,924	42.5%	7.3%	232	24.9%					257	27.8%				
		Total Rev. available	1,677	90.2%	\$82,533	97.6%	99.2%	828	88.8%					849	91.7%				
		Rev. Not Known	182	9.8%	\$2,056	2.4%	0.8%	105	11.3%					77	8.3%				
		Total	1,859	100.0%	\$84,589	100.0%	100.0%	933	100.0%					926	100.0%				
	Loan Size	\$100,000 or Less	1,796	96.6%	\$63,916	75.6%		908	97.3%	94.2%	\$31,577	79.8%	37.1%	888	95.9%	94.7%	\$32,339	71.9%	40.6%
		\$100,001 - \$250,000	34	1.8%	\$5,852	6.9%		13	1.4%	2.5%	\$2,310	5.8%	12.3%	21	2.3%	2.3%	\$3,542	7.9%	11.8%
		\$250,001 - \$1 Million	29	1.6%	\$14,821	17.5%		12	1.3%	3.3%	\$5,702	14.4%	50.5%	17	1.8%	2.9%	\$9,119	20.3%	47.6%
		Total	1,859	100.0%	\$84,589	100.0%		933	100.0%	100.0%	\$39,589	100.0%	100.0%	926	100.0%	100.0%	\$45,000	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,163	97.9%	\$38,092	81.7%													
\$100,001 - \$250,000		12	1.0%	\$2,234	4.8%														
\$250,001 - \$1 Million		13	1.1%	\$6,283	13.5%														
Total		1,188	100.0%	\$46,609	100.0%														
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	Total Farms 97.7%	0	0.0%	53.8%	\$0	0.0%	62.0%	0	0.0%	52.1%	\$0	0.0%	70.5%
		Over \$1 Million	0	0.0%	\$0	0.0%	2.3%	0	0.0%					0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	88.5%	\$0	0.0%	38.4%	0	0.0%	85.1%	\$0	0.0%	32.4%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.8%	\$0	0.0%	35.9%	0	0.0%	9.9%	\$0	0.0%	33.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.7%	\$0	0.0%	25.8%	0	0.0%	5.0%	\$0	0.0%	34.6%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	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%														
Total		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 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: FL Jacksonville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015					2016						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	%	%	
HOME PURCHASE	Low	5	1.7%	\$343	0.5%	2.9%	2	1.0%	0.7%	\$66	0.1%	0.3%	3	3.0%	0.8%	\$277	1.1%	0.3%
	Moderate	48	16.0%	\$6,345	8.6%	15.5%	37	18.6%	9.1%	\$4,669	9.8%	5.6%	11	10.9%	10.5%	\$1,676	6.4%	6.0%
	Middle	123	41.0%	\$23,370	31.6%	47.4%	82	41.2%	48.5%	\$16,090	33.7%	43.2%	41	40.6%	48.5%	\$7,280	27.9%	43.2%
	Upper	124	41.3%	\$43,854	59.3%	34.2%	78	39.2%	41.7%	\$26,956	56.4%	50.8%	46	45.5%	40.2%	\$16,898	64.7%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>300</i>	<i>100.0%</i>	<i>\$73,912</i>	<i>100.0%</i>	<i>100.0%</i>	<i>199</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$47,781</i>	<i>100.0%</i>	<i>100.0%</i>	<i>101</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$26,131</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	0.7%	\$78	0.2%	2.9%	1	1.4%	0.8%	\$78	0.4%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	17	12.0%	\$1,779	4.9%	15.5%	8	10.8%	8.9%	\$799	4.4%	5.4%	9	13.2%	8.3%	\$980	5.3%	5.2%
	Middle	54	38.0%	\$10,281	28.1%	47.4%	26	35.1%	46.3%	\$4,837	26.9%	40.4%	28	41.2%	46.7%	\$5,444	29.3%	41.4%
	Upper	70	49.3%	\$24,396	66.8%	34.2%	39	52.7%	44.0%	\$12,245	68.2%	53.8%	31	45.6%	44.3%	\$12,151	65.4%	53.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>142</i>	<i>100.0%</i>	<i>\$36,534</i>	<i>100.0%</i>	<i>100.0%</i>	<i>74</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,959</i>	<i>100.0%</i>	<i>100.0%</i>	<i>68</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,575</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	2.1%	\$0	0.0%	1.2%	0	0.0%	1.7%	\$0	0.0%	0.4%
	Moderate	5	10.2%	\$185	16.9%	15.5%	5	14.3%	11.8%	\$185	22.9%	6.2%	0	0.0%	10.5%	\$0	0.0%	5.4%
	Middle	29	59.2%	\$525	47.9%	47.4%	18	51.4%	48.7%	\$316	39.1%	40.5%	11	78.6%	47.9%	\$209	72.3%	38.1%
	Upper	15	30.6%	\$387	35.3%	34.2%	12	34.3%	37.5%	\$307	38.0%	52.1%	3	21.4%	39.9%	\$80	27.7%	56.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>49</i>	<i>100.0%</i>	<i>\$1,097</i>	<i>100.0%</i>	<i>100.0%</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$808</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$289</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	5.7%	0	0.0%	3.6%	\$0	0.0%	1.2%	0	0.0%	6.3%	\$0	0.0%	5.4%
	Moderate	0	0.0%	\$0	0.0%	30.3%	0	0.0%	28.6%	\$0	0.0%	18.1%	0	0.0%	27.0%	\$0	0.0%	20.0%
	Middle	0	0.0%	\$0	0.0%	36.9%	0	0.0%	50.0%	\$0	0.0%	44.2%	0	0.0%	46.0%	\$0	0.0%	47.7%
	Upper	0	0.0%	\$0	0.0%	27.1%	0	0.0%	17.9%	\$0	0.0%	36.6%	0	0.0%	20.6%	\$0	0.0%	26.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	6	1.2%	\$421	0.4%	2.9%	3	1.0%	0.8%	\$144	0.2%	0.3%	3	1.6%	0.8%	\$277	0.6%	0.5%
	Moderate	70	14.3%	\$8,309	7.4%	15.5%	50	16.2%	9.2%	\$5,653	8.5%	6.0%	20	10.9%	9.8%	\$2,656	5.9%	6.3%
	Middle	206	42.0%	\$34,176	30.6%	47.4%	126	40.9%	47.8%	\$21,243	31.9%	42.4%	80	43.7%	47.9%	\$12,933	28.7%	42.7%
	Upper	209	42.6%	\$68,637	61.5%	34.2%	129	41.9%	42.3%	\$39,508	59.4%	51.3%	80	43.7%	41.5%	\$29,129	64.7%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>491</i>	<i>100.0%</i>	<i>\$111,543</i>	<i>100.0%</i>	<i>100.0%</i>	<i>308</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$66,548</i>	<i>100.0%</i>	<i>100.0%</i>	<i>183</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$44,995</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Borrower Distribution of HMDA Loans Assessment Area: FL Jacksonville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg			
#	%	\$(000s)	%	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	28	9.3%	\$2,633	3.6%	20.5%	21	10.6%	4.9%	\$1,912	4.0%	2.0%	7	6.9%	5.4%	\$721	2.8%	2.3%
	Moderate	106	35.3%	\$13,711	18.6%	17.6%	69	34.7%	16.0%	\$8,926	18.7%	9.8%	37	36.6%	17.1%	\$4,785	18.3%	10.6%
	Middle	39	13.0%	\$6,249	8.5%	21.8%	25	12.6%	21.3%	\$3,942	8.3%	18.0%	14	13.9%	22.1%	\$2,307	8.8%	19.1%
	Upper	127	42.3%	\$51,319	69.4%	40.2%	84	42.2%	41.7%	\$33,001	69.1%	55.1%	43	42.6%	38.5%	\$18,318	70.1%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.1%	\$0	0.0%	15.1%	0	0.0%	17.0%	\$0	0.0%	15.0%
	<i>Total</i>	<i>300</i>	<i>100.0%</i>	<i>\$73,912</i>	<i>100.0%</i>	<i>100.0%</i>	<i>199</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$47,781</i>	<i>100.0%</i>	<i>100.0%</i>	<i>101</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$26,131</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	14	9.9%	\$1,301	3.6%	20.5%	8	10.8%	4.5%	\$746	4.2%	2.2%	6	8.8%	4.2%	\$555	3.0%	2.0%
	Moderate	29	20.4%	\$3,263	8.9%	17.6%	14	18.9%	11.0%	\$1,545	8.6%	6.6%	15	22.1%	10.3%	\$1,718	9.2%	6.2%
	Middle	25	17.6%	\$3,868	10.6%	21.8%	12	16.2%	16.4%	\$1,948	10.8%	12.7%	13	19.1%	17.1%	\$1,920	10.3%	13.5%
	Upper	74	52.1%	\$28,102	76.9%	40.2%	40	54.1%	39.3%	\$13,720	76.4%	49.9%	34	50.0%	38.7%	\$14,382	77.4%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	28.9%	\$0	0.0%	28.5%	0	0.0%	29.7%	\$0	0.0%	30.1%
	<i>Total</i>	<i>142</i>	<i>100.0%</i>	<i>\$36,534</i>	<i>100.0%</i>	<i>100.0%</i>	<i>74</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,959</i>	<i>100.0%</i>	<i>100.0%</i>	<i>68</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,575</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	6	12.2%	\$38	3.5%	20.5%	5	14.3%	6.5%	\$33	4.1%	3.1%	1	7.1%	5.9%	\$5	1.7%	2.7%
	Moderate	9	18.4%	\$155	14.1%	17.6%	5	14.3%	16.4%	\$70	8.7%	12.0%	4	28.6%	14.6%	\$85	29.4%	8.2%
	Middle	6	12.2%	\$85	7.7%	21.8%	5	14.3%	22.0%	\$81	10.0%	16.7%	1	7.1%	22.5%	\$4	1.4%	15.9%
	Upper	28	57.1%	\$819	74.7%	40.2%	20	57.1%	49.3%	\$624	77.2%	58.9%	8	57.1%	51.8%	\$195	67.5%	64.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.8%	\$0	0.0%	9.2%	0	0.0%	5.2%	\$0	0.0%	8.7%
	<i>Total</i>	<i>49</i>	<i>100.0%</i>	<i>\$1,097</i>	<i>100.0%</i>	<i>100.0%</i>	<i>35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$808</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$289</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	48	9.8%	\$3,972	3.6%	20.5%	34	11.0%	4.8%	\$2,691	4.0%	2.0%	14	7.7%	5.0%	\$1,281	2.8%	2.1%
	Moderate	144	29.3%	\$17,129	15.4%	17.6%	88	28.6%	14.4%	\$10,541	15.8%	8.5%	56	30.6%	14.8%	\$6,588	14.6%	8.8%
	Middle	70	14.3%	\$10,202	9.1%	21.8%	42	13.6%	19.7%	\$5,971	9.0%	15.8%	28	15.3%	20.5%	\$4,231	9.4%	16.6%
	Upper	229	46.6%	\$80,240	71.9%	40.2%	144	46.8%	41.2%	\$47,345	71.1%	51.7%	85	46.4%	39.1%	\$32,895	73.1%	49.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.9%	\$0	0.0%	21.9%	0	0.0%	20.6%	\$0	0.0%	23.0%
	<i>Total</i>	<i>491</i>	<i>100.0%</i>	<i>\$111,543</i>	<i>100.0%</i>	<i>100.0%</i>	<i>308</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$66,548</i>	<i>100.0%</i>	<i>100.0%</i>	<i>183</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$44,995</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: FL Jacksonville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		%	Bank	Agg	%	\$ 000s	%	\$ %	#	%	%	\$ 000s	%
#	%			%	#	%	%	\$ 000s	%	\$ %	#	%	%	\$ 000s	%	\$ %		
SMALL BUSINESSES	Low	83	4.1%	\$3,809	3.6%	3.4%	42	4.2%	3.1%	\$1,987	4.0%	4.7%	41	4.0%	3.1%	\$1,822	3.3%	4.0%
	Moderate	425	21.0%	\$24,150	22.8%	18.1%	207	20.9%	18.1%	\$10,557	21.2%	21.3%	218	21.1%	17.2%	\$13,593	24.3%	19.4%
	Middle	917	45.3%	\$44,292	41.9%	43.4%	455	45.9%	39.6%	\$20,726	41.7%	38.7%	462	44.8%	39.3%	\$23,566	42.1%	39.8%
	Upper	598	29.6%	\$33,444	31.6%	35.1%	288	29.0%	38.1%	\$16,465	33.1%	34.3%	310	30.1%	39.3%	\$16,979	30.3%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.1%	\$0	0.0%	1.0%	0	0.0%	1.1%	\$0	0.0%	0.8%
	Total	2,023	100.0%	\$105,695	100.0%	100.0%	992	100.0%	100.0%	\$49,735	100.0%	100.0%	1,031	100.0%	100.0%	\$55,960	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	10.2%	0	0.0%	14.5%	\$0	0.0%	12.7%	0	0.0%	12.2%	\$0	0.0%	14.4%
	Middle	4	100.0%	\$170	100.0%	53.7%	3	100.0%	49.3%	\$145	100.0%	63.1%	1	100.0%	42.7%	\$25	100.0%	40.1%
	Upper	0	0.0%	\$0	0.0%	35.7%	0	0.0%	33.3%	\$0	0.0%	23.0%	0	0.0%	41.5%	\$0	0.0%	43.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	1.3%	0	0.0%	2.4%	\$0	0.0%	0.8%
Total	4	100.0%	\$170	100.0%	100.0%	3	100.0%	100.0%	\$145	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: FL Jacksonville

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2015			2016									
		Count		Dollar			Count	Dollar	Count	Dollar	Count	Dollar							
		#	%	\$ (000s)	\$ %	%							#	%	\$ %	#	%	\$ %	
Small Business	Revenue	\$1 Million or Less	1,315	65.0%	\$51,893	49.1%	92.9%	646	65.1%	54.2%	\$24,897	50.1%	36.1%	669	64.9%	47.9%	\$26,996	48.2%	35.3%
		Over \$1 Million	513	25.4%	\$50,192	47.5%	6.4%	246	24.8%					267	25.9%				
		Total Rev. available	1,828	90.4%	\$102,085	96.6%	99.3%	892	89.9%					936	90.8%				
		Rev. Not Known	195	9.6%	\$3,610	3.4%	0.6%	100	10.1%					95	9.2%				
		Total	2,023	100.0%	\$105,695	100.0%	100.0%	992	100.0%					1,031	100.0%				
	Loan Size	\$100,000 or Less	1,911	94.5%	\$71,832	68.0%		940	94.8%	94.8%	\$35,285	70.9%	42.4%	971	94.2%	95.3%	\$36,547	65.3%	45.9%
		\$100,001 - \$250,000	69	3.4%	\$11,588	11.0%		33	3.3%	2.5%	\$5,527	11.1%	13.7%	36	3.5%	2.3%	\$6,061	10.8%	12.7%
		\$250,001 - \$1 Million	43	2.1%	\$22,275	21.1%		19	1.9%	2.7%	\$8,923	17.9%	43.9%	24	2.3%	2.4%	\$13,352	23.9%	41.3%
		Total	2,023	100.0%	\$105,695	100.0%		992	100.0%	100.0%	\$49,735	100.0%	100.0%	1,031	100.0%	100.0%	\$55,960	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,282	97.5%	\$43,075	83.0%													
\$100,001 - \$250,000		21	1.6%	\$3,410	6.6%														
\$250,001 - \$1 Million		12	0.9%	\$5,408	10.4%														
Total		1,315	100.0%	\$51,893	100.0%														
Small Farm	Revenue	\$1 Million or Less	2	50.0%	\$50	29.4%	95.6%	1	33.3%	46.4%	\$25	17.2%	26.6%	1	100.0%	45.1%	\$25	100.0%	33.4%
		Over \$1 Million	2	50.0%	\$120	70.6%	4.4%	2	66.7%					0	0.0%				
		Total Rev. available	4	100.0%	\$170	100.0%	100.0%	3	100.0%					1	100.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
		Total	4	100.0%	\$170	100.0%	100.0%	3	100.0%					1	100.0%				
	Loan Size	\$100,000 or Less	4	100.0%	\$170	100.0%		3	100.0%	92.8%	\$145	100.0%	56.5%	1	100.0%	90.2%	\$25	100.0%	48.3%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.8%	\$0	0.0%	24.9%	0	0.0%	6.1%	\$0	0.0%	23.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	18.5%	0	0.0%	3.7%	\$0	0.0%	28.6%
		Total	4	100.0%	\$170	100.0%		3	100.0%	100.0%	\$145	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	\$50	100.0%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		2	100.0%	\$50	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: NM Albuquerque

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Dollar		Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	3	1.3%	\$328	0.5%	2.5%	1	0.9%	1.6%	\$130	0.5%	1.0%	2	1.6%	2.0%	\$198	0.6%	1.3%
	Moderate	67	28.2%	\$8,934	14.6%	25.6%	33	30.3%	18.2%	\$4,378	16.1%	12.2%	34	26.4%	18.3%	\$4,556	13.5%	11.9%
	Middle	61	25.6%	\$12,514	20.5%	33.3%	20	18.3%	34.7%	\$3,917	14.4%	30.2%	41	31.8%	33.6%	\$8,597	25.5%	28.8%
	Upper	107	45.0%	\$39,214	64.3%	38.6%	55	50.5%	45.5%	\$18,820	69.1%	56.6%	52	40.3%	46.1%	\$20,394	60.4%	57.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>238</i>	<i>100.0%</i>	<i>\$60,990</i>	<i>100.0%</i>	<i>100.0%</i>	<i>109</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$27,245</i>	<i>100.0%</i>	<i>100.0%</i>	<i>129</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$33,745</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	3	2.2%	\$360	1.0%	2.5%	1	1.4%	2.1%	\$103	0.5%	1.5%	2	3.1%	1.5%	\$257	1.5%	1.0%
	Moderate	29	20.9%	\$3,858	10.4%	25.6%	12	16.2%	18.8%	\$1,321	6.6%	13.8%	17	26.2%	18.2%	\$2,537	14.7%	13.0%
	Middle	34	24.5%	\$5,621	15.1%	33.3%	16	21.6%	34.2%	\$2,213	11.1%	29.5%	18	27.7%	33.3%	\$3,408	19.7%	28.6%
	Upper	73	52.5%	\$27,429	73.6%	38.6%	45	60.8%	45.0%	\$16,319	81.8%	55.2%	28	43.1%	47.0%	\$11,110	64.2%	57.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>139</i>	<i>100.0%</i>	<i>\$37,268</i>	<i>100.0%</i>	<i>100.0%</i>	<i>74</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$19,956</i>	<i>100.0%</i>	<i>100.0%</i>	<i>65</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,312</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.8%	\$0	0.0%	1.1%	0	0.0%	1.7%	\$0	0.0%	1.0%
	Moderate	3	30.0%	\$45	27.4%	25.6%	2	25.0%	19.4%	\$35	27.1%	13.2%	1	50.0%	16.9%	\$10	28.6%	12.2%
	Middle	4	40.0%	\$54	32.9%	33.3%	4	50.0%	33.3%	\$54	41.9%	27.2%	0	0.0%	30.8%	\$0	0.0%	25.9%
	Upper	3	30.0%	\$65	39.6%	38.6%	2	25.0%	45.5%	\$40	31.0%	58.4%	1	50.0%	50.6%	\$25	71.4%	60.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$164</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$129</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	13.5%	0	0.0%	19.0%	\$0	0.0%	16.8%	0	0.0%	24.4%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	33.7%	0	0.0%	32.8%	\$0	0.0%	22.0%	0	0.0%	48.9%	\$0	0.0%	42.8%
	Middle	0	0.0%	\$0	0.0%	34.1%	0	0.0%	29.3%	\$0	0.0%	25.2%	0	0.0%	11.1%	\$0	0.0%	16.5%
	Upper	0	0.0%	\$0	0.0%	18.7%	0	0.0%	19.0%	\$0	0.0%	36.1%	0	0.0%	15.6%	\$0	0.0%	38.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	6	1.6%	\$688	0.7%	2.5%	2	1.0%	1.9%	\$233	0.5%	2.0%	4	2.0%	1.8%	\$455	0.9%	1.2%
	Moderate	99	25.6%	\$12,837	13.0%	25.6%	47	24.6%	18.5%	\$5,734	12.1%	13.4%	52	26.5%	18.2%	\$7,103	13.9%	13.8%
	Middle	99	25.6%	\$18,189	18.5%	33.3%	40	20.9%	34.4%	\$6,184	13.1%	29.6%	59	30.1%	33.3%	\$12,005	23.5%	28.1%
	Upper	183	47.3%	\$66,708	67.8%	38.6%	102	53.4%	45.2%	\$35,179	74.3%	55.0%	81	41.3%	46.7%	\$31,529	61.7%	56.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>387</i>	<i>100.0%</i>	<i>\$98,422</i>	<i>100.0%</i>	<i>100.0%</i>	<i>191</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$47,330</i>	<i>100.0%</i>	<i>100.0%</i>	<i>196</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$51,092</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Borrower Distribution of HMDA Loans

Assessment Area: NM Albuquerque

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
				%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	24	10.1%	\$2,489	4.1%	21.4%	8	7.3%	5.6%	\$779	2.9%	2.8%	16	12.4%	6.5%	\$1,710	5.1%	3.1%
	Moderate	68	28.6%	\$9,346	15.3%	17.4%	27	24.8%	18.9%	\$3,643	13.4%	12.6%	41	31.8%	21.6%	\$5,703	16.9%	14.0%
	Middle	35	14.7%	\$6,016	9.9%	19.2%	17	15.6%	21.9%	\$2,685	9.9%	19.4%	18	14.0%	21.5%	\$3,331	9.9%	19.6%
	Upper	111	46.6%	\$43,139	70.7%	42.0%	57	52.3%	39.0%	\$20,138	73.9%	51.0%	54	41.9%	38.5%	\$23,001	68.2%	51.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.6%	\$0	0.0%	14.3%	0	0.0%	11.9%	\$0	0.0%	12.2%
	<i>Total</i>	<i>238</i>	<i>100.0%</i>	<i>\$60,990</i>	<i>100.0%</i>	<i>100.0%</i>	<i>109</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$27,245</i>	<i>100.0%</i>	<i>100.0%</i>	<i>129</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$33,745</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	12	8.6%	\$1,316	3.5%	21.4%	5	6.8%	4.6%	\$518	2.6%	2.6%	7	10.8%	5.0%	\$798	4.6%	2.6%
	Moderate	23	16.5%	\$2,558	6.9%	17.4%	11	14.9%	11.6%	\$1,202	6.0%	8.0%	12	18.5%	12.2%	\$1,356	7.8%	8.2%
	Middle	18	12.9%	\$2,855	7.7%	19.2%	7	9.5%	16.7%	\$1,062	5.3%	14.0%	11	16.9%	16.5%	\$1,793	10.4%	14.0%
	Upper	84	60.4%	\$30,212	81.1%	42.0%	50	67.6%	37.0%	\$17,034	85.4%	44.4%	34	52.3%	36.0%	\$13,178	76.1%	43.9%
	Unknown	2	1.4%	\$327	0.9%	0.0%	1	1.4%	30.2%	\$140	0.7%	31.1%	1	1.5%	30.3%	\$187	1.1%	31.2%
	<i>Total</i>	<i>139</i>	<i>100.0%</i>	<i>\$37,268</i>	<i>100.0%</i>	<i>100.0%</i>	<i>74</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$19,956</i>	<i>100.0%</i>	<i>100.0%</i>	<i>65</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,312</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	6.6%	\$0	0.0%	3.6%	0	0.0%	6.9%	\$0	0.0%	3.1%
	Moderate	1	10.0%	\$10	6.1%	17.4%	0	0.0%	14.5%	\$0	0.0%	9.7%	1	50.0%	15.0%	\$10	28.6%	10.7%
	Middle	3	30.0%	\$39	23.8%	19.2%	3	37.5%	22.0%	\$39	30.2%	16.8%	0	0.0%	21.2%	\$0	0.0%	18.4%
	Upper	6	60.0%	\$115	70.1%	42.0%	5	62.5%	51.6%	\$90	69.8%	60.7%	1	50.0%	52.5%	\$25	71.4%	63.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%	9.1%	0	0.0%	4.4%	\$0	0.0%	4.7%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$164</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$129</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	36	9.3%	\$3,805	3.9%	21.4%	13	6.8%	5.2%	\$1,297	2.7%	2.6%	23	11.7%	5.8%	\$2,508	4.9%	2.8%
	Moderate	92	23.8%	\$11,914	12.1%	17.4%	38	19.9%	15.6%	\$4,845	10.2%	10.0%	54	27.6%	17.2%	\$7,069	13.8%	10.9%
	Middle	56	14.5%	\$8,910	9.1%	19.2%	27	14.1%	19.6%	\$3,786	8.0%	16.2%	29	14.8%	19.3%	\$5,124	10.0%	16.3%
	Upper	201	51.9%	\$73,466	74.6%	42.0%	112	58.6%	38.6%	\$37,262	78.7%	46.0%	89	45.4%	38.0%	\$36,204	70.9%	46.0%
	Unknown	2	0.5%	\$327	0.3%	0.0%	1	0.5%	20.9%	\$140	0.3%	25.3%	1	0.5%	19.6%	\$187	0.4%	24.0%
	<i>Total</i>	<i>387</i>	<i>100.0%</i>	<i>\$98,422</i>	<i>100.0%</i>	<i>100.0%</i>	<i>191</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$47,330</i>	<i>100.0%</i>	<i>100.0%</i>	<i>196</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$51,092</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: NM Albuquerque

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2015, 2016					2015					2016							
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar					
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	Agg
#	%			%	#	%	%				#	%	%						
SMALL BUSINESSES	Low	96	9.9%	\$3,540	8.3%	5.9%	52	11.1%	6.3%	\$1,834	8.9%	10.2%	44	8.7%	5.8%	\$1,706	7.7%	9.1%	
	Moderate	252	26.0%	\$13,716	32.1%	24.4%	115	24.6%	23.6%	\$6,021	29.2%	33.2%	137	27.2%	22.3%	\$7,695	34.7%	30.9%	
	Middle	331	34.1%	\$13,793	32.2%	33.5%	164	35.1%	30.4%	\$7,432	36.1%	25.8%	167	33.2%	28.6%	\$6,361	28.7%	25.5%	
	Upper	291	30.0%	\$11,725	27.4%	36.2%	136	29.1%	36.9%	\$5,326	25.8%	28.3%	155	30.8%	39.0%	\$6,399	28.9%	31.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	2.5%	0	0.0%	4.4%	\$0	0.0%	3.4%	
	Total	970	100.0%	\$42,774	100.0%	100.0%	467	100.0%	100.0%	\$20,613	100.0%	100.0%	503	100.0%	100.0%	\$22,161	100.0%	100.0%	
SMALL FARM					Small Farms														
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	2.5%	\$0	0.0%	0.4%	0	0.0%	6.5%	\$0	0.0%	7.4%	
	Moderate	1	33.3%	\$90	56.3%	18.4%	0	0.0%	12.5%	\$0	0.0%	3.4%	1	50.0%	26.1%	\$90	72.0%	16.8%	
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	42.5%	\$0	0.0%	41.3%	0	0.0%	26.1%	\$0	0.0%	12.9%	
	Upper	2	66.7%	\$70	43.8%	46.7%	1	100.0%	35.0%	\$35	100.0%	47.4%	1	50.0%	41.3%	\$35	28.0%	62.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.5%	\$0	0.0%	7.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	3	100.0%	\$160	100.0%	100.0%	1	100.0%	100.0%	\$35	100.0%	100.0%	2	100.0%	100.0%	\$125	100.0%	100.0%		

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: NM Albuquerque

Product Type	Bank Lending & Demographic Data Comparison 2015, 2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2015			2016										
	Count		Dollar			Count		Dollar		Count		Dollar							
	#	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	671	69.2%	\$26,392	61.7%	91.6%	329	70.4%	56.7%	\$12,812	62.2%	38.2%	342	68.0%	43.4%	\$13,580	61.3%	36.1%
		Over \$1 Million	249	25.7%	\$15,676	36.6%	7.8%	114	24.4%					135	26.8%				
		Total Rev. available	920	94.9%	\$42,068	98.3%	99.4%	443	94.8%					477	94.8%				
		Rev. Not Known	50	5.2%	\$706	1.7%	0.6%	24	5.1%					26	5.2%				
		Total	970	100.0%	\$42,774	100.0%	100.0%	467	100.0%					503	100.0%				
	Loan Size	\$100,000 or Less	950	97.9%	\$36,190	84.6%		459	98.3%	95.1%	\$17,322	84.0%	44.4%	491	97.6%	96.0%	\$18,868	85.1%	50.8%
		\$100,001 - \$250,000	9	0.9%	\$1,505	3.5%		3	0.6%	2.3%	\$540	2.6%	12.4%	6	1.2%	2.0%	\$965	4.4%	11.7%
		\$250,001 - \$1 Million	11	1.1%	\$5,079	11.9%		5	1.1%	2.6%	\$2,751	13.3%	43.2%	6	1.2%	2.0%	\$2,328	10.5%	37.5%
		Total	970	100.0%	\$42,774	100.0%		467	100.0%	100.0%	\$20,613	100.0%	100.0%	503	100.0%	100.0%	\$22,161	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	660	98.4%	\$22,041	83.5%													
\$100,001 - \$250,000		2	0.3%	\$500	1.9%														
\$250,001 - \$1 Million		9	1.3%	\$3,851	14.6%														
Total		671	100.0%	\$26,392	100.0%														
Small Farm	Revenue	\$1 Million or Less	2	66.7%	\$70	43.8%	98.6%	1	100.0%	65.0%	\$35	100.0%	67.8%	1	50.0%	56.5%	\$35	28.0%	50.1%
		Over \$1 Million	1	33.3%	\$90	56.3%	1.4%	0	0.0%					1	50.0%				
		Total Rev. available	3	100.0%	\$160	100.1%	100.0%	1	100.0%					2	100.0%				
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
		Total	3	100.0%	\$160	100.0%	100.0%	1	100.0%					2	100.0%				
	Loan Size	\$100,000 or Less	3	100.0%	\$160	100.0%		1	100.0%	92.5%	\$35	100.0%	59.9%	2	100.0%	95.7%	\$125	100.0%	67.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.5%	\$0	0.0%	40.1%	0	0.0%	4.3%	\$0	0.0%	32.3%
		\$250,001 - \$500,000	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	3	100.0%	\$160	100.0%		1	100.0%	100.0%	\$35	100.0%	100.0%	2	100.0%	100.0%	\$125	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	\$70	100.0%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		2	100.0%	\$70	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: TX Austin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015					2016						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	%	%	
HOME PURCHASE	Low	42	6.7%	\$9,710	4.8%	4.6%	26	6.4%	3.0%	\$6,118	4.8%	2.5%	16	7.3%	3.2%	\$3,592	4.9%	2.8%
	Moderate	194	31.0%	\$40,006	20.0%	16.2%	121	29.8%	15.0%	\$23,374	18.4%	11.3%	73	33.3%	16.4%	\$16,632	22.6%	12.7%
	Middle	159	25.4%	\$38,479	19.2%	37.5%	103	25.4%	40.8%	\$23,106	18.2%	34.9%	56	25.6%	40.8%	\$15,373	20.9%	35.3%
	Upper	230	36.8%	\$112,306	56.0%	41.6%	156	38.4%	41.2%	\$74,305	58.6%	51.3%	74	33.8%	39.6%	\$38,001	51.6%	49.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>625</i>	<i>100.0%</i>	<i>\$200,501</i>	<i>100.0%</i>	<i>100.0%</i>	<i>406</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$126,903</i>	<i>100.0%</i>	<i>100.0%</i>	<i>219</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$73,598</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	11	4.4%	\$2,203	2.9%	4.6%	7	4.8%	3.3%	\$897	1.9%	2.4%	4	3.9%	3.0%	\$1,306	4.6%	2.3%
	Moderate	38	15.3%	\$6,513	8.6%	16.2%	22	15.0%	12.6%	\$4,455	9.5%	8.8%	16	15.7%	12.3%	\$2,058	7.2%	8.8%
	Middle	76	30.5%	\$13,772	18.3%	37.5%	46	31.3%	36.3%	\$8,101	17.3%	28.3%	30	29.4%	36.5%	\$5,671	20.0%	29.1%
	Upper	124	49.8%	\$52,816	70.1%	41.6%	72	49.0%	47.8%	\$33,450	71.3%	60.5%	52	51.0%	48.1%	\$19,366	68.2%	59.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>249</i>	<i>100.0%</i>	<i>\$75,304</i>	<i>100.0%</i>	<i>100.0%</i>	<i>147</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$46,903</i>	<i>100.0%</i>	<i>100.0%</i>	<i>102</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$28,401</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	4	6.3%	\$63	1.0%	4.6%	1	3.4%	4.0%	\$3	0.3%	2.8%	3	8.8%	3.5%	\$60	1.2%	2.6%
	Moderate	9	14.3%	\$462	7.5%	16.2%	4	13.8%	13.1%	\$312	26.3%	10.0%	5	14.7%	13.3%	\$150	3.0%	10.0%
	Middle	22	34.9%	\$482	7.8%	37.5%	13	44.8%	33.1%	\$304	25.6%	24.3%	9	26.5%	36.8%	\$178	3.6%	29.5%
	Upper	28	44.4%	\$5,174	83.7%	41.6%	11	37.9%	49.9%	\$567	47.8%	62.8%	17	50.0%	46.4%	\$4,607	92.2%	57.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>63</i>	<i>100.0%</i>	<i>\$6,181</i>	<i>100.0%</i>	<i>100.0%</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,186</i>	<i>100.0%</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,995</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.2%	0	0.0%	27.6%	\$0	0.0%	18.1%	0	0.0%	22.5%	\$0	0.0%	18.8%
	Moderate	0	0.0%	\$0	0.0%	27.9%	0	0.0%	28.2%	\$0	0.0%	20.0%	0	0.0%	27.5%	\$0	0.0%	22.9%
	Middle	0	0.0%	\$0	0.0%	27.8%	0	0.0%	25.9%	\$0	0.0%	41.8%	0	0.0%	27.5%	\$0	0.0%	25.6%
	Upper	0	0.0%	\$0	0.0%	21.1%	0	0.0%	18.2%	\$0	0.0%	20.1%	0	0.0%	22.5%	\$0	0.0%	32.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	57	6.1%	\$11,976	4.2%	4.6%	34	5.8%	3.2%	\$7,018	4.0%	3.7%	23	6.5%	3.2%	\$4,958	4.6%	3.9%
	Moderate	241	25.7%	\$46,981	16.7%	16.2%	147	25.3%	14.2%	\$28,141	16.1%	11.2%	94	26.5%	15.0%	\$18,840	17.6%	12.4%
	Middle	257	27.4%	\$52,733	18.7%	37.5%	162	27.8%	39.0%	\$31,511	18.0%	33.4%	95	26.8%	39.2%	\$21,222	19.8%	32.6%
	Upper	382	40.8%	\$170,296	60.4%	41.6%	239	41.1%	43.6%	\$108,322	61.9%	51.7%	143	40.3%	42.7%	\$61,974	57.9%	51.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>937</i>	<i>100.0%</i>	<i>\$281,986</i>	<i>100.0%</i>	<i>100.0%</i>	<i>582</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$174,992</i>	<i>100.0%</i>	<i>100.0%</i>	<i>355</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$106,994</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Borrower Distribution of HMDA Loans Assessment Area: TX Austin

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	%	Bank	Agg	Bank	Agg				
#	%	\$(000s)	%	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	25	4.0%	\$3,242	1.6%	21.1%	19	4.7%	3.0%	\$2,380	1.9%	1.4%	6	2.7%	2.4%	\$862	1.2%	1.2%
	Moderate	176	28.2%	\$30,442	15.2%	17.1%	111	27.3%	13.8%	\$18,024	14.2%	9.2%	65	29.7%	13.7%	\$12,418	16.9%	9.3%
	Middle	131	21.0%	\$26,930	13.4%	19.8%	92	22.7%	20.4%	\$18,156	14.3%	17.2%	39	17.8%	20.7%	\$8,774	11.9%	17.6%
	Upper	293	46.9%	\$139,887	69.8%	42.0%	184	45.3%	45.9%	\$88,343	69.6%	56.5%	109	49.8%	49.5%	\$51,544	70.0%	59.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.9%	\$0	0.0%	15.7%	0	0.0%	13.7%	\$0	0.0%	12.4%
	Total	625	100.0%	\$200,501	100.0%	100.0%	406	100.0%	100.0%	\$126,903	100.0%	100.0%	219	100.0%	100.0%	\$73,598	100.0%	100.0%
REFINANCE	Low	13	5.2%	\$1,434	1.9%	21.1%	10	6.8%	3.6%	\$1,065	2.3%	1.7%	3	2.9%	3.1%	\$369	1.3%	1.6%
	Moderate	45	18.1%	\$6,487	8.6%	17.1%	24	16.3%	11.5%	\$3,361	7.2%	6.9%	21	20.6%	11.2%	\$3,126	11.0%	6.8%
	Middle	48	19.3%	\$7,226	9.6%	19.8%	33	22.4%	18.3%	\$4,906	10.5%	13.8%	15	14.7%	17.1%	\$2,320	8.2%	12.8%
	Upper	143	57.4%	\$60,157	79.9%	42.0%	80	54.4%	47.2%	\$37,571	80.1%	58.5%	63	61.8%	48.9%	\$22,586	79.5%	59.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.5%	\$0	0.0%	19.1%	0	0.0%	19.7%	\$0	0.0%	19.0%
	Total	249	100.0%	\$75,304	100.0%	100.0%	147	100.0%	100.0%	\$46,903	100.0%	100.0%	102	100.0%	100.0%	\$28,401	100.0%	100.0%
HOME IMPROVEMENT	Low	5	7.9%	\$36	0.6%	21.1%	1	3.4%	3.7%	\$3	0.3%	1.4%	4	11.8%	4.7%	\$33	0.7%	2.5%
	Moderate	8	12.7%	\$133	2.2%	17.1%	4	13.8%	12.1%	\$63	5.3%	6.7%	4	11.8%	13.3%	\$70	1.4%	8.6%
	Middle	12	19.0%	\$276	4.5%	19.8%	4	13.8%	19.9%	\$66	5.6%	14.5%	8	23.5%	19.8%	\$210	4.2%	15.0%
	Upper	38	60.3%	\$5,736	92.8%	42.0%	20	69.0%	60.9%	\$1,054	88.9%	70.6%	18	52.9%	60.0%	\$4,682	93.7%	70.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	6.8%	0	0.0%	2.2%	\$0	0.0%	3.5%
	Total	63	100.0%	\$6,181	100.0%	100.0%	29	100.0%	100.0%	\$1,186	100.0%	100.0%	34	100.0%	100.0%	\$4,995	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	43	4.6%	\$4,712	1.7%	21.1%	30	5.2%	3.2%	\$3,448	2.0%	1.4%	13	3.7%	2.7%	\$1,264	1.2%	1.2%
	Moderate	229	24.4%	\$37,062	13.1%	17.1%	139	23.9%	13.0%	\$21,448	12.3%	7.8%	90	25.4%	12.8%	\$15,614	14.6%	7.8%
	Middle	191	20.4%	\$34,432	12.2%	19.8%	129	22.2%	19.6%	\$23,128	13.2%	14.9%	62	17.5%	19.4%	\$11,304	10.6%	14.7%
	Upper	474	50.6%	\$205,780	73.0%	42.0%	284	48.8%	46.7%	\$126,968	72.6%	52.9%	190	53.5%	49.7%	\$78,812	73.7%	55.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.5%	\$0	0.0%	23.0%	0	0.0%	15.4%	\$0	0.0%	21.2%
	Total	937	100.0%	\$281,986	100.0%	100.0%	582	100.0%	100.0%	\$174,992	100.0%	100.0%	355	100.0%	100.0%	\$106,994	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: TX Austin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Dollar		Small Businesses	Count		Dollar				Count		Dollar			
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
#	%			%	#	%	%				#	%	%					
SMALL BUSINESSES	Low	142	5.8%	\$5,318	4.8%	5.8%	71	5.7%	6.3%	\$2,534	4.4%	7.3%	71	5.9%	6.3%	\$2,784	5.2%	7.6%
	Moderate	457	18.6%	\$22,302	20.0%	16.1%	244	19.4%	16.2%	\$12,379	21.4%	18.1%	213	17.8%	15.7%	\$9,923	18.4%	16.6%
	Middle	738	30.0%	\$34,327	30.8%	30.0%	372	29.6%	28.9%	\$19,184	33.2%	26.7%	366	30.5%	29.1%	\$15,143	28.1%	26.6%
	Upper	1,115	45.4%	\$49,456	44.3%	48.1%	567	45.1%	46.7%	\$23,561	40.8%	46.7%	548	45.7%	47.0%	\$25,895	48.1%	48.0%
	Unknown	4	0.2%	\$170	0.2%	0.0%	2	0.2%	0.1%	\$85	0.1%	0.1%	2	0.2%	0.1%	\$85	0.2%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%	1.1%	0	0.0%	1.9%	\$0	0.0%	1.2%
	Total	2,456	100.0%	\$111,573	100.0%	100.0%	1,256	100.0%	100.0%	\$57,743	100.0%	100.0%	1,200	100.0%	100.0%	\$53,830	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	1.7%	\$0	0.0%	1.0%	0	0.0%	1.1%	\$0	0.0%	0.5%
	Moderate	1	25.0%	\$25	13.5%	16.7%	1	100.0%	29.1%	\$25	100.0%	38.5%	0	0.0%	26.8%	\$0	0.0%	30.2%
	Middle	2	50.0%	\$60	32.4%	32.5%	0	0.0%	36.3%	\$0	0.0%	38.2%	2	66.7%	41.3%	\$60	37.5%	37.9%
	Upper	1	25.0%	\$100	54.1%	48.6%	0	0.0%	30.3%	\$0	0.0%	21.5%	1	33.3%	30.5%	\$100	62.5%	31.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	0.7%	0	0.0%	0.4%	\$0	0.0%	0.4%
Total	4	100.0%	\$185	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	3	100.0%	100.0%	\$160	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TX Austin

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2015			2016									
		Count		Dollar			#	%	%	Bank		%	Count		Dollar				
		#	%	\$ (000s)	\$ %	%				\$ 000s	\$ %		\$ %	#	%	%	\$ 000s	\$ %	\$ %
Small Business	Revenue	\$1 Million or Less	1,605	65.4%	\$67,268	60.3%	91.7%	822	65.4%	49.8%	\$35,725	61.9%	36.4%	783	65.3%	41.1%	\$31,543	58.6%	34.8%
		Over \$1 Million	628	25.6%	\$40,159	36.0%	7.1%	314	25.0%					314	26.2%				
		Total Rev. available	2,233	91.0%	\$107,427	96.3%	98.8%	1,136	90.4%					1,097	91.5%				
		Rev. Not Known	223	9.1%	\$4,146	3.7%	1.2%	120	9.6%					103	8.6%				
		Total	2,456	100.0%	\$111,573	100.0%	100.0%	1,256	100.0%					1,200	100.0%				
	Loan Size	\$100,000 or Less	2,382	97.0%	\$86,273	77.3%		1,215	96.7%	94.0%	\$43,563	75.4%	39.1%	1,167	97.3%	94.9%	\$42,710	79.3%	43.4%
		\$100,001 - \$250,000	40	1.6%	\$7,728	6.9%		23	1.8%	2.8%	\$4,529	7.8%	14.0%	17	1.4%	2.4%	\$3,199	5.9%	12.8%
		\$250,001 - \$1 Million	34	1.4%	\$17,572	15.7%		18	1.4%	3.1%	\$9,651	16.7%	46.9%	16	1.3%	2.7%	\$7,921	14.7%	43.8%
		Total	2,456	100.0%	\$111,573	100.0%		1,256	100.0%	100.0%	\$57,743	100.0%	100.0%	1,200	100.0%	100.0%	\$53,830	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,570	97.8%	\$51,755	76.9%													
\$100,001 - \$250,000		10	0.6%	\$1,851	2.8%														
\$250,001 - \$1 Million		25	1.6%	\$13,662	20.3%														
Total		1,605	100.0%	\$67,268	100.0%														
Small Farm	Revenue	\$1 Million or Less	2	50.0%	\$75	40.5%	99.1%	1	100.0%	54.7%	\$25	100.0%	74.0%	1	33.3%	58.4%	\$50	31.3%	72.5%
		Over \$1 Million	0	0.0%	\$0	0.0%	0.9%	0	0.0%					0	0.0%				
		Total Rev. available	2	50.0%	\$75	40.5%	100.0%	1	100.0%					1	33.3%				
		Not Known	2	50.0%	\$110	59.5%	0.0%	0	0.0%					2	66.7%				
		Total	4	100.0%	\$185	100.0%	100.0%	1	100.0%					3	100.0%				
	Loan Size	\$100,000 or Less	4	100.0%	\$185	100.0%		1	100.0%	84.2%	\$25	100.0%	28.6%	3	100.0%	85.1%	\$160	100.0%	34.7%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.1%	\$0	0.0%	23.3%	0	0.0%	9.3%	\$0	0.0%	29.5%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.7%	\$0	0.0%	48.0%	0	0.0%	5.6%	\$0	0.0%	35.8%
		Total	4	100.0%	\$185	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	3	100.0%	100.0%	\$160	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	\$75	100.0%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		2	100.0%	\$75	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: TX Dallas

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015					2016						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	%	Bank	Agg	%	%	%		
#	%			#	%	%				#	%	%	\$ (000s)	%	%			
HOME PURCHASE	Low	66	4.6%	\$9,723	2.5%	4.6%	44	4.7%	1.8%	\$5,736	2.3%	1.1%	22	4.6%	2.1%	\$3,987	2.9%	1.6%
	Moderate	363	25.5%	\$52,645	13.4%	19.2%	212	22.5%	10.4%	\$28,651	11.3%	6.5%	151	31.3%	10.7%	\$23,994	17.3%	7.0%
	Middle	391	27.4%	\$70,059	17.8%	33.6%	262	27.8%	33.2%	\$44,549	17.5%	26.1%	129	26.8%	34.6%	\$25,510	18.4%	28.1%
	Upper	604	42.4%	\$259,453	66.0%	42.6%	424	45.0%	54.6%	\$174,277	68.5%	66.2%	180	37.3%	52.5%	\$85,176	61.4%	63.4%
	Unknown	1	0.1%	\$1,260	0.3%	0.0%	1	0.1%	0.0%	\$1,260	0.5%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,425</i>	<i>100.0%</i>	<i>\$393,140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>943</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$254,473</i>	<i>100.0%</i>	<i>100.0%</i>	<i>482</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$138,667</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	14	2.0%	\$1,674	1.0%	4.6%	7	1.7%	1.2%	\$1,027	1.0%	0.8%	7	2.3%	1.3%	\$647	0.9%	0.8%
	Moderate	89	12.5%	\$10,570	6.0%	19.2%	49	12.1%	8.8%	\$5,456	5.2%	5.3%	40	13.2%	8.4%	\$5,114	7.2%	5.1%
	Middle	201	28.3%	\$29,536	16.8%	33.6%	111	27.3%	30.0%	\$14,711	14.1%	22.3%	90	29.6%	29.1%	\$14,825	20.7%	21.9%
	Upper	406	57.2%	\$133,784	76.2%	42.6%	239	58.9%	60.0%	\$82,858	79.6%	71.6%	167	54.9%	61.1%	\$50,926	71.2%	72.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>710</i>	<i>100.0%</i>	<i>\$175,564</i>	<i>100.0%</i>	<i>100.0%</i>	<i>406</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$104,052</i>	<i>100.0%</i>	<i>100.0%</i>	<i>304</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$71,512</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	6	3.6%	\$72	1.3%	4.6%	4	4.7%	2.1%	\$51	1.9%	0.9%	2	2.5%	1.7%	\$21	0.7%	0.8%
	Moderate	27	16.3%	\$405	7.2%	19.2%	15	17.6%	10.9%	\$238	8.8%	5.9%	12	14.8%	11.1%	\$167	5.7%	5.5%
	Middle	55	33.1%	\$2,422	43.1%	33.6%	29	34.1%	27.6%	\$870	32.2%	19.7%	26	32.1%	29.3%	\$1,552	53.2%	21.4%
	Upper	78	47.0%	\$2,718	48.4%	42.6%	37	43.5%	59.4%	\$1,539	57.0%	73.6%	41	50.6%	57.9%	\$1,179	40.4%	72.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>166</i>	<i>100.0%</i>	<i>\$5,617</i>	<i>100.0%</i>	<i>100.0%</i>	<i>85</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,698</i>	<i>100.0%</i>	<i>100.0%</i>	<i>81</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,919</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	20.0%	0	0.0%	23.7%	\$0	0.0%	16.4%	0	0.0%	24.0%	\$0	0.0%	17.6%
	Moderate	1	100.0%	\$3,500	100.0%	29.9%	0	0.0%	28.5%	\$0	0.0%	21.0%	1	100.0%	30.7%	\$3,500	100.0%	20.0%
	Middle	0	0.0%	\$0	0.0%	30.6%	0	0.0%	30.4%	\$0	0.0%	29.1%	0	0.0%	28.0%	\$0	0.0%	33.9%
	Upper	0	0.0%	\$0	0.0%	19.5%	0	0.0%	17.4%	\$0	0.0%	33.5%	0	0.0%	17.3%	\$0	0.0%	28.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$3,500</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,500</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	86	3.7%	\$11,469	2.0%	4.6%	55	3.8%	1.6%	\$6,814	1.9%	2.3%	31	3.6%	1.9%	\$4,655	2.1%	2.4%
	Moderate	480	20.9%	\$67,120	11.6%	19.2%	276	19.2%	9.9%	\$34,345	9.5%	7.4%	204	23.5%	10.0%	\$32,775	15.1%	7.2%
	Middle	647	28.1%	\$102,017	17.7%	33.6%	402	28.0%	31.9%	\$60,130	16.6%	25.1%	245	28.2%	32.5%	\$41,887	19.3%	26.4%
	Upper	1,088	47.3%	\$395,955	68.5%	42.6%	700	48.8%	56.5%	\$258,674	71.6%	65.2%	388	44.7%	55.7%	\$137,281	63.4%	63.9%
	Unknown	1	0.0%	\$1,260	0.2%	0.0%	1	0.1%	0.0%	\$1,260	0.3%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2,302</i>	<i>100.0%</i>	<i>\$577,821</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,434</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$361,223</i>	<i>100.0%</i>	<i>100.0%</i>	<i>868</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$216,598</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Borrower Distribution of HMDA Loans

Assessment Area: TX Dallas

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income			Count		Dollar				Count		Dollar			
		Count	Dollar		%	%	Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg	Agg		
#	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%	#	%	%	\$(000s)	%	%		
HOME PURCHASE	Low	110	7.7%	\$10,456	2.7%	22.4%	79	8.4%	3.8%	\$7,463	2.9%	1.7%	31	6.4%	3.2%	\$2,993	2.2%	1.4%
	Moderate	408	28.6%	\$53,674	13.7%	16.9%	256	27.1%	13.1%	\$33,028	13.0%	8.1%	152	31.5%	12.6%	\$20,646	14.9%	7.9%
	Middle	216	15.2%	\$36,181	9.2%	18.7%	140	14.8%	17.9%	\$23,106	9.1%	14.6%	76	15.8%	18.8%	\$13,075	9.4%	15.5%
	Upper	691	48.5%	\$292,829	74.5%	42.0%	468	49.6%	46.4%	\$190,876	75.0%	59.1%	223	46.3%	48.4%	\$101,953	73.5%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	16.5%	0	0.0%	17.0%	\$0	0.0%	14.9%
	Total	1,425	100.0%	\$393,140	100.0%	100.0%	943	100.0%	100.0%	\$254,473	100.0%	100.0%	482	100.0%	100.0%	\$138,667	100.0%	100.0%
REFINANCE	Low	46	6.5%	\$3,846	2.2%	22.4%	29	7.1%	3.4%	\$2,259	2.2%	1.5%	17	5.6%	2.8%	\$1,587	2.2%	1.3%
	Moderate	123	17.3%	\$13,894	7.9%	16.9%	76	18.7%	9.3%	\$8,358	8.0%	5.2%	47	15.5%	8.8%	\$5,536	7.7%	4.9%
	Middle	128	18.0%	\$18,191	10.4%	18.7%	64	15.8%	15.6%	\$9,330	9.0%	11.1%	64	21.1%	15.4%	\$8,861	12.4%	11.1%
	Upper	413	58.2%	\$139,633	79.5%	42.0%	237	58.4%	46.8%	\$84,105	80.8%	58.6%	176	57.9%	49.2%	\$55,528	77.6%	61.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.0%	\$0	0.0%	23.5%	0	0.0%	23.7%	\$0	0.0%	21.7%
	Total	710	100.0%	\$175,564	100.0%	100.0%	406	100.0%	100.0%	\$104,052	100.0%	100.0%	304	100.0%	100.0%	\$71,512	100.0%	100.0%
HOME IMPROVEMENT	Low	10	6.0%	\$93	1.7%	22.4%	5	5.9%	4.9%	\$45	1.7%	1.4%	5	6.2%	4.5%	\$48	1.6%	2.0%
	Moderate	31	18.7%	\$382	6.8%	16.9%	14	16.5%	11.2%	\$151	5.6%	5.0%	17	21.0%	11.1%	\$231	7.9%	5.7%
	Middle	32	19.3%	\$638	11.4%	18.7%	18	21.2%	15.8%	\$367	13.6%	9.9%	14	17.3%	17.3%	\$271	9.3%	12.5%
	Upper	93	56.0%	\$4,504	80.2%	42.0%	48	56.5%	63.2%	\$2,135	79.1%	76.0%	45	55.6%	63.0%	\$2,369	81.2%	74.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.9%	\$0	0.0%	7.7%	0	0.0%	4.0%	\$0	0.0%	5.2%
	Total	166	100.0%	\$5,617	100.0%	100.0%	85	100.0%	100.0%	\$2,698	100.0%	100.0%	81	100.0%	100.0%	\$2,919	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$3,500	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$3,500	100.0%	100.0%
	Total	1	100.0%	\$3,500	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$3,500	100.0%	100.0%
HMDA TOTALS	Low	166	7.2%	\$14,395	2.5%	22.4%	113	7.9%	3.7%	\$9,767	2.7%	1.5%	53	6.1%	3.1%	\$4,628	2.1%	1.3%
	Moderate	562	24.4%	\$67,950	11.8%	16.9%	346	24.1%	11.7%	\$41,537	11.5%	6.6%	216	24.9%	11.2%	\$26,413	12.2%	6.4%
	Middle	376	16.3%	\$55,010	9.5%	18.7%	222	15.5%	17.0%	\$32,803	9.1%	12.3%	154	17.7%	17.5%	\$22,207	10.3%	13.0%
	Upper	1,197	52.0%	\$436,966	75.6%	42.0%	753	52.5%	47.0%	\$277,116	76.7%	54.3%	444	51.2%	49.1%	\$159,850	73.8%	56.7%
	Unknown	1	0.0%	\$3,500	0.6%	0.0%	0	0.0%	20.5%	\$0	0.0%	25.3%	1	0.1%	19.0%	\$3,500	1.6%	22.6%
	Total	2,302	100.0%	\$577,821	100.0%	100.0%	1,434	100.0%	100.0%	\$361,223	100.0%	100.0%	868	100.0%	100.0%	\$216,598	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: TX Dallas

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2015, 2016					2015					2016							
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	819	8.5%	\$38,465	8.3%	6.5%	385	8.1%	7.3%	\$17,915	8.2%	9.5%	434	8.8%	6.8%	\$20,550	8.4%	9.2%	
	Moderate	1,977	20.4%	\$97,145	21.0%	17.8%	983	20.6%	17.6%	\$44,443	20.4%	19.9%	994	20.3%	17.3%	\$52,702	21.6%	20.1%	
	Middle	2,660	27.5%	\$121,185	26.2%	29.7%	1,316	27.6%	27.0%	\$57,828	26.5%	25.6%	1,344	27.4%	26.8%	\$63,357	26.0%	25.3%	
	Upper	4,214	43.6%	\$204,871	44.4%	45.9%	2,080	43.6%	46.5%	\$97,549	44.8%	43.8%	2,134	43.5%	47.5%	\$107,322	44.0%	44.1%	
	Unknown	5	0.1%	\$122	0.0%	0.1%	3	0.1%	0.1%	\$85	0.0%	0.4%	2	0.0%	0.1%	\$37	0.0%	0.3%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.8%	0	0.0%	1.5%	\$0	0.0%	0.9%	
	Total	9,675	100.0%	\$461,788	100.0%	100.0%	4,767	100.0%	100.0%	\$217,820	100.0%	100.0%	4,908	100.0%	100.0%	\$243,968	100.0%	100.0%	
SMALL FARM		Small Farms																	
	Low	1	10.0%	\$35	13.3%	2.8%	0	0.0%	1.9%	\$0	0.0%	3.8%	1	14.3%	3.3%	\$35	20.1%	4.9%	
	Moderate	1	10.0%	\$50	18.9%	10.8%	1	33.3%	9.1%	\$50	55.6%	10.0%	0	0.0%	13.1%	\$0	0.0%	12.7%	
	Middle	5	50.0%	\$111	42.0%	40.5%	2	66.7%	53.2%	\$40	44.4%	54.6%	3	42.9%	50.5%	\$71	40.8%	51.8%	
	Upper	3	30.0%	\$68	25.8%	45.9%	0	0.0%	33.4%	\$0	0.0%	30.8%	3	42.9%	31.8%	\$68	39.1%	29.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.2%	\$0	0.0%	0.7%	0	0.0%	1.3%	\$0	0.0%	0.9%	
Total	10	100.0%	\$264	100.0%	100.0%	3	100.0%	100.0%	\$90	100.0%	100.0%	7	100.0%	100.0%	\$174	100.0%	100.0%		

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TX Dallas

Product Type	Bank Lending & Demographic Data Comparison 2015, 2016						Bank & Aggregate Lending Comparison												
	Bank					Total Businesses	2015			2016									
	Count		Dollar				Count		Dollar		Count			Dollar					
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
Small Business	Revenue	\$1 Million or Less	6,296	65.1%	\$255,788	55.4%	91.3%	3,115	65.3%	48.8%	\$124,261	57.0%	34.2%	3,181	64.8%	42.3%	\$131,527	53.9%	33.7%
		Over \$1 Million	2,571	26.6%	\$190,845	41.3%	7.8%	1,234	25.9%					1,337	27.2%				
		Total Rev. available	8,867	91.7%	\$446,633	96.7%	99.1%	4,349	91.2%					4,518	92.0%				
		Rev. Not Known	808	8.4%	\$15,155	3.3%	0.9%	418	8.8%					390	7.9%				
		Total	9,675	100.0%	\$461,788	100.0%	100.0%	4,767	100.0%					4,908	100.0%				
	Loan Size	\$100,000 or Less	9,330	96.4%	\$355,891	77.1%		4,617	96.9%	93.2%	\$175,725	80.7%	35.3%	4,713	96.0%	94.1%	\$180,166	73.8%	39.8%
		\$100,001 - \$250,000	202	2.1%	\$36,786	8.0%		97	2.0%	3.2%	\$17,916	8.2%	14.4%	105	2.1%	2.9%	\$18,870	7.7%	14.0%
		\$250,001 - \$1 Million	143	1.5%	\$69,111	15.0%		53	1.1%	3.6%	\$24,179	11.1%	50.3%	90	1.8%	3.1%	\$44,932	18.4%	46.2%
		Total	9,675	100.0%	\$461,788	100.0%		4,767	100.0%	100.0%	\$217,820	100.0%	100.0%	4,908	100.0%	100.0%	\$243,968	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	6,156	97.8%	\$212,837	83.2%													
		\$100,001 - \$250,000	84	1.3%	\$15,586	6.1%													
		\$250,001 - \$1 Million	56	0.9%	\$27,365	10.7%													
		Total	6,296	100.0%	\$255,788	100.0%													
Small Farm	Revenue	\$1 Million or Less	6	60.0%	\$193	73.1%	98.3%	2	66.7%	47.3%	\$85	94.4%	56.7%	4	57.1%	49.0%	\$108	62.1%	60.8%
		Over \$1 Million	1	10.0%	\$11	4.2%	1.7%	0	0.0%				1	14.3%					
		Total Rev. available	7	70.0%	\$204	77.3%	100.0%	2	66.7%				5	71.4%					
		Not Known	3	30.0%	\$60	22.7%	0.0%	1	33.3%				2	28.6%					
		Total	10	100.0%	\$264	100.0%	100.0%	3	100.0%				7	100.0%					
	Loan Size	\$100,000 or Less	10	100.0%	\$264	100.0%		3	100.0%	86.9%	\$90	100.0%	39.6%	7	100.0%	89.4%	\$174	100.0%	45.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.7%	\$0	0.0%	28.1%	0	0.0%	6.6%	\$0	0.0%	24.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.4%	\$0	0.0%	32.3%	0	0.0%	4.0%	\$0	0.0%	31.0%
		Total	10	100.0%	\$264	100.0%		3	100.0%	100.0%	\$90	100.0%	100.0%	7	100.0%	100.0%	\$174	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	6	100.0%	\$193	100.0%													
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		Total	6	100.0%	\$193	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: TX Houston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	77	4.3%	\$15,033	2.2%	4.1%	35	3.2%	1.5%	\$7,464	1.8%	1.1%	42	6.0%	1.6%	\$7,569	2.8%	1.2%
	Moderate	218	12.1%	\$37,273	5.3%	20.9%	115	10.5%	10.5%	\$20,462	4.8%	6.9%	103	14.8%	11.0%	\$16,811	6.2%	7.6%
	Middle	386	21.5%	\$102,544	14.7%	29.9%	250	22.7%	30.1%	\$66,223	15.6%	23.9%	136	19.5%	30.1%	\$36,321	13.4%	24.3%
	Upper	1,114	62.0%	\$541,568	77.7%	45.1%	698	63.5%	57.9%	\$330,546	77.8%	68.1%	416	59.7%	57.2%	\$211,022	77.7%	66.9%
	Unknown	1	0.1%	\$409	0.1%	0.0%	1	0.1%	0.0%	\$409	0.1%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1,796</i>	<i>100.0%</i>	<i>\$696,827</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,099</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$425,104</i>	<i>100.0%</i>	<i>100.0%</i>	<i>697</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$271,723</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	12	1.7%	\$1,565	0.6%	4.1%	7	1.9%	1.4%	\$864	0.6%	0.9%	5	1.6%	1.4%	\$701	0.7%	1.0%
	Moderate	83	12.0%	\$12,530	5.1%	20.9%	41	11.0%	9.9%	\$6,489	4.6%	6.1%	42	13.3%	10.0%	\$6,041	5.6%	6.3%
	Middle	144	20.9%	\$27,481	11.1%	29.9%	83	22.3%	26.4%	\$16,462	11.7%	20.0%	61	19.3%	27.2%	\$11,019	10.3%	20.8%
	Upper	450	65.3%	\$205,939	83.2%	45.1%	242	64.9%	62.3%	\$116,633	83.0%	72.9%	208	65.8%	61.4%	\$89,306	83.4%	71.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>689</i>	<i>100.0%</i>	<i>\$247,515</i>	<i>100.0%</i>	<i>100.0%</i>	<i>373</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$140,448</i>	<i>100.0%</i>	<i>100.0%</i>	<i>316</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107,067</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	7	3.6%	\$137	0.6%	4.1%	4	4.5%	2.2%	\$92	2.1%	1.1%	3	2.8%	2.8%	\$45	0.3%	1.2%
	Moderate	32	16.5%	\$671	3.2%	20.9%	15	17.0%	12.0%	\$259	6.0%	7.3%	17	16.0%	12.2%	\$412	2.4%	6.8%
	Middle	44	22.7%	\$2,106	10.0%	29.9%	19	21.6%	25.4%	\$975	22.6%	19.5%	25	23.6%	26.3%	\$1,131	6.7%	19.6%
	Upper	111	57.2%	\$18,237	86.2%	45.1%	50	56.8%	60.3%	\$2,982	69.2%	72.1%	61	57.5%	58.7%	\$15,255	90.6%	72.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>194</i>	<i>100.0%</i>	<i>\$21,151</i>	<i>100.0%</i>	<i>100.0%</i>	<i>88</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,308</i>	<i>100.0%</i>	<i>100.0%</i>	<i>106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,843</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	20.7%	\$0	0.0%	12.4%	0	0.0%	19.5%	\$0	0.0%	13.6%
	Moderate	0	0.0%	\$0	0.0%	30.8%	0	0.0%	35.8%	\$0	0.0%	24.0%	0	0.0%	31.2%	\$0	0.0%	21.7%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	22.9%	\$0	0.0%	26.6%	0	0.0%	27.0%	\$0	0.0%	30.0%
	Upper	0	0.0%	\$0	0.0%	25.1%	0	0.0%	20.7%	\$0	0.0%	37.0%	0	0.0%	22.1%	\$0	0.0%	34.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	96	3.6%	\$16,735	1.7%	4.1%	46	2.9%	1.5%	\$8,420	1.5%	1.9%	50	4.5%	1.6%	\$8,315	2.1%	2.1%
	Moderate	333	12.4%	\$50,474	5.2%	20.9%	171	11.0%	10.4%	\$27,210	4.8%	7.9%	162	14.5%	10.8%	\$23,264	5.9%	8.3%
	Middle	574	21.4%	\$132,131	13.7%	29.9%	352	22.6%	28.8%	\$83,660	14.7%	23.0%	222	19.8%	29.0%	\$48,471	12.3%	23.7%
	Upper	1,675	62.5%	\$765,744	79.3%	45.1%	990	63.5%	59.3%	\$450,161	79.0%	67.2%	685	61.2%	58.5%	\$315,583	79.8%	65.8%
	Unknown	1	0.0%	\$409	0.0%	0.0%	1	0.1%	0.0%	\$409	0.1%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2,679</i>	<i>100.0%</i>	<i>\$965,493</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,560</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$569,860</i>	<i>100.0%</i>	<i>100.0%</i>	<i>###</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$395,633</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

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Borrower Distribution of HMDA Loans Assessment Area: TX Houston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	%	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	70	3.9%	\$6,569	0.9%	23.7%	43	3.9%	3.0%	\$4,003	0.9%	1.3%	27	3.9%	2.1%	\$2,566	0.9%	0.9%
	Moderate	255	14.2%	\$34,372	4.9%	16.5%	157	14.3%	12.5%	\$21,038	4.9%	7.5%	98	14.1%	11.8%	\$13,334	4.9%	7.2%
	Middle	211	11.7%	\$35,288	5.1%	17.5%	111	10.1%	18.3%	\$18,954	4.5%	14.2%	100	14.3%	19.0%	\$16,334	6.0%	14.8%
	Upper	1,260	70.2%	\$620,598	89.1%	42.3%	788	71.7%	48.4%	\$381,109	89.7%	61.8%	472	67.7%	50.4%	\$239,489	88.1%	62.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.8%	\$0	0.0%	15.2%	0	0.0%	16.7%	\$0	0.0%	14.2%
	<i>Total</i>	<i>1,796</i>	<i>100.0%</i>	<i>\$696,827</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,099</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$425,104</i>	<i>100.0%</i>	<i>100.0%</i>	<i>697</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$271,723</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	30	4.4%	\$2,704	1.1%	23.7%	21	5.6%	3.7%	\$1,874	1.3%	1.7%	9	2.8%	2.8%	\$830	0.8%	1.4%
	Moderate	82	11.9%	\$8,715	3.5%	16.5%	50	13.4%	9.2%	\$5,095	3.6%	4.9%	32	10.1%	8.1%	\$3,620	3.4%	4.3%
	Middle	76	11.0%	\$10,702	4.3%	17.5%	36	9.7%	15.3%	\$5,206	3.7%	10.4%	40	12.7%	14.5%	\$5,496	5.1%	9.6%
	Upper	500	72.6%	\$225,198	91.0%	42.3%	266	71.3%	49.8%	\$128,273	91.3%	62.4%	234	74.1%	50.6%	\$96,925	90.5%	62.3%
	Unknown	1	0.1%	\$196	0.1%	0.0%	0	0.0%	22.0%	\$0	0.0%	20.5%	1	0.3%	24.0%	\$196	0.2%	22.4%
	<i>Total</i>	<i>689</i>	<i>100.0%</i>	<i>\$247,515</i>	<i>100.0%</i>	<i>100.0%</i>	<i>373</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$140,448</i>	<i>100.0%</i>	<i>100.0%</i>	<i>316</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107,067</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	6	3.1%	\$49	0.2%	23.7%	3	3.4%	5.0%	\$34	0.8%	1.4%	3	2.8%	3.9%	\$15	0.1%	1.4%
	Moderate	27	13.9%	\$492	2.3%	16.5%	13	14.8%	10.6%	\$224	5.2%	5.4%	14	13.2%	10.3%	\$268	1.6%	5.1%
	Middle	32	16.5%	\$458	2.2%	17.5%	13	14.8%	16.3%	\$193	4.5%	11.2%	19	17.9%	16.9%	\$265	1.6%	11.0%
	Upper	129	66.5%	\$20,152	95.3%	42.3%	59	67.0%	64.5%	\$3,857	89.5%	76.6%	70	66.0%	65.2%	\$16,295	96.7%	78.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.7%	\$0	0.0%	5.4%	0	0.0%	3.7%	\$0	0.0%	4.3%
	<i>Total</i>	<i>194</i>	<i>100.0%</i>	<i>\$21,151</i>	<i>100.0%</i>	<i>100.0%</i>	<i>88</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,308</i>	<i>100.0%</i>	<i>100.0%</i>	<i>106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,843</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	106	4.0%	\$9,322	1.0%	23.7%	67	4.3%	3.3%	\$5,911	1.0%	1.3%	39	3.5%	2.4%	\$3,411	0.9%	1.0%
	Moderate	364	13.6%	\$43,579	4.5%	16.5%	220	14.1%	11.4%	\$26,357	4.6%	6.3%	144	12.9%	10.6%	\$17,222	4.4%	5.8%
	Middle	319	11.9%	\$46,448	4.8%	17.5%	160	10.3%	17.3%	\$24,353	4.3%	12.1%	159	14.2%	17.4%	\$22,095	5.6%	12.2%
	Upper	1,889	70.5%	\$865,948	89.7%	42.3%	1,113	71.3%	49.3%	\$513,239	90.1%	57.7%	776	69.3%	50.9%	\$352,709	89.2%	58.0%
	Unknown	1	0.0%	\$196	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	22.6%	1	0.1%	18.7%	\$196	0.0%	23.0%
	<i>Total</i>	<i>2,679</i>	<i>100.0%</i>	<i>\$965,493</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1,560</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$569,860</i>	<i>100.0%</i>	<i>100.0%</i>	<i>###</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$395,633</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: TX Houston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %
SMALL BUSINESSES	Low	879	10.4%	\$41,766	9.3%	7.4%	442	10.5%	7.7%	\$22,046	9.7%	9.0%	437	10.3%	7.4%	\$19,720	8.9%	9.2%
	Moderate	1,549	18.4%	\$80,175	17.9%	18.9%	770	18.3%	18.4%	\$40,464	17.9%	19.2%	779	18.4%	17.8%	\$39,711	17.9%	18.4%
	Middle	2,040	24.2%	\$108,975	24.4%	25.4%	1,022	24.3%	24.5%	\$51,663	22.8%	24.5%	1,018	24.1%	24.4%	\$57,312	25.9%	25.0%
	Upper	3,962	47.0%	\$216,475	48.4%	48.2%	1,968	46.8%	47.8%	\$111,972	49.5%	46.4%	1,994	47.2%	48.9%	\$104,503	47.2%	46.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	1.0%	0	0.0%	1.4%	\$0	0.0%	1.0%
	Total	8,430	100.0%	\$447,391	100.0%	100.0%	4,202	100.0%	100.0%	\$226,145	100.0%	100.0%	4,228	100.0%	100.0%	\$221,246	100.0%	100.0%
SMALL FARM	Small Farms					0	0.0%	1.5%	\$0	0.0%	1.9%	0	0.0%	1.8%	\$0	0.0%	1.1%	
	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	14.0%	\$0	0.0%	16.2%	0	0.0%	14.8%	\$0	0.0%	15.9%
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	44.4%	\$385	89.1%	53.0%	3	100.0%	45.5%	\$65	100.0%	56.7%
	Middle	8	80.0%	\$450	90.5%	35.3%	5	71.4%	36.6%	\$47	10.9%	26.4%	0	0.0%	35.2%	\$0	0.0%	24.2%
	Upper	2	20.0%	\$47	9.5%	49.9%	2	28.6%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	2.5%	0	0.0%	2.7%	\$0	0.0%	2.0%
	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%
Total	10	100.0%	\$497	100.0%	100.0%	7	100.0%	100.0%	\$432	100.0%	100.0%	3	100.0%	100.0%	\$65	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TX Houston

Product Type	Bank Lending & Demographic Data Comparison 2015, 2016						Bank & Aggregate Lending Comparison												
	Bank				Total Businesses	2015			2016										
	Count		Dollar			Count		Dollar		Count		Dollar							
#	%	\$ (000s)	%	%	#	%	%	\$ 000s	%	%	#	%	%	\$ 000s	%	%			
Small Business	Revenue	\$1 Million or Less	5,335	63.3%	\$233,186	52.1%	90.6%	2,639	62.8%	47.0%	\$113,692	50.3%	32.7%	2,696	63.8%	40.6%	\$119,494	54.0%	31.6%
		Over \$1 Million	2,346	27.8%	\$201,029	44.9%	8.5%	1,190	28.3%					1,156	27.3%				
		Total Rev. available	7,681	91.1%	\$434,215	97.0%	99.1%	3,829	91.1%					3,852	91.1%				
		Rev. Not Known	749	8.9%	\$13,176	2.9%	0.9%	373	8.9%					376	8.9%				
		Total	8,430	100.0%	\$447,391	100.0%	100.0%	4,202	100.0%					4,228	100.0%				
	Loan Size	\$100,000 or Less	7,992	94.8%	\$310,196	69.3%		3,972	94.5%	93.5%	\$153,390	67.8%	35.8%	4,020	95.1%	94.1%	\$156,806	70.9%	38.9%
		\$100,001 - \$250,000	271	3.2%	\$51,528	11.5%		144	3.4%	3.0%	\$27,190	12.0%	13.8%	127	3.0%	2.8%	\$24,338	11.0%	13.8%
		\$250,001 - \$1 Million	167	2.0%	\$85,667	19.1%		86	2.0%	3.5%	\$45,565	20.1%	50.4%	81	1.9%	3.1%	\$40,102	18.1%	47.3%
		Total	8,430	100.0%	\$447,391	100.0%		4,202	100.0%	100.0%	\$226,145	100.0%	100.0%	4,228	100.0%	100.0%	\$221,246	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5,182	97.1%	\$188,006	80.6%													
\$100,001 - \$250,000		93	1.7%	\$17,030	7.3%														
\$250,001 - \$1 Million		60	1.1%	\$28,150	12.1%														
Total		5,335	100.0%	\$233,186	100.0%														
Small Farm	Revenue	\$1 Million or Less	2	20.0%	\$55	11.1%	Total Farms 98.1%	1	14.3%	59.4%	\$40	9.3%	78.0%	1	33.3%	54.5%	\$15	23.1%	72.1%
		Over \$1 Million	4	40.0%	\$390	78.5%	1.9%	3	42.9%					1	33.3%				
		Total Rev. available	6	60.0%	\$445	89.6%	100.0%	4	57.2%					2	66.6%				
		Not Known	4	40.0%	\$52	10.5%	0.0%	3	42.9%					1	33.3%				
		Total	10	100.0%	\$497	100.0%	100.0%	7	100.0%					3	100.0%				
	Loan Size	\$100,000 or Less	9	90.0%	\$197	39.6%		6	85.7%	82.9%	\$132	30.6%	30.9%	3	100.0%	86.8%	\$65	100.0%	40.8%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.7%	\$0	0.0%	29.0%	0	0.0%	8.5%	\$0	0.0%	26.1%
		\$250,001 - \$500,000	1	10.0%	\$300	60.4%		1	14.3%	6.4%	\$300	69.4%	40.1%	0	0.0%	4.7%	\$0	0.0%	33.1%
		Total	10	100.0%	\$497	100.0%		7	100.0%	100.0%	\$432	100.0%	100.0%	3	100.0%	100.0%	\$65	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	\$55	100.0%													
\$100,001 - \$250,000		0	0.0%	\$0	0.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		2	100.0%	\$55	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by 2016 FFIEC Census Data and 2016 D&B Information

Appendices

Geographic Distribution of HMDA Loans

Assessment Area: TX Laredo

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015					2016						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	%	Bank	Agg	\$ (000s)	%	%		
#	%			#	%	%				#	%	%						
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.5%	\$0	0.0%	0.4%
	Moderate	13	14.4%	\$1,231	7.3%	26.6%	7	14.6%	10.8%	\$753	7.8%	8.3%	6	14.3%	9.0%	\$478	6.7%	6.6%
	Middle	18	20.0%	\$2,198	13.1%	36.1%	11	22.9%	30.0%	\$1,263	13.1%	22.6%	7	16.7%	33.8%	\$935	13.1%	26.0%
	Upper	59	65.6%	\$13,355	79.6%	35.5%	30	62.5%	59.0%	\$7,645	79.1%	68.9%	29	69.0%	56.7%	\$5,710	80.2%	67.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>90</i>	<i>100.0%</i>	<i>\$16,784</i>	<i>100.0%</i>	<i>100.0%</i>	<i>48</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,661</i>	<i>100.0%</i>	<i>100.0%</i>	<i>42</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,123</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	1	1.4%	\$105	1.0%	26.6%	0	0.0%	7.2%	\$0	0.0%	5.7%	1	3.3%	8.6%	\$105	2.2%	7.2%
	Middle	15	21.7%	\$1,362	12.8%	36.1%	10	25.6%	27.0%	\$959	16.3%	18.8%	5	16.7%	23.9%	\$403	8.5%	16.1%
	Upper	53	76.8%	\$9,201	86.2%	35.5%	29	74.4%	65.3%	\$4,941	83.7%	75.3%	24	80.0%	67.1%	\$4,260	89.3%	76.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>69</i>	<i>100.0%</i>	<i>\$10,668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,900</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,768</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	0.1%
	Moderate	6	9.7%	\$62	5.9%	26.6%	5	12.5%	16.4%	\$53	7.9%	11.4%	1	4.5%	20.4%	\$9	2.4%	15.4%
	Middle	28	45.2%	\$491	47.1%	36.1%	19	47.5%	34.5%	\$350	52.5%	26.6%	9	40.9%	35.9%	\$141	37.5%	26.1%
	Upper	28	45.2%	\$490	47.0%	35.5%	16	40.0%	49.1%	\$264	39.6%	62.0%	12	54.5%	43.1%	\$226	60.1%	58.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>62</i>	<i>100.0%</i>	<i>\$1,043</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$667</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$376</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	1.5%	0	0.0%	7.7%	\$0	0.0%	3.1%	0	0.0%	5.0%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	23.4%	0	0.0%	26.9%	\$0	0.0%	3.6%	0	0.0%	25.0%	\$0	0.0%	15.1%
	Middle	0	0.0%	\$0	0.0%	41.0%	0	0.0%	26.9%	\$0	0.0%	64.3%	0	0.0%	50.0%	\$0	0.0%	36.6%
	Upper	0	0.0%	\$0	0.0%	34.1%	0	0.0%	38.5%	\$0	0.0%	29.1%	0	0.0%	20.0%	\$0	0.0%	47.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	0.3%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	20	9.0%	\$1,398	4.9%	26.6%	12	9.4%	10.3%	\$806	5.0%	7.3%	8	8.5%	9.5%	\$592	4.8%	7.0%
	Middle	61	27.6%	\$4,051	14.2%	36.1%	40	31.5%	29.4%	\$2,572	15.8%	25.2%	21	22.3%	31.0%	\$1,479	12.1%	23.5%
	Upper	140	63.3%	\$23,046	80.9%	35.5%	75	59.1%	60.0%	\$12,850	79.2%	67.1%	65	69.1%	59.1%	\$10,196	83.1%	69.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>221</i>	<i>100.0%</i>	<i>\$28,495</i>	<i>100.0%</i>	<i>100.0%</i>	<i>127</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,228</i>	<i>100.0%</i>	<i>100.0%</i>	<i>94</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,267</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

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Borrower Distribution of HMDA Loans Assessment Area: TX Laredo

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg			
HOME PURCHASE	Low	1	1.1%	\$68	0.4%	23.6%	1	2.1%	1.2%	\$68	0.7%	0.5%	0	0.0%	1.3%	\$0	0.0%	0.6%
	Moderate	13	14.4%	\$1,438	8.6%	16.1%	6	12.5%	9.2%	\$722	7.5%	5.9%	7	16.7%	10.0%	\$716	10.1%	6.2%
	Middle	16	17.8%	\$2,148	12.8%	17.9%	9	18.8%	17.1%	\$1,141	11.8%	14.1%	7	16.7%	17.7%	\$1,007	14.1%	15.2%
	Upper	60	66.7%	\$13,130	78.2%	42.3%	32	66.7%	48.2%	\$7,730	80.0%	57.9%	28	66.7%	43.7%	\$5,400	75.8%	53.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.3%	\$0	0.0%	21.6%	0	0.0%	27.4%	\$0	0.0%	24.3%
	<i>Total</i>	<i>90</i>	<i>100.0%</i>	<i>\$16,784</i>	<i>100.0%</i>	<i>100.0%</i>	<i>48</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,661</i>	<i>100.0%</i>	<i>100.0%</i>	<i>42</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,123</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	1.4%	\$83	0.8%	23.6%	1	2.6%	1.7%	\$83	1.4%	1.1%	0	0.0%	1.5%	\$0	0.0%	0.8%
	Moderate	4	5.8%	\$356	3.3%	16.1%	3	7.7%	4.8%	\$279	4.7%	2.7%	1	3.3%	4.6%	\$77	1.6%	2.5%
	Middle	12	17.4%	\$1,101	10.3%	17.9%	5	12.8%	10.8%	\$511	8.7%	7.1%	7	23.3%	9.6%	\$590	12.4%	6.4%
	Upper	52	75.4%	\$9,128	85.6%	42.3%	30	76.9%	52.4%	\$5,027	85.2%	56.0%	22	73.3%	46.8%	\$4,101	86.0%	49.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	30.4%	\$0	0.0%	33.1%	0	0.0%	37.5%	\$0	0.0%	41.2%
	<i>Total</i>	<i>69</i>	<i>100.0%</i>	<i>\$10,668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,900</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,768</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	7	11.3%	\$42	4.0%	23.6%	6	15.0%	7.8%	\$40	6.0%	2.3%	1	4.5%	5.5%	\$2	0.5%	1.7%
	Moderate	5	8.1%	\$69	6.6%	16.1%	2	5.0%	10.8%	\$29	4.3%	10.1%	3	13.6%	8.8%	\$40	10.6%	3.5%
	Middle	10	16.1%	\$106	10.2%	17.9%	8	20.0%	15.1%	\$88	13.2%	12.1%	2	9.1%	16.6%	\$18	4.8%	9.6%
	Upper	40	64.5%	\$826	79.2%	42.3%	24	60.0%	53.9%	\$510	76.5%	61.7%	16	72.7%	55.8%	\$316	84.0%	70.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.5%	\$0	0.0%	13.8%	0	0.0%	13.3%	\$0	0.0%	14.6%
	<i>Total</i>	<i>62</i>	<i>100.0%</i>	<i>\$1,043</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$667</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$376</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	9	4.1%	\$193	0.7%	23.6%	8	6.3%	1.7%	\$191	1.2%	0.6%	1	1.1%	1.5%	\$2	0.0%	0.7%
	Moderate	22	10.0%	\$1,863	6.5%	16.1%	11	8.7%	8.1%	\$1,030	6.3%	4.7%	11	11.7%	8.3%	\$833	6.8%	5.0%
	Middle	38	17.2%	\$3,355	11.8%	17.9%	22	17.3%	15.2%	\$1,740	10.7%	11.3%	16	17.0%	15.1%	\$1,615	13.2%	12.3%
	Upper	152	68.8%	\$23,084	81.0%	42.3%	86	67.7%	49.3%	\$13,267	81.8%	52.8%	66	70.2%	44.9%	\$9,817	80.0%	51.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.7%	\$0	0.0%	30.6%	0	0.0%	30.1%	\$0	0.0%	31.0%
	<i>Total</i>	<i>221</i>	<i>100.0%</i>	<i>\$28,495</i>	<i>100.0%</i>	<i>100.0%</i>	<i>127</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,228</i>	<i>100.0%</i>	<i>100.0%</i>	<i>94</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,267</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendices

Geographic Distribution of Small Business & Small Farm Loans Assessment Area: TX Laredo

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
SMALL BUSINESSES	Low	5	0.6%	\$185	0.5%	0.9%	2	0.6%	0.6%	\$75	0.5%	0.3%	3	0.6%	0.4%	\$110	0.5%	0.1%
	Moderate	150	18.5%	\$5,554	13.8%	21.7%	75	21.5%	16.7%	\$2,343	14.5%	13.5%	75	16.2%	16.8%	\$3,211	13.3%	12.2%
	Middle	251	30.9%	\$10,401	25.9%	30.2%	101	28.9%	25.5%	\$3,255	20.2%	22.7%	150	32.5%	25.2%	\$7,146	29.6%	21.7%
	Upper	404	49.8%	\$24,014	59.7%	47.0%	171	49.0%	55.7%	\$10,451	64.8%	62.7%	233	50.4%	56.1%	\$13,563	56.3%	64.9%
	Unknown	1	0.1%	\$75	0.2%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.4%	1	0.2%	0.5%	\$75	0.3%	0.6%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.5%	0	0.0%	1.1%	\$0	0.0%	0.4%
	Total	811	100.0%	\$40,229	100.0%	100.0%	349	100.0%	100.0%	\$16,124	100.0%	100.0%	462	100.0%	100.0%	\$24,105	100.0%	100.0%
SMALL FARM					Small Farms													
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	10.8%	0	0.0%	15.5%	\$0	0.0%	13.1%	0	0.0%	13.3%	\$0	0.0%	16.6%
	Middle	0	0.0%	\$0	0.0%	30.1%	0	0.0%	31.0%	\$0	0.0%	25.5%	0	0.0%	18.7%	\$0	0.0%	12.9%
	Upper	0	0.0%	\$0	0.0%	59.0%	0	0.0%	53.4%	\$0	0.0%	61.4%	0	0.0%	68.0%	\$0	0.0%	70.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	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%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Appendices

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TX Laredo

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2015			2016									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	511	63.0%	\$19,106	47.5%	88.5%	223	63.9%	50.6%	\$7,478	46.4%	47.8%	288	62.3%	45.2%	\$11,628	48.2%	43.9%
		Over \$1 Million	219	27.0%	\$20,360	50.6%	10.9%	89	25.5%				130	28.1%					
		Total Rev. available	730	90.0%	\$39,466	98.1%	99.4%	312	89.4%				418	90.4%					
		Rev. Not Known	81	10.0%	\$763	1.9%	0.6%	37	10.6%				44	9.5%					
		Total	811	100.0%	\$40,229	100.0%	100.0%	349	100.0%				462	100.0%					
	Loan Size	\$100,000 or Less	762	94.0%	\$26,192	65.1%		330	94.6%	91.4%	\$11,112	68.9%	38.1%	432	93.5%	91.0%	\$15,080	62.6%	39.0%
		\$100,001 - \$250,000	30	3.7%	\$5,578	13.9%		14	4.0%	5.1%	\$2,588	16.1%	20.0%	16	3.5%	5.6%	\$2,990	12.4%	21.4%
		\$250,001 - \$1 Million	19	2.3%	\$8,459	21.0%		5	1.4%	3.5%	\$2,424	15.0%	42.0%	14	3.0%	3.4%	\$6,035	25.0%	39.6%
		Total	811	100.0%	\$40,229	100.0%		349	100.0%	100.0%	\$16,124	100.0%	100.0%	462	100.0%	100.0%	\$24,105	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	492	96.3%	\$13,801	72.2%													
\$100,001 - \$250,000		12	2.3%	\$2,156	11.3%														
\$250,001 - \$1 Million		7	1.4%	\$3,149	16.5%														
Total		511	100.0%	\$19,106	100.0%														
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	96.5%	0	0.0%	77.6%	\$0	0.0%	54.0%	0	0.0%	69.3%	\$0	0.0%	70.8%
		Over \$1 Million	0	0.0%	\$0	0.0%	3.5%	0	0.0%				0	0.0%					
		Total Rev. available	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
		Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				0	0.0%					
		Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				0	0.0%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	84.5%	\$0	0.0%	46.9%	0	0.0%	93.3%	\$0	0.0%	68.8%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	13.8%	\$0	0.0%	40.7%	0	0.0%	5.3%	\$0	0.0%	21.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.7%	\$0	0.0%	12.4%	0	0.0%	1.3%	\$0	0.0%	10.0%
		Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	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%														
Total		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 2016 FFIEC Census Data and 2016 D&B Information

Appendices

APPENDIX H – LIMITED-SCOPE ASSESSMENT AREA LENDING TABLE

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Anniston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank		Owner Occupied Units	2015		2016											
		Count	Dollar		Count	Dollar	Count	Dollar	Dollar	Agg								
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	0.4%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	4	14.3%	\$246	9.3%	16.7%	3	18.8%	10.8%	\$206	12.1%	7.9%	1	8.3%	8.5%	\$40	4.3%	6.1%
	Middle	9	32.1%	\$1,037	39.4%	46.6%	4	25.0%	51.2%	\$570	33.5%	51.3%	5	41.7%	52.0%	\$467	49.9%	52.3%
	Upper	15	53.6%	\$1,351	51.3%	32.7%	9	56.3%	37.7%	\$923	54.3%	40.7%	6	50.0%	39.3%	\$428	45.8%	41.5%
	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%
	Total	28	100.0%	\$2,634	100.0%	100.0%	16	100.0%	100.0%	\$1,699	100.0%	100.0%	12	100.0%	100.0%	\$935	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	1.0%	\$0	0.0%	0.5%	0	0.0%	1.0%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	11.0%	\$0	0.0%	8.1%	0	0.0%	9.7%	\$0	0.0%	7.1%
	Middle	10	66.7%	\$959	62.9%	46.6%	6	60.0%	50.4%	\$609	56.8%	51.4%	4	80.0%	46.8%	\$350	77.3%	45.3%
	Upper	5	33.3%	\$566	37.1%	32.7%	4	40.0%	37.5%	\$463	43.2%	39.8%	1	20.0%	42.4%	\$103	22.7%	47.2%
	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%
	Total	15	100.0%	\$1,525	100.0%	100.0%	10	100.0%	100.0%	\$1,072	100.0%	100.0%	5	100.0%	100.0%	\$453	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	3.2%	\$0	0.0%	1.5%	0	0.0%	3.6%	\$0	0.0%	0.6%
	Moderate	1	12.5%	\$10	10.2%	16.7%	1	33.3%	14.0%	\$10	29.4%	14.6%	0	0.0%	13.0%	\$0	0.0%	9.0%
	Middle	7	87.5%	\$88	89.8%	46.6%	2	66.7%	52.7%	\$24	70.6%	53.2%	5	100.0%	50.9%	\$64	100.0%	54.2%
	Upper	0	0.0%	\$0	0.0%	32.7%	0	0.0%	30.1%	\$0	0.0%	30.7%	0	0.0%	32.5%	\$0	0.0%	36.1%
	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%
	Total	8	100.0%	\$98	100.0%	100.0%	3	100.0%	100.0%	\$34	100.0%	100.0%	5	100.0%	100.0%	\$64	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	28.6%	\$0	0.0%	84.1%	0	0.0%	28.6%	\$0	0.0%	20.4%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	42.9%	\$0	0.0%	9.7%	0	0.0%	42.9%	\$0	0.0%	59.2%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	28.6%	\$0	0.0%	6.2%	0	0.0%	28.6%	\$0	0.0%	20.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	0.8%	\$0	0.0%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.2%
	Moderate	5	9.8%	\$256	6.0%	16.7%	4	13.8%	11.2%	\$216	7.7%	10.3%	1	4.5%	9.3%	\$40	2.8%	7.2%
	Middle	26	51.0%	\$2,084	49.0%	46.6%	12	41.4%	50.9%	\$1,203	42.9%	50.2%	14	63.6%	49.8%	\$881	60.7%	49.6%
	Upper	20	39.2%	\$1,917	45.0%	32.7%	13	44.8%	37.0%	\$1,386	49.4%	39.1%	7	31.8%	40.1%	\$531	36.6%	42.9%
	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%
	Total	51	100.0%	\$4,257	100.0%	100.0%	29	100.0%	100.0%	\$2,805	100.0%	100.0%	22	100.0%	100.0%	\$1,452	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	3.8%	\$0	0.0%	7.1%	0	0.0%	4.0%	\$0	0.0%	1.9%
	Moderate	30	34.9%	\$1,149	35.2%	27.6%	11	27.5%	23.9%	\$462	31.5%	27.8%	19	41.3%	26.3%	\$687	38.2%	26.7%
	Middle	34	39.5%	\$1,523	46.7%	42.1%	18	45.0%	41.2%	\$743	50.7%	33.2%	16	34.8%	38.4%	\$780	43.4%	39.8%
	Upper	22	25.6%	\$590	18.1%	25.2%	11	27.5%	28.5%	\$260	17.7%	30.5%	11	23.9%	27.4%	\$330	18.4%	28.6%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.5%	\$0	0.0%	1.4%	0	0.0%	3.8%	\$0	0.0%	3.0%
Total	86	100.0%	\$3,262	100.0%	100.0%	40	100.0%	100.0%	\$1,465	100.0%	100.0%	46	100.0%	100.0%	\$1,797	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	8.9%	0	0.0%	26.7%	\$0	0.0%	9.4%	0	0.0%	40.0%	\$0	0.0%	19.6%
	Middle	0	0.0%	\$0	0.0%	46.8%	0	0.0%	33.3%	\$0	0.0%	20.0%	0	0.0%	20.0%	\$0	0.0%	10.9%
	Upper	0	0.0%	\$0	0.0%	43.0%	0	0.0%	40.0%	\$0	0.0%	70.6%	0	0.0%	40.0%	\$0	0.0%	69.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Anniston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	4	14.3%	\$253	9.6%	22.9%	1	6.3%	5.1%	\$57	3.4%	2.6%	3	25.0%	3.9%	\$196	21.0%	2.1%
	Moderate	10	35.7%	\$765	29.0%	18.0%	5	31.3%	18.2%	\$479	28.2%	13.4%	5	41.7%	16.8%	\$286	30.6%	12.5%
	Middle	9	32.1%	\$767	29.1%	18.6%	8	50.0%	24.3%	\$727	42.8%	23.2%	1	8.3%	24.0%	\$40	4.3%	22.1%
	Upper	5	17.9%	\$849	32.2%	40.5%	2	12.5%	28.6%	\$436	25.7%	37.7%	3	25.0%	31.4%	\$413	44.2%	40.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.8%	\$0	0.0%	23.1%	0	0.0%	23.9%	\$0	0.0%	22.9%
	Total	28	100.0%	\$2,634	100.0%	100.0%	16	100.0%	100.0%	\$1,699	100.0%	100.0%	12	100.0%	100.0%	\$935	100.0%	100.0%
REFINANCE	Low	1	6.7%	\$65	4.3%	22.9%	1	10.0%	4.6%	\$65	6.1%	2.8%	0	0.0%	4.3%	\$0	0.0%	2.3%
	Moderate	2	13.3%	\$178	11.7%	18.0%	1	10.0%	10.8%	\$75	7.0%	6.1%	1	20.0%	8.9%	\$103	22.7%	5.8%
	Middle	8	53.3%	\$755	49.5%	18.6%	4	40.0%	19.2%	\$405	37.8%	16.1%	4	80.0%	17.4%	\$350	77.3%	14.0%
	Upper	4	26.7%	\$527	34.6%	40.5%	4	40.0%	36.7%	\$527	49.2%	42.2%	0	0.0%	38.2%	\$0	0.0%	44.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	28.7%	\$0	0.0%	32.9%	0	0.0%	31.1%	\$0	0.0%	33.3%
	Total	15	100.0%	\$1,525	100.0%	100.0%	10	100.0%	100.0%	\$1,072	100.0%	100.0%	5	100.0%	100.0%	\$453	100.0%	100.0%
HOME IMPROVEMENT	Low	2	25.0%	\$15	15.3%	22.9%	1	33.3%	7.5%	\$10	29.4%	1.9%	1	20.0%	7.1%	\$5	7.8%	2.7%
	Moderate	1	12.5%	\$15	15.3%	18.0%	0	0.0%	21.5%	\$0	0.0%	13.6%	1	20.0%	14.2%	\$15	23.4%	6.9%
	Middle	1	12.5%	\$19	19.4%	18.6%	0	0.0%	27.4%	\$0	0.0%	22.7%	1	20.0%	24.3%	\$19	29.7%	19.0%
	Upper	4	50.0%	\$49	50.0%	40.5%	2	66.7%	40.9%	\$24	70.6%	56.9%	2	40.0%	45.6%	\$25	39.1%	55.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.7%	\$0	0.0%	4.9%	0	0.0%	8.9%	\$0	0.0%	15.6%
	Total	8	100.0%	\$98	100.0%	100.0%	3	100.0%	100.0%	\$34	100.0%	100.0%	5	100.0%	100.0%	\$64	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	7	13.7%	\$333	7.8%	22.9%	3	10.3%	5.1%	\$132	4.7%	2.6%	4	18.2%	4.3%	\$201	13.8%	2.1%
	Moderate	13	25.5%	\$958	22.5%	18.0%	6	20.7%	15.4%	\$554	19.8%	9.8%	7	31.8%	13.4%	\$404	27.8%	9.0%
	Middle	18	35.3%	\$1,541	36.2%	18.6%	12	41.4%	22.4%	\$1,132	40.4%	19.4%	6	27.3%	21.2%	\$409	28.2%	17.6%
	Upper	13	25.5%	\$1,425	33.5%	40.5%	8	27.6%	32.7%	\$987	35.2%	39.0%	5	22.7%	35.0%	\$438	30.2%	40.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.4%	\$0	0.0%	29.1%	0	0.0%	26.1%	\$0	0.0%	30.6%
	Total	51	100.0%	\$4,257	100.0%	100.0%	29	100.0%	100.0%	\$2,805	100.0%	100.0%	22	100.0%	100.0%	\$1,452	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	65	75.6%	\$1,922	58.9%	90.3%	30	75.0%	53.2%	\$840	57.3%	41.2%	35	76.1%	49.0%	\$1,082	60.2%	39.7%
	Over \$1 Million	17	19.8%	\$1,145	35.1%	8.7%	8	20.0%					9	19.6%				
	Total Rev. available	82	95.4%	\$3,067	94.0%	99.0%	38	95.0%					44	95.7%				
	Rev. Not Known	4	4.7%	\$195	6.0%	1.1%	2	5.0%					2	4.3%				
	Total	86	100.0%	\$3,262	100.0%	100.0%	40	100.0%					46	100.0%				
Small Business Loan Size	\$100,000 or Less	86	100.0%	\$3,262	100.0%		40	100.0%	92.5%	\$1,465	100.0%	33.9%	46	100.0%	95.2%	\$1,797	100.0%	48.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	10.8%	0	0.0%	2.8%	\$0	0.0%	15.2%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	4.4%	\$0	0.0%	55.3%	0	0.0%	2.0%	\$0	0.0%	36.1%
	Total	86	100.0%	\$3,262	100.0%		40	100.0%	100.0%	\$1,465	100.0%	100.0%	46	100.0%	100.0%	\$1,797	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	53.3%	\$0	0.0%	35.1%	0	0.0%	60.0%	\$0	0.0%	84.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	\$100,001 - \$250,000	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%
	\$250,001 - \$500,000	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	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Auburn

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015				2016							
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	1.7%	\$0	0.0%	1.0%	0	0.0%	1.9%	\$0	0.0%	1.8%
	Moderate	16	34.8%	\$2,528	31.5%	15.7%	9	37.5%	19.2%	\$1,169	31.7%	17.6%	7	31.8%	21.1%	\$1,359	31.2%	19.2%
	Middle	17	37.0%	\$3,132	39.0%	57.2%	8	33.3%	56.9%	\$1,608	43.7%	54.2%	9	40.9%	55.7%	\$1,524	35.0%	54.3%
	Upper	13	28.3%	\$2,378	29.6%	22.7%	7	29.2%	22.2%	\$905	24.6%	27.2%	6	27.3%	21.3%	\$1,473	33.8%	24.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	46	100.0%	\$8,038	100.0%	100.0%	24	100.0%	100.0%	\$3,682	100.0%	100.0%	22	100.0%	100.0%	\$4,356	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	1.4%	\$0	0.0%	0.7%	0	0.0%	1.7%	\$0	0.0%	1.0%
	Moderate	8	28.6%	\$1,279	26.6%	15.7%	4	30.8%	13.4%	\$796	47.7%	12.9%	4	26.7%	12.4%	\$483	15.4%	11.5%
	Middle	12	42.9%	\$1,478	30.7%	57.2%	7	53.8%	56.9%	\$668	40.0%	52.3%	5	33.3%	55.6%	\$810	25.8%	53.5%
	Upper	8	28.6%	\$2,053	42.7%	22.7%	2	15.4%	28.3%	\$204	12.2%	34.1%	6	40.0%	30.3%	\$1,849	58.8%	34.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	28	100.0%	\$4,810	100.0%	100.0%	13	100.0%	100.0%	\$1,668	100.0%	100.0%	15	100.0%	100.0%	\$3,142	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	3.1%	\$0	0.0%	1.2%	0	0.0%	1.3%	\$0	0.0%	1.5%
	Moderate	1	20.0%	\$18	18.8%	15.7%	1	20.0%	11.0%	\$18	18.8%	3.9%	0	0.0%	13.5%	\$0	0.0%	8.8%
	Middle	2	40.0%	\$37	38.5%	57.2%	2	40.0%	57.1%	\$37	38.5%	59.1%	0	0.0%	54.5%	\$0	0.0%	47.5%
	Upper	2	40.0%	\$41	42.7%	22.7%	2	40.0%	28.8%	\$41	42.7%	35.8%	0	0.0%	30.8%	\$0	0.0%	42.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$96	100.0%	100.0%	5	100.0%	100.0%	\$96	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units					Low	0	0.0%	36.8%	\$0	0.0%	41.0%	0	0.0%	21.4%	\$0	0.0%	3.9%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	15.8%	\$0	0.0%	4.8%	0	0.0%	21.4%	\$0	0.0%	6.4%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	15.8%	\$0	0.0%	6.7%	0	0.0%	35.7%	\$0	0.0%	31.5%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	31.6%	\$0	0.0%	47.6%	0	0.0%	21.4%	\$0	0.0%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	1.8%	\$0	0.0%	4.8%	0	0.0%	1.9%	\$0	0.0%	1.6%
	Moderate	25	31.6%	\$3,825	29.6%	15.7%	14	33.3%	17.0%	\$1,983	36.4%	14.8%	11	29.7%	17.8%	\$1,842	24.6%	15.7%
	Middle	31	39.2%	\$4,647	35.9%	57.2%	17	40.5%	56.8%	\$2,313	42.5%	49.0%	14	37.8%	55.6%	\$2,334	31.1%	52.6%
	Upper	23	29.1%	\$4,472	34.5%	22.7%	11	26.2%	24.5%	\$1,150	21.1%	31.5%	12	32.4%	24.8%	\$3,322	44.3%	30.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	79	100.0%	\$12,944	100.0%	100.0%	42	100.0%	100.0%	\$5,446	100.0%	100.0%	37	100.0%	100.0%	\$7,498	100.0%	100.0%
SMALL BUSINESSES	Small Businesses					Low	2	2.3%	2.2%	\$25	1.9%	2.0%	1	2.2%	2.7%	\$25	1.2%	1.7%
	Moderate	6	6.8%	\$175	5.1%	16.4%	3	7.0%	16.3%	\$85	6.5%	23.1%	3	6.7%	14.7%	\$90	4.2%	22.0%
	Middle	64	72.7%	\$2,248	65.1%	59.4%	30	69.8%	57.7%	\$999	76.6%	54.6%	34	75.6%	58.5%	\$1,249	58.1%	54.8%
	Upper	16	18.2%	\$980	28.4%	20.4%	9	20.9%	22.4%	\$195	15.0%	19.9%	7	15.6%	22.6%	\$785	36.5%	21.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	0.4%	0	0.0%	1.4%	\$0	0.0%	0.6%
	Total	88	100.0%	\$3,453	100.0%	100.0%	43	100.0%	100.0%	\$1,304	100.0%	100.0%	45	100.0%	100.0%	\$2,149	100.0%	100.0%
SMALL FARM	Small Farms					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	20.0%	\$0	0.0%	26.0%	0	0.0%	28.6%	\$0	0.0%	50.0%
	Middle	0	0.0%	\$0	0.0%	59.7%	0	0.0%	60.0%	\$0	0.0%	59.6%	0	0.0%	67.9%	\$0	0.0%	49.8%
	Upper	0	0.0%	\$0	0.0%	25.0%	0	0.0%	20.0%	\$0	0.0%	14.4%	0	0.0%	3.6%	\$0	0.0%	0.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Auburn

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	3	6.5%	\$267	3.3%	23.1%	3	12.5%	8.6%	\$267	7.3%	4.7%	0	0.0%	4.3%	\$0	0.0%	2.1%
	Moderate	14	30.4%	\$1,705	21.2%	16.3%	9	37.5%	21.6%	\$1,088	29.5%	16.8%	5	22.7%	15.2%	\$617	14.2%	10.4%
	Middle	12	26.1%	\$2,412	30.0%	20.8%	5	20.8%	21.9%	\$1,115	30.3%	22.1%	7	31.8%	20.5%	\$1,297	29.8%	19.2%
	Upper	17	37.0%	\$3,654	45.5%	39.7%	7	29.2%	33.0%	\$1,212	32.9%	42.7%	10	45.5%	42.9%	\$2,442	56.1%	52.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.9%	\$0	0.0%	13.8%	0	0.0%	17.1%	\$0	0.0%	15.8%
	Total	46	100.0%	\$8,038	100.0%	100.0%	24	100.0%	100.0%	\$3,682	100.0%	100.0%	22	100.0%	100.0%	\$4,356	100.0%	100.0%
REFINANCE	Low	4	14.3%	\$385	8.0%	23.1%	2	15.4%	5.0%	\$169	10.1%	2.3%	2	13.3%	4.3%	\$216	6.9%	2.3%
	Moderate	6	21.4%	\$586	12.2%	16.3%	4	30.8%	11.4%	\$386	23.1%	7.7%	2	13.3%	8.5%	\$200	6.4%	5.3%
	Middle	5	17.9%	\$792	16.5%	20.8%	3	23.1%	16.8%	\$575	34.5%	14.3%	2	13.3%	15.9%	\$217	6.9%	12.6%
	Upper	13	46.4%	\$3,047	63.3%	39.7%	4	30.8%	33.7%	\$538	32.3%	44.7%	9	60.0%	41.0%	\$2,509	79.9%	49.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	33.0%	\$0	0.0%	31.0%	0	0.0%	30.3%	\$0	0.0%	29.9%
	Total	28	100.0%	\$4,810	100.0%	100.0%	13	100.0%	100.0%	\$1,668	100.0%	100.0%	15	100.0%	100.0%	\$3,142	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.1%	0	0.0%	11.0%	\$0	0.0%	4.4%	0	0.0%	5.1%	\$0	0.0%	1.0%
	Moderate	1	20.0%	\$2	2.1%	16.3%	1	20.0%	16.6%	\$2	2.1%	15.6%	0	0.0%	11.5%	\$0	0.0%	7.2%
	Middle	2	40.0%	\$24	25.0%	20.8%	2	40.0%	27.0%	\$24	25.0%	12.3%	0	0.0%	22.4%	\$0	0.0%	14.6%
	Upper	2	40.0%	\$70	72.9%	39.7%	2	40.0%	39.3%	\$70	72.9%	57.8%	0	0.0%	52.6%	\$0	0.0%	68.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	9.8%	0	0.0%	8.3%	\$0	0.0%	8.9%
	Total	5	100.0%	\$96	100.0%	100.0%	5	100.0%	100.0%	\$96	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	7	8.9%	\$652	5.0%	23.1%	5	11.9%	7.4%	\$436	8.0%	3.5%	2	5.4%	4.3%	\$216	2.9%	2.0%
	Moderate	21	26.6%	\$2,293	17.7%	16.3%	14	33.3%	17.9%	\$1,476	27.1%	12.2%	7	18.9%	12.7%	\$817	10.9%	8.0%
	Middle	19	24.1%	\$3,228	24.9%	20.8%	10	23.8%	20.3%	\$1,714	31.5%	17.4%	9	24.3%	18.9%	\$1,514	20.2%	15.7%
	Upper	32	40.5%	\$6,771	52.3%	39.7%	13	31.0%	33.3%	\$1,820	33.4%	39.3%	19	51.4%	42.4%	\$4,951	66.0%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.1%	\$0	0.0%	27.7%	0	0.0%	21.7%	\$0	0.0%	25.6%
	Total	79	100.0%	\$12,944	100.0%	100.0%	42	100.0%	100.0%	\$5,446	100.0%	100.0%	37	100.0%	100.0%	\$7,498	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	69	78.4%	\$2,731	79.1%	90.8%	35	81.4%	47.6%	\$1,067	81.8%	46.4%	34	75.6%	48.9%	\$1,664	77.4%	50.4%
	Over \$1 Million	9	10.2%	\$605	17.5%	8.3%	3	7.0%					6	13.3%				
	Total Rev. available	78	88.6%	\$3,336	96.6%	99.1%	38	88.4%					40	88.9%				
	Rev. Not Known	10	11.4%	\$117	3.4%	0.9%	5	11.6%					5	11.1%				
Total	88	100.0%	\$3,453	100.0%	100.0%	43	100.0%					45	100.0%					
Small Business Loan Size	\$100,000 or Less	83	94.3%	\$2,337	67.7%		41	95.3%	92.0%	\$1,034	79.3%	35.4%	42	93.3%	93.7%	\$1,303	60.6%	41.1%
	\$100,001 - \$250,000	4	4.5%	\$516	14.9%		2	4.7%	4.1%	\$270	20.7%	17.3%	2	4.4%	3.3%	\$246	11.4%	15.7%
	\$250,001 - \$1 Million	1	1.1%	\$600	17.4%		0	0.0%	3.9%	\$0	0.0%	47.3%	1	2.2%	3.0%	\$600	27.9%	43.2%
	Total	88	100.0%	\$3,453	100.0%		43	100.0%	100.0%	\$1,304	100.0%	100.0%	45	100.0%	100.0%	\$2,149	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	97.3%	0	0.0%	60.0%	\$0	0.0%	64.1%	0	0.0%	39.3%	\$0	0.0%	42.8%
Over \$1 Million		0	0.0%	\$0	0.0%	2.7%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	95.0%	\$0	0.0%	84.3%	0	0.0%	85.7%	\$0	0.0%	40.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.0%	\$0	0.0%	15.7%	0	0.0%	10.7%	\$0	0.0%	33.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	25.3%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Daphne-Fairhope-Foley

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015				2016							
		Bank		Dollar			Count		Dollar		Count		Dollar					
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	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%
	Moderate	30	28.3%	\$5,159	25.9%	15.1%	15	28.8%	6.8%	\$2,149	21.8%	5.2%	15	27.8%	6.9%	\$3,010	30.0%	4.8%
	Middle	49	46.2%	\$8,852	44.5%	60.1%	24	46.2%	58.3%	\$5,150	52.3%	54.9%	25	46.3%	59.5%	\$3,702	36.9%	56.2%
	Upper	27	25.5%	\$5,875	29.5%	24.8%	13	25.0%	34.9%	\$2,551	25.9%	39.9%	14	25.9%	33.6%	\$3,324	33.1%	39.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	106	100.0%	\$19,886	100.0%	100.0%	52	100.0%	100.0%	\$9,850	100.0%	100.0%	54	100.0%	100.0%	\$10,036	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	1	2.9%	\$154	1.5%	15.1%	0	0.0%	8.7%	\$0	0.0%	6.9%	1	4.8%	9.3%	\$154	3.9%	7.4%
	Middle	17	50.0%	\$6,442	64.4%	60.1%	7	53.8%	57.7%	\$4,427	72.5%	55.7%	10	47.6%	57.9%	\$2,015	51.6%	54.6%
	Upper	16	47.1%	\$3,413	34.1%	24.8%	6	46.2%	33.6%	\$1,678	27.5%	37.4%	10	47.6%	32.7%	\$1,735	44.4%	38.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	34	100.0%	\$10,009	100.0%	100.0%	13	100.0%	100.0%	\$6,105	100.0%	100.0%	21	100.0%	100.0%	\$3,904	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	1	20.0%	\$7	13.0%	15.1%	0	0.0%	16.1%	\$0	0.0%	10.5%	1	33.3%	14.1%	\$7	33.3%	7.4%
	Middle	2	40.0%	\$22	40.7%	60.1%	1	50.0%	62.7%	\$16	48.5%	67.0%	1	33.3%	60.7%	\$6	28.6%	60.8%
	Upper	2	40.0%	\$25	46.3%	24.8%	1	50.0%	21.2%	\$17	51.5%	22.5%	1	33.3%	25.1%	\$8	38.1%	31.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$54	100.0%	100.0%	2	100.0%	100.0%	\$33	100.0%	100.0%	3	100.0%	100.0%	\$21	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	14.3%	\$0	0.0%	2.0%	0	0.0%	7.1%	\$0	0.0%	8.4%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	57.1%	\$0	0.0%	45.5%	0	0.0%	78.6%	\$0	0.0%	74.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	28.6%	\$0	0.0%	52.5%	0	0.0%	14.3%	\$0	0.0%	17.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	32	22.1%	\$5,320	17.8%	15.1%	15	22.4%	7.8%	\$2,149	13.4%	5.6%	17	21.8%	8.0%	\$3,171	22.7%	5.8%
	Middle	68	46.9%	\$15,316	51.1%	60.1%	32	47.8%	58.3%	\$9,593	60.0%	55.0%	36	46.2%	59.1%	\$5,723	41.0%	56.2%
	Upper	45	31.0%	\$9,313	31.1%	24.8%	20	29.9%	34.0%	\$4,246	26.6%	39.4%	25	32.1%	32.9%	\$5,067	36.3%	38.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	145	100.0%	\$29,949	100.0%	100.0%	67	100.0%	100.0%	\$15,988	100.0%	100.0%	78	100.0%	100.0%	\$13,961	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	15	5.1%	\$1,290	8.6%	10.0%	8	5.3%	8.2%	\$420	6.0%	9.2%	7	4.8%	9.0%	\$870	11.0%	8.4%
	Middle	191	64.5%	\$10,128	67.8%	69.6%	99	66.0%	65.3%	\$4,915	69.7%	66.3%	92	63.0%	64.1%	\$5,213	66.1%	64.1%
	Upper	90	30.4%	\$3,521	23.6%	20.3%	43	28.7%	23.7%	\$1,715	24.3%	23.6%	47	32.2%	24.5%	\$1,806	22.9%	26.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	0.9%	0	0.0%	2.4%	\$0	0.0%	1.1%
Total	296	100.0%	\$14,939	100.0%	100.0%	150	100.0%	100.0%	\$7,050	100.0%	100.0%	146	100.0%	100.0%	\$7,889	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	27.3%	0	0.0%	28.4%	\$0	0.0%	13.6%	0	0.0%	36.2%	\$0	0.0%	8.1%
	Middle	0	0.0%	\$0	0.0%	60.4%	0	0.0%	53.1%	\$0	0.0%	48.8%	0	0.0%	50.0%	\$0	0.0%	69.0%
	Upper	1	100.0%	\$200	100.0%	12.3%	1	100.0%	17.3%	\$200	100.0%	37.2%	0	0.0%	12.1%	\$0	0.0%	22.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	0.4%	0	0.0%	1.7%	\$0	0.0%	0.4%
Total	1	100.0%	\$200	100.0%	100.0%	1	100.0%	100.0%	\$200	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Daphne-Fairhope-Foley

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income			Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	8	7.5%	\$853	4.3%	19.4%	4	7.7%	2.9%	\$426	4.3%	1.3%	4	7.4%	3.4%	\$427	4.3%	1.6%
	Moderate	31	29.2%	\$4,135	20.8%	18.6%	18	34.6%	12.0%	\$2,408	24.4%	7.7%	13	24.1%	13.4%	\$1,727	17.2%	8.5%
	Middle	22	20.8%	\$3,293	16.6%	21.5%	8	15.4%	17.3%	\$1,140	11.6%	13.4%	14	25.9%	19.1%	\$2,153	21.5%	15.1%
	Upper	44	41.5%	\$11,275	56.7%	40.4%	21	40.4%	46.9%	\$5,546	56.3%	56.4%	23	42.6%	44.6%	\$5,729	57.1%	53.9%
	Unknown	1	0.9%	\$330	1.7%	0.0%	1	1.9%	20.8%	\$330	3.4%	21.2%	0	0.0%	19.4%	\$0	0.0%	20.8%
	Total	106	100.0%	\$19,886	100.0%	100.0%	52	100.0%	100.0%	\$9,850	100.0%	100.0%	54	100.0%	100.0%	\$10,036	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	3.9%	\$0	0.0%	1.8%	0	0.0%	4.1%	\$0	0.0%	2.0%
	Moderate	8	23.5%	\$916	9.2%	18.6%	4	30.8%	10.2%	\$534	8.7%	6.2%	4	19.0%	11.1%	\$382	9.8%	6.4%
	Middle	7	20.6%	\$1,115	11.1%	21.5%	1	7.7%	15.7%	\$75	1.2%	11.4%	6	28.6%	15.6%	\$1,040	26.6%	11.9%
	Upper	19	55.9%	\$7,978	79.7%	40.4%	8	61.5%	44.9%	\$5,496	90.0%	54.3%	11	52.4%	41.9%	\$2,482	63.6%	49.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.3%	\$0	0.0%	26.3%	0	0.0%	27.3%	\$0	0.0%	29.9%
	Total	34	100.0%	\$10,009	100.0%	100.0%	13	100.0%	100.0%	\$6,105	100.0%	100.0%	21	100.0%	100.0%	\$3,904	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	8.2%	\$0	0.0%	2.2%	0	0.0%	11.5%	\$0	0.0%	3.7%
	Moderate	2	40.0%	\$23	42.6%	18.6%	1	50.0%	12.0%	\$16	48.5%	6.2%	1	33.3%	17.0%	\$7	33.3%	13.5%
	Middle	1	20.0%	\$6	11.1%	21.5%	0	0.0%	31.3%	\$0	0.0%	16.5%	1	33.3%	20.7%	\$6	28.6%	15.6%
	Upper	2	40.0%	\$25	46.3%	40.4%	1	50.0%	42.1%	\$17	51.5%	60.3%	1	33.3%	45.0%	\$8	38.1%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.3%	\$0	0.0%	14.9%	0	0.0%	5.8%	\$0	0.0%	10.6%
	Total	5	100.0%	\$54	100.0%	100.0%	2	100.0%	100.0%	\$33	100.0%	100.0%	3	100.0%	100.0%	\$21	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	5.5%	\$853	2.8%	19.4%	4	6.0%	3.4%	\$426	2.7%	1.4%	4	5.1%	4.0%	\$427	3.1%	1.7%
	Moderate	41	28.3%	\$5,074	16.9%	18.6%	23	34.3%	11.4%	\$2,958	18.5%	6.9%	18	23.1%	12.8%	\$2,116	15.2%	7.7%
	Middle	30	20.7%	\$4,414	14.7%	21.5%	9	13.4%	17.3%	\$1,215	7.6%	12.3%	21	26.9%	18.0%	\$3,199	22.9%	13.6%
	Upper	65	44.8%	\$19,278	64.4%	40.4%	30	44.8%	46.0%	\$11,059	69.2%	53.6%	35	44.9%	43.6%	\$8,219	58.9%	51.0%
	Unknown	1	0.7%	\$330	1.1%	0.0%	1	1.5%	21.8%	\$330	2.1%	25.7%	0	0.0%	21.6%	\$0	0.0%	26.0%
	Total	145	100.0%	\$29,949	100.0%	100.0%	67	100.0%	100.0%	\$15,988	100.0%	100.0%	78	100.0%	100.0%	\$13,961	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	218	73.6%	\$8,328	55.7%	91.7%	111	74.0%	51.9%	\$4,453	63.2%	44.4%	107	73.3%	48.3%	\$3,875	49.1%	40.2%
	Over \$1 Million	55	18.6%	\$5,771	38.6%	7.4%	28	18.7%					27	18.5%				
	Total Rev. available	273	92.2%	\$14,099	94.3%	99.1%	139	92.7%					134	91.8%				
	Rev. Not Known	23	7.8%	\$840	5.6%	0.9%	11	7.3%					12	8.2%				
	Total	296	100.0%	\$14,939	100.0%	100.0%	150	100.0%					146	100.0%				
Small Business Loan Size	\$100,000 or Less	281	94.9%	\$10,219	68.4%		144	96.0%	89.3%	\$5,367	76.1%	30.8%	137	93.8%	90.7%	\$4,852	61.5%	33.8%
	\$100,001 - \$250,000	7	2.4%	\$1,478	9.9%		3	2.0%	5.2%	\$615	8.7%	18.3%	4	2.7%	4.8%	\$863	10.9%	17.9%
	\$250,001 - \$1 Million	8	2.7%	\$3,242	21.7%		3	2.0%	5.4%	\$1,068	15.1%	50.9%	5	3.4%	4.5%	\$2,174	27.6%	48.2%
	Total	296	100.0%	\$14,939	100.0%		150	100.0%	100.0%	\$7,050	100.0%	100.0%	146	100.0%	100.0%	\$7,889	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	94.0%	0	0.0%	28.4%	\$0	0.0%	59.6%	0	0.0%	19.0%	\$0	0.0%	26.9%
	Over \$1 Million	1	100.0%	\$200	100.0%	6.0%	1	100.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$200	100.0%	100.0%	1	100.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	91.4%	\$0	0.0%	37.4%	0	0.0%	89.7%	\$0	0.0%	31.6%
	\$100,001 - \$250,000	1	100.0%	\$200	100.0%		1	100.0%	6.2%	\$200	100.0%	33.0%	0	0.0%	5.2%	\$0	0.0%	16.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.5%	\$0	0.0%	29.6%	0	0.0%	5.2%	\$0	0.0%	51.5%
	Total	1	100.0%	\$200	100.0%		1	100.0%	100.0%	\$200	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Decatur

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	2	11.1%	\$137	6.3%	13.5%	1	16.7%	14.4%	\$57	8.0%	9.2%	1	8.3%	14.1%	\$80	5.5%	8.5%
	Middle	10	55.6%	\$1,085	50.0%	50.4%	4	66.7%	47.5%	\$418	58.9%	45.6%	6	50.0%	46.7%	\$667	45.7%	44.8%
	Upper	6	33.3%	\$947	43.7%	34.4%	1	16.7%	37.9%	\$235	33.1%	45.2%	5	41.7%	39.0%	\$712	48.8%	46.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$2,169	100.0%	100.0%	6	100.0%	100.0%	\$710	100.0%	100.0%	12	100.0%	100.0%	\$1,459	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.6%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Moderate	1	5.9%	\$45	2.2%	13.5%	1	12.5%	11.6%	\$45	4.2%	7.1%	0	0.0%	10.4%	\$0	0.0%	6.9%
	Middle	6	35.3%	\$685	32.9%	50.4%	0	0.0%	48.1%	\$0	0.0%	46.0%	6	66.7%	48.2%	\$685	68.5%	47.9%
	Upper	10	58.8%	\$1,350	64.9%	34.4%	7	87.5%	39.7%	\$1,035	95.8%	46.7%	3	33.3%	40.9%	\$315	31.5%	45.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$2,080	100.0%	100.0%	8	100.0%	100.0%	\$1,080	100.0%	100.0%	9	100.0%	100.0%	\$1,000	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	1.2%	\$0	0.0%	0.3%	0	0.0%	1.0%	\$0	0.0%	0.5%
	Moderate	1	100.0%	\$6	100.0%	13.5%	1	100.0%	8.9%	\$6	100.0%	4.5%	0	0.0%	12.0%	\$0	0.0%	4.4%
	Middle	0	0.0%	\$0	0.0%	50.4%	0	0.0%	56.5%	\$0	0.0%	44.9%	0	0.0%	54.9%	\$0	0.0%	52.1%
	Upper	0	0.0%	\$0	0.0%	34.4%	0	0.0%	33.4%	\$0	0.0%	50.3%	0	0.0%	32.2%	\$0	0.0%	43.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$6	100.0%	100.0%	1	100.0%	100.0%	\$6	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	61.5%	\$0	0.0%	73.1%	0	0.0%	18.2%	\$0	0.0%	22.1%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	38.5%	\$0	0.0%	26.9%	0	0.0%	72.7%	\$0	0.0%	67.2%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	10.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.5%	\$0	0.0%	0.1%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	4	11.1%	\$188	4.4%	13.5%	3	20.0%	13.0%	\$108	6.0%	9.6%	1	4.8%	12.6%	\$80	3.3%	7.9%
	Middle	16	44.4%	\$1,770	41.6%	50.4%	4	26.7%	48.6%	\$418	23.3%	45.3%	12	57.1%	48.2%	\$1,352	55.0%	46.4%
	Upper	16	44.4%	\$2,297	54.0%	34.4%	8	53.3%	38.0%	\$1,270	70.7%	44.9%	8	38.1%	38.8%	\$1,027	41.8%	45.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	36	100.0%	\$4,255	100.0%	100.0%	15	100.0%	100.0%	\$1,796	100.0%	100.0%	21	100.0%	100.0%	\$2,459	100.0%	100.0%
SMALL BUSINESSES	Small Businesses					Low	3	3.0%	1.4%	\$75	1.6%	1.3%	1	2.3%	1.2%	\$50	1.7%	2.5%
	Moderate	34	34.0%	\$1,862	39.6%	21.4%	15	34.1%	19.4%	\$620	36.4%	22.6%	19	33.9%	20.8%	\$1,242	41.3%	21.7%
	Middle	42	42.0%	\$1,773	37.7%	50.5%	19	43.2%	46.1%	\$671	39.4%	48.8%	23	41.1%	44.5%	\$1,102	36.7%	48.4%
	Upper	21	21.0%	\$995	21.1%	26.8%	9	20.5%	30.9%	\$385	22.6%	25.8%	12	21.4%	30.8%	\$610	20.3%	26.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	0.6%	0	0.0%	2.7%	\$0	0.0%	0.8%
	Total	100	100.0%	\$4,705	100.0%	100.0%	44	100.0%	100.0%	\$1,701	100.0%	100.0%	56	100.0%	100.0%	\$3,004	100.0%	100.0%
SMALL FARM	Small Farms					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$25	100.0%	68.8%	1	100.0%	87.5%	\$25	100.0%	97.3%	0	0.0%	94.6%	\$0	0.0%	98.7%
	Upper	0	0.0%	\$0	0.0%	29.6%	0	0.0%	12.5%	\$0	0.0%	2.7%	0	0.0%	5.4%	\$0	0.0%	1.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Decatur

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	3	16.7%	\$266	12.3%	20.7%	1	16.7%	10.7%	\$134	18.9%	6.1%	2	16.7%	8.2%	\$132	9.0%	4.6%
	Moderate	5	27.8%	\$444	20.5%	17.2%	3	50.0%	21.9%	\$249	35.1%	17.0%	2	16.7%	20.4%	\$195	13.4%	15.0%
	Middle	4	22.2%	\$551	25.4%	20.0%	1	16.7%	20.4%	\$92	13.0%	19.0%	3	25.0%	20.4%	\$459	31.5%	20.0%
	Upper	6	33.3%	\$908	41.9%	42.1%	1	16.7%	27.2%	\$235	33.1%	39.1%	5	41.7%	31.9%	\$673	46.1%	43.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.7%	\$0	0.0%	18.7%	0	0.0%	19.1%	\$0	0.0%	17.2%
	Total	18	100.0%	\$2,169	100.0%	100.0%	6	100.0%	100.0%	\$710	100.0%	100.0%	12	100.0%	100.0%	\$1,459	100.0%	100.0%
REFINANCE	Low	2	11.8%	\$149	7.2%	20.7%	2	25.0%	6.9%	\$149	13.8%	3.4%	0	0.0%	6.1%	\$0	0.0%	2.8%
	Moderate	6	35.3%	\$394	18.9%	17.2%	3	37.5%	13.9%	\$229	21.2%	9.6%	3	33.3%	13.8%	\$165	16.5%	9.1%
	Middle	1	5.9%	\$95	4.6%	20.0%	0	0.0%	17.3%	\$0	0.0%	13.4%	1	11.1%	18.5%	\$95	9.5%	16.7%
	Upper	8	47.1%	\$1,442	69.3%	42.1%	3	37.5%	37.1%	\$702	65.0%	46.5%	5	55.6%	36.1%	\$740	74.0%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.9%	\$0	0.0%	27.1%	0	0.0%	25.5%	\$0	0.0%	27.0%
	Total	17	100.0%	\$2,080	100.0%	100.0%	8	100.0%	100.0%	\$1,080	100.0%	100.0%	9	100.0%	100.0%	\$1,000	100.0%	100.0%
HOME IMPROVEMENT	Low	1	100.0%	\$6	100.0%	20.7%	1	100.0%	11.5%	\$6	100.0%	3.4%	0	0.0%	10.2%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	19.0%	\$0	0.0%	8.4%	0	0.0%	23.7%	\$0	0.0%	13.0%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	26.2%	\$0	0.0%	17.1%	0	0.0%	27.3%	\$0	0.0%	21.7%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	39.8%	\$0	0.0%	60.5%	0	0.0%	34.6%	\$0	0.0%	51.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	10.6%	0	0.0%	4.1%	\$0	0.0%	11.1%
	Total	1	100.0%	\$6	100.0%	100.0%	1	100.0%	100.0%	\$6	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	6	16.7%	\$421	9.9%	20.7%	4	26.7%	9.3%	\$289	16.1%	4.8%	2	9.5%	7.7%	\$132	5.4%	3.9%
	Moderate	11	30.6%	\$838	19.7%	17.2%	6	40.0%	18.5%	\$478	26.6%	13.4%	5	23.8%	18.4%	\$360	14.6%	12.5%
	Middle	5	13.9%	\$646	15.2%	20.0%	1	6.7%	19.8%	\$92	5.1%	16.2%	4	19.0%	20.5%	\$554	22.5%	18.6%
	Upper	14	38.9%	\$2,350	55.2%	42.1%	4	26.7%	32.1%	\$937	52.2%	41.8%	10	47.6%	33.6%	\$1,413	57.5%	43.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.3%	\$0	0.0%	23.7%	0	0.0%	19.8%	\$0	0.0%	21.7%
	Total	36	100.0%	\$4,255	100.0%	100.0%	15	100.0%	100.0%	\$1,796	100.0%	100.0%	21	100.0%	100.0%	\$2,459	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	75	75.0%	\$2,797	59.4%	89.4%	37	84.1%	53.4%	\$1,221	71.8%	55.4%	38	67.9%	49.1%	\$1,576	52.5%	41.7%
	Over \$1 Million	16	16.0%	\$1,719	36.5%	9.7%	5	11.4%					11	19.6%				
	Total Rev. available	91	91.0%	\$4,516	95.9%	99.1%	42	95.5%					49	87.5%				
	Rev. Not Known	9	9.0%	\$189	4.0%	0.9%	2	4.5%					7	12.5%				
Total	100	100.0%	\$4,705	100.0%	100.0%	44	100.0%					56	100.0%					
Small Business Loan Size	\$100,000 or Less	95	95.0%	\$3,631	77.2%		43	97.7%	88.6%	\$1,551	91.2%	29.1%	52	92.9%	87.4%	\$2,080	69.2%	28.0%
	\$100,001 - \$250,000	4	4.0%	\$700	14.9%		1	2.3%	6.4%	\$150	8.8%	20.1%	3	5.4%	7.2%	\$550	18.3%	21.7%
	\$250,001 - \$1 Million	1	1.0%	\$374	7.9%		0	0.0%	5.0%	\$0	0.0%	50.9%	1	1.8%	5.4%	\$374	12.5%	50.3%
	Total	100	100.0%	\$4,705	100.0%		44	100.0%	100.0%	\$1,701	100.0%	100.0%	56	100.0%	100.0%	\$3,004	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.7%	0	0.0%	50.0%	\$0	0.0%	77.8%	0	0.0%	48.6%	\$0	0.0%	86.4%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.3%	0	0.0%					0	0.0%				
	Not Known	1	100.0%	\$25	100.0%	0.0%	1	100.0%					0	0.0%				
	Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$25	100.0%		1	100.0%	84.4%	\$25	100.0%	29.0%	0	0.0%	89.2%	\$0	0.0%	37.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.4%	\$0	0.0%	28.2%	0	0.0%	8.1%	\$0	0.0%	35.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.3%	\$0	0.0%	42.8%	0	0.0%	2.7%	\$0	0.0%	26.9%
	Total	1	100.0%	\$25	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Dothan

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar		Dollar			
		#	%	\$ (000s)	%		%	#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.2%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.0%
	Moderate	7	11.3%	\$816	8.1%	13.3%	2	7.7%	8.6%	\$226	5.9%	4.6%	5	13.9%	7.9%	\$590	9.5%	4.5%
	Middle	25	40.3%	\$4,023	40.1%	50.5%	13	50.0%	47.9%	\$2,078	54.1%	42.0%	12	33.3%	48.1%	\$1,945	31.4%	42.4%
	Upper	30	48.4%	\$5,199	51.8%	35.5%	11	42.3%	43.3%	\$1,540	40.1%	53.3%	19	52.8%	43.9%	\$3,659	59.1%	53.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	62	100.0%	\$10,038	100.0%	100.0%	26	100.0%	100.0%	\$3,844	100.0%	100.0%	36	100.0%	100.0%	\$6,194	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.5%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.4%
	Moderate	4	21.1%	\$678	21.0%	13.3%	2	16.7%	9.7%	\$256	13.1%	7.2%	2	28.6%	7.6%	\$422	33.2%	5.0%
	Middle	3	15.8%	\$236	7.3%	50.5%	3	25.0%	41.8%	\$236	12.1%	35.9%	0	0.0%	46.8%	\$0	0.0%	39.1%
	Upper	12	63.2%	\$2,316	71.7%	35.5%	7	58.3%	48.0%	\$1,465	74.9%	56.6%	5	71.4%	45.3%	\$851	66.8%	55.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	19	100.0%	\$3,230	100.0%	100.0%	12	100.0%	100.0%	\$1,957	100.0%	100.0%	7	100.0%	100.0%	\$1,273	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	10.1%	\$0	0.0%	6.9%	0	0.0%	16.6%	\$0	0.0%	10.2%
	Middle	1	100.0%	\$24	100.0%	50.5%	1	100.0%	49.7%	\$24	100.0%	40.8%	0	0.0%	45.6%	\$0	0.0%	40.2%
	Upper	0	0.0%	\$0	0.0%	35.5%	0	0.0%	40.3%	\$0	0.0%	52.2%	0	0.0%	37.9%	\$0	0.0%	49.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$24	100.0%	100.0%	1	100.0%	100.0%	\$24	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	66.7%	\$0	0.0%	66.7%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	33.3%	\$0	0.0%	33.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Moderate	11	13.4%	\$1,494	11.2%	13.3%	4	10.3%	9.1%	\$482	8.3%	5.7%	7	16.3%	8.2%	\$1,012	13.6%	4.6%
	Middle	29	35.4%	\$4,283	32.2%	50.5%	17	43.6%	45.6%	\$2,338	40.1%	39.4%	12	27.9%	47.5%	\$1,945	26.0%	42.0%
	Upper	42	51.2%	\$7,515	56.5%	35.5%	18	46.2%	45.0%	\$3,005	51.6%	54.7%	24	55.8%	44.1%	\$4,510	60.4%	53.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	82	100.0%	\$13,292	100.0%	100.0%	39	100.0%	100.0%	\$5,825	100.0%	100.0%	43	100.0%	100.0%	\$7,467	100.0%	100.0%
SMALL BUSINESSES	Small Businesses					Low	16	13.9%	7.3%	\$745	12.7%	7.3%	8	13.8%	6.5%	\$330	10.7%	7.7%
	Moderate	17	14.8%	\$567	9.7%	16.3%	10	17.2%	16.8%	\$271	8.8%	16.5%	7	12.3%	16.8%	\$296	10.7%	19.0%
	Middle	38	33.0%	\$1,415	24.2%	39.5%	19	32.8%	38.3%	\$800	25.9%	28.5%	19	33.3%	35.9%	\$615	22.3%	30.6%
	Upper	44	38.3%	\$3,122	53.4%	36.9%	21	36.2%	36.6%	\$1,685	54.6%	46.6%	23	40.4%	38.4%	\$1,437	52.0%	39.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.7%	0	0.0%	1.3%	\$0	0.0%	0.3%
	Total	115	100.0%	\$5,849	100.0%	100.0%	58	100.0%	100.0%	\$3,086	100.0%	100.0%	57	100.0%	100.0%	\$2,763	100.0%	100.0%
SMALL FARM	Small Farms					Low	0	0.0%	0.7%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	4.6%	0	0.0%	3.1%	\$0	0.0%	2.3%	0	0.0%	5.1%	\$0	0.0%	2.4%
	Middle	0	0.0%	\$0	0.0%	64.5%	0	0.0%	71.1%	\$0	0.0%	76.9%	0	0.0%	68.4%	\$0	0.0%	81.0%
	Upper	0	0.0%	\$0	0.0%	30.3%	0	0.0%	25.8%	\$0	0.0%	20.8%	0	0.0%	26.5%	\$0	0.0%	16.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Dothan

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
					#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	5	8.1%	\$490	4.9%	21.0%	3	11.5%	5.9%	\$274	7.1%	2.6%	2	5.6%	6.0%	\$216	3.5%	2.8%
	Moderate	23	37.1%	\$2,667	26.6%	16.1%	10	38.5%	17.8%	\$1,156	30.1%	12.1%	13	36.1%	18.0%	\$1,511	24.4%	12.6%
	Middle	5	8.1%	\$628	6.3%	18.3%	2	7.7%	18.3%	\$208	5.4%	16.0%	3	8.3%	20.4%	\$420	6.8%	18.6%
	Upper	29	46.8%	\$6,253	62.3%	44.6%	11	42.3%	37.8%	\$2,206	57.4%	50.3%	18	50.0%	36.9%	\$4,047	65.3%	47.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.2%	\$0	0.0%	19.0%	0	0.0%	18.8%	\$0	0.0%	18.1%
	Total	62	100.0%	\$10,038	100.0%	100.0%	26	100.0%	100.0%	\$3,844	100.0%	100.0%	36	100.0%	100.0%	\$6,194	100.0%	100.0%
REFINANCE	Low	3	15.8%	\$248	7.7%	21.0%	2	16.7%	5.1%	\$187	9.6%	2.5%	1	14.3%	5.1%	\$61	4.8%	2.4%
	Moderate	4	21.1%	\$397	12.3%	16.1%	3	25.0%	9.8%	\$264	13.5%	6.4%	1	14.3%	9.8%	\$133	10.4%	5.7%
	Middle	2	10.5%	\$210	6.5%	18.3%	2	16.7%	15.5%	\$210	10.7%	11.5%	0	0.0%	14.4%	\$0	0.0%	11.2%
	Upper	10	52.6%	\$2,375	73.5%	44.6%	5	41.7%	38.6%	\$1,296	66.2%	45.3%	5	71.4%	39.3%	\$1,079	84.8%	47.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	31.0%	\$0	0.0%	34.3%	0	0.0%	31.4%	\$0	0.0%	33.7%
	Total	19	100.0%	\$3,230	100.0%	100.0%	12	100.0%	100.0%	\$1,957	100.0%	100.0%	7	100.0%	100.0%	\$1,273	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	8.1%	\$0	0.0%	3.2%	0	0.0%	10.1%	\$0	0.0%	3.9%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	11.4%	\$0	0.0%	6.7%	0	0.0%	17.8%	\$0	0.0%	9.1%
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	20.1%	\$0	0.0%	15.4%	0	0.0%	17.8%	\$0	0.0%	18.7%
	Upper	1	100.0%	\$24	100.0%	44.6%	1	100.0%	53.7%	\$24	100.0%	64.9%	0	0.0%	49.7%	\$0	0.0%	60.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.7%	\$0	0.0%	9.9%	0	0.0%	4.7%	\$0	0.0%	8.2%
	Total	1	100.0%	\$24	100.0%	100.0%	1	100.0%	100.0%	\$24	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	44.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	9.8%	\$738	5.6%	21.0%	5	12.8%	5.7%	\$461	7.9%	2.6%	3	7.0%	5.8%	\$277	3.7%	2.6%
	Moderate	27	32.9%	\$3,064	23.1%	16.1%	13	33.3%	14.3%	\$1,420	24.4%	9.6%	14	32.6%	14.7%	\$1,644	22.0%	9.3%
	Middle	7	8.5%	\$838	6.3%	18.3%	4	10.3%	17.3%	\$418	7.2%	14.1%	3	7.0%	17.9%	\$420	5.6%	15.0%
	Upper	40	48.8%	\$8,652	65.1%	44.6%	17	43.6%	39.0%	\$3,526	60.5%	48.5%	23	53.5%	38.5%	\$5,126	68.6%	45.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.7%	\$0	0.0%	25.2%	0	0.0%	23.1%	\$0	0.0%	27.2%
	Total	82	100.0%	\$13,292	100.0%	100.0%	39	100.0%	100.0%	\$5,825	100.0%	100.0%	43	100.0%	100.0%	\$7,467	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	77	67.0%	\$2,917	49.9%	88.0%	36	62.1%	53.8%	\$1,472	47.7%	47.9%	41	71.9%	52.5%	\$1,445	52.3%	44.5%
	Over \$1 Million	27	23.5%	\$2,625	44.9%	10.9%	13	22.4%					14	24.6%				
	Total Rev. available	104	90.5%	\$5,542	94.8%	98.9%	49	84.5%					55	96.5%				
	Rev. Not Known	11	9.6%	\$307	5.2%	1.0%	9	15.5%					2	3.5%				
	Total	115	100.0%	\$5,849	100.0%	100.0%	58	100.0%					57	100.0%				
Small Business Loan Size	\$100,000 or Less	104	90.4%	\$3,523	60.2%		53	91.4%	89.2%	\$1,853	60.0%	30.2%	51	89.5%	90.3%	\$1,670	60.4%	30.7%
	\$100,001 - \$250,000	9	7.8%	\$1,545	26.4%		4	6.9%	6.0%	\$792	25.7%	20.7%	5	8.8%	5.1%	\$753	27.3%	18.1%
	\$250,001 - \$1 Million	2	1.7%	\$781	13.4%		1	1.7%	4.8%	\$441	14.3%	49.1%	1	1.8%	4.6%	\$340	12.3%	51.2%
	Total	115	100.0%	\$5,849	100.0%		58	100.0%	100.0%	\$3,086	100.0%	100.0%	57	100.0%	100.0%	\$2,763	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	99.3%	0	0.0%	58.8%	\$0	0.0%	77.9%	0	0.0%	69.2%	\$0	0.0%	85.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	70.1%	\$0	0.0%	21.8%	0	0.0%	72.6%	\$0	0.0%	25.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	15.5%	\$0	0.0%	25.1%	0	0.0%	16.2%	\$0	0.0%	29.6%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	14.4%	\$0	0.0%	53.1%	0	0.0%	11.1%	\$0	0.0%	44.9%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Eufaula

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Bank	Agg	Bank		Agg	Bank	Agg	Bank		Agg
		Count	Dollar		Bank	Agg	Bank	Agg			Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	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%
	Moderate	3	4.1%	\$261	2.6%	11.9%	2	4.8%	9.2%	\$169	3.0%	6.8%	1	3.1%	4.2%	\$92	2.2%	2.5%
	Middle	65	87.8%	\$8,762	88.6%	82.5%	36	85.7%	80.1%	\$4,942	87.5%	83.0%	29	90.6%	87.5%	\$3,820	90.0%	87.1%
	Upper	6	8.1%	\$867	8.8%	5.6%	4	9.5%	9.9%	\$534	9.5%	9.4%	2	6.3%	6.3%	\$333	7.8%	8.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.7%	\$0	0.0%	0.7%	0	0.0%	2.1%	\$0	0.0%	1.8%
	Total	74	100.0%	\$9,890	100.0%	100.0%	42	100.0%	100.0%	\$5,645	100.0%	100.0%	32	100.0%	100.0%	\$4,245	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	1	3.4%	\$75	2.0%	11.9%	0	0.0%	4.1%	\$0	0.0%	4.4%	1	8.3%	7.9%	\$75	5.3%	5.7%
	Middle	22	75.9%	\$2,772	74.8%	82.5%	12	70.6%	82.4%	\$1,526	66.4%	78.0%	10	83.3%	79.3%	\$1,246	88.4%	82.9%
	Upper	6	20.7%	\$860	23.2%	5.6%	5	29.4%	13.5%	\$771	33.6%	17.5%	1	8.3%	11.4%	\$89	6.3%	10.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.8%
	Total	29	100.0%	\$3,707	100.0%	100.0%	17	100.0%	100.0%	\$2,297	100.0%	100.0%	12	100.0%	100.0%	\$1,410	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	17.4%	\$0	0.0%	12.6%	0	0.0%	12.5%	\$0	0.0%	7.9%
	Middle	1	50.0%	\$5	26.3%	82.5%	1	100.0%	78.3%	\$5	100.0%	80.4%	0	0.0%	68.8%	\$0	0.0%	78.0%
	Upper	1	50.0%	\$14	73.7%	5.6%	0	0.0%	4.3%	\$0	0.0%	7.0%	1	100.0%	18.8%	\$14	100.0%	14.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$19	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%	1	100.0%	100.0%	\$14	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
HMDA TOTALS	Low	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%
	Moderate	4	3.8%	\$336	2.5%	11.9%	2	3.3%	7.4%	\$169	2.1%	5.7%	2	4.4%	6.3%	\$167	2.9%	4.2%
	Middle	88	83.8%	\$11,539	84.7%	82.5%	49	81.7%	81.1%	\$6,473	81.5%	80.5%	39	86.7%	82.7%	\$5,066	89.4%	84.9%
	Upper	13	12.4%	\$1,741	12.8%	5.6%	9	15.0%	11.2%	\$1,305	16.4%	13.3%	4	8.9%	9.3%	\$436	7.7%	9.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.4%	0	0.0%	1.7%	\$0	0.0%	1.3%
	Total	105	100.0%	\$13,616	100.0%	100.0%	60	100.0%	100.0%	\$7,947	100.0%	100.0%	45	100.0%	100.0%	\$5,669	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	1	2.7%	\$15	1.0%	9.1%	0	0.0%	10.8%	\$0	0.0%	11.0%	1	4.5%	9.5%	\$15	1.7%	11.1%
	Middle	36	97.3%	\$1,530	99.0%	81.7%	15	100.0%	79.2%	\$663	100.0%	84.7%	21	95.5%	80.6%	\$867	98.3%	79.8%
	Upper	0	0.0%	\$0	0.0%	9.1%	0	0.0%	7.8%	\$0	0.0%	3.6%	0	0.0%	7.1%	\$0	0.0%	8.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.2%	\$0	0.0%	0.7%	0	0.0%	2.7%	\$0	0.0%	0.4%
Total	37	100.0%	\$1,545	100.0%	100.0%	15	100.0%	100.0%	\$663	100.0%	100.0%	22	100.0%	100.0%	\$882	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	30.8%	\$0	0.0%	37.4%	0	0.0%	30.0%	\$0	0.0%	60.3%
	Middle	0	0.0%	\$0	0.0%	80.7%	0	0.0%	64.1%	\$0	0.0%	52.1%	0	0.0%	70.0%	\$0	0.0%	39.7%
	Upper	0	0.0%	\$0	0.0%	1.8%	0	0.0%	5.1%	\$0	0.0%	10.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	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%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Eufaula

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar					
		Count	Dollar	%	%		Bank	Agg		Bank	Agg		Bank	Agg	Bank	Agg		
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	6	8.1%	\$468	4.7%	26.8%	3	7.1%	8.5%	\$217	3.8%	3.6%	3	9.4%	6.3%	\$251	5.9%	3.2%
	Moderate	19	25.7%	\$1,859	18.8%	14.4%	12	28.6%	22.0%	\$1,193	21.1%	14.2%	7	21.9%	17.4%	\$666	15.7%	10.2%
	Middle	20	27.0%	\$2,797	28.3%	21.2%	10	23.8%	19.1%	\$1,325	23.5%	14.7%	10	31.3%	27.1%	\$1,472	34.7%	25.3%
	Upper	29	39.2%	\$4,766	48.2%	37.6%	17	40.5%	40.4%	\$2,910	51.6%	56.2%	12	37.5%	37.5%	\$1,856	43.7%	48.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.9%	\$0	0.0%	11.3%	0	0.0%	11.8%	\$0	0.0%	12.8%
	Total	74	100.0%	\$9,890	100.0%	100.0%	42	100.0%	100.0%	\$5,645	100.0%	100.0%	32	100.0%	100.0%	\$4,245	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	26.8%	0	0.0%	5.4%	\$0	0.0%	2.4%	0	0.0%	10.0%	\$0	0.0%	5.3%
	Moderate	3	10.3%	\$303	8.2%	14.4%	2	11.8%	9.5%	\$144	6.3%	4.6%	1	8.3%	4.3%	\$159	11.3%	3.8%
	Middle	5	17.2%	\$608	16.4%	21.2%	3	17.6%	13.5%	\$467	20.3%	12.5%	2	16.7%	15.7%	\$141	10.0%	11.4%
	Upper	21	72.4%	\$2,796	75.4%	37.6%	12	70.6%	47.3%	\$1,686	73.4%	52.4%	9	75.0%	50.0%	\$1,110	78.7%	60.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.3%	\$0	0.0%	28.1%	0	0.0%	20.0%	\$0	0.0%	18.5%
	Total	29	100.0%	\$3,707	100.0%	100.0%	17	100.0%	100.0%	\$2,297	100.0%	100.0%	12	100.0%	100.0%	\$1,410	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	26.8%	0	0.0%	4.3%	\$0	0.0%	0.4%	0	0.0%	25.0%	\$0	0.0%	17.3%
	Moderate	2	100.0%	\$19	100.0%	14.4%	1	100.0%	21.7%	\$5	100.0%	6.2%	1	100.0%	6.3%	\$14	100.0%	2.8%
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	30.4%	\$0	0.0%	23.4%	0	0.0%	12.5%	\$0	0.0%	6.7%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	30.4%	\$0	0.0%	62.3%	0	0.0%	43.8%	\$0	0.0%	62.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.0%	\$0	0.0%	7.6%	0	0.0%	12.5%	\$0	0.0%	10.9%
	Total	2	100.0%	\$19	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%	1	100.0%	100.0%	\$14	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	26.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	37.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	6	5.7%	\$468	3.4%	26.8%	3	5.0%	6.7%	\$217	2.7%	3.0%	3	6.7%	9.0%	\$251	4.4%	4.5%
	Moderate	24	22.9%	\$2,181	16.0%	14.4%	15	25.0%	16.0%	\$1,342	16.9%	9.4%	9	20.0%	10.7%	\$839	14.8%	6.9%
	Middle	25	23.8%	\$3,405	25.0%	21.2%	13	21.7%	17.3%	\$1,792	22.5%	13.7%	12	26.7%	21.0%	\$1,613	28.5%	18.1%
	Upper	50	47.6%	\$7,562	55.5%	37.6%	29	48.3%	42.9%	\$4,596	57.8%	54.4%	21	46.7%	43.7%	\$2,966	52.3%	54.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.0%	\$0	0.0%	19.4%	0	0.0%	15.7%	\$0	0.0%	15.6%
	Total	105	100.0%	\$13,616	100.0%	100.0%	60	100.0%	100.0%	\$7,947	100.0%	100.0%	45	100.0%	100.0%	\$5,669	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	24	64.9%	\$923	59.7%	89.0%	9	60.0%	48.3%	\$380	57.3%	47.4%	15	68.2%	51.4%	\$543	61.6%	48.8%
	Over \$1 Million	9	24.3%	\$505	32.7%	8.0%	5	33.3%					4	18.2%				
	Total Rev. available	33	89.2%	\$1,428	92.4%	97.0%	14	93.3%					19	86.4%				
	Rev. Not Known	4	10.8%	\$117	7.6%	3.0%	1	6.7%					3	13.6%				
Total	37	100.0%	\$1,545	100.0%	100.0%	15	100.0%					22	100.0%					
Small Business Loan Size	\$100,000 or Less	36	97.3%	\$1,420	91.9%		15	100.0%	88.1%	\$663	100.0%	38.2%	21	95.5%	86.1%	\$757	85.8%	26.6%
	\$100,001 - \$250,000	1	2.7%	\$125	8.1%		0	0.0%	7.8%	\$0	0.0%	27.0%	1	4.5%	7.8%	\$125	14.2%	21.4%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	4.1%	\$0	0.0%	34.8%	0	0.0%	6.1%	\$0	0.0%	51.9%
	Total	37	100.0%	\$1,545	100.0%		15	100.0%	100.0%	\$663	100.0%	100.0%	22	100.0%	100.0%	\$882	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	96.6%	0	0.0%	53.8%	\$0	0.0%	64.7%	0	0.0%	70.0%	\$0	0.0%	95.8%
Over \$1 Million		0	0.0%	\$0	0.0%	3.4%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	74.4%	\$0	0.0%	16.2%	0	0.0%	73.3%	\$0	0.0%	13.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	20.5%	\$0	0.0%	58.7%	0	0.0%	20.0%	\$0	0.0%	51.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.1%	\$0	0.0%	25.0%	0	0.0%	6.7%	\$0	0.0%	35.7%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Florence

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	4	7.7%	\$351	5.3%	3.1%	3	9.1%	0.8%	\$302	7.5%	0.4%	1	5.3%	1.1%	\$49	1.9%	0.5%
	Moderate	9	17.3%	\$1,016	15.4%	8.8%	4	12.1%	8.5%	\$601	14.9%	5.5%	5	26.3%	9.1%	\$415	16.2%	5.8%
	Middle	28	53.8%	\$3,210	48.7%	68.9%	19	57.6%	66.9%	\$2,111	52.3%	64.5%	9	47.4%	67.8%	\$1,099	43.0%	65.7%
	Upper	11	21.2%	\$2,021	30.6%	19.2%	7	21.2%	23.8%	\$1,026	25.4%	29.6%	4	21.1%	22.0%	\$995	38.9%	27.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	52	100.0%	\$6,598	100.0%	100.0%	33	100.0%	100.0%	\$4,040	100.0%	100.0%	19	100.0%	100.0%	\$2,558	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.1%	0	0.0%	2.3%	\$0	0.0%	0.9%	0	0.0%	2.0%	\$0	0.0%	0.9%
	Moderate	2	7.7%	\$243	7.2%	8.8%	1	5.6%	9.5%	\$40	1.8%	6.4%	1	12.5%	8.1%	\$203	16.9%	4.7%
	Middle	16	61.5%	\$1,833	54.2%	68.9%	10	55.6%	65.4%	\$1,023	46.9%	65.9%	6	75.0%	69.2%	\$810	67.4%	70.7%
	Upper	8	30.8%	\$1,308	38.7%	19.2%	7	38.9%	22.8%	\$1,120	51.3%	26.8%	1	12.5%	20.7%	\$188	15.7%	23.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$3,384	100.0%	100.0%	18	100.0%	100.0%	\$2,183	100.0%	100.0%	8	100.0%	100.0%	\$1,201	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.1%	0	0.0%	2.1%	\$0	0.0%	0.6%	0	0.0%	1.5%	\$0	0.0%	1.0%
	Moderate	1	33.3%	\$75	85.2%	8.8%	1	33.3%	7.8%	\$75	85.2%	4.5%	0	0.0%	8.4%	\$0	0.0%	7.6%
	Middle	1	33.3%	\$3	3.4%	68.9%	1	33.3%	70.3%	\$3	3.4%	68.5%	0	0.0%	70.6%	\$0	0.0%	66.2%
	Upper	1	33.3%	\$10	11.4%	19.2%	1	33.3%	19.8%	\$10	11.4%	26.5%	0	0.0%	19.5%	\$0	0.0%	25.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$88	100.0%	100.0%	3	100.0%	100.0%	\$88	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	30.8%	\$0	0.0%	9.5%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	80.0%	\$0	0.0%	94.6%	0	0.0%	53.8%	\$0	0.0%	23.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	20.0%	\$0	0.0%	5.4%	0	0.0%	15.4%	\$0	0.0%	67.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	4.9%	\$351	3.5%	3.1%	3	5.6%	1.5%	\$302	4.8%	0.6%	1	3.7%	1.5%	\$49	1.3%	0.7%
	Moderate	12	14.8%	\$1,334	13.2%	8.8%	6	11.1%	8.9%	\$716	11.3%	5.7%	6	22.2%	8.7%	\$618	16.4%	5.4%
	Middle	45	55.6%	\$5,046	50.1%	68.9%	30	55.6%	66.5%	\$3,137	49.7%	66.1%	15	55.6%	68.6%	\$1,909	50.8%	67.1%
	Upper	20	24.7%	\$3,339	33.2%	19.2%	15	27.8%	23.1%	\$2,156	34.2%	27.6%	5	18.5%	21.2%	\$1,183	31.5%	26.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	81	100.0%	\$10,070	100.0%	100.0%	54	100.0%	100.0%	\$6,311	100.0%	100.0%	27	100.0%	100.0%	\$3,759	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	26	19.0%	\$1,420	18.6%	11.9%	12	19.0%	10.3%	\$585	15.7%	11.9%	14	18.9%	10.9%	\$835	21.4%	14.5%
	Moderate	23	16.8%	\$1,012	13.3%	10.8%	9	14.3%	8.9%	\$430	11.5%	7.5%	14	18.9%	9.6%	\$582	14.9%	5.6%
	Middle	57	41.6%	\$2,997	39.3%	53.3%	26	41.3%	51.2%	\$1,303	35.0%	44.7%	31	41.9%	50.0%	\$1,694	43.5%	37.1%
	Upper	31	22.6%	\$2,192	28.8%	24.0%	16	25.4%	28.2%	\$1,407	37.8%	35.0%	15	20.3%	28.4%	\$785	20.1%	42.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.9%	0	0.0%	1.3%	\$0	0.0%	0.7%
Total	137	100.0%	\$7,621	100.0%	100.0%	63	100.0%	100.0%	\$3,725	100.0%	100.0%	74	100.0%	100.0%	\$3,896	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	1.2%	\$0	0.0%	0.3%	0	0.0%	1.3%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.6%	\$0	0.0%	0.6%
	Middle	0	0.0%	\$0	0.0%	89.9%	0	0.0%	91.5%	\$0	0.0%	89.3%	0	0.0%	88.5%	\$0	0.0%	97.8%
	Upper	0	0.0%	\$0	0.0%	9.6%	0	0.0%	7.3%	\$0	0.0%	10.3%	0	0.0%	7.7%	\$0	0.0%	1.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	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%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Florence

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	9	17.3%	\$533	8.1%	21.7%	5	15.2%	9.9%	\$270	6.7%	5.1%	4	21.1%	7.2%	\$263	10.3%	3.7%
	Moderate	20	38.5%	\$1,783	27.0%	17.9%	12	36.4%	20.2%	\$1,102	27.3%	14.7%	8	42.1%	19.0%	\$681	26.6%	13.4%
	Middle	14	26.9%	\$1,750	26.5%	18.4%	11	33.3%	21.6%	\$1,439	35.6%	20.4%	3	15.8%	22.0%	\$311	12.2%	19.8%
	Upper	9	17.3%	\$2,532	38.4%	42.0%	5	15.2%	29.4%	\$1,229	30.4%	42.2%	4	21.1%	32.4%	\$1,303	50.9%	44.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	17.7%	0	0.0%	19.4%	\$0	0.0%	18.5%
	Total	52	100.0%	\$6,598	100.0%	100.0%	33	100.0%	100.0%	\$4,040	100.0%	100.0%	19	100.0%	100.0%	\$2,558	100.0%	100.0%
REFINANCE	Low	4	15.4%	\$295	8.7%	21.7%	2	11.1%	8.4%	\$109	5.0%	4.0%	2	25.0%	7.4%	\$186	15.5%	3.1%
	Moderate	5	19.2%	\$564	16.7%	17.9%	5	27.8%	13.6%	\$564	25.8%	8.5%	0	0.0%	12.9%	\$0	0.0%	8.0%
	Middle	7	26.9%	\$920	27.2%	18.4%	6	33.3%	23.4%	\$848	38.8%	15.9%	1	12.5%	18.4%	\$72	6.0%	14.5%
	Upper	10	38.5%	\$1,605	47.4%	42.0%	5	27.8%	37.9%	\$662	30.3%	53.7%	5	62.5%	42.3%	\$943	78.5%	54.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	17.9%	0	0.0%	19.1%	\$0	0.0%	20.2%
	Total	26	100.0%	\$3,384	100.0%	100.0%	18	100.0%	100.0%	\$2,183	100.0%	100.0%	8	100.0%	100.0%	\$1,201	100.0%	100.0%
HOME IMPROVEMENT	Low	1	33.3%	\$3	3.4%	21.7%	1	33.3%	16.6%	\$3	3.4%	5.3%	0	0.0%	10.1%	\$0	0.0%	4.6%
	Moderate	1	33.3%	\$10	11.4%	17.9%	1	33.3%	19.1%	\$10	11.4%	11.8%	0	0.0%	12.3%	\$0	0.0%	6.5%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	14.5%	\$0	0.0%	13.6%	0	0.0%	13.8%	\$0	0.0%	16.6%
	Upper	1	33.3%	\$75	85.2%	42.0%	1	33.3%	37.1%	\$75	85.2%	53.5%	0	0.0%	30.6%	\$0	0.0%	55.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.7%	\$0	0.0%	15.8%	0	0.0%	33.1%	\$0	0.0%	16.8%
	Total	3	100.0%	\$88	100.0%	100.0%	3	100.0%	100.0%	\$88	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	14	17.3%	\$831	8.3%	21.7%	8	14.8%	9.6%	\$382	6.1%	4.4%	6	22.2%	7.5%	\$449	11.9%	3.4%
	Moderate	26	32.1%	\$2,357	23.4%	17.9%	18	33.3%	17.2%	\$1,676	26.6%	11.5%	8	29.6%	15.8%	\$681	18.1%	10.6%
	Middle	21	25.9%	\$2,670	26.5%	18.4%	17	31.5%	21.9%	\$2,287	36.2%	17.7%	4	14.8%	19.7%	\$383	10.2%	17.0%
	Upper	20	24.7%	\$4,212	41.8%	42.0%	11	20.4%	33.6%	\$1,966	31.2%	46.2%	9	33.3%	36.3%	\$2,246	59.7%	48.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.7%	\$0	0.0%	20.3%	0	0.0%	20.7%	\$0	0.0%	20.8%
	Total	81	100.0%	\$10,070	100.0%	100.0%	54	100.0%	100.0%	\$6,311	100.0%	100.0%	27	100.0%	100.0%	\$3,759	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	93	67.9%	\$3,645	47.8%	89.5%	44	69.8%	52.0%	\$1,721	46.2%	48.3%	49	66.2%	47.4%	\$1,924	49.4%	38.5%
	Over \$1 Million	36	26.3%	\$3,549	46.6%	9.3%	16	25.4%					20	27.0%				
	Total Rev. available	129	94.2%	\$7,194	94.4%	98.8%	60	95.2%					69	93.2%				
	Rev. Not Known	8	5.8%	\$427	5.6%	1.2%	3	4.8%					5	6.8%				
Total	137	100.0%	\$7,621	100.0%	100.0%	63	100.0%					74	100.0%					
Small Business Loan Size	\$100,000 or Less	131	95.6%	\$5,737	75.3%		60	95.2%	88.6%	\$2,641	70.9%	30.5%	71	95.9%	89.1%	\$3,096	79.5%	29.7%
	\$100,001 - \$250,000	3	2.2%	\$640	8.4%		1	1.6%	6.4%	\$240	6.4%	21.3%	2	2.7%	6.0%	\$400	10.3%	19.1%
	\$250,001 - \$1 Million	3	2.2%	\$1,244	16.3%		2	3.2%	4.9%	\$844	22.7%	48.2%	1	1.4%	5.0%	\$400	10.3%	51.2%
	Total	137	100.0%	\$7,621	100.0%		63	100.0%	100.0%	\$3,725	100.0%	100.0%	74	100.0%	100.0%	\$3,896	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	97.3%	0	0.0%	56.1%	\$0	0.0%	78.9%	0	0.0%	71.8%	\$0	0.0%	82.6%
Over \$1 Million		0	0.0%	\$0	0.0%	2.7%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	82.9%	\$0	0.0%	29.3%	0	0.0%	83.3%	\$0	0.0%	34.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.8%	\$0	0.0%	28.2%	0	0.0%	9.0%	\$0	0.0%	21.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.3%	\$0	0.0%	42.5%	0	0.0%	7.7%	\$0	0.0%	43.5%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Gadsden

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	1	2.7%	\$141	3.4%	1.4%	0	0.0%	0.3%	\$0	0.0%	0.3%	1	6.7%	0.1%	\$141	7.8%	0.1%
	Moderate	9	24.3%	\$690	16.8%	21.1%	5	22.7%	15.7%	\$394	17.0%	11.0%	4	26.7%	14.1%	\$296	16.5%	9.7%
	Middle	12	32.4%	\$1,145	27.8%	40.9%	8	36.4%	30.0%	\$641	27.7%	24.7%	4	26.7%	32.6%	\$504	28.0%	24.8%
	Upper	15	40.5%	\$2,138	52.0%	36.6%	9	40.9%	54.0%	\$1,281	55.3%	64.0%	6	40.0%	53.1%	\$857	47.7%	65.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	37	100.0%	\$4,114	100.0%	100.0%	22	100.0%	100.0%	\$2,316	100.0%	100.0%	15	100.0%	100.0%	\$1,798	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.4%	0	0.0%	1.0%	\$0	0.0%	0.6%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Moderate	3	21.4%	\$309	17.1%	21.1%	2	22.2%	11.7%	\$208	20.2%	7.2%	1	20.0%	11.0%	\$101	13.0%	6.9%
	Middle	2	14.3%	\$168	9.3%	40.9%	1	11.1%	32.1%	\$85	8.3%	27.9%	1	20.0%	35.3%	\$83	10.7%	30.9%
	Upper	9	64.3%	\$1,328	73.6%	36.6%	6	66.7%	55.2%	\$735	71.5%	64.2%	3	60.0%	53.2%	\$593	76.3%	62.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$1,805	100.0%	100.0%	9	100.0%	100.0%	\$1,028	100.0%	100.0%	5	100.0%	100.0%	\$777	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	21.1%	0	0.0%	11.7%	\$0	0.0%	5.1%	0	0.0%	15.1%	\$0	0.0%	8.5%
	Middle	3	100.0%	\$26	100.0%	40.9%	1	100.0%	33.8%	\$8	100.0%	28.5%	2	100.0%	32.8%	\$18	100.0%	29.9%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	54.5%	\$0	0.0%	66.4%	0	0.0%	50.5%	\$0	0.0%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$26	100.0%	100.0%	1	100.0%	100.0%	\$8	100.0%	100.0%	2	100.0%	100.0%	\$18	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	62.5%	\$0	0.0%	90.6%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	25.0%	\$0	0.0%	5.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	12.5%	\$0	0.0%	4.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	1.9%	\$141	2.4%	1.4%	0	0.0%	0.5%	\$0	0.0%	0.4%	1	4.5%	0.4%	\$141	5.4%	0.2%
	Moderate	12	22.2%	\$999	16.8%	21.1%	7	21.9%	14.0%	\$602	18.0%	12.3%	5	22.7%	13.2%	\$397	15.3%	10.4%
	Middle	17	31.5%	\$1,339	22.5%	40.9%	10	31.3%	31.1%	\$734	21.9%	25.4%	7	31.8%	33.6%	\$605	23.3%	26.9%
	Upper	24	44.4%	\$3,466	58.3%	36.6%	15	46.9%	54.4%	\$2,016	60.1%	61.9%	9	40.9%	52.8%	\$1,450	55.9%	62.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	54	100.0%	\$5,945	100.0%	100.0%	32	100.0%	100.0%	\$3,352	100.0%	100.0%	22	100.0%	100.0%	\$2,593	100.0%	100.0%
SMALL BUSINESSES	Small Businesses					Low	0	0.0%	0.4%	\$0	0.0%	0.1%	0	0.0%	0.5%	\$0	0.0%	0.1%
	Moderate	49	41.5%	\$1,156	37.2%	27.5%	22	39.3%	26.9%	\$550	35.1%	35.4%	27	43.5%	27.5%	\$606	39.5%	26.4%
	Middle	46	39.0%	\$1,147	37.0%	39.0%	24	42.9%	33.8%	\$624	39.8%	27.8%	22	35.5%	33.9%	\$523	34.1%	37.8%
	Upper	23	19.5%	\$801	25.8%	32.4%	10	17.9%	37.4%	\$395	25.2%	35.7%	13	21.0%	37.1%	\$406	26.4%	35.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	1.0%	0	0.0%	1.0%	\$0	0.0%	0.6%
	Total	118	100.0%	\$3,104	100.0%	100.0%	56	100.0%	100.0%	\$1,569	100.0%	100.0%	62	100.0%	100.0%	\$1,535	100.0%	100.0%
SMALL FARM	Small Farms					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.8%	0	0.0%	10.5%	\$0	0.0%	2.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	69.6%	0	0.0%	63.2%	\$0	0.0%	86.2%	0	0.0%	73.9%	\$0	0.0%	90.9%
	Upper	0	0.0%	\$0	0.0%	26.6%	0	0.0%	26.3%	\$0	0.0%	11.2%	0	0.0%	21.7%	\$0	0.0%	8.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.3%	\$0	0.0%	1.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Gadsden

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income			Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	11	29.7%	\$745	18.1%	19.9%	6	27.3%	5.2%	\$398	17.2%	2.2%	5	33.3%	6.6%	\$347	19.3%	3.0%
	Moderate	10	27.0%	\$855	20.8%	18.3%	6	27.3%	18.5%	\$522	22.5%	11.5%	4	26.7%	18.2%	\$333	18.5%	12.4%
	Middle	7	18.9%	\$860	20.9%	19.7%	5	22.7%	21.3%	\$538	23.2%	18.9%	2	13.3%	19.9%	\$322	17.9%	17.6%
	Upper	9	24.3%	\$1,654	40.2%	42.1%	5	22.7%	35.5%	\$858	37.0%	47.9%	4	26.7%	32.4%	\$796	44.3%	44.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.5%	\$0	0.0%	19.5%	0	0.0%	22.8%	\$0	0.0%	22.6%
	Total	37	100.0%	\$4,114	100.0%	100.0%	22	100.0%	100.0%	\$2,316	100.0%	100.0%	15	100.0%	100.0%	\$1,798	100.0%	100.0%
REFINANCE	Low	1	7.1%	\$85	4.7%	19.9%	1	11.1%	5.4%	\$85	8.3%	3.0%	0	0.0%	5.6%	\$0	0.0%	2.4%
	Moderate	2	14.3%	\$170	9.4%	18.3%	1	11.1%	12.4%	\$87	8.5%	8.0%	1	20.0%	14.3%	\$83	10.7%	9.7%
	Middle	5	35.7%	\$514	28.5%	19.7%	3	33.3%	21.3%	\$248	24.1%	18.0%	2	40.0%	19.9%	\$266	34.2%	16.7%
	Upper	6	42.9%	\$1,036	57.4%	42.1%	4	44.4%	42.0%	\$608	59.1%	51.0%	2	40.0%	37.8%	\$428	55.1%	47.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.9%	\$0	0.0%	20.0%	0	0.0%	22.4%	\$0	0.0%	23.7%
	Total	14	100.0%	\$1,805	100.0%	100.0%	9	100.0%	100.0%	\$1,028	100.0%	100.0%	5	100.0%	100.0%	\$777	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	7.6%	\$0	0.0%	2.3%	0	0.0%	5.9%	\$0	0.0%	2.1%
	Moderate	1	33.3%	\$3	11.5%	18.3%	0	0.0%	19.3%	\$0	0.0%	15.8%	1	50.0%	15.1%	\$3	16.7%	10.5%
	Middle	1	33.3%	\$15	57.7%	19.7%	0	0.0%	24.8%	\$0	0.0%	16.4%	1	50.0%	24.7%	\$15	83.3%	25.0%
	Upper	1	33.3%	\$8	30.8%	42.1%	1	100.0%	41.4%	\$8	100.0%	54.3%	0	0.0%	50.0%	\$0	0.0%	56.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.9%	\$0	0.0%	11.1%	0	0.0%	4.3%	\$0	0.0%	5.5%
	Total	3	100.0%	\$26	100.0%	100.0%	1	100.0%	100.0%	\$8	100.0%	100.0%	2	100.0%	100.0%	\$18	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	12	22.2%	\$830	14.0%	19.9%	7	21.9%	5.4%	\$483	14.4%	2.4%	5	22.7%	6.2%	\$347	13.4%	2.7%
	Moderate	13	24.1%	\$1,028	17.3%	18.3%	7	21.9%	16.0%	\$609	18.2%	9.7%	6	27.3%	16.5%	\$419	16.2%	11.0%
	Middle	13	24.1%	\$1,389	23.4%	19.7%	8	25.0%	21.5%	\$786	23.4%	17.7%	5	22.7%	20.2%	\$603	23.3%	17.1%
	Upper	16	29.6%	\$2,698	45.4%	42.1%	10	31.3%	38.4%	\$1,474	44.0%	47.5%	6	27.3%	35.7%	\$1,224	47.2%	45.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.7%	\$0	0.0%	22.5%	0	0.0%	21.5%	\$0	0.0%	24.2%
	Total	54	100.0%	\$5,945	100.0%	100.0%	32	100.0%	100.0%	\$3,352	100.0%	100.0%	22	100.0%	100.0%	\$2,593	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	95	80.5%	\$2,355	75.9%	89.6%	47	83.9%	48.9%	\$1,224	78.0%	37.6%	48	77.4%	41.2%	\$1,131	73.7%	33.3%
	Over \$1 Million	13	11.0%	\$640	20.6%	9.1%	6	10.7%					7	11.3%				
	Total Rev. available	108	91.5%	\$2,995	96.5%	98.7%	53	94.6%					55	88.7%				
	Rev. Not Known	10	8.5%	\$109	3.5%	1.3%	3	5.4%					7	11.3%				
Total	118	100.0%	\$3,104	100.0%	100.0%	56	100.0%					62	100.0%					
Small Business Loan Size	\$100,000 or Less	118	100.0%	\$3,104	100.0%		56	100.0%	94.6%	\$1,569	100.0%	40.1%	62	100.0%	93.5%	\$1,535	100.0%	39.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	19.4%	0	0.0%	4.0%	\$0	0.0%	21.3%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	2.3%	\$0	0.0%	40.4%	0	0.0%	2.5%	\$0	0.0%	39.2%
	Total	118	100.0%	\$3,104	100.0%		56	100.0%	100.0%	\$1,569	100.0%	100.0%	62	100.0%	100.0%	\$1,535	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	31.6%	\$0	0.0%	37.8%	0	0.0%	34.8%	\$0	0.0%	84.2%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	89.5%	\$0	0.0%	37.7%	0	0.0%	91.3%	\$0	0.0%	41.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	18.6%	0	0.0%	4.3%	\$0	0.0%	16.1%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	43.7%	0	0.0%	4.3%	\$0	0.0%	42.7%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Mobile

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.1%
	Moderate	17	12.7%	\$1,692	9.4%	19.6%	8	11.3%	10.2%	\$641	7.1%	7.1%	9	14.3%	9.5%	\$1,051	11.8%	6.4%
	Middle	45	33.6%	\$4,704	26.2%	40.7%	22	31.0%	40.0%	\$1,647	18.2%	37.0%	23	36.5%	39.4%	\$3,057	34.3%	36.6%
	Upper	72	53.7%	\$11,563	64.4%	35.6%	41	57.7%	49.4%	\$6,750	74.7%	55.5%	31	49.2%	50.7%	\$4,813	54.0%	56.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	134	100.0%	\$17,959	100.0%	100.0%	71	100.0%	100.0%	\$9,038	100.0%	100.0%	63	100.0%	100.0%	\$8,921	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	1.2%	\$0	0.0%	0.6%	0	0.0%	1.1%	\$0	0.0%	0.5%
	Moderate	14	18.4%	\$1,026	11.4%	19.6%	6	17.6%	12.5%	\$437	8.7%	8.5%	8	19.0%	10.4%	\$589	14.9%	6.5%
	Middle	29	38.2%	\$3,139	34.9%	40.7%	10	29.4%	38.5%	\$1,603	31.8%	35.6%	19	45.2%	41.3%	\$1,536	39.0%	37.7%
	Upper	33	43.4%	\$4,817	53.6%	35.6%	18	52.9%	47.8%	\$2,999	59.5%	55.3%	15	35.7%	47.3%	\$1,818	46.1%	55.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	76	100.0%	\$8,982	100.0%	100.0%	34	100.0%	100.0%	\$5,039	100.0%	100.0%	42	100.0%	100.0%	\$3,943	100.0%	100.0%
HOME IMPROVEMENT	Low	1	3.8%	\$4	0.8%	4.0%	1	7.1%	3.1%	\$4	1.1%	1.4%	0	0.0%	3.3%	\$0	0.0%	0.8%
	Moderate	5	19.2%	\$46	9.0%	19.6%	2	14.3%	17.2%	\$9	2.4%	11.9%	3	25.0%	18.3%	\$37	26.6%	10.9%
	Middle	15	57.7%	\$364	71.4%	40.7%	7	50.0%	40.8%	\$274	73.9%	38.4%	8	66.7%	41.1%	\$90	64.7%	30.2%
	Upper	5	19.2%	\$96	18.8%	35.6%	4	28.6%	38.9%	\$84	22.6%	48.2%	1	8.3%	37.3%	\$12	8.6%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$510	100.0%	100.0%	14	100.0%	100.0%	\$371	100.0%	100.0%	12	100.0%	100.0%	\$139	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	4.5%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	36.4%	\$0	0.0%	8.6%	0	0.0%	15.8%	\$0	0.0%	6.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	36.4%	\$0	0.0%	54.2%	0	0.0%	52.6%	\$0	0.0%	46.7%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	22.7%	\$0	0.0%	36.6%	0	0.0%	31.6%	\$0	0.0%	47.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	0.4%	\$4	0.0%	4.0%	1	0.8%	0.9%	\$4	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Moderate	36	15.3%	\$2,764	10.1%	19.6%	16	13.4%	11.6%	\$1,087	7.5%	7.8%	20	17.1%	10.4%	\$1,677	12.9%	6.5%
	Middle	89	37.7%	\$8,207	29.9%	40.7%	39	32.8%	39.5%	\$3,524	24.4%	37.9%	50	42.7%	40.2%	\$4,683	36.0%	37.2%
	Upper	110	46.6%	\$16,476	60.0%	35.6%	63	52.9%	48.0%	\$9,833	68.1%	53.9%	47	40.2%	48.5%	\$6,643	51.1%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	236	100.0%	\$27,451	100.0%	100.0%	119	100.0%	100.0%	\$14,448	100.0%	100.0%	117	100.0%	100.0%	\$13,003	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	38	5.1%	\$1,681	4.3%	5.8%	18	5.0%	6.3%	\$509	3.0%	8.5%	20	5.2%	6.7%	\$1,172	5.2%	8.5%
	Moderate	142	19.0%	\$7,000	17.8%	19.0%	71	19.8%	19.9%	\$3,460	20.5%	24.4%	71	18.3%	19.0%	\$3,540	15.8%	22.2%
	Middle	243	32.5%	\$12,344	31.4%	34.8%	118	32.9%	29.6%	\$6,406	37.9%	24.7%	125	32.2%	30.7%	\$5,938	26.5%	27.2%
	Upper	324	43.4%	\$18,310	46.5%	40.3%	152	42.3%	42.8%	\$6,526	38.6%	42.1%	172	44.3%	42.2%	\$11,784	52.5%	41.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.3%	0	0.0%	1.4%	\$0	0.0%	0.5%
Total	747	100.0%	\$39,335	100.0%	100.0%	359	100.0%	100.0%	\$16,901	100.0%	100.0%	388	100.0%	100.0%	\$22,434	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	4.1%	\$0	0.0%	11.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.1%	0	0.0%	4.1%	\$0	0.0%	0.3%	0	0.0%	9.4%	\$0	0.0%	11.0%
	Middle	1	100.0%	\$30	100.0%	50.3%	0	0.0%	36.7%	\$0	0.0%	41.6%	1	100.0%	50.0%	\$30	100.0%	47.7%
	Upper	0	0.0%	\$0	0.0%	37.1%	0	0.0%	53.1%	\$0	0.0%	44.9%	0	0.0%	40.6%	\$0	0.0%	41.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.0%	\$0	0.0%	1.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$30	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$30	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Mobile

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	9	6.7%	\$642	3.6%	23.2%	7	9.9%	3.8%	\$496	5.5%	2.0%	2	3.2%	3.6%	\$146	1.6%	1.8%
	Moderate	41	30.6%	\$3,796	21.1%	16.7%	21	29.6%	17.0%	\$1,772	19.6%	12.1%	20	31.7%	18.0%	\$2,024	22.7%	12.8%
	Middle	43	32.1%	\$4,936	27.5%	19.5%	23	32.4%	22.9%	\$2,577	28.5%	20.7%	20	31.7%	23.3%	\$2,359	26.4%	20.9%
	Upper	40	29.9%	\$8,377	46.6%	40.6%	19	26.8%	33.9%	\$3,985	44.1%	44.6%	21	33.3%	35.8%	\$4,392	49.2%	46.7%
	Unknown	1	0.7%	\$208	1.2%	0.0%	1	1.4%	22.5%	\$208	2.3%	20.5%	0	0.0%	19.4%	\$0	0.0%	17.7%
	Total	134	100.0%	\$17,959	100.0%	100.0%	71	100.0%	100.0%	\$9,038	100.0%	100.0%	63	100.0%	100.0%	\$8,921	100.0%	100.0%
REFINANCE	Low	9	11.8%	\$620	6.9%	23.2%	4	11.8%	4.6%	\$289	5.7%	2.2%	5	11.9%	4.8%	\$331	8.4%	2.4%
	Moderate	13	17.1%	\$1,084	12.1%	16.7%	6	17.6%	11.0%	\$501	9.9%	7.1%	7	16.7%	10.2%	\$583	14.8%	6.3%
	Middle	23	30.3%	\$1,974	22.0%	19.5%	10	29.4%	16.0%	\$973	19.3%	12.6%	13	31.0%	15.9%	\$1,001	25.4%	11.8%
	Upper	30	39.5%	\$5,079	56.5%	40.6%	13	38.2%	39.2%	\$3,051	60.5%	46.7%	17	40.5%	37.4%	\$2,028	51.4%	45.1%
	Unknown	1	1.3%	\$225	2.5%	0.0%	1	2.9%	29.3%	\$225	4.5%	31.5%	0	0.0%	31.6%	\$0	0.0%	34.4%
	Total	76	100.0%	\$8,982	100.0%	100.0%	34	100.0%	100.0%	\$5,039	100.0%	100.0%	42	100.0%	100.0%	\$3,943	100.0%	100.0%
HOME IMPROVEMENT	Low	8	30.8%	\$57	11.2%	23.2%	3	21.4%	8.3%	\$15	4.0%	3.1%	5	41.7%	9.8%	\$42	30.2%	4.3%
	Moderate	2	7.7%	\$27	5.3%	16.7%	1	7.1%	17.0%	\$15	4.0%	9.9%	1	8.3%	15.9%	\$12	8.6%	9.3%
	Middle	6	23.1%	\$73	14.3%	19.5%	4	28.6%	19.9%	\$39	10.5%	12.4%	2	16.7%	22.5%	\$34	24.5%	18.1%
	Upper	10	38.5%	\$353	69.2%	40.6%	6	42.9%	49.2%	\$302	81.4%	61.6%	4	33.3%	45.8%	\$51	36.7%	57.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	13.1%	0	0.0%	5.9%	\$0	0.0%	11.2%
	Total	26	100.0%	\$510	100.0%	100.0%	14	100.0%	100.0%	\$371	100.0%	100.0%	12	100.0%	100.0%	\$139	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	26	11.0%	\$1,319	4.8%	23.2%	14	11.8%	4.4%	\$800	5.5%	1.9%	12	10.3%	4.4%	\$519	4.0%	2.0%
	Moderate	56	23.7%	\$4,907	17.9%	16.7%	28	23.5%	14.8%	\$2,288	15.8%	9.5%	28	23.9%	14.9%	\$2,619	20.1%	9.9%
	Middle	72	30.5%	\$6,983	25.4%	19.5%	37	31.1%	20.2%	\$3,589	24.8%	16.3%	35	29.9%	20.5%	\$3,394	26.1%	16.8%
	Upper	80	33.9%	\$13,809	50.3%	40.6%	38	31.9%	36.8%	\$7,338	50.8%	42.2%	42	35.9%	37.0%	\$6,471	49.8%	44.7%
	Unknown	2	0.8%	\$433	1.6%	0.0%	2	1.7%	23.9%	\$433	3.0%	30.2%	0	0.0%	23.2%	\$0	0.0%	26.5%
	Total	236	100.0%	\$27,451	100.0%	100.0%	119	100.0%	100.0%	\$14,448	100.0%	100.0%	117	100.0%	100.0%	\$13,003	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	521	69.7%	\$20,390	51.8%	88.4%	256	71.3%	46.8%	\$10,349	61.2%	35.3%	265	68.3%	44.2%	\$10,041	44.8%	33.1%
	Over \$1 Million	188	25.2%	\$18,209	46.3%	10.9%	86	24.0%					102	26.3%				
	Total Rev. available	709	94.9%	\$38,599	98.1%	99.3%	342	95.3%					367	94.6%				
	Rev. Not Known	38	5.1%	\$736	1.9%	0.7%	17	4.7%					21	5.4%				
Total	747	100.0%	\$39,335	100.0%	100.0%	359	100.0%					388	100.0%					
Small Business Loan Size	\$100,000 or Less	704	94.2%	\$26,163	66.5%		344	95.8%	84.0%	\$12,886	76.2%	22.4%	360	92.8%	86.6%	\$13,277	59.2%	26.4%
	\$100,001 - \$250,000	24	3.2%	\$4,242	10.8%		9	2.5%	7.4%	\$1,552	9.2%	17.5%	15	3.9%	6.9%	\$2,690	12.0%	19.1%
	\$250,001 - \$1 Million	19	2.5%	\$8,930	22.7%		6	1.7%	8.6%	\$2,463	14.6%	60.1%	13	3.4%	6.6%	\$6,467	28.8%	54.6%
	Total	747	100.0%	\$39,335	100.0%		359	100.0%	100.0%	\$16,901	100.0%	100.0%	388	100.0%	100.0%	\$22,434	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	1	100.0%	\$30	100.0%	89.9%	0	0.0%	38.8%	\$0	0.0%	25.8%	1	100.0%	34.4%	\$30	100.0%	42.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	10.1%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$30	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$30	100.0%		0	0.0%	61.2%	\$0	0.0%	10.9%	1	100.0%	75.0%	\$30	100.0%	24.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	24.5%	\$0	0.0%	32.0%	0	0.0%	18.8%	\$0	0.0%	42.1%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	14.3%	\$0	0.0%	57.1%	0	0.0%	6.3%	\$0	0.0%	33.4%
	Total	1	100.0%	\$30	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$30	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Montgomery

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar		Dollar			
		#	%	\$ (000s)	%		%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	2	2.5%	\$157	1.4%	9.6%	1	2.7%	2.0%	\$96	1.8%	0.9%	1	2.3%	2.0%	\$61	1.0%	1.3%
	Moderate	12	15.0%	\$927	8.2%	21.4%	4	10.8%	8.5%	\$246	4.7%	4.3%	8	18.6%	6.7%	\$681	11.3%	2.8%
	Middle	15	18.8%	\$1,220	10.8%	23.4%	8	21.6%	17.0%	\$656	12.4%	11.1%	7	16.3%	18.1%	\$564	9.4%	12.4%
	Upper	51	63.8%	\$8,979	79.6%	45.6%	24	64.9%	72.5%	\$4,280	81.1%	83.6%	27	62.8%	73.2%	\$4,699	78.3%	83.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	80	100.0%	\$11,283	100.0%	100.0%	37	100.0%	100.0%	\$5,278	100.0%	100.0%	43	100.0%	100.0%	\$6,005	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	9.6%	0	0.0%	3.0%	\$0	0.0%	1.4%	0	0.0%	2.5%	\$0	0.0%	1.0%
	Moderate	6	17.1%	\$289	5.6%	21.4%	4	33.3%	11.5%	\$198	9.2%	6.0%	2	8.7%	9.5%	\$91	3.0%	5.3%
	Middle	6	17.1%	\$689	13.4%	23.4%	1	8.3%	18.7%	\$98	4.6%	14.3%	5	21.7%	20.8%	\$591	19.7%	15.4%
	Upper	23	65.7%	\$4,182	81.0%	45.6%	7	58.3%	66.8%	\$1,857	86.3%	78.2%	16	69.6%	67.1%	\$2,325	77.3%	78.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	35	100.0%	\$5,160	100.0%	100.0%	12	100.0%	100.0%	\$2,153	100.0%	100.0%	23	100.0%	100.0%	\$3,007	100.0%	100.0%
HOME IMPROVEMENT	Low	1	6.3%	\$5	1.5%	9.6%	1	8.3%	10.0%	\$5	2.6%	4.8%	0	0.0%	14.1%	\$0	0.0%	7.3%
	Moderate	3	18.8%	\$48	14.6%	21.4%	2	16.7%	15.9%	\$28	14.5%	11.8%	1	25.0%	19.6%	\$20	14.8%	11.7%
	Middle	3	18.8%	\$54	16.5%	23.4%	3	25.0%	27.9%	\$54	28.0%	21.5%	0	0.0%	18.1%	\$0	0.0%	16.1%
	Upper	9	56.3%	\$221	67.4%	45.6%	6	50.0%	46.2%	\$106	54.9%	61.9%	3	75.0%	48.2%	\$115	85.2%	64.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	16	100.0%	\$328	100.0%	100.0%	12	100.0%	100.0%	\$193	100.0%	100.0%	4	100.0%	100.0%	\$135	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	11.1%	\$0	0.0%	4.8%	0	0.0%	30.8%	\$0	0.0%	28.4%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	44.4%	\$0	0.0%	41.4%	0	0.0%	23.1%	\$0	0.0%	39.4%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	11.1%	\$0	0.0%	6.0%	0	0.0%	15.4%	\$0	0.0%	14.5%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	33.3%	\$0	0.0%	47.9%	0	0.0%	30.8%	\$0	0.0%	17.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	2.3%	\$162	1.0%	9.6%	2	3.3%	2.9%	\$101	1.3%	1.5%	1	1.4%	2.9%	\$61	0.7%	2.2%
	Moderate	21	16.0%	\$1,264	7.5%	21.4%	10	16.4%	10.2%	\$472	6.2%	7.8%	11	15.7%	8.5%	\$792	8.7%	5.1%
	Middle	24	18.3%	\$1,963	11.7%	23.4%	12	19.7%	18.3%	\$808	10.6%	12.1%	12	17.1%	19.2%	\$1,155	12.6%	13.7%
	Upper	83	63.4%	\$13,382	79.8%	45.6%	37	60.7%	68.5%	\$6,243	81.9%	78.6%	46	65.7%	69.4%	\$7,139	78.0%	79.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	131	100.0%	\$16,771	100.0%	100.0%	61	100.0%	100.0%	\$7,624	100.0%	100.0%	70	100.0%	100.0%	\$9,147	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	81	22.0%	\$3,186	21.5%	19.8%	43	24.9%	18.0%	\$1,637	25.2%	22.3%	38	19.4%	16.2%	\$1,549	18.5%	23.4%
	Moderate	72	19.5%	\$3,089	20.8%	16.0%	36	20.8%	14.5%	\$1,518	23.4%	11.4%	36	18.4%	13.2%	\$1,571	18.8%	14.1%
	Middle	63	17.1%	\$2,420	16.3%	18.2%	32	18.5%	15.7%	\$977	15.0%	15.4%	31	15.8%	14.2%	\$1,443	17.3%	11.8%
	Upper	153	41.5%	\$6,153	41.4%	45.9%	62	35.8%	50.3%	\$2,363	36.4%	50.5%	91	46.4%	53.3%	\$3,790	45.4%	49.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	0.4%	0	0.0%	3.0%	\$0	0.0%	1.1%
Total	369	100.0%	\$14,848	100.0%	100.0%	173	100.0%	100.0%	\$6,495	100.0%	100.0%	196	100.0%	100.0%	\$8,353	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.8%	\$0	0.0%	0.1%	0	0.0%	2.3%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	10.4%	0	0.0%	3.6%	\$0	0.0%	2.4%	0	0.0%	4.7%	\$0	0.0%	0.7%
	Middle	0	0.0%	\$0	0.0%	41.7%	0	0.0%	50.9%	\$0	0.0%	50.4%	0	0.0%	55.8%	\$0	0.0%	42.6%
	Upper	0	0.0%	\$0	0.0%	42.7%	0	0.0%	43.6%	\$0	0.0%	47.0%	0	0.0%	37.2%	\$0	0.0%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Montgomery

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
				%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	12	15.0%	\$849	7.5%	26.4%	5	13.5%	6.8%	\$325	6.2%	3.2%	7	16.3%	7.9%	\$524	8.7%	3.8%
	Moderate	40	50.0%	\$4,410	39.1%	16.1%	17	45.9%	19.9%	\$1,854	35.1%	13.0%	23	53.5%	19.7%	\$2,556	42.6%	12.9%
	Middle	8	10.0%	\$1,490	13.2%	16.9%	5	13.5%	20.9%	\$939	17.8%	19.5%	3	7.0%	19.7%	\$551	9.2%	18.5%
	Upper	20	25.0%	\$4,534	40.2%	40.6%	10	27.0%	32.1%	\$2,160	40.9%	47.1%	10	23.3%	31.4%	\$2,374	39.5%	45.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.2%	\$0	0.0%	17.2%	0	0.0%	21.3%	\$0	0.0%	19.5%
	Total	80	100.0%	\$11,283	100.0%	100.0%	37	100.0%	100.0%	\$5,278	100.0%	100.0%	43	100.0%	100.0%	\$6,005	100.0%	100.0%
REFINANCE	Low	5	14.3%	\$392	7.6%	26.4%	1	8.3%	6.1%	\$137	6.4%	3.2%	4	17.4%	5.8%	\$255	8.5%	3.0%
	Moderate	10	28.6%	\$816	15.8%	16.1%	6	50.0%	12.0%	\$517	24.0%	7.7%	4	17.4%	9.4%	\$299	9.9%	5.7%
	Middle	8	22.9%	\$939	18.2%	16.9%	2	16.7%	14.9%	\$263	12.2%	11.8%	6	26.1%	14.1%	\$676	22.5%	11.5%
	Upper	12	34.3%	\$3,013	58.4%	40.6%	3	25.0%	32.7%	\$1,236	57.4%	42.0%	9	39.1%	30.6%	\$1,777	59.1%	38.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	34.2%	\$0	0.0%	35.4%	0	0.0%	40.1%	\$0	0.0%	41.2%
	Total	35	100.0%	\$5,160	100.0%	100.0%	12	100.0%	100.0%	\$2,153	100.0%	100.0%	23	100.0%	100.0%	\$3,007	100.0%	100.0%
HOME IMPROVEMENT	Low	3	18.8%	\$13	4.0%	26.4%	3	25.0%	10.6%	\$13	6.7%	5.1%	0	0.0%	12.0%	\$0	0.0%	4.0%
	Moderate	2	12.5%	\$24	7.3%	16.1%	1	8.3%	21.6%	\$4	2.1%	11.0%	1	25.0%	22.5%	\$20	14.8%	10.7%
	Middle	3	18.8%	\$40	12.2%	16.9%	3	25.0%	28.9%	\$40	20.7%	22.4%	0	0.0%	22.5%	\$0	0.0%	13.6%
	Upper	8	50.0%	\$251	76.5%	40.6%	5	41.7%	35.9%	\$136	70.5%	51.9%	3	75.0%	36.6%	\$115	85.2%	55.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	9.6%	0	0.0%	6.5%	\$0	0.0%	15.7%
	Total	16	100.0%	\$328	100.0%	100.0%	12	100.0%	100.0%	\$193	100.0%	100.0%	4	100.0%	100.0%	\$135	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	26.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	20	15.3%	\$1,254	7.5%	26.4%	9	14.8%	6.8%	\$475	6.2%	3.0%	11	15.7%	7.2%	\$779	8.5%	3.4%
	Moderate	52	39.7%	\$5,250	31.3%	16.1%	24	39.3%	16.8%	\$2,375	31.2%	10.0%	28	40.0%	15.6%	\$2,875	31.4%	9.6%
	Middle	19	14.5%	\$2,469	14.7%	16.9%	10	16.4%	18.9%	\$1,242	16.3%	15.1%	9	12.9%	17.5%	\$1,227	13.4%	15.0%
	Upper	40	30.5%	\$7,798	46.5%	40.6%	18	29.5%	32.5%	\$3,532	46.3%	41.6%	22	31.4%	31.3%	\$4,266	46.6%	41.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.0%	\$0	0.0%	30.3%	0	0.0%	28.4%	\$0	0.0%	30.8%
	Total	131	100.0%	\$16,771	100.0%	100.0%	61	100.0%	100.0%	\$7,624	100.0%	100.0%	70	100.0%	100.0%	\$9,147	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	276	74.8%	\$9,325	62.8%	86.3%	134	77.5%	51.8%	\$4,467	68.8%	46.8%	142	72.4%	44.7%	\$4,858	58.2%	41.4%
	Over \$1 Million	74	20.1%	\$5,268	35.5%	11.9%	32	18.5%					42	21.4%				
	Total Rev. available	350	94.9%	\$14,593	98.3%	98.2%	166	96.0%					184	93.8%				
	Rev. Not Known	19	5.1%	\$255	1.7%	1.8%	7	4.0%					12	6.1%				
Total	369	100.0%	\$14,848	100.0%	100.0%	173	100.0%					196	100.0%					
Small Business Loan Size	\$100,000 or Less	361	97.8%	\$12,632	85.1%		171	98.8%	88.5%	\$6,142	94.6%	28.1%	190	96.9%	90.9%	\$6,490	77.7%	34.2%
	\$100,001 - \$250,000	5	1.4%	\$928	6.3%		2	1.2%	5.4%	\$353	5.4%	16.4%	3	1.5%	4.8%	\$575	6.9%	18.1%
	\$250,001 - \$1 Million	3	0.8%	\$1,288	8.7%		0	0.0%	6.2%	\$0	0.0%	55.4%	3	1.5%	4.3%	\$1,288	15.4%	47.7%
	Total	369	100.0%	\$14,848	100.0%		173	100.0%	100.0%	\$6,495	100.0%	100.0%	196	100.0%	100.0%	\$8,353	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	95.0%	0	0.0%	61.8%	\$0	0.0%	63.2%	0	0.0%	79.1%	\$0	0.0%	74.9%
Over \$1 Million		0	0.0%	\$0	0.0%	5.0%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	67.3%	\$0	0.0%	23.7%	0	0.0%	72.1%	\$0	0.0%	23.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	20.0%	\$0	0.0%	32.5%	0	0.0%	18.6%	\$0	0.0%	38.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.7%	\$0	0.0%	43.8%	0	0.0%	9.3%	\$0	0.0%	38.8%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Northeast AL

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Agg	Bank	Agg			
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	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%
	Moderate	2	4.1%	\$184	2.3%	4.3%	1	3.4%	3.9%	\$109	2.0%	2.8%	1	5.0%	4.0%	\$75	2.8%	3.3%
	Middle	29	59.2%	\$3,607	44.7%	72.1%	19	65.5%	64.9%	\$2,451	45.4%	61.2%	10	50.0%	65.5%	\$1,156	43.5%	62.8%
	Upper	18	36.7%	\$4,271	53.0%	23.6%	9	31.0%	31.2%	\$2,843	52.6%	36.0%	9	45.0%	30.5%	\$1,428	53.7%	34.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	49	100.0%	\$8,062	100.0%	100.0%	29	100.0%	100.0%	\$5,403	100.0%	100.0%	20	100.0%	100.0%	\$2,659	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	2	4.1%	\$214	2.4%	4.3%	0	0.0%	3.6%	\$0	0.0%	2.7%	2	8.3%	3.3%	\$214	5.3%	3.1%
	Middle	32	65.3%	\$5,263	58.5%	72.1%	19	76.0%	67.4%	\$3,567	72.1%	62.9%	13	54.2%	65.0%	\$1,696	41.9%	62.3%
	Upper	15	30.6%	\$3,516	39.1%	23.6%	6	24.0%	29.0%	\$1,382	27.9%	34.5%	9	37.5%	31.7%	\$2,134	52.8%	34.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	49	100.0%	\$8,993	100.0%	100.0%	25	100.0%	100.0%	\$4,949	100.0%	100.0%	24	100.0%	100.0%	\$4,044	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	4.3%	0	0.0%	5.4%	\$0	0.0%	3.6%	0	0.0%	4.2%	\$0	0.0%	3.3%
	Middle	9	60.0%	\$178	50.9%	72.1%	6	66.7%	72.9%	\$104	60.8%	71.5%	3	50.0%	73.3%	\$74	41.3%	61.5%
	Upper	6	40.0%	\$172	49.1%	23.6%	3	33.3%	21.7%	\$67	39.2%	24.9%	3	50.0%	22.4%	\$105	58.7%	35.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$350	100.0%	100.0%	9	100.0%	100.0%	\$171	100.0%	100.0%	6	100.0%	100.0%	\$179	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	11.1%	\$0	0.0%	0.0%	0	0.0%	14.3%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	88.9%	\$0	0.0%	100.0%	0	0.0%	85.7%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	3.5%	\$398	2.3%	4.3%	1	1.6%	3.9%	\$109	1.0%	2.8%	3	6.0%	3.8%	\$289	4.2%	3.2%
	Middle	70	61.9%	\$9,048	52.0%	72.1%	44	69.8%	66.5%	\$6,122	58.2%	62.6%	26	52.0%	65.9%	\$2,926	42.5%	62.8%
	Upper	39	34.5%	\$7,959	45.7%	23.6%	18	28.6%	29.6%	\$4,292	40.8%	34.7%	21	42.0%	30.4%	\$3,667	53.3%	34.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	113	100.0%	\$17,405	100.0%	100.0%	63	100.0%	100.0%	\$10,523	100.0%	100.0%	50	100.0%	100.0%	\$6,882	100.0%	100.0%
SMALL BUSINESSES	Small Businesses					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	4.1%	\$237	4.1%	3.6%	4	6.8%	4.1%	\$202	8.5%	3.5%	1	1.6%	4.4%	\$35	1.0%	1.8%
	Middle	94	76.4%	\$4,129	71.3%	69.3%	45	76.3%	64.2%	\$1,722	72.4%	58.9%	49	76.6%	62.9%	\$2,407	70.5%	60.8%
	Upper	24	19.5%	\$1,425	24.6%	27.1%	10	16.9%	28.5%	\$455	19.1%	36.6%	14	21.9%	29.2%	\$970	28.4%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	1.0%	0	0.0%	3.5%	\$0	0.0%	1.4%
	Total	123	100.0%	\$5,791	100.0%	100.0%	59	100.0%	100.0%	\$2,379	100.0%	100.0%	64	100.0%	100.0%	\$3,412	100.0%	100.0%
SMALL FARM	Small Farms					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.0%	0	0.0%	4.4%	\$0	0.0%	2.5%	0	0.0%	3.6%	\$0	0.0%	1.3%
	Middle	1	100.0%	\$10	100.0%	79.1%	0	0.0%	68.8%	\$0	0.0%	67.8%	1	100.0%	73.7%	\$10	100.0%	67.6%
	Upper	0	0.0%	\$0	0.0%	15.0%	0	0.0%	26.3%	\$0	0.0%	29.6%	0	0.0%	22.7%	\$0	0.0%	31.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Northeast AL

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar		Count	Dollar		
		Count	Dollar	%	%		Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	5	10.2%	\$311	3.9%	20.4%	2	6.9%	4.7%	\$142	2.6%	2.2%	3	15.0%	3.8%	\$169	6.4%	1.9%
	Moderate	11	22.4%	\$1,064	13.2%	17.0%	5	17.2%	17.5%	\$434	8.0%	11.3%	6	30.0%	17.6%	\$630	23.7%	11.0%
	Middle	11	22.4%	\$1,179	14.6%	19.9%	5	17.2%	21.2%	\$491	9.1%	17.7%	6	30.0%	20.7%	\$688	25.9%	17.1%
	Upper	22	44.9%	\$5,508	68.3%	42.7%	17	58.6%	33.3%	\$4,336	80.3%	46.7%	5	25.0%	37.8%	\$1,172	44.1%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.3%	\$0	0.0%	22.0%	0	0.0%	20.1%	\$0	0.0%	19.6%
	Total	49	100.0%	\$8,062	100.0%	100.0%	29	100.0%	100.0%	\$5,403	100.0%	100.0%	20	100.0%	100.0%	\$2,659	100.0%	100.0%
REFINANCE	Low	2	4.1%	\$221	2.5%	20.4%	1	4.0%	5.9%	\$116	2.3%	2.4%	1	4.2%	4.0%	\$105	2.6%	1.6%
	Moderate	9	18.4%	\$787	8.8%	17.0%	6	24.0%	12.9%	\$589	11.9%	7.3%	3	12.5%	10.7%	\$198	4.9%	5.7%
	Middle	10	20.4%	\$1,390	15.5%	19.9%	5	20.0%	20.3%	\$890	18.0%	14.8%	5	20.8%	17.7%	\$500	12.4%	12.4%
	Upper	28	57.1%	\$6,595	73.3%	42.7%	13	52.0%	43.9%	\$3,354	67.8%	56.6%	15	62.5%	46.2%	\$3,241	80.1%	57.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.0%	\$0	0.0%	19.0%	0	0.0%	21.5%	\$0	0.0%	22.8%
	Total	49	100.0%	\$8,993	100.0%	100.0%	25	100.0%	100.0%	\$4,949	100.0%	100.0%	24	100.0%	100.0%	\$4,044	100.0%	100.0%
HOME IMPROVEMENT	Low	2	13.3%	\$9	2.6%	20.4%	1	11.1%	9.4%	\$5	2.9%	4.1%	1	16.7%	5.8%	\$4	2.2%	2.6%
	Moderate	2	13.3%	\$26	7.4%	17.0%	2	22.2%	17.2%	\$26	15.2%	9.3%	0	0.0%	15.8%	\$0	0.0%	9.3%
	Middle	1	6.7%	\$20	5.7%	19.9%	1	11.1%	20.2%	\$20	11.7%	16.0%	0	0.0%	16.9%	\$0	0.0%	19.1%
	Upper	10	66.7%	\$295	84.3%	42.7%	5	55.6%	39.7%	\$120	70.2%	61.1%	5	83.3%	34.9%	\$175	97.8%	54.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.5%	\$0	0.0%	9.5%	0	0.0%	26.7%	\$0	0.0%	14.8%
	Total	15	100.0%	\$350	100.0%	100.0%	9	100.0%	100.0%	\$171	100.0%	100.0%	6	100.0%	100.0%	\$179	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	9	8.0%	\$541	3.1%	20.4%	4	6.3%	5.5%	\$263	2.5%	2.3%	5	10.0%	4.0%	\$278	4.0%	1.8%
	Moderate	22	19.5%	\$1,877	10.8%	17.0%	13	20.6%	15.6%	\$1,049	10.0%	9.4%	9	18.0%	14.7%	\$828	12.0%	8.6%
	Middle	22	19.5%	\$2,589	14.9%	19.9%	11	17.5%	20.7%	\$1,401	13.3%	16.1%	11	22.0%	19.2%	\$1,188	17.3%	15.0%
	Upper	60	53.1%	\$12,398	71.2%	42.7%	35	55.6%	38.1%	\$7,810	74.2%	50.9%	25	50.0%	40.9%	\$4,588	66.7%	53.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.1%	\$0	0.0%	21.3%	0	0.0%	21.2%	\$0	0.0%	21.6%
	Total	113	100.0%	\$17,405	100.0%	100.0%	63	100.0%	100.0%	\$10,523	100.0%	100.0%	50	100.0%	100.0%	\$6,882	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	86	69.9%	\$3,390	58.5%	90.4%	42	71.2%	46.2%	\$1,494	62.8%	39.1%	44	68.8%	42.1%	\$1,896	55.6%	37.3%
	Over \$1 Million	25	20.3%	\$2,150	37.1%	7.9%	10	16.9%					15	23.4%				
	Total Rev. available	111	90.2%	\$5,540	95.6%	98.3%	52	88.1%					59	92.2%				
	Rev. Not Known	12	9.8%	\$251	4.3%	1.7%	7	11.9%					5	7.8%				
	Total	123	100.0%	\$5,791	100.0%	100.0%	59	100.0%					64	100.0%				
Small Business Loan Size	\$100,000 or Less	117	95.1%	\$4,531	78.2%		58	98.3%	93.4%	\$2,229	93.7%	35.0%	59	92.2%	93.2%	\$2,302	67.5%	36.4%
	\$100,001 - \$250,000	5	4.1%	\$820	14.2%		1	1.7%	3.4%	\$150	6.3%	16.2%	4	6.3%	3.6%	\$670	19.6%	16.1%
	\$250,001 - \$1 Million	1	0.8%	\$440	7.6%		0	0.0%	3.2%	\$0	0.0%	48.8%	1	1.6%	3.2%	\$440	12.9%	47.5%
	Total	123	100.0%	\$5,791	100.0%		59	100.0%	100.0%	\$2,379	100.0%	100.0%	64	100.0%	100.0%	\$3,412	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	1	100.0%	\$10	100.0%	98.0%	0	0.0%	41.0%	\$0	0.0%	52.1%	1	100.0%	44.3%	\$10	100.0%	74.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$10	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$10	100.0%		0	0.0%	94.1%	\$0	0.0%	53.3%	1	100.0%	93.3%	\$10	100.0%	48.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	18.2%	0	0.0%	4.6%	\$0	0.0%	26.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.4%	\$0	0.0%	28.5%	0	0.0%	2.1%	\$0	0.0%	25.3%
	Total	1	100.0%	\$10	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AL Tuscaloosa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		#	%	\$ (000s)	%	#	%	\$ (000s)	%				
HOME PURCHASE	Low	1	3.0%	\$160	2.2%	4.1%	1	6.3%	2.1%	\$160	4.6%	2.3%	0	0.0%	1.5%	\$0	0.0%	1.5%
	Moderate	5	15.2%	\$659	9.0%	12.9%	3	18.8%	7.2%	\$446	12.9%	5.3%	2	11.8%	7.8%	\$213	5.6%	6.3%
	Middle	6	18.2%	\$998	13.7%	41.6%	1	6.3%	35.1%	\$120	3.5%	29.3%	5	29.4%	36.7%	\$878	23.0%	31.3%
	Upper	21	63.6%	\$5,475	75.1%	41.4%	11	68.8%	55.6%	\$2,743	79.1%	63.1%	10	58.8%	54.0%	\$2,732	71.5%	60.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	33	100.0%	\$7,292	100.0%	100.0%	16	100.0%	100.0%	\$3,469	100.0%	100.0%	17	100.0%	100.0%	\$3,823	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.1%	0	0.0%	2.4%	\$0	0.0%	4.0%	0	0.0%	1.8%	\$0	0.0%	2.5%
	Moderate	4	14.8%	\$1,197	21.5%	12.9%	4	22.2%	9.3%	\$1,197	32.9%	8.7%	0	0.0%	8.6%	\$0	0.0%	5.6%
	Middle	10	37.0%	\$1,340	24.1%	41.6%	5	27.8%	35.2%	\$812	22.3%	29.3%	5	55.6%	35.3%	\$528	27.5%	31.3%
	Upper	13	48.1%	\$3,021	54.4%	41.4%	9	50.0%	53.1%	\$1,628	44.8%	57.9%	4	44.4%	54.3%	\$1,393	72.5%	60.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	27	100.0%	\$5,558	100.0%	100.0%	18	100.0%	100.0%	\$3,637	100.0%	100.0%	9	100.0%	100.0%	\$1,921	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.1%	0	0.0%	5.9%	\$0	0.0%	6.3%	0	0.0%	2.9%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	12.9%	0	0.0%	13.3%	\$0	0.0%	11.7%	0	0.0%	13.3%	\$0	0.0%	13.8%
	Middle	2	100.0%	\$10	100.0%	41.6%	0	0.0%	33.0%	\$0	0.0%	27.7%	2	100.0%	37.6%	\$10	100.0%	31.7%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	47.9%	\$0	0.0%	54.3%	0	0.0%	46.2%	\$0	0.0%	51.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$10	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	24.1%	\$0	0.0%	6.3%	0	0.0%	13.6%	\$0	0.0%	4.6%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	34.5%	\$0	0.0%	46.8%	0	0.0%	22.7%	\$0	0.0%	24.7%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	41.4%	\$0	0.0%	46.9%	0	0.0%	63.6%	\$0	0.0%	70.7%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	1.6%	\$160	1.2%	4.1%	1	2.9%	2.5%	\$160	2.3%	3.2%	0	0.0%	1.7%	\$0	0.0%	2.0%
	Moderate	9	14.5%	\$1,856	14.4%	12.9%	7	20.6%	8.3%	\$1,643	23.1%	9.4%	2	7.1%	8.3%	\$213	3.7%	6.8%
	Middle	18	29.0%	\$2,348	18.3%	41.6%	6	17.6%	35.1%	\$932	13.1%	30.5%	12	42.9%	36.4%	\$1,416	24.6%	32.7%
	Upper	34	54.8%	\$8,496	66.1%	41.4%	20	58.8%	54.2%	\$4,371	61.5%	56.8%	14	50.0%	53.7%	\$4,125	71.7%	58.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	62	100.0%	\$12,860	100.0%	100.0%	34	100.0%	100.0%	\$7,106	100.0%	100.0%	28	100.0%	100.0%	\$5,754	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	3	3.4%	\$145	3.8%	6.2%	2	4.0%	6.4%	\$110	5.3%	7.2%	1	2.6%	6.2%	\$35	2.1%	9.2%
	Moderate	21	23.6%	\$612	16.2%	22.9%	12	24.0%	24.6%	\$372	17.8%	26.7%	9	23.1%	23.8%	\$240	14.3%	26.8%
	Middle	34	38.2%	\$1,828	48.5%	35.8%	19	38.0%	33.8%	\$952	45.5%	35.2%	15	38.5%	33.3%	\$876	52.3%	31.0%
	Upper	31	34.8%	\$1,185	31.4%	35.1%	17	34.0%	33.6%	\$660	31.5%	30.6%	14	35.9%	35.0%	\$525	31.3%	32.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	0.3%	0	0.0%	1.6%	\$0	0.0%	0.4%
Total	89	100.0%	\$3,770	100.0%	100.0%	50	100.0%	100.0%	\$2,094	100.0%	100.0%	39	100.0%	100.0%	\$1,676	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	11.2%	0	0.0%	17.4%	\$0	0.0%	14.0%	0	0.0%	30.4%	\$0	0.0%	39.4%
	Middle	0	0.0%	\$0	0.0%	49.1%	0	0.0%	52.2%	\$0	0.0%	61.4%	0	0.0%	30.4%	\$0	0.0%	12.0%
	Upper	0	0.0%	\$0	0.0%	38.8%	0	0.0%	30.4%	\$0	0.0%	24.6%	0	0.0%	39.1%	\$0	0.0%	48.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AL Tuscaloosa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	2	6.1%	\$205	2.8%	19.8%	2	12.5%	4.3%	\$205	5.9%	2.1%	0	0.0%	3.4%	\$0	0.0%	1.8%
	Moderate	10	30.3%	\$1,244	17.1%	16.2%	5	31.3%	16.8%	\$673	19.4%	11.9%	5	29.4%	17.3%	\$571	14.9%	11.9%
	Middle	1	3.0%	\$158	2.2%	19.8%	0	0.0%	19.5%	\$0	0.0%	17.2%	1	5.9%	18.8%	\$158	4.1%	16.2%
	Upper	20	60.6%	\$5,685	78.0%	44.2%	9	56.3%	34.4%	\$2,591	74.7%	44.0%	11	64.7%	31.8%	\$3,094	80.9%	41.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.1%	\$0	0.0%	24.9%	0	0.0%	28.7%	\$0	0.0%	28.7%
	Total	33	100.0%	\$7,292	100.0%	100.0%	16	100.0%	100.0%	\$3,469	100.0%	100.0%	17	100.0%	100.0%	\$3,823	100.0%	100.0%
REFINANCE	Low	2	7.4%	\$152	2.7%	19.8%	1	5.6%	4.0%	\$92	2.5%	2.3%	1	11.1%	3.6%	\$60	3.1%	1.8%
	Moderate	6	22.2%	\$571	10.3%	16.2%	3	16.7%	10.7%	\$271	7.5%	6.5%	3	33.3%	9.9%	\$300	15.6%	6.3%
	Middle	4	14.8%	\$435	7.8%	19.8%	3	16.7%	17.4%	\$322	8.9%	13.1%	1	11.1%	15.6%	\$113	5.9%	11.9%
	Upper	14	51.9%	\$3,505	63.1%	44.2%	10	55.6%	38.6%	\$2,057	56.6%	45.0%	4	44.4%	38.8%	\$1,448	75.4%	47.2%
	Unknown	1	3.7%	\$895	16.1%	0.0%	1	5.6%	29.3%	\$895	24.6%	33.1%	0	0.0%	32.1%	\$0	0.0%	32.7%
	Total	27	100.0%	\$5,558	100.0%	100.0%	18	100.0%	100.0%	\$3,637	100.0%	100.0%	9	100.0%	100.0%	\$1,921	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.8%	0	0.0%	7.4%	\$0	0.0%	1.3%	0	0.0%	2.4%	\$0	0.0%	1.0%
	Moderate	1	50.0%	\$5	50.0%	16.2%	0	0.0%	18.1%	\$0	0.0%	9.0%	1	50.0%	16.7%	\$5	50.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	19.8%	0	0.0%	20.7%	\$0	0.0%	20.8%	0	0.0%	21.0%	\$0	0.0%	13.1%
	Upper	1	50.0%	\$5	50.0%	44.2%	0	0.0%	41.5%	\$0	0.0%	47.7%	1	50.0%	44.3%	\$5	50.0%	44.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.2%	\$0	0.0%	21.2%	0	0.0%	15.7%	\$0	0.0%	31.4%
	Total	2	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$10	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	44.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	6.5%	\$357	2.8%	19.8%	3	8.8%	4.2%	\$297	4.2%	2.0%	1	3.6%	3.4%	\$60	1.0%	1.7%
	Moderate	17	27.4%	\$1,820	14.2%	16.2%	8	23.5%	14.6%	\$944	13.3%	9.2%	9	32.1%	14.6%	\$876	15.2%	9.5%
	Middle	5	8.1%	\$593	4.6%	19.8%	3	8.8%	18.7%	\$322	4.5%	14.6%	2	7.1%	17.7%	\$271	4.7%	14.1%
	Upper	35	56.5%	\$9,195	71.5%	44.2%	19	55.9%	36.0%	\$4,648	65.4%	41.3%	16	57.1%	34.6%	\$4,547	79.0%	42.0%
	Unknown	1	1.6%	\$895	7.0%	0.0%	1	2.9%	26.5%	\$895	12.6%	32.9%	0	0.0%	29.7%	\$0	0.0%	32.7%
	Total	62	100.0%	\$12,860	100.0%	100.0%	34	100.0%	100.0%	\$7,106	100.0%	100.0%	28	100.0%	100.0%	\$5,754	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	55	61.8%	\$1,869	49.6%	90.2%	32	64.0%	45.7%	\$1,072	51.2%	39.4%	23	59.0%	45.2%	\$797	47.6%	37.4%
	Over \$1 Million	25	28.1%	\$1,814	48.1%	9.2%	12	24.0%					13	33.3%				
	Total Rev. available	80	89.9%	\$3,683	97.7%	99.4%	44	88.0%					36	92.3%				
	Rev. Not Known	9	10.1%	\$87	2.3%	0.6%	6	12.0%					3	7.7%				
	Total	89	100.0%	\$3,770	100.0%	100.0%	50	100.0%					39	100.0%				
Small Business Loan Size	\$100,000 or Less	85	95.5%	\$3,089	81.9%		48	96.0%	86.1%	\$1,744	83.3%	28.3%	37	94.9%	87.0%	\$1,345	80.3%	29.4%
	\$100,001 - \$250,000	4	4.5%	\$681	18.1%		2	4.0%	7.2%	\$350	16.7%	18.9%	2	5.1%	6.8%	\$331	19.7%	20.1%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	6.7%	\$0	0.0%	52.8%	0	0.0%	6.2%	\$0	0.0%	50.5%
	Total	89	100.0%	\$3,770	100.0%		50	100.0%	100.0%	\$2,094	100.0%	100.0%	39	100.0%	100.0%	\$1,676	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.3%	0	0.0%	52.2%	\$0	0.0%	74.4%	0	0.0%	47.8%	\$0	0.0%	53.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.9%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.8%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	87.0%	\$0	0.0%	53.3%	0	0.0%	82.6%	\$0	0.0%	27.3%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.7%	\$0	0.0%	25.4%	0	0.0%	8.7%	\$0	0.0%	25.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.3%	\$0	0.0%	21.3%	0	0.0%	8.7%	\$0	0.0%	47.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AZ Flagstaff

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2015				2016							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	5.5%	\$0	0.0%	4.0%	0	0.0%	4.9%	\$0	0.0%	3.6%
	Middle	14	60.9%	\$5,182	59.1%	48.4%	8	61.5%	56.7%	\$2,635	56.1%	50.7%	6	60.0%	59.8%	\$2,547	62.6%	54.4%
	Upper	9	39.1%	\$3,579	40.9%	33.6%	5	38.5%	37.8%	\$2,060	43.9%	45.2%	4	40.0%	35.4%	\$1,519	37.4%	42.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	23	100.0%	\$8,761	100.0%	100.0%	13	100.0%	100.0%	\$4,695	100.0%	100.0%	10	100.0%	100.0%	\$4,066	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	2	11.1%	\$282	5.0%	18.0%	1	10.0%	4.5%	\$129	4.2%	3.8%	1	12.5%	3.7%	\$153	5.8%	3.0%
	Middle	3	16.7%	\$463	8.2%	48.4%	3	30.0%	51.9%	\$463	15.2%	46.7%	0	0.0%	50.5%	\$0	0.0%	45.7%
	Upper	13	72.2%	\$4,928	86.9%	33.6%	6	60.0%	43.5%	\$2,460	80.6%	49.6%	7	87.5%	45.8%	\$2,468	94.2%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$5,673	100.0%	100.0%	10	100.0%	100.0%	\$3,052	100.0%	100.0%	8	100.0%	100.0%	\$2,621	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	6.3%	\$0	0.0%	4.0%	0	0.0%	3.1%	\$0	0.0%	1.9%
	Middle	2	100.0%	\$908	100.0%	48.4%	1	100.0%	53.1%	\$878	100.0%	44.7%	1	100.0%	53.1%	\$30	100.0%	46.9%
	Upper	0	0.0%	\$0	0.0%	33.6%	0	0.0%	40.6%	\$0	0.0%	51.3%	0	0.0%	43.9%	\$0	0.0%	51.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$908	100.0%	100.0%	1	100.0%	100.0%	\$878	100.0%	100.0%	1	100.0%	100.0%	\$30	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	20.0%	\$0	0.0%	1.8%	0	0.0%	28.6%	\$0	0.0%	65.7%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	46.7%	\$0	0.0%	44.5%	0	0.0%	28.6%	\$0	0.0%	20.6%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	33.3%	\$0	0.0%	53.7%	0	0.0%	42.9%	\$0	0.0%	13.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	4.7%	\$282	1.8%	18.0%	1	4.2%	5.1%	\$129	1.5%	3.7%	1	5.3%	4.4%	\$153	2.3%	7.9%
	Middle	19	44.2%	\$6,553	42.7%	48.4%	12	50.0%	54.5%	\$3,976	46.1%	48.4%	7	36.8%	55.6%	\$2,577	38.4%	48.4%
	Upper	22	51.2%	\$8,507	55.4%	33.6%	11	45.8%	40.4%	\$4,520	52.4%	47.9%	11	57.9%	40.0%	\$3,987	59.4%	43.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	43	100.0%	\$15,342	100.0%	100.0%	24	100.0%	100.0%	\$8,625	100.0%	100.0%	19	100.0%	100.0%	\$6,717	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	15	17.2%	\$884	23.9%	14.3%	9	20.5%	14.3%	\$212	11.3%	16.9%	6	14.0%	13.2%	\$672	36.7%	22.0%
	Middle	34	39.1%	\$1,820	49.1%	44.0%	15	34.1%	40.5%	\$1,150	61.4%	46.8%	19	44.2%	40.0%	\$670	36.6%	40.6%
	Upper	38	43.7%	\$1,002	27.0%	41.7%	20	45.5%	41.0%	\$512	27.3%	31.0%	18	41.9%	40.3%	\$490	26.7%	31.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.2%	\$0	0.0%	5.2%	0	0.0%	6.5%	\$0	0.0%	6.0%
Total	87	100.0%	\$3,706	100.0%	100.0%	44	100.0%	100.0%	\$1,874	100.0%	100.0%	43	100.0%	100.0%	\$1,832	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	10.8%	0	0.0%	17.6%	\$0	0.0%	7.8%	0	0.0%	13.3%	\$0	0.0%	20.4%
	Middle	0	0.0%	\$0	0.0%	52.3%	0	0.0%	64.7%	\$0	0.0%	85.7%	0	0.0%	53.3%	\$0	0.0%	69.5%
	Upper	0	0.0%	\$0	0.0%	36.9%	0	0.0%	5.9%	\$0	0.0%	3.9%	0	0.0%	26.7%	\$0	0.0%	8.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.8%	\$0	0.0%	2.5%	0	0.0%	6.7%	\$0	0.0%	1.2%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AZ Flagstaff

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count #	% %	Dollar \$ (000s) \$ %			Count #	% %	Agg %	Dollar \$ (000s) \$ % \$ %			Count #	% %	Agg %	Dollar \$ (000s) \$ % \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.2%	0	0.0%	1.3%	\$0	0.0%	0.6%	0	0.0%	1.9%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	10.0%	\$0	0.0%	6.5%	0	0.0%	10.4%	\$0	0.0%	7.2%
	Middle	2	8.7%	\$494	5.6%	20.0%	1	7.7%	18.7%	\$130	2.8%	15.4%	1	10.0%	18.5%	\$364	9.0%	15.8%
	Upper	21	91.3%	\$8,267	94.4%	41.0%	12	92.3%	55.2%	\$4,565	97.2%	62.8%	9	90.0%	57.5%	\$3,702	91.0%	64.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.8%	\$0	0.0%	14.7%	0	0.0%	11.8%	\$0	0.0%	11.7%
	Total	23	100.0%	\$8,761	100.0%	100.0%	13	100.0%	100.0%	\$4,695	100.0%	100.0%	10	100.0%	100.0%	\$4,066	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.2%	0	0.0%	2.6%	\$0	0.0%	1.5%	0	0.0%	1.3%	\$0	0.0%	0.7%
	Moderate	2	11.1%	\$339	6.0%	17.8%	2	20.0%	9.0%	\$339	11.1%	5.8%	0	0.0%	9.7%	\$0	0.0%	6.3%
	Middle	5	27.8%	\$1,105	19.5%	20.0%	3	30.0%	16.2%	\$563	18.4%	13.2%	2	25.0%	16.0%	\$542	20.7%	13.5%
	Upper	10	55.6%	\$4,076	71.8%	41.0%	5	50.0%	50.1%	\$2,150	70.4%	56.4%	5	62.5%	52.7%	\$1,926	73.5%	59.3%
	Unknown	1	5.6%	\$153	2.7%	0.0%	0	0.0%	22.2%	\$0	0.0%	23.1%	1	12.5%	20.4%	\$153	5.8%	20.2%
	Total	18	100.0%	\$5,673	100.0%	100.0%	10	100.0%	100.0%	\$3,052	100.0%	100.0%	8	100.0%	100.0%	\$2,621	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.2%	0	0.0%	1.0%	\$0	0.0%	0.1%	0	0.0%	2.0%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	11.5%	\$0	0.0%	6.3%	0	0.0%	13.3%	\$0	0.0%	6.2%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	13.5%	\$0	0.0%	9.5%	0	0.0%	21.4%	\$0	0.0%	22.7%
	Upper	2	100.0%	\$908	100.0%	41.0%	1	100.0%	63.5%	\$878	100.0%	70.3%	1	100.0%	60.2%	\$30	100.0%	68.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.4%	\$0	0.0%	13.8%	0	0.0%	3.1%	\$0	0.0%	3.0%
	Total	2	100.0%	\$908	100.0%	100.0%	1	100.0%	100.0%	\$878	100.0%	100.0%	1	100.0%	100.0%	\$30	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.2%	0	0.0%	1.9%	\$0	0.0%	0.9%	0	0.0%	1.6%	\$0	0.0%	0.8%
	Moderate	2	4.7%	\$339	2.2%	17.8%	2	8.3%	9.6%	\$339	3.9%	5.6%	0	0.0%	10.1%	\$0	0.0%	6.3%
	Middle	7	16.3%	\$1,599	10.4%	20.0%	4	16.7%	17.4%	\$693	8.0%	12.9%	3	15.8%	17.4%	\$906	13.5%	13.8%
	Upper	33	76.7%	\$13,251	86.4%	41.0%	18	75.0%	52.9%	\$7,593	88.0%	54.0%	15	78.9%	55.4%	\$5,658	84.2%	57.7%
	Unknown	1	2.3%	\$153	1.0%	0.0%	0	0.0%	18.3%	\$0	0.0%	26.6%	1	5.3%	15.5%	\$153	2.3%	21.4%
	Total	43	100.0%	\$15,342	100.0%	100.0%	24	100.0%	100.0%	\$8,625	100.0%	100.0%	19	100.0%	100.0%	\$6,717	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	57	65.5%	\$1,949	52.6%	91.1%	28	63.6%	47.2%	\$1,147	61.2%	35.6%	29	67.4%	43.2%	\$802	43.8%	37.4%
	Over \$1 Million	20	23.0%	\$1,665	44.9%	7.7%	10	22.7%					10	23.3%				
	Total Rev. available	77	88.5%	\$3,614	97.5%	98.8%	38	86.3%					39	90.7%				
	Rev. Not Known	10	11.5%	\$92	2.5%	1.1%	6	13.6%					4	9.3%				
Total	87	100.0%	\$3,706	100.0%	100.0%	44	100.0%					43	100.0%					
Small Business Loan Size	\$100,000 or Less	84	96.6%	\$2,501	67.5%		42	95.5%	95.5%	\$1,169	62.4%	51.9%	42	97.7%	95.5%	\$1,332	72.7%	48.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.8%	\$0	0.0%	16.6%	0	0.0%	2.3%	\$0	0.0%	13.2%
	\$250,001 - \$1 Million	3	3.4%	\$1,205	32.5%		2	4.5%	1.7%	\$705	37.6%	31.5%	1	2.3%	2.2%	\$500	27.3%	38.3%
	Total	87	100.0%	\$3,706	100.0%		44	100.0%	100.0%	\$1,874	100.0%	100.0%	43	100.0%	100.0%	\$1,832	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.6%	0	0.0%	52.9%	\$0	0.0%	57.8%	0	0.0%	46.7%	\$0	0.0%	30.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.4%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	88.2%	\$0	0.0%	32.4%	0	0.0%	80.0%	\$0	0.0%	19.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	11.8%	\$0	0.0%	67.6%	0	0.0%	13.3%	\$0	0.0%	43.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	6.7%	\$0	0.0%	37.1%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AZ Lake Havasu City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	4.8%	\$323	1.7%	10.1%	1	2.4%	4.2%	\$75	0.8%	2.6%	3	7.0%	4.0%	\$248	2.6%	2.3%
	Middle	70	83.3%	\$15,160	80.0%	83.1%	33	80.5%	89.2%	\$6,334	68.5%	88.9%	37	86.0%	89.2%	\$8,826	91.1%	89.5%
	Upper	10	11.9%	\$3,461	18.3%	6.9%	7	17.1%	6.6%	\$2,844	30.7%	8.6%	3	7.0%	6.7%	\$617	6.4%	8.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	84	100.0%	\$18,944	100.0%	100.0%	41	100.0%	100.0%	\$9,253	100.0%	100.0%	43	100.0%	100.0%	\$9,691	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	1	1.7%	\$66	0.6%	10.1%	1	3.3%	3.1%	\$66	1.4%	2.1%	0	0.0%	2.7%	\$0	0.0%	1.4%
	Middle	49	81.7%	\$7,687	74.6%	83.1%	24	80.0%	89.6%	\$3,421	71.7%	89.4%	25	83.3%	90.8%	\$4,266	77.0%	91.0%
	Upper	10	16.7%	\$2,558	24.8%	6.9%	5	16.7%	7.4%	\$1,286	26.9%	8.4%	5	16.7%	6.5%	\$1,272	23.0%	7.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	60	100.0%	\$10,311	100.0%	100.0%	30	100.0%	100.0%	\$4,773	100.0%	100.0%	30	100.0%	100.0%	\$5,538	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	10.1%	0	0.0%	2.5%	\$0	0.0%	1.2%	0	0.0%	3.4%	\$0	0.0%	0.4%
	Middle	7	100.0%	\$116	100.0%	83.1%	5	100.0%	92.1%	\$46	100.0%	90.4%	2	100.0%	89.4%	\$70	100.0%	90.9%
	Upper	0	0.0%	\$0	0.0%	6.9%	0	0.0%	5.4%	\$0	0.0%	8.4%	0	0.0%	7.2%	\$0	0.0%	8.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$116	100.0%	100.0%	5	100.0%	100.0%	\$46	100.0%	100.0%	2	100.0%	100.0%	\$70	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	5	3.3%	\$389	1.3%	10.1%	2	2.6%	3.7%	\$141	1.0%	2.4%	3	4.0%	3.4%	\$248	1.6%	1.9%
	Middle	126	83.4%	\$22,963	78.2%	83.1%	62	81.6%	89.5%	\$9,801	69.6%	89.2%	64	85.3%	89.9%	\$13,162	86.0%	90.3%
	Upper	20	13.2%	\$6,019	20.5%	6.9%	12	15.8%	6.9%	\$4,130	29.3%	8.5%	8	10.7%	6.7%	\$1,889	12.3%	7.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	151	100.0%	\$29,371	100.0%	100.0%	76	100.0%	100.0%	\$14,072	100.0%	100.0%	75	100.0%	100.0%	\$15,299	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	10	5.4%	\$380	5.2%	4.6%	4	4.7%	4.7%	\$180	5.2%	2.7%	6	6.1%	4.5%	\$200	5.3%	2.8%
	Middle	164	88.6%	\$6,333	87.4%	88.1%	76	88.4%	84.9%	\$3,019	86.8%	87.3%	88	88.9%	84.6%	\$3,314	88.0%	83.8%
	Upper	11	5.9%	\$530	7.3%	7.3%	6	7.0%	7.6%	\$280	8.0%	7.0%	5	5.1%	7.3%	\$250	6.6%	9.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	3.0%	0	0.0%	3.6%	\$0	0.0%	3.5%
Total	185	100.0%	\$7,243	100.0%	100.0%	86	100.0%	100.0%	\$3,479	100.0%	100.0%	99	100.0%	100.0%	\$3,764	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	7.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	89.1%	0	0.0%	80.0%	\$0	0.0%	53.2%	0	0.0%	84.2%	\$0	0.0%	88.5%
	Upper	0	0.0%	\$0	0.0%	3.6%	0	0.0%	20.0%	\$0	0.0%	46.8%	0	0.0%	15.8%	\$0	0.0%	11.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	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%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AZ Lake Havasu City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	3	3.6%	\$303	1.6%	18.4%	0	0.0%	2.3%	\$0	0.0%	1.1%	3	7.0%	4.8%	\$303	3.1%	2.4%
	Moderate	11	13.1%	\$1,275	6.7%	19.3%	4	9.8%	11.2%	\$390	4.2%	7.2%	7	16.3%	13.9%	\$885	9.1%	9.8%
	Middle	14	16.7%	\$1,657	8.7%	23.4%	6	14.6%	17.4%	\$645	7.0%	14.6%	8	18.6%	18.9%	\$1,012	10.4%	16.4%
	Upper	56	66.7%	\$15,709	82.9%	38.9%	31	75.6%	52.9%	\$8,218	88.8%	62.4%	25	58.1%	46.8%	\$7,491	77.3%	56.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.2%	\$0	0.0%	14.8%	0	0.0%	15.6%	\$0	0.0%	14.7%
	Total	84	100.0%	\$18,944	100.0%	100.0%	41	100.0%	100.0%	\$9,253	100.0%	100.0%	43	100.0%	100.0%	\$9,691	100.0%	100.0%
REFINANCE	Low	1	1.7%	\$116	1.1%	18.4%	0	0.0%	2.5%	\$0	0.0%	1.4%	1	3.3%	4.7%	\$116	2.1%	2.6%
	Moderate	13	21.7%	\$1,485	14.4%	19.3%	7	23.3%	9.7%	\$719	15.1%	6.2%	6	20.0%	11.2%	\$766	13.8%	7.9%
	Middle	9	15.0%	\$1,078	10.5%	23.4%	4	13.3%	13.8%	\$332	7.0%	11.1%	5	16.7%	16.7%	\$746	13.5%	14.8%
	Upper	37	61.7%	\$7,632	74.0%	38.9%	19	63.3%	45.6%	\$3,722	78.0%	51.2%	18	60.0%	38.0%	\$3,910	70.6%	44.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	28.3%	\$0	0.0%	30.1%	0	0.0%	29.4%	\$0	0.0%	30.0%
	Total	60	100.0%	\$10,311	100.0%	100.0%	30	100.0%	100.0%	\$4,773	100.0%	100.0%	30	100.0%	100.0%	\$5,538	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	18.4%	0	0.0%	2.1%	\$0	0.0%	0.4%	0	0.0%	8.7%	\$0	0.0%	4.5%
	Moderate	2	28.6%	\$22	19.0%	19.3%	2	40.0%	14.1%	\$22	47.8%	7.5%	0	0.0%	15.6%	\$0	0.0%	10.8%
	Middle	1	14.3%	\$4	3.4%	23.4%	1	20.0%	12.9%	\$4	8.7%	10.9%	0	0.0%	18.3%	\$0	0.0%	17.1%
	Upper	4	57.1%	\$90	77.6%	38.9%	2	40.0%	62.7%	\$20	43.5%	69.6%	2	100.0%	50.6%	\$70	100.0%	57.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.3%	\$0	0.0%	11.6%	0	0.0%	6.8%	\$0	0.0%	10.2%
	Total	7	100.0%	\$116	100.0%	100.0%	5	100.0%	100.0%	\$46	100.0%	100.0%	2	100.0%	100.0%	\$70	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	2.6%	\$419	1.4%	18.4%	0	0.0%	2.4%	\$0	0.0%	1.2%	4	5.3%	4.9%	\$419	2.7%	2.5%
	Moderate	26	17.2%	\$2,782	9.5%	19.3%	13	17.1%	10.7%	\$1,131	8.0%	6.7%	13	17.3%	12.8%	\$1,651	10.8%	8.9%
	Middle	24	15.9%	\$2,739	9.3%	23.4%	11	14.5%	15.8%	\$981	7.0%	13.0%	13	17.3%	18.0%	\$1,758	11.5%	15.4%
	Upper	97	64.2%	\$23,431	79.8%	38.9%	52	68.4%	50.3%	\$11,960	85.0%	57.5%	45	60.0%	43.3%	\$11,471	75.0%	50.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.9%	\$0	0.0%	21.7%	0	0.0%	21.1%	\$0	0.0%	22.4%
	Total	151	100.0%	\$29,371	100.0%	100.0%	76	100.0%	100.0%	\$14,072	100.0%	100.0%	75	100.0%	100.0%	\$15,299	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	115	62.2%	\$4,143	57.2%	93.0%	53	61.6%	54.3%	\$1,953	56.1%	43.3%	62	62.6%	44.3%	\$2,190	58.2%	35.4%
	Over \$1 Million	49	26.5%	\$2,812	38.8%	6.3%	24	27.9%					25	25.3%				
	Total Rev. available	164	88.7%	\$6,955	96.0%	99.3%	77	89.5%					87	87.9%				
	Rev. Not Known	21	11.4%	\$288	4.0%	0.7%	9	10.5%					12	12.1%				
Total	185	100.0%	\$7,243	100.0%	100.0%	86	100.0%					99	100.0%					
Small Business Loan Size	\$100,000 or Less	180	97.3%	\$6,533	90.2%		83	96.5%	97.3%	\$3,069	88.2%	58.8%	97	98.0%	97.9%	\$3,464	92.0%	62.0%
	\$100,001 - \$250,000	5	2.7%	\$710	9.8%		3	3.5%	1.8%	\$410	11.8%	15.1%	2	2.0%	1.1%	\$300	8.0%	9.8%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	26.1%	0	0.0%	1.0%	\$0	0.0%	28.2%
	Total	185	100.0%	\$7,243	100.0%		86	100.0%	100.0%	\$3,479	100.0%	100.0%	99	100.0%	100.0%	\$3,764	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.8%	0	0.0%	40.0%	\$0	0.0%	36.1%	0	0.0%	26.3%	\$0	0.0%	8.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.2%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.0%	\$0	0.0%	29.7%	0	0.0%	84.2%	\$0	0.0%	35.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	13.3%	\$0	0.0%	31.2%	0	0.0%	10.5%	\$0	0.0%	27.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.7%	\$0	0.0%	39.0%	0	0.0%	5.3%	\$0	0.0%	37.4%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AZ Northern AZ

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2015				2016							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%	%	Bank #	Agg %	Bank \$ (000s)	\$ %	\$ %	Bank #	Agg %	Bank \$ (000s)	%	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.8%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Middle	13	43.3%	\$2,318	35.8%	49.0%	9	39.1%	51.7%	\$1,638	34.2%	50.2%	4	57.1%	49.8%	\$680	40.4%	48.4%
	Upper	17	56.7%	\$4,148	64.2%	34.9%	14	60.9%	47.8%	\$3,146	65.8%	49.6%	3	42.9%	49.5%	\$1,002	59.6%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	30	100.0%	\$6,466	100.0%	100.0%	23	100.0%	100.0%	\$4,784	100.0%	100.0%	7	100.0%	100.0%	\$1,682	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.4%	\$0	0.0%	0.3%
	Middle	9	45.0%	\$1,392	35.5%	49.0%	4	40.0%	52.0%	\$578	26.5%	48.2%	5	50.0%	52.2%	\$814	46.9%	47.6%
	Upper	11	55.0%	\$2,526	64.5%	34.9%	6	60.0%	47.8%	\$1,603	73.5%	51.7%	5	50.0%	47.4%	\$923	53.1%	52.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	20	100.0%	\$3,918	100.0%	100.0%	10	100.0%	100.0%	\$2,181	100.0%	100.0%	10	100.0%	100.0%	\$1,737	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.7%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	6.2%	\$0	0.0%	0.8%	0	0.0%	4.2%	\$0	0.0%	2.0%
	Middle	4	50.0%	\$43	35.5%	49.0%	1	33.3%	53.6%	\$9	33.3%	44.9%	3	60.0%	53.1%	\$34	36.2%	53.5%
	Upper	4	50.0%	\$78	64.5%	34.9%	2	66.7%	40.2%	\$18	66.7%	54.3%	2	40.0%	42.0%	\$60	63.8%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$121	100.0%	100.0%	3	100.0%	100.0%	\$27	100.0%	100.0%	5	100.0%	100.0%	\$94	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.8%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	0.4%	\$0	0.0%	0.1%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Middle	26	44.8%	\$3,753	35.7%	49.0%	14	38.9%	51.9%	\$2,225	31.8%	49.6%	12	54.5%	50.7%	\$1,528	43.5%	48.1%
	Upper	32	55.2%	\$6,752	64.3%	34.9%	22	61.1%	47.6%	\$4,767	68.2%	50.3%	10	45.5%	48.5%	\$1,985	56.5%	51.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	58	100.0%	\$10,505	100.0%	100.0%	36	100.0%	100.0%	\$6,992	100.0%	100.0%	22	100.0%	100.0%	\$3,513	100.0%	100.0%
SMALL BUSINESSES	Small Businesses					Low	0	0.0%	0.1%	\$0	0.0%	0.8%	0	0.0%	0.2%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.5%	0	0.0%	2.0%	\$0	0.0%	2.2%	0	0.0%	1.8%	\$0	0.0%	0.8%
	Middle	35	61.4%	\$1,116	45.1%	49.6%	19	67.9%	47.6%	\$563	70.1%	44.7%	16	55.2%	45.7%	\$553	33.1%	45.1%
	Upper	22	38.6%	\$1,359	54.9%	47.5%	9	32.1%	42.2%	\$240	29.9%	46.4%	13	44.8%	39.5%	\$1,119	66.9%	43.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.1%	\$0	0.0%	6.0%	0	0.0%	12.8%	\$0	0.0%	10.7%
	Total	57	100.0%	\$2,475	100.0%	100.0%	28	100.0%	100.0%	\$803	100.0%	100.0%	29	100.0%	100.0%	\$1,672	100.0%	100.0%
SMALL FARM	Small Farms					Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$2	100.0%	59.0%	1	100.0%	66.7%	\$2	100.0%	61.1%	0	0.0%	55.6%	\$0	0.0%	56.5%
	Upper	0	0.0%	\$0	0.0%	37.0%	0	0.0%	16.7%	\$0	0.0%	26.1%	0	0.0%	14.8%	\$0	0.0%	25.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	12.9%	0	0.0%	29.6%	\$0	0.0%	18.3%
	Total	1	100.0%	\$2	100.0%	100.0%	1	100.0%	100.0%	\$2	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AZ Northern AZ

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	1	3.3%	\$120	1.9%	20.1%	0	0.0%	1.9%	\$0	0.0%	1.0%	1	14.3%	1.0%	\$120	7.1%	0.5%
	Moderate	2	6.7%	\$240	3.7%	16.8%	2	8.7%	9.8%	\$240	5.0%	6.8%	0	0.0%	8.7%	\$0	0.0%	5.5%
	Middle	3	10.0%	\$434	6.7%	18.9%	2	8.7%	16.9%	\$223	4.7%	13.6%	1	14.3%	16.4%	\$211	12.5%	13.0%
	Upper	24	80.0%	\$5,672	87.7%	44.2%	19	82.6%	54.9%	\$4,321	90.3%	62.2%	5	71.4%	61.4%	\$1,351	80.3%	68.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.5%	\$0	0.0%	16.5%	0	0.0%	12.6%	\$0	0.0%	12.2%
	Total	30	100.0%	\$6,466	100.0%	100.0%	23	100.0%	100.0%	\$4,784	100.0%	100.0%	7	100.0%	100.0%	\$1,682	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	2.9%	\$0	0.0%	1.5%	0	0.0%	2.3%	\$0	0.0%	1.2%
	Moderate	2	10.0%	\$139	3.5%	16.8%	1	10.0%	7.8%	\$85	3.9%	4.8%	1	10.0%	7.6%	\$54	3.1%	4.6%
	Middle	1	5.0%	\$219	5.6%	18.9%	1	10.0%	13.0%	\$219	10.0%	10.4%	0	0.0%	12.3%	\$0	0.0%	9.0%
	Upper	17	85.0%	\$3,560	90.9%	44.2%	8	80.0%	50.6%	\$1,877	86.1%	56.7%	9	90.0%	53.4%	\$1,683	96.9%	59.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.7%	\$0	0.0%	26.6%	0	0.0%	24.5%	\$0	0.0%	25.9%
	Total	20	100.0%	\$3,918	100.0%	100.0%	10	100.0%	100.0%	\$2,181	100.0%	100.0%	10	100.0%	100.0%	\$1,737	100.0%	100.0%
HOME IMPROVEMENT	Low	1	12.5%	\$3	2.5%	20.1%	1	33.3%	11.3%	\$3	11.1%	1.4%	0	0.0%	4.2%	\$0	0.0%	1.7%
	Moderate	2	25.0%	\$17	14.0%	16.8%	1	33.3%	18.6%	\$15	55.6%	10.6%	1	20.0%	15.4%	\$2	2.1%	6.9%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	18.6%	\$0	0.0%	11.1%	0	0.0%	12.6%	\$0	0.0%	6.6%
	Upper	5	62.5%	\$101	83.5%	44.2%	1	33.3%	42.3%	\$9	33.3%	51.2%	4	80.0%	62.2%	\$92	97.9%	80.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.3%	\$0	0.0%	25.7%	0	0.0%	5.6%	\$0	0.0%	4.9%
	Total	8	100.0%	\$121	100.0%	100.0%	3	100.0%	100.0%	\$27	100.0%	100.0%	5	100.0%	100.0%	\$94	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	44.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	3.4%	\$123	1.2%	20.1%	1	2.8%	2.5%	\$3	0.0%	1.2%	1	4.5%	1.6%	\$120	3.4%	0.8%
	Moderate	6	10.3%	\$396	3.8%	16.8%	4	11.1%	9.3%	\$340	4.9%	6.0%	2	9.1%	8.5%	\$56	1.6%	5.2%
	Middle	4	6.9%	\$653	6.2%	18.9%	3	8.3%	15.5%	\$442	6.3%	12.3%	1	4.5%	14.7%	\$211	6.0%	11.3%
	Upper	46	79.3%	\$9,333	88.8%	44.2%	28	77.8%	52.9%	\$6,207	88.8%	59.7%	18	81.8%	58.4%	\$3,126	89.0%	65.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.8%	\$0	0.0%	20.8%	0	0.0%	16.9%	\$0	0.0%	17.6%
	Total	58	100.0%	\$10,505	100.0%	100.0%	36	100.0%	100.0%	\$6,992	100.0%	100.0%	22	100.0%	100.0%	\$3,513	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	42	73.7%	\$1,121	45.3%	92.4%	20	71.4%	49.0%	\$565	70.4%	44.3%	22	75.9%	42.3%	\$556	33.3%	36.0%
	Over \$1 Million	10	17.5%	\$1,233	49.8%	6.0%	4	14.3%					6	20.7%				
	Total Rev. available	52	91.2%	\$2,354	95.1%	98.4%	24	85.7%					28	96.6%				
	Rev. Not Known	5	8.8%	\$121	4.9%	1.5%	4	14.3%					1	3.4%				
	Total	57	100.0%	\$2,475	100.0%	100.0%	28	100.0%					29	100.0%				
Small Business Loan Size	\$100,000 or Less	56	98.2%	\$1,629	65.8%		28	100.0%	95.5%	\$803	100.0%	46.9%	28	96.6%	97.4%	\$826	49.4%	62.3%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	9.9%	0	0.0%	1.4%	\$0	0.0%	9.9%
	\$250,001 - \$1 Million	1	1.8%	\$846	34.2%		0	0.0%	2.6%	\$0	0.0%	43.2%	1	3.4%	1.2%	\$846	50.6%	27.8%
	Total	57	100.0%	\$2,475	100.0%		28	100.0%	100.0%	\$803	100.0%	100.0%	29	100.0%	100.0%	\$1,672	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	93.5%	0	0.0%	54.2%	\$0	0.0%	85.1%	0	0.0%	51.9%	\$0	0.0%	90.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	6.5%	0	0.0%					0	0.0%				
	Not Known	1	100.0%	\$2	100.0%	0.0%	1	100.0%					0	0.0%				
	Total	1	100.0%	\$2	100.0%	100.0%	1	100.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$2	100.0%		1	100.0%	83.3%	\$2	100.0%	31.2%	0	0.0%	88.9%	\$0	0.0%	40.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.3%	\$0	0.0%	20.9%	0	0.0%	3.7%	\$0	0.0%	15.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	8.3%	\$0	0.0%	48.0%	0	0.0%	7.4%	\$0	0.0%	44.7%
	Total	1	100.0%	\$2	100.0%		1	100.0%	100.0%	\$2	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AZ Prescott

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2015				2016							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%	Bank #	Agg %	Bank \$ (000s)	\$ %	\$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	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%
	Moderate	4	10.8%	\$588	5.8%	11.6%	3	12.5%	10.3%	\$372	6.6%	7.8%	1	7.7%	12.4%	\$216	4.8%	10.4%
	Middle	23	62.2%	\$5,496	54.3%	68.2%	16	66.7%	72.6%	\$3,357	59.7%	68.5%	7	53.8%	71.7%	\$2,139	47.6%	67.1%
	Upper	10	27.0%	\$4,038	39.9%	20.2%	5	20.8%	17.1%	\$1,895	33.7%	23.7%	5	38.5%	15.9%	\$2,143	47.6%	22.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	37	100.0%	\$10,122	100.0%	100.0%	24	100.0%	100.0%	\$5,624	100.0%	100.0%	13	100.0%	100.0%	\$4,498	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	3	10.7%	\$517	9.7%	11.6%	2	10.5%	9.8%	\$310	8.9%	7.0%	1	11.1%	10.8%	\$207	11.1%	9.0%
	Middle	19	67.9%	\$3,103	57.9%	68.2%	14	73.7%	68.0%	\$2,296	65.8%	63.5%	5	55.6%	69.0%	\$807	43.3%	64.4%
	Upper	6	21.4%	\$1,736	32.4%	20.2%	3	15.8%	22.2%	\$886	25.4%	29.5%	3	33.3%	20.2%	\$850	45.6%	26.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	28	100.0%	\$5,356	100.0%	100.0%	19	100.0%	100.0%	\$3,492	100.0%	100.0%	9	100.0%	100.0%	\$1,864	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	1	20.0%	\$10	21.7%	11.6%	1	33.3%	8.0%	\$10	31.3%	5.3%	0	0.0%	12.0%	\$0	0.0%	8.3%
	Middle	4	80.0%	\$36	78.3%	68.2%	2	66.7%	69.0%	\$22	68.8%	60.6%	2	100.0%	66.8%	\$14	100.0%	62.3%
	Upper	0	0.0%	\$0	0.0%	20.2%	0	0.0%	23.0%	\$0	0.0%	34.1%	0	0.0%	21.2%	\$0	0.0%	29.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$46	100.0%	100.0%	3	100.0%	100.0%	\$32	100.0%	100.0%	2	100.0%	100.0%	\$14	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	66.7%	\$0	0.0%	97.0%	0	0.0%	63.6%	\$0	0.0%	41.4%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	33.3%	\$0	0.0%	3.0%	0	0.0%	27.3%	\$0	0.0%	38.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	20.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	8	11.4%	\$1,115	7.2%	11.6%	6	13.0%	10.1%	\$692	7.6%	8.9%	2	8.3%	11.8%	\$423	6.6%	10.8%
	Middle	46	65.7%	\$8,635	55.6%	68.2%	32	69.6%	70.7%	\$5,675	62.0%	65.4%	14	58.3%	70.3%	\$2,960	46.4%	65.0%
	Upper	16	22.9%	\$5,774	37.2%	20.2%	8	17.4%	19.2%	\$2,781	30.4%	25.7%	8	33.3%	17.8%	\$2,993	46.9%	24.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	70	100.0%	\$15,524	100.0%	100.0%	46	100.0%	100.0%	\$9,148	100.0%	100.0%	24	100.0%	100.0%	\$6,376	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	28	31.5%	\$997	26.3%	17.5%	14	31.8%	15.8%	\$441	20.1%	23.3%	14	31.1%	13.3%	\$556	34.8%	15.8%
	Middle	41	46.1%	\$1,450	38.2%	56.4%	20	45.5%	55.0%	\$705	32.1%	46.2%	21	46.7%	53.9%	\$745	46.7%	53.5%
	Upper	20	22.5%	\$1,345	35.5%	26.1%	10	22.7%	25.1%	\$1,050	47.8%	26.3%	10	22.2%	25.2%	\$295	18.5%	24.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	4.2%	0	0.0%	7.7%	\$0	0.0%	6.4%
Total	89	100.0%	\$3,792	100.0%	100.0%	44	100.0%	100.0%	\$2,196	100.0%	100.0%	45	100.0%	100.0%	\$1,596	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	8.0%	0	0.0%	3.9%	\$0	0.0%	3.7%	0	0.0%	6.5%	\$0	0.0%	8.6%
	Middle	0	0.0%	\$0	0.0%	69.5%	0	0.0%	66.7%	\$0	0.0%	74.1%	0	0.0%	58.7%	\$0	0.0%	60.9%
	Upper	0	0.0%	\$0	0.0%	22.5%	0	0.0%	21.6%	\$0	0.0%	16.1%	0	0.0%	26.1%	\$0	0.0%	24.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.8%	\$0	0.0%	6.2%	0	0.0%	8.7%	\$0	0.0%	6.1%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: AZ Prescott

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	3	8.1%	\$343	3.4%	18.5%	2	8.3%	4.0%	\$175	3.1%	2.0%	1	7.7%	3.0%	\$168	3.7%	1.4%
	Moderate	4	10.8%	\$524	5.2%	20.3%	3	12.5%	14.9%	\$345	6.1%	10.4%	1	7.7%	13.4%	\$179	4.0%	8.7%
	Middle	7	18.9%	\$1,129	11.2%	20.9%	6	25.0%	22.4%	\$913	16.2%	19.6%	1	7.7%	21.0%	\$216	4.8%	17.7%
	Upper	23	62.2%	\$8,126	80.3%	40.3%	13	54.2%	41.3%	\$4,191	74.5%	51.3%	10	76.9%	48.2%	\$3,935	87.5%	58.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.3%	\$0	0.0%	16.7%	0	0.0%	14.4%	\$0	0.0%	14.1%
	Total	37	100.0%	\$10,122	100.0%	100.0%	24	100.0%	100.0%	\$5,624	100.0%	100.0%	13	100.0%	100.0%	\$4,498	100.0%	100.0%
REFINANCE	Low	3	10.7%	\$262	4.9%	18.5%	2	10.5%	5.0%	\$165	4.7%	2.5%	1	11.1%	3.6%	\$97	5.2%	1.9%
	Moderate	8	28.6%	\$1,252	23.4%	20.3%	6	31.6%	13.2%	\$890	25.5%	8.7%	2	22.2%	9.2%	\$362	19.4%	6.0%
	Middle	5	17.9%	\$581	10.8%	20.9%	3	15.8%	20.1%	\$321	9.2%	17.3%	2	22.2%	18.8%	\$260	13.9%	15.6%
	Upper	12	42.9%	\$3,261	60.9%	40.3%	8	42.1%	36.3%	\$2,116	60.6%	44.5%	4	44.4%	41.7%	\$1,145	61.4%	48.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.4%	\$0	0.0%	27.1%	0	0.0%	26.7%	\$0	0.0%	28.1%
	Total	28	100.0%	\$5,356	100.0%	100.0%	19	100.0%	100.0%	\$3,492	100.0%	100.0%	9	100.0%	100.0%	\$1,864	100.0%	100.0%
HOME IMPROVEMENT	Low	1	20.0%	\$8	17.4%	18.5%	0	0.0%	8.5%	\$0	0.0%	2.3%	1	50.0%	7.3%	\$8	57.1%	3.9%
	Moderate	1	20.0%	\$6	13.0%	20.3%	0	0.0%	15.5%	\$0	0.0%	10.2%	1	50.0%	11.2%	\$6	42.9%	6.5%
	Middle	1	20.0%	\$10	21.7%	20.9%	1	33.3%	29.1%	\$10	31.3%	23.6%	0	0.0%	27.8%	\$0	0.0%	26.1%
	Upper	2	40.0%	\$22	47.8%	40.3%	2	66.7%	41.8%	\$22	68.8%	58.2%	0	0.0%	50.2%	\$0	0.0%	60.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.2%	\$0	0.0%	5.7%	0	0.0%	3.5%	\$0	0.0%	2.7%
	Total	5	100.0%	\$46	100.0%	100.0%	3	100.0%	100.0%	\$32	100.0%	100.0%	2	100.0%	100.0%	\$14	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	7	10.0%	\$613	3.9%	18.5%	4	8.7%	4.5%	\$340	3.7%	2.1%	3	12.5%	3.4%	\$273	4.3%	1.6%
	Moderate	13	18.6%	\$1,782	11.5%	20.3%	9	19.6%	14.2%	\$1,235	13.5%	9.6%	4	16.7%	11.5%	\$547	8.6%	7.3%
	Middle	13	18.6%	\$1,720	11.1%	20.9%	10	21.7%	21.6%	\$1,244	13.6%	18.5%	3	12.5%	20.2%	\$476	7.5%	16.4%
	Upper	37	52.9%	\$11,409	73.5%	40.3%	23	50.0%	39.3%	\$6,329	69.2%	47.9%	14	58.3%	45.3%	\$5,080	79.7%	52.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.3%	\$0	0.0%	21.9%	0	0.0%	19.6%	\$0	0.0%	22.3%
	Total	70	100.0%	\$15,524	100.0%	100.0%	46	100.0%	100.0%	\$9,148	100.0%	100.0%	24	100.0%	100.0%	\$6,376	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	54	60.7%	\$2,500	65.9%	93.9%	27	61.4%	53.5%	\$1,595	72.6%	42.9%	27	60.0%	38.9%	\$905	56.7%	33.9%
	Over \$1 Million	26	29.2%	\$1,138	30.0%	5.3%	12	27.3%					14	31.1%				
	Total Rev. available	80	89.9%	\$3,638	95.9%	99.2%	39	88.7%					41	91.1%				
	Rev. Not Known	9	10.1%	\$154	4.1%	0.8%	5	11.4%					4	8.9%				
Total	89	100.0%	\$3,792	100.0%	100.0%	44	100.0%					45	100.0%					
Small Business Loan Size	\$100,000 or Less	88	98.9%	\$3,072	81.0%		43	97.7%	96.9%	\$1,476	67.2%	55.7%	45	100.0%	97.9%	\$1,596	100.0%	64.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	11.8%	0	0.0%	1.1%	\$0	0.0%	9.2%
	\$250,001 - \$1 Million	1	1.1%	\$720	19.0%		1	2.3%	1.5%	\$720	32.8%	32.5%	0	0.0%	1.0%	\$0	0.0%	26.1%
	Total	89	100.0%	\$3,792	100.0%		44	100.0%	100.0%	\$2,196	100.0%	100.0%	45	100.0%	100.0%	\$1,596	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.2%	0	0.0%	37.3%	\$0	0.0%	19.5%	0	0.0%	34.8%	\$0	0.0%	31.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.4%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.5%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.2%	\$0	0.0%	47.6%	0	0.0%	93.5%	\$0	0.0%	64.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.9%	\$0	0.0%	31.4%	0	0.0%	6.5%	\$0	0.0%	35.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AZ Sierra Vista-Douglas

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2015				2016							
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	29.4%	0	0.0%	22.0%	\$0	0.0%	16.1%	0	0.0%	24.3%	\$0	0.0%	18.6%
	Middle	3	75.0%	\$260	57.1%	47.1%	3	75.0%	48.5%	\$260	57.1%	44.6%	0	0.0%	49.0%	\$0	0.0%	47.0%
	Upper	1	25.0%	\$195	42.9%	23.5%	1	25.0%	29.5%	\$195	42.9%	39.3%	0	0.0%	26.7%	\$0	0.0%	34.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$455	100.0%	100.0%	4	100.0%	100.0%	\$455	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	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%
	Moderate	3	14.3%	\$195	8.9%	29.4%	0	0.0%	19.9%	\$0	0.0%	14.7%	3	30.0%	18.4%	\$195	19.5%	13.4%
	Middle	13	61.9%	\$1,484	67.8%	47.1%	10	90.9%	46.2%	\$1,077	90.7%	43.8%	3	30.0%	47.3%	\$407	40.6%	44.7%
	Upper	5	23.8%	\$510	23.3%	23.5%	1	9.1%	33.9%	\$110	9.3%	41.5%	4	40.0%	34.3%	\$400	39.9%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	21	100.0%	\$2,189	100.0%	100.0%	11	100.0%	100.0%	\$1,187	100.0%	100.0%	10	100.0%	100.0%	\$1,002	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	4	16.7%	\$74	15.0%	29.4%	3	23.1%	22.0%	\$44	16.1%	15.9%	1	9.1%	23.9%	\$30	13.6%	15.3%
	Middle	14	58.3%	\$245	49.6%	47.1%	4	30.8%	45.5%	\$55	20.1%	51.2%	10	90.9%	53.1%	\$190	86.4%	54.8%
	Upper	6	25.0%	\$175	35.4%	23.5%	6	46.2%	32.5%	\$175	63.9%	32.9%	0	0.0%	23.0%	\$0	0.0%	29.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	24	100.0%	\$494	100.0%	100.0%	13	100.0%	100.0%	\$274	100.0%	100.0%	11	100.0%	100.0%	\$220	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	83.3%	\$0	0.0%	84.3%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	15.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	7	14.3%	\$269	8.6%	29.4%	3	10.7%	21.1%	\$44	2.3%	17.1%	4	19.0%	21.8%	\$225	18.4%	15.5%
	Middle	30	61.2%	\$1,989	63.4%	47.1%	17	60.7%	47.3%	\$1,392	72.7%	43.4%	13	61.9%	48.4%	\$597	48.9%	47.5%
	Upper	12	24.5%	\$880	28.0%	23.5%	8	28.6%	31.6%	\$480	25.1%	39.4%	4	19.0%	29.7%	\$400	32.7%	36.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	49	100.0%	\$3,138	100.0%	100.0%	28	100.0%	100.0%	\$1,916	100.0%	100.0%	21	100.0%	100.0%	\$1,222	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	48	31.6%	\$1,574	27.4%	29.5%	22	28.9%	27.5%	\$682	24.9%	34.4%	26	34.2%	24.3%	\$892	29.7%	27.5%
	Middle	75	49.3%	\$3,184	55.4%	51.4%	41	53.9%	47.7%	\$1,590	58.1%	46.5%	34	44.7%	48.2%	\$1,594	53.0%	48.0%
	Upper	29	19.1%	\$985	17.2%	19.1%	13	17.1%	20.3%	\$465	17.0%	14.1%	16	21.1%	19.5%	\$520	17.3%	17.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.5%	\$0	0.0%	4.9%	0	0.0%	7.9%	\$0	0.0%	6.6%
Total	152	100.0%	\$5,743	100.0%	100.0%	76	100.0%	100.0%	\$2,737	100.0%	100.0%	76	100.0%	100.0%	\$3,006	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	30.4%	0	0.0%	21.6%	\$0	0.0%	28.3%	0	0.0%	41.1%	\$0	0.0%	48.6%
	Middle	0	0.0%	\$0	0.0%	49.1%	0	0.0%	62.7%	\$0	0.0%	53.1%	0	0.0%	42.9%	\$0	0.0%	37.9%
	Upper	1	100.0%	\$25	100.0%	20.5%	1	100.0%	9.8%	\$25	100.0%	14.1%	0	0.0%	12.5%	\$0	0.0%	11.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.9%	\$0	0.0%	4.6%	0	0.0%	3.6%	\$0	0.0%	2.1%
Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AZ Sierra Vista-Douglas

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	25.0%	\$72	15.8%	20.7%	1	25.0%	5.9%	\$72	15.8%	3.0%	0	0.0%	8.4%	\$0	0.0%	4.8%
	Moderate	2	50.0%	\$188	41.3%	17.9%	2	50.0%	16.5%	\$188	41.3%	11.2%	0	0.0%	15.8%	\$0	0.0%	11.6%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	17.5%	\$0	0.0%	16.2%	0	0.0%	19.2%	\$0	0.0%	17.5%
	Upper	1	25.0%	\$195	42.9%	41.4%	1	25.0%	37.4%	\$195	42.9%	48.6%	0	0.0%	32.3%	\$0	0.0%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.7%	\$0	0.0%	21.0%	0	0.0%	24.3%	\$0	0.0%	24.1%
	Total	4	100.0%	\$455	100.0%	100.0%	4	100.0%	100.0%	\$455	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	3	14.3%	\$215	9.8%	20.7%	1	9.1%	4.4%	\$69	5.8%	3.0%	2	20.0%	4.6%	\$146	14.6%	2.2%
	Moderate	4	19.0%	\$350	16.0%	17.9%	2	18.2%	9.0%	\$123	10.4%	5.5%	2	20.0%	7.7%	\$227	22.7%	4.8%
	Middle	4	19.0%	\$438	20.0%	20.0%	1	9.1%	9.9%	\$115	9.7%	8.1%	3	30.0%	9.8%	\$323	32.2%	7.6%
	Upper	10	47.6%	\$1,186	54.2%	41.4%	7	63.6%	28.9%	\$880	74.1%	30.8%	3	30.0%	24.6%	\$306	30.5%	27.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	47.8%	\$0	0.0%	52.6%	0	0.0%	53.2%	\$0	0.0%	58.1%
	Total	21	100.0%	\$2,189	100.0%	100.0%	11	100.0%	100.0%	\$1,187	100.0%	100.0%	10	100.0%	100.0%	\$1,002	100.0%	100.0%
HOME IMPROVEMENT	Low	1	4.2%	\$14	2.8%	20.7%	0	0.0%	6.5%	\$0	0.0%	3.1%	1	9.1%	11.5%	\$14	6.4%	2.9%
	Moderate	6	25.0%	\$76	15.4%	17.9%	4	30.8%	13.8%	\$40	14.6%	12.5%	2	18.2%	12.4%	\$36	16.4%	10.7%
	Middle	4	16.7%	\$59	11.9%	20.0%	1	7.7%	15.4%	\$26	9.5%	11.5%	3	27.3%	22.1%	\$33	15.0%	21.1%
	Upper	13	54.2%	\$345	69.8%	41.4%	8	61.5%	50.4%	\$208	75.9%	40.8%	5	45.5%	51.3%	\$137	62.3%	61.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.8%	\$0	0.0%	32.1%	0	0.0%	2.7%	\$0	0.0%	3.5%
	Total	24	100.0%	\$494	100.0%	100.0%	13	100.0%	100.0%	\$274	100.0%	100.0%	11	100.0%	100.0%	\$220	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	5	10.2%	\$301	9.6%	20.7%	2	7.1%	5.2%	\$141	7.4%	3.0%	3	14.3%	6.9%	\$160	13.1%	3.4%
	Moderate	12	24.5%	\$614	19.6%	17.9%	8	28.6%	13.1%	\$351	18.3%	8.4%	4	19.0%	12.3%	\$263	21.5%	8.1%
	Middle	8	16.3%	\$497	15.8%	20.0%	2	7.1%	14.0%	\$141	7.4%	12.1%	6	28.6%	15.3%	\$356	29.1%	12.4%
	Upper	24	49.0%	\$1,726	55.0%	41.4%	16	57.1%	34.1%	\$1,283	67.0%	39.2%	8	38.1%	29.6%	\$443	36.3%	33.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	33.6%	\$0	0.0%	37.4%	0	0.0%	35.9%	\$0	0.0%	42.1%
	Total	49	100.0%	\$3,138	100.0%	100.0%	28	100.0%	100.0%	\$1,916	100.0%	100.0%	21	100.0%	100.0%	\$1,222	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	103	67.8%	\$3,453	60.1%	92.8%	46	60.5%	49.7%	\$1,530	55.9%	41.8%	57	75.0%	41.6%	\$1,923	64.0%	39.1%
	Over \$1 Million	33	21.7%	\$2,134	37.2%	5.7%	17	22.4%					16	21.1%				
	Total Rev. available	136	89.5%	\$5,587	97.3%	98.5%	63	82.9%					73	96.1%				
	Rev. Not Known	16	10.5%	\$156	2.7%	1.5%	13	17.1%					3	3.9%				
Total	152	100.0%	\$5,743	100.0%	100.0%	76	100.0%					76	100.0%					
Small Business Loan Size	\$100,000 or Less	150	98.7%	\$5,341	93.0%		75	98.7%	96.5%	\$2,587	94.5%	56.1%	75	98.7%	97.7%	\$2,754	91.6%	63.5%
	\$100,001 - \$250,000	1	0.7%	\$150	2.6%		1	1.3%	2.2%	\$150	5.5%	13.9%	0	0.0%	1.2%	\$0	0.0%	9.2%
	\$250,001 - \$1 Million	1	0.7%	\$252	4.4%		0	0.0%	1.3%	\$0	0.0%	29.9%	1	1.3%	1.1%	\$252	8.4%	27.3%
	Total	152	100.0%	\$5,743	100.0%		76	100.0%	100.0%	\$2,737	100.0%	100.0%	76	100.0%	100.0%	\$3,006	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	1	100.0%	\$25	100.0%	97.8%	1	100.0%	31.4%	\$25	100.0%	16.5%	0	0.0%	39.3%	\$0	0.0%	38.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.2%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$25	100.0%		1	100.0%	74.5%	\$25	100.0%	27.4%	0	0.0%	73.2%	\$0	0.0%	18.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.6%	\$0	0.0%	36.9%	0	0.0%	14.3%	\$0	0.0%	26.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.8%	\$0	0.0%	35.7%	0	0.0%	12.5%	\$0	0.0%	54.5%
	Total	1	100.0%	\$25	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AZ Tucson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2015				2016							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
					#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	6	3.8%	\$642	1.5%	3.5%	4	4.0%	1.9%	\$379	1.5%	1.1%	2	3.4%	1.7%	\$263	1.4%	1.1%
	Moderate	31	19.7%	\$4,018	9.2%	22.0%	18	18.2%	13.8%	\$1,977	7.9%	9.3%	13	22.4%	15.3%	\$2,041	10.9%	10.6%
	Middle	33	21.0%	\$5,346	12.2%	37.4%	20	20.2%	37.7%	\$2,999	12.0%	31.7%	13	22.4%	37.1%	\$2,347	12.6%	31.4%
	Upper	87	55.4%	\$33,658	77.1%	37.2%	57	57.6%	46.6%	\$19,635	78.6%	57.8%	30	51.7%	45.9%	\$14,023	75.1%	56.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	157	100.0%	\$43,664	100.0%	100.0%	99	100.0%	100.0%	\$24,990	100.0%	100.0%	58	100.0%	100.0%	\$18,674	100.0%	100.0%
REFINANCE	Low	6	3.8%	\$723	2.1%	3.5%	2	2.5%	1.7%	\$129	0.8%	1.1%	4	5.2%	1.6%	\$594	3.5%	0.9%
	Moderate	27	17.2%	\$2,664	7.9%	22.0%	14	17.5%	13.6%	\$1,244	7.4%	8.7%	13	16.9%	12.5%	\$1,420	8.4%	8.0%
	Middle	39	24.8%	\$4,796	14.2%	37.4%	13	16.3%	34.8%	\$1,389	8.2%	28.0%	26	33.8%	35.0%	\$3,407	20.2%	28.7%
	Upper	85	54.1%	\$25,564	75.8%	37.2%	51	63.8%	49.9%	\$14,093	83.6%	62.2%	34	44.2%	50.9%	\$11,471	67.9%	62.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	157	100.0%	\$33,747	100.0%	100.0%	80	100.0%	100.0%	\$16,855	100.0%	100.0%	77	100.0%	100.0%	\$16,892	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	2.6%	\$0	0.0%	2.0%	0	0.0%	2.6%	\$0	0.0%	2.0%
	Moderate	8	21.1%	\$181	19.4%	22.0%	3	15.0%	15.5%	\$56	12.0%	9.1%	5	27.8%	14.0%	\$125	26.7%	10.0%
	Middle	16	42.1%	\$324	34.7%	37.4%	9	45.0%	30.3%	\$153	32.8%	21.5%	7	38.9%	35.9%	\$171	36.5%	27.6%
	Upper	14	36.8%	\$430	46.0%	37.2%	8	40.0%	51.6%	\$257	55.2%	67.3%	6	33.3%	47.5%	\$173	36.9%	60.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	38	100.0%	\$935	100.0%	100.0%	20	100.0%	100.0%	\$466	100.0%	100.0%	18	100.0%	100.0%	\$469	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	13.3%	\$0	0.0%	3.1%	0	0.0%	20.5%	\$0	0.0%	6.3%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	54.2%	\$0	0.0%	39.2%	0	0.0%	49.4%	\$0	0.0%	47.6%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	20.5%	\$0	0.0%	27.6%	0	0.0%	21.7%	\$0	0.0%	27.6%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	12.0%	\$0	0.0%	30.2%	0	0.0%	8.4%	\$0	0.0%	18.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	12	3.4%	\$1,365	1.7%	3.5%	6	3.0%	1.8%	\$508	1.2%	1.2%	6	3.9%	1.7%	\$857	2.4%	1.3%
	Moderate	66	18.8%	\$6,863	8.8%	22.0%	35	17.6%	13.9%	\$3,277	7.7%	10.5%	31	20.3%	14.2%	\$3,586	10.0%	11.1%
	Middle	88	25.0%	\$10,466	13.4%	37.4%	42	21.1%	36.3%	\$4,541	10.7%	29.9%	46	30.1%	36.2%	\$5,925	16.4%	30.2%
	Upper	186	52.8%	\$59,652	76.1%	37.2%	116	58.3%	48.0%	\$33,985	80.3%	58.4%	70	45.8%	47.9%	\$25,667	71.2%	57.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	352	100.0%	\$78,346	100.0%	100.0%	199	100.0%	100.0%	\$42,311	100.0%	100.0%	153	100.0%	100.0%	\$36,035	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	92	8.6%	\$5,221	10.7%	5.3%	47	9.1%	5.1%	\$2,041	8.7%	7.2%	45	8.2%	4.6%	\$3,180	12.6%	6.0%
	Moderate	299	28.1%	\$14,983	30.7%	23.6%	146	28.2%	24.0%	\$6,907	29.3%	30.2%	153	28.0%	22.1%	\$8,076	32.0%	29.7%
	Middle	357	33.6%	\$15,903	32.6%	31.1%	179	34.6%	29.5%	\$8,179	34.7%	28.9%	178	32.6%	29.5%	\$7,724	30.6%	27.9%
	Upper	316	29.7%	\$12,702	26.0%	40.0%	146	28.2%	39.4%	\$6,450	27.4%	32.1%	170	31.1%	40.9%	\$6,252	24.8%	34.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	1.6%	0	0.0%	2.9%	\$0	0.0%	2.1%
Total	1,064	100.0%	\$48,809	100.0%	100.0%	518	100.0%	100.0%	\$23,577	100.0%	100.0%	546	100.0%	100.0%	\$25,232	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.3%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.2%	0	0.0%	20.0%	\$0	0.0%	13.8%	0	0.0%	22.2%	\$0	0.0%	6.2%
	Middle	1	100.0%	\$10	100.0%	36.3%	0	0.0%	38.8%	\$0	0.0%	48.6%	1	100.0%	36.5%	\$10	100.0%	58.7%
	Upper	0	0.0%	\$0	0.0%	43.5%	0	0.0%	37.5%	\$0	0.0%	35.8%	0	0.0%	39.7%	\$0	0.0%	33.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	1.3%	0	0.0%	1.6%	\$0	0.0%	1.5%
Total	1	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: AZ Tucson

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	12	7.6%	\$1,140	2.6%	21.6%	7	7.1%	5.8%	\$588	2.4%	3.1%	5	8.6%	4.8%	\$552	3.0%	2.5%
	Moderate	35	22.3%	\$4,361	10.0%	17.8%	20	20.2%	16.5%	\$2,520	10.1%	11.6%	15	25.9%	15.0%	\$1,841	9.9%	10.1%
	Middle	20	12.7%	\$3,196	7.3%	19.6%	16	16.2%	19.2%	\$2,653	10.6%	17.3%	4	6.9%	19.8%	\$543	2.9%	17.3%
	Upper	90	57.3%	\$34,967	80.1%	40.9%	56	56.6%	35.9%	\$19,229	76.9%	47.3%	34	58.6%	39.1%	\$15,738	84.3%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.7%	\$0	0.0%	20.8%	0	0.0%	21.3%	\$0	0.0%	19.6%
	Total	157	100.0%	\$43,664	100.0%	100.0%	99	100.0%	100.0%	\$24,990	100.0%	100.0%	58	100.0%	100.0%	\$18,674	100.0%	100.0%
REFINANCE	Low	15	9.6%	\$1,229	3.6%	21.6%	6	7.5%	7.3%	\$455	2.7%	4.9%	9	11.7%	3.9%	\$774	4.6%	2.1%
	Moderate	27	17.2%	\$3,031	9.0%	17.8%	17	21.3%	10.4%	\$1,886	11.2%	6.8%	10	13.0%	9.3%	\$1,145	6.8%	5.9%
	Middle	27	17.2%	\$3,363	10.0%	19.6%	12	15.0%	14.7%	\$1,361	8.1%	11.8%	15	19.5%	14.7%	\$2,002	11.9%	11.6%
	Upper	88	56.1%	\$26,124	77.4%	40.9%	45	56.3%	33.9%	\$13,153	78.0%	43.0%	43	55.8%	38.0%	\$12,971	76.8%	46.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	33.7%	\$0	0.0%	33.5%	0	0.0%	34.1%	\$0	0.0%	34.1%
	Total	157	100.0%	\$33,747	100.0%	100.0%	80	100.0%	100.0%	\$16,855	100.0%	100.0%	77	100.0%	100.0%	\$16,892	100.0%	100.0%
HOME IMPROVEMENT	Low	3	7.9%	\$61	6.5%	21.6%	3	15.0%	5.2%	\$61	13.1%	2.6%	0	0.0%	6.1%	\$0	0.0%	3.4%
	Moderate	8	21.1%	\$103	11.0%	17.8%	4	20.0%	14.8%	\$55	11.8%	9.6%	4	22.2%	14.5%	\$48	10.2%	10.2%
	Middle	4	10.5%	\$68	7.3%	19.6%	3	15.0%	19.1%	\$65	13.9%	18.2%	1	5.6%	20.2%	\$3	0.6%	17.2%
	Upper	23	60.5%	\$703	75.2%	40.9%	10	50.0%	51.4%	\$285	61.2%	59.4%	13	72.2%	55.1%	\$418	89.1%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.4%	\$0	0.0%	10.2%	0	0.0%	4.1%	\$0	0.0%	5.1%
	Total	38	100.0%	\$935	100.0%	100.0%	20	100.0%	100.0%	\$466	100.0%	100.0%	18	100.0%	100.0%	\$469	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	30	8.5%	\$2,430	3.1%	21.6%	16	8.0%	6.4%	\$1,104	2.6%	3.7%	14	9.2%	4.4%	\$1,326	3.7%	2.2%
	Moderate	70	19.9%	\$7,495	9.6%	17.8%	41	20.6%	13.9%	\$4,461	10.5%	9.1%	29	19.0%	12.6%	\$3,034	8.4%	8.0%
	Middle	51	14.5%	\$6,627	8.5%	19.6%	31	15.6%	17.3%	\$4,079	9.6%	14.2%	20	13.1%	17.7%	\$2,548	7.1%	14.3%
	Upper	201	57.1%	\$61,794	78.9%	40.9%	111	55.8%	35.3%	\$32,667	77.2%	43.4%	90	58.8%	38.9%	\$29,127	80.8%	46.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	27.2%	\$0	0.0%	29.7%	0	0.0%	26.3%	\$0	0.0%	28.5%
	Total	352	100.0%	\$78,346	100.0%	100.0%	199	100.0%	100.0%	\$42,311	100.0%	100.0%	153	100.0%	100.0%	\$36,035	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	709	66.6%	\$25,565	52.4%	92.3%	353	68.1%	54.1%	\$12,630	53.6%	38.7%	356	65.2%	39.6%	\$12,935	51.3%	32.7%
	Over \$1 Million	259	24.3%	\$22,179	45.4%	7.0%	124	23.9%					135	24.7%				
	Total Rev. available	968	90.9%	\$47,744	97.8%	99.3%	477	92.0%					491	89.9%				
	Rev. Not Known	96	9.0%	\$1,065	2.2%	0.6%	41	7.9%					55	10.1%				
Total	1,064	100.0%	\$48,809	100.0%	100.0%	518	100.0%					546	100.0%					
Small Business Loan Size	\$100,000 or Less	1,026	96.4%	\$37,311	76.4%		500	96.5%	95.4%	\$18,240	77.4%	47.5%	526	96.3%	96.6%	\$19,071	75.6%	54.1%
	\$100,001 - \$250,000	21	2.0%	\$3,512	7.2%		12	2.3%	2.4%	\$2,015	8.5%	13.7%	9	1.6%	1.6%	\$1,497	5.9%	10.5%
	\$250,001 - \$1 Million	17	1.6%	\$7,986	16.4%		6	1.2%	2.2%	\$3,322	14.1%	38.8%	11	2.0%	1.8%	\$4,664	18.5%	35.4%
	Total	1,064	100.0%	\$48,809	100.0%		518	100.0%	100.0%	\$23,577	100.0%	100.0%	546	100.0%	100.0%	\$25,232	100.0%	100.0%
	Total Farms																	
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	96.8%	0	0.0%	46.3%	\$0	0.0%	45.2%	0	0.0%	49.2%	\$0	0.0%	43.5%
	Over \$1 Million	1	100.0%	\$10	100.0%	3.2%	0	0.0%					1	100.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$10	100.0%	100.0%	0	0.0%					1	100.0%				
	Total Farms																	
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$10	100.0%		0	0.0%	91.3%	\$0	0.0%	41.8%	1	100.0%	88.9%	\$10	100.0%	39.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.5%	\$0	0.0%	9.9%	0	0.0%	6.3%	\$0	0.0%	23.6%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.3%	\$0	0.0%	48.3%	0	0.0%	4.8%	\$0	0.0%	37.1%
	Total	1	100.0%	\$10	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
	Total Farms																	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA Amador-Calaveras-Tuolumne

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	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%
	Moderate	1	6.3%	\$110	2.3%	0.9%	0	0.0%	2.7%	\$0	0.0%	2.7%	1	11.1%	2.5%	\$110	4.3%	2.4%
	Middle	8	50.0%	\$2,250	47.6%	57.0%	4	57.1%	44.1%	\$884	40.3%	43.5%	4	44.4%	45.6%	\$1,366	53.9%	43.6%
	Upper	7	43.8%	\$2,369	50.1%	42.1%	3	42.9%	53.2%	\$1,309	59.7%	53.8%	4	44.4%	51.8%	\$1,060	41.8%	54.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	16	100.0%	\$4,729	100.0%	100.0%	7	100.0%	100.0%	\$2,193	100.0%	100.0%	9	100.0%	100.0%	\$2,536	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	0.9%	0	0.0%	2.4%	\$0	0.0%	2.2%	0	0.0%	1.8%	\$0	0.0%	1.7%
	Middle	6	66.7%	\$1,107	65.1%	57.0%	3	60.0%	47.2%	\$575	76.3%	47.5%	3	75.0%	46.5%	\$532	56.2%	46.2%
	Upper	3	33.3%	\$594	34.9%	42.1%	2	40.0%	50.5%	\$179	23.7%	50.3%	1	25.0%	51.7%	\$415	43.8%	52.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$1,701	100.0%	100.0%	5	100.0%	100.0%	\$754	100.0%	100.0%	4	100.0%	100.0%	\$947	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.4%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Middle	1	50.0%	\$13	41.9%	57.0%	0	0.0%	47.7%	\$0	0.0%	48.9%	1	50.0%	56.2%	\$13	41.9%	54.8%
	Upper	1	50.0%	\$18	58.1%	42.1%	0	0.0%	51.9%	\$0	0.0%	50.8%	1	50.0%	43.5%	\$18	58.1%	45.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$31	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$31	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	60.0%	\$0	0.0%	82.2%	0	0.0%	33.3%	\$0	0.0%	32.3%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	40.0%	\$0	0.0%	17.8%	0	0.0%	66.7%	\$0	0.0%	67.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	3.7%	\$110	1.7%	0.9%	0	0.0%	2.4%	\$0	0.0%	2.4%	1	6.7%	2.1%	\$110	3.1%	1.9%
	Middle	15	55.6%	\$3,370	52.2%	57.0%	7	58.3%	45.8%	\$1,459	49.5%	45.7%	8	53.3%	46.6%	\$1,911	54.4%	45.3%
	Upper	11	40.7%	\$2,981	46.1%	42.1%	5	41.7%	51.8%	\$1,488	50.5%	51.9%	6	40.0%	51.3%	\$1,493	42.5%	52.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	27	100.0%	\$6,461	100.0%	100.0%	12	100.0%	100.0%	\$2,947	100.0%	100.0%	15	100.0%	100.0%	\$3,514	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.6%	\$0	0.0%	0.1%	0	0.0%	0.4%	\$0	0.0%	0.4%
	Middle	110	75.3%	\$3,967	76.7%	62.2%	49	76.6%	55.3%	\$1,738	79.9%	58.8%	61	74.4%	47.8%	\$2,229	74.3%	54.1%
	Upper	36	24.7%	\$1,207	23.3%	36.8%	15	23.4%	34.6%	\$436	20.1%	32.1%	21	25.6%	35.7%	\$771	25.7%	31.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.5%	\$0	0.0%	9.0%	0	0.0%	16.0%	\$0	0.0%	14.1%
Total	146	100.0%	\$5,174	100.0%	100.0%	64	100.0%	100.0%	\$2,174	100.0%	100.0%	82	100.0%	100.0%	\$3,000	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	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%
	Middle	0	0.0%	\$0	0.0%	58.5%	0	0.0%	54.0%	\$0	0.0%	35.0%	0	0.0%	51.8%	\$0	0.0%	36.6%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	38.1%	\$0	0.0%	58.9%	0	0.0%	33.9%	\$0	0.0%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.9%	\$0	0.0%	6.1%	0	0.0%	14.3%	\$0	0.0%	9.6%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA Amador-Calaveras-Tuolumne

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank		Families by Family Income	2015		2016												
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar									
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	1	6.3%	\$128	2.7%	16.2%	0	0.0%	1.6%	\$0	0.0%	0.8%	1	11.1%	1.3%	\$128	5.0%	0.6%	
	Moderate	4	25.0%	\$834	17.6%	16.5%	2	28.6%	10.4%	\$539	24.6%	6.9%	2	22.2%	10.7%	\$295	11.6%	7.4%	
	Middle	2	12.5%	\$456	9.6%	19.2%	1	14.3%	17.6%	\$240	10.9%	15.2%	1	11.1%	19.9%	\$216	8.5%	17.4%	
	Upper	9	56.3%	\$3,311	70.0%	48.0%	4	57.1%	53.2%	\$1,414	64.5%	60.1%	5	55.6%	54.1%	\$1,897	74.8%	60.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.2%	\$0	0.0%	17.0%	0	0.0%	13.9%	\$0	0.0%	14.2%	
	Total	16	100.0%	\$4,729	100.0%	100.0%	7	100.0%	100.0%	\$2,193	100.0%	100.0%	9	100.0%	100.0%	\$2,536	100.0%	100.0%	
REFINANCE	Low	1	11.1%	\$86	5.1%	16.2%	0	0.0%	3.3%	\$0	0.0%	1.9%	1	25.0%	2.7%	\$86	9.1%	1.4%	
	Moderate	3	33.3%	\$346	20.3%	16.5%	2	40.0%	8.7%	\$150	19.9%	5.7%	1	25.0%	9.1%	\$196	20.7%	6.1%	
	Middle	1	11.1%	\$146	8.6%	19.2%	1	20.0%	16.4%	\$146	19.4%	14.3%	0	0.0%	16.5%	\$0	0.0%	14.3%	
	Upper	4	44.4%	\$1,123	66.0%	48.0%	2	40.0%	49.3%	\$458	60.7%	53.1%	2	50.0%	51.0%	\$665	70.2%	54.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.3%	\$0	0.0%	25.0%	0	0.0%	20.8%	\$0	0.0%	23.7%	
	Total	9	100.0%	\$1,701	100.0%	100.0%	5	100.0%	100.0%	\$754	100.0%	100.0%	4	100.0%	100.0%	\$947	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	16.2%	0	0.0%	1.9%	\$0	0.0%	1.0%	0	0.0%	4.0%	\$0	0.0%	2.3%	
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	10.6%	\$0	0.0%	8.0%	0	0.0%	13.7%	\$0	0.0%	10.9%	
	Middle	1	50.0%	\$13	41.9%	19.2%	0	0.0%	25.4%	\$0	0.0%	24.9%	1	50.0%	19.1%	\$13	41.9%	17.0%	
	Upper	1	50.0%	\$18	58.1%	48.0%	0	0.0%	56.1%	\$0	0.0%	61.4%	1	50.0%	58.7%	\$18	58.1%	67.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	4.7%	0	0.0%	4.6%	\$0	0.0%	2.3%	
	Total	2	100.0%	\$31	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$31	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	48.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	2	7.4%	\$214	3.3%	16.2%	0	0.0%	2.4%	\$0	0.0%	1.3%	2	13.3%	2.1%	\$214	6.1%	1.1%	
	Moderate	7	25.9%	\$1,180	18.3%	16.5%	4	33.3%	9.6%	\$689	23.4%	6.3%	3	20.0%	10.0%	\$491	14.0%	6.9%	
	Middle	4	14.8%	\$615	9.5%	19.2%	2	16.7%	17.4%	\$386	13.1%	15.1%	2	13.3%	18.2%	\$229	6.5%	15.8%	
	Upper	14	51.9%	\$4,452	68.9%	48.0%	6	50.0%	51.4%	\$1,872	63.5%	56.6%	8	53.3%	52.8%	\$2,580	73.4%	57.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.2%	\$0	0.0%	20.7%	0	0.0%	16.9%	\$0	0.0%	18.6%	
	Total	27	100.0%	\$6,461	100.0%	100.0%	12	100.0%	100.0%	\$2,947	100.0%	100.0%	15	100.0%	100.0%	\$3,514	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	110	75.3%	\$3,384	65.4%	93.4%	48	75.0%	52.4%	\$1,363	62.7%	47.3%	62	75.6%	38.2%	\$2,021	67.4%	38.2%	
	Over \$1 Million	28	19.2%	\$1,741	33.6%	5.8%	14	21.9%					14	17.1%					
	Total Rev. available	138	94.5%	\$5,125	99.0%	99.2%	62	96.9%					76	92.7%					
	Rev. Not Known	8	5.5%	\$49	0.9%	0.9%	2	3.1%					6	7.3%					
	Total	146	100.0%	\$5,174	100.0%	100.0%	64	100.0%					82	100.0%					
Small Business Loan Size	\$100,000 or Less	144	98.6%	\$4,724	91.3%		64	100.0%	96.3%	\$2,174	100.0%	56.7%	80	97.6%	97.8%	\$2,550	85.0%	67.4%	
	\$100,001 - \$250,000	2	1.4%	\$450	8.7%		0	0.0%	2.1%	\$0	0.0%	12.9%	2	2.4%	1.3%	\$450	15.0%	9.9%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	30.4%	0	0.0%	0.9%	\$0	0.0%	22.7%	
	Total	146	100.0%	\$5,174	100.0%		64	100.0%	100.0%	\$2,174	100.0%	100.0%	82	100.0%	100.0%	\$3,000	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.6%	0	0.0%	61.9%	\$0	0.0%	78.5%	0	0.0%	62.5%	\$0	0.0%	45.3%	
Over \$1 Million	0	0.0%	\$0	0.0%	4.4%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	87.3%	\$0	0.0%	38.5%	0	0.0%	87.5%	\$0	0.0%	38.7%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.9%	\$0	0.0%	31.1%	0	0.0%	3.6%	\$0	0.0%	12.2%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	30.4%	0	0.0%	8.9%	\$0	0.0%	49.1%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA Bakersfield

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	1	2.6%	\$76	0.7%	2.0%	0	0.0%	0.8%	\$0	0.0%	0.4%	1	9.1%	0.8%	\$76	3.9%	0.4%
	Moderate	10	26.3%	\$1,261	12.1%	23.2%	4	14.8%	14.9%	\$513	6.0%	10.7%	6	54.5%	16.8%	\$748	38.4%	12.5%
	Middle	4	10.5%	\$753	7.2%	30.8%	1	3.7%	27.0%	\$128	1.5%	21.8%	3	27.3%	26.5%	\$625	32.1%	22.2%
	Upper	23	60.5%	\$8,363	80.0%	44.1%	22	81.5%	57.2%	\$7,863	92.5%	67.1%	1	9.1%	55.8%	\$500	25.7%	64.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	38	100.0%	\$10,453	100.0%	100.0%	27	100.0%	100.0%	\$8,504	100.0%	100.0%	11	100.0%	100.0%	\$1,949	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.6%
	Moderate	3	25.0%	\$437	20.2%	23.2%	2	28.6%	13.4%	\$309	31.1%	9.1%	1	20.0%	12.0%	\$128	10.9%	8.0%
	Middle	3	25.0%	\$373	17.2%	30.8%	1	14.3%	25.2%	\$116	11.7%	20.4%	2	40.0%	25.0%	\$257	21.9%	20.0%
	Upper	6	50.0%	\$1,355	62.6%	44.1%	4	57.1%	60.9%	\$567	57.2%	70.2%	2	40.0%	62.5%	\$788	67.2%	71.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$2,165	100.0%	100.0%	7	100.0%	100.0%	\$992	100.0%	100.0%	5	100.0%	100.0%	\$1,173	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	23.2%	0	0.0%	13.2%	\$0	0.0%	11.3%	0	0.0%	10.2%	\$0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	30.8%	0	0.0%	22.6%	\$0	0.0%	18.4%	0	0.0%	21.5%	\$0	0.0%	21.3%
	Upper	1	100.0%	\$2	100.0%	44.1%	0	0.0%	63.7%	\$0	0.0%	70.1%	1	100.0%	68.0%	\$2	100.0%	69.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$2	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	12.2%	\$0	0.0%	12.9%	0	0.0%	4.7%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	39.0%	\$0	0.0%	16.4%	0	0.0%	51.2%	\$0	0.0%	16.4%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	29.3%	\$0	0.0%	27.3%	0	0.0%	27.9%	\$0	0.0%	36.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	19.5%	\$0	0.0%	43.4%	0	0.0%	16.3%	\$0	0.0%	47.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	2.0%	\$76	0.6%	2.0%	0	0.0%	0.7%	\$0	0.0%	0.8%	1	5.9%	0.7%	\$76	2.4%	0.5%
	Moderate	13	25.5%	\$1,698	13.5%	23.2%	6	17.6%	14.3%	\$822	8.7%	10.2%	7	41.2%	14.6%	\$876	28.0%	10.7%
	Middle	7	13.7%	\$1,126	8.9%	30.8%	2	5.9%	26.0%	\$244	2.6%	21.3%	5	29.4%	25.6%	\$882	28.2%	21.6%
	Upper	30	58.8%	\$9,720	77.0%	44.1%	26	76.5%	59.0%	\$8,430	88.8%	67.6%	4	23.5%	59.1%	\$1,290	41.3%	67.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	51	100.0%	\$12,620	100.0%	100.0%	34	100.0%	100.0%	\$9,496	100.0%	100.0%	17	100.0%	100.0%	\$3,124	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	1	2.9%	\$33	2.9%	3.6%	1	5.0%	2.8%	\$33	5.3%	3.4%	0	0.0%	2.6%	\$0	0.0%	2.6%
	Moderate	2	5.7%	\$50	4.3%	20.4%	1	5.0%	18.6%	\$25	4.0%	16.8%	1	6.7%	16.0%	\$25	4.7%	16.2%
	Middle	13	37.1%	\$463	40.1%	29.7%	9	45.0%	26.2%	\$278	44.4%	27.4%	4	26.7%	24.4%	\$185	34.9%	22.9%
	Upper	19	54.3%	\$610	52.8%	46.3%	9	45.0%	50.5%	\$290	46.3%	50.6%	10	66.7%	53.5%	\$320	60.4%	55.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	1.8%	0	0.0%	3.5%	\$0	0.0%	2.7%
Total	35	100.0%	\$1,156	100.0%	100.0%	20	100.0%	100.0%	\$626	100.0%	100.0%	15	100.0%	100.0%	\$530	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	1.0%	\$0	0.0%	0.1%	0	0.0%	0.4%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	28.7%	0	0.0%	26.8%	\$0	0.0%	23.0%	0	0.0%	33.0%	\$0	0.0%	31.4%
	Middle	0	0.0%	\$0	0.0%	29.9%	0	0.0%	28.9%	\$0	0.0%	32.1%	0	0.0%	27.3%	\$0	0.0%	31.1%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	37.1%	\$0	0.0%	42.9%	0	0.0%	35.2%	\$0	0.0%	34.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.2%	\$0	0.0%	1.9%	0	0.0%	4.2%	\$0	0.0%	1.4%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA Bakersfield

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2015, 2016					2015					2016							
		Bank		Families by Family Income		Count		Dollar			Count		Dollar						
		Count	Dollar		%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$(000s)	\$ %	%	#	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %				
HOME PURCHASE	Low	4	10.5%	\$407	3.9%	23.0%	2	7.4%	1.8%	\$243	2.9%	0.8%	2	18.2%	2.5%	\$164	8.4%	1.2%	
	Moderate	7	18.4%	\$819	7.8%	17.2%	3	11.1%	11.9%	\$395	4.6%	7.8%	4	36.4%	11.3%	\$424	21.8%	7.6%	
	Middle	5	13.2%	\$832	8.0%	18.0%	3	11.1%	21.4%	\$542	6.4%	18.8%	2	18.2%	20.6%	\$290	14.9%	18.3%	
	Upper	22	57.9%	\$8,395	80.3%	41.8%	19	70.4%	44.4%	\$7,324	86.1%	53.7%	3	27.3%	43.6%	\$1,071	55.0%	52.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.5%	\$0	0.0%	18.9%	0	0.0%	21.9%	\$0	0.0%	20.9%	
	Total	38	100.0%	\$10,453	100.0%	100.0%	27	100.0%	100.0%	\$8,504	100.0%	100.0%	11	100.0%	100.0%	\$1,949	100.0%	100.0%	
REFINANCE	Low	2	16.7%	\$182	8.4%	23.0%	1	14.3%	2.7%	\$48	4.8%	1.5%	1	20.0%	2.8%	\$134	11.4%	1.5%	
	Moderate	3	25.0%	\$370	17.1%	17.2%	1	14.3%	7.0%	\$119	12.0%	4.3%	2	40.0%	7.5%	\$251	21.4%	4.8%	
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	13.8%	\$0	0.0%	10.7%	0	0.0%	13.4%	\$0	0.0%	10.4%	
	Upper	7	58.3%	\$1,613	74.5%	41.8%	5	71.4%	45.1%	\$825	83.2%	49.3%	2	40.0%	45.9%	\$788	67.2%	50.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	31.4%	\$0	0.0%	34.3%	0	0.0%	30.4%	\$0	0.0%	33.3%	
	Total	12	100.0%	\$2,165	100.0%	100.0%	7	100.0%	100.0%	\$992	100.0%	100.0%	5	100.0%	100.0%	\$1,173	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	2.5%	\$0	0.0%	1.5%	0	0.0%	2.9%	\$0	0.0%	2.1%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	8.0%	\$0	0.0%	6.4%	0	0.0%	7.0%	\$0	0.0%	6.8%	
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	17.7%	\$0	0.0%	17.5%	0	0.0%	15.9%	\$0	0.0%	17.1%	
	Upper	1	100.0%	\$2	100.0%	41.8%	0	0.0%	61.7%	\$0	0.0%	63.9%	1	100.0%	70.5%	\$2	100.0%	68.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.1%	\$0	0.0%	10.8%	0	0.0%	3.7%	\$0	0.0%	5.1%	
	Total	1	100.0%	\$2	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$2	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	11.8%	\$589	4.7%	23.0%	3	8.8%	2.2%	\$291	3.1%	1.1%	3	17.6%	2.6%	\$298	9.5%	1.3%	
	Moderate	10	19.6%	\$1,189	9.4%	17.2%	4	11.8%	9.6%	\$514	5.4%	6.0%	6	35.3%	9.4%	\$675	21.6%	6.2%	
	Middle	5	9.8%	\$832	6.6%	18.0%	3	8.8%	17.8%	\$542	5.7%	14.8%	2	11.8%	17.3%	\$290	9.3%	14.5%	
	Upper	30	58.8%	\$10,010	79.3%	41.8%	24	70.6%	45.3%	\$8,149	85.8%	50.2%	6	35.3%	45.8%	\$1,861	59.6%	50.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.1%	\$0	0.0%	27.9%	0	0.0%	24.9%	\$0	0.0%	27.7%	
	Total	51	100.0%	\$12,620	100.0%	100.0%	34	100.0%	100.0%	\$9,496	100.0%	100.0%	17	100.0%	100.0%	\$3,124	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	25	71.4%	\$966	83.6%	92.1%	14	70.0%	51.1%	\$511	81.6%	31.0%	11	73.3%	38.8%	\$455	85.8%	25.4%	
	Over \$1 Million	6	17.1%	\$120	10.4%	7.5%	3	15.0%					3	20.0%					
	Total Rev. available	31	88.5%	\$1,086	94.0%	99.6%	17	85.0%					14	93.3%					
	Rev. Not Known	4	11.4%	\$70	6.1%	0.4%	3	15.0%					1	6.7%					
	Total	35	100.0%	\$1,156	100.0%	100.0%	20	100.0%	100.0%				15	100.0%	100.0%				
Small Business Loan Size	\$100,000 or Less	35	100.0%	\$1,156	100.0%		20	100.0%	95.0%	\$626	100.0%	44.7%	15	100.0%	96.1%	\$530	100.0%	53.3%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	16.5%	0	0.0%	2.3%	\$0	0.0%	15.1%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	2.0%	\$0	0.0%	38.9%	0	0.0%	1.6%	\$0	0.0%	31.6%	
	Total	35	100.0%	\$1,156	100.0%		20	100.0%	100.0%	\$626	100.0%	100.0%	15	100.0%	100.0%	\$530	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	84.8%	0	0.0%	40.7%	\$0	0.0%	40.8%	0	0.0%	38.3%	\$0	0.0%	26.4%	
Over \$1 Million	0	0.0%	\$0	0.0%	15.2%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.9%	\$0	0.0%	32.6%	0	0.0%	82.6%	\$0	0.0%	29.8%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.8%	\$0	0.0%	21.2%	0	0.0%	8.3%	\$0	0.0%	20.4%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	9.3%	\$0	0.0%	46.1%	0	0.0%	9.1%	\$0	0.0%	49.9%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA Fresno

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	3	4.3%	\$526	2.0%	5.0%	2	5.3%	3.0%	\$276	1.7%	1.6%	1	3.1%	3.6%	\$250	2.3%	1.9%
	Moderate	20	28.6%	\$3,018	11.2%	20.8%	5	13.2%	16.1%	\$756	4.8%	11.0%	15	46.9%	15.8%	\$2,262	20.6%	10.9%
	Middle	4	5.7%	\$993	3.7%	27.7%	1	2.6%	26.1%	\$100	0.6%	21.4%	3	9.4%	26.8%	\$893	8.1%	22.7%
	Upper	43	61.4%	\$22,320	83.1%	46.5%	30	78.9%	54.8%	\$14,744	92.9%	66.0%	13	40.6%	53.8%	\$7,576	69.0%	64.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	70	100.0%	\$26,857	100.0%	100.0%	38	100.0%	100.0%	\$15,876	100.0%	100.0%	32	100.0%	100.0%	\$10,981	100.0%	100.0%
REFINANCE	Low	2	6.5%	\$185	2.1%	5.0%	1	6.3%	2.2%	\$64	1.4%	1.2%	1	6.7%	2.1%	\$121	2.8%	1.1%
	Moderate	7	22.6%	\$943	10.6%	20.8%	4	25.0%	13.1%	\$467	10.3%	8.5%	3	20.0%	12.9%	\$476	11.0%	8.4%
	Middle	4	12.9%	\$508	5.7%	27.7%	2	12.5%	23.5%	\$324	7.1%	18.6%	2	13.3%	23.2%	\$184	4.2%	18.6%
	Upper	18	58.1%	\$7,245	81.6%	46.5%	9	56.3%	61.2%	\$3,687	81.2%	71.7%	9	60.0%	61.8%	\$3,558	82.0%	71.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	31	100.0%	\$8,881	100.0%	100.0%	16	100.0%	100.0%	\$4,542	100.0%	100.0%	15	100.0%	100.0%	\$4,339	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.6%	\$0	0.0%	1.9%	0	0.0%	2.4%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	13.7%	\$0	0.0%	9.3%	0	0.0%	12.7%	\$0	0.0%	9.3%
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	23.8%	\$0	0.0%	19.2%	0	0.0%	22.3%	\$0	0.0%	17.1%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	59.9%	\$0	0.0%	69.5%	0	0.0%	62.7%	\$0	0.0%	72.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	20.0%	\$0	0.0%	14.2%	0	0.0%	22.0%	\$0	0.0%	8.6%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	37.5%	\$0	0.0%	17.5%	0	0.0%	39.4%	\$0	0.0%	30.8%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	28.8%	\$0	0.0%	38.9%	0	0.0%	30.3%	\$0	0.0%	48.7%
	Upper	1	100.0%	\$3,600	100.0%	24.3%	1	100.0%	13.8%	\$3,600	100.0%	29.4%	0	0.0%	8.3%	\$0	0.0%	11.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$3,600	100.0%	100.0%	1	100.0%	100.0%	\$3,600	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	5	4.9%	\$711	1.8%	5.0%	3	5.5%	2.7%	\$340	1.4%	2.1%	2	4.3%	2.9%	\$371	2.4%	1.9%
	Moderate	27	26.5%	\$3,961	10.1%	20.8%	9	16.4%	14.8%	\$1,223	5.1%	10.3%	18	38.3%	14.5%	\$2,738	17.9%	10.9%
	Middle	8	7.8%	\$1,501	3.8%	27.7%	3	5.5%	24.9%	\$424	1.8%	21.0%	5	10.6%	25.0%	\$1,077	7.0%	22.2%
	Upper	62	60.8%	\$33,165	84.3%	46.5%	40	72.7%	57.6%	\$22,031	91.7%	66.6%	22	46.8%	57.6%	\$11,134	72.7%	65.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	102	100.0%	\$39,338	100.0%	100.0%	55	100.0%	100.0%	\$24,018	100.0%	100.0%	47	100.0%	100.0%	\$15,320	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	13	8.0%	\$745	7.3%	9.2%	6	7.9%	6.8%	\$360	6.8%	7.5%	7	8.1%	6.1%	\$385	7.9%	6.4%
	Moderate	17	10.5%	\$1,489	14.6%	22.3%	7	9.2%	21.1%	\$522	9.8%	25.5%	10	11.6%	18.9%	\$967	19.8%	21.3%
	Middle	49	30.2%	\$2,413	23.6%	26.1%	21	27.6%	25.9%	\$1,027	19.3%	25.1%	28	32.6%	24.2%	\$1,386	28.4%	26.5%
	Upper	83	51.2%	\$5,566	54.5%	42.4%	42	55.3%	44.6%	\$3,421	64.2%	40.6%	41	47.7%	48.1%	\$2,145	43.9%	43.8%
	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%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	1.3%	0	0.0%	2.7%	\$0	0.0%	1.8%
Total	162	100.0%	\$10,213	100.0%	100.0%	76	100.0%	100.0%	\$5,330	100.0%	100.0%	86	100.0%	100.0%	\$4,883	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	3.6%	0	0.0%	3.6%	\$0	0.0%	4.4%	0	0.0%	4.3%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	31.1%	0	0.0%	29.6%	\$0	0.0%	32.1%	0	0.0%	29.9%	\$0	0.0%	34.3%
	Middle	2	100.0%	\$50	100.0%	36.0%	1	100.0%	36.0%	\$25	100.0%	34.2%	1	100.0%	36.7%	\$25	100.0%	38.1%
	Upper	0	0.0%	\$0	0.0%	29.2%	0	0.0%	28.0%	\$0	0.0%	28.1%	0	0.0%	26.8%	\$0	0.0%	24.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	1.2%	0	0.0%	2.3%	\$0	0.0%	1.0%
Total	2	100.0%	\$50	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA Fresno

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016				Bank & Aggregate Lending Comparison													
		Bank		Families by Family Income	2015		2016												
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar									
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	2	2.9%	\$181	0.7%	24.7%	1	2.6%	1.4%	\$79	0.5%	0.5%	1	3.1%	1.2%	\$102	0.9%	0.6%	
	Moderate	6	8.6%	\$735	2.7%	16.0%	3	7.9%	8.4%	\$346	2.2%	5.1%	3	9.4%	9.1%	\$389	3.5%	5.5%	
	Middle	5	7.1%	\$1,000	3.7%	17.1%	2	5.3%	19.4%	\$416	2.6%	15.8%	3	9.4%	19.8%	\$584	5.3%	16.1%	
	Upper	57	81.4%	\$24,941	92.9%	42.1%	32	84.2%	49.6%	\$15,035	94.7%	59.2%	25	78.1%	49.0%	\$9,906	90.2%	58.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.2%	\$0	0.0%	19.4%	0	0.0%	20.8%	\$0	0.0%	19.0%	
	Total	70	100.0%	\$26,857	100.0%	100.0%	38	100.0%	100.0%	\$15,876	100.0%	100.0%	32	100.0%	100.0%	\$10,981	100.0%	100.0%	
REFINANCE	Low	2	6.5%	\$181	2.0%	24.7%	1	6.3%	2.1%	\$88	1.9%	1.0%	1	6.7%	2.3%	\$93	2.1%	1.1%	
	Moderate	6	19.4%	\$720	8.1%	16.0%	4	25.0%	6.4%	\$476	10.5%	3.7%	2	13.3%	5.8%	\$244	5.6%	3.3%	
	Middle	3	9.7%	\$308	3.5%	17.1%	1	6.3%	12.2%	\$137	3.0%	9.0%	2	13.3%	13.2%	\$171	3.9%	9.7%	
	Upper	19	61.3%	\$7,534	84.8%	42.1%	10	62.5%	50.2%	\$3,841	84.6%	55.6%	9	60.0%	52.5%	\$3,693	85.1%	57.9%	
	Unknown	1	3.2%	\$138	1.6%	0.0%	0	0.0%	29.1%	\$0	0.0%	30.7%	1	6.7%	26.3%	\$138	3.2%	28.0%	
	Total	31	100.0%	\$8,881	100.0%	100.0%	16	100.0%	100.0%	\$4,542	100.0%	100.0%	15	100.0%	100.0%	\$4,339	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	1.9%	\$0	0.0%	0.9%	0	0.0%	1.2%	\$0	0.0%	0.7%	
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	8.2%	\$0	0.0%	6.3%	0	0.0%	6.7%	\$0	0.0%	5.1%	
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	15.2%	\$0	0.0%	13.5%	0	0.0%	16.0%	\$0	0.0%	13.2%	
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	66.5%	\$0	0.0%	66.8%	0	0.0%	71.5%	\$0	0.0%	77.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.4%	\$0	0.0%	12.6%	0	0.0%	4.6%	\$0	0.0%	3.8%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$3,600	100.0%	0.0%	1	100.0%	100.0%	\$3,600	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	1	100.0%	\$3,600	100.0%	100.0%	1	100.0%	100.0%	\$3,600	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	3.9%	\$362	0.9%	24.7%	2	3.6%	1.7%	\$167	0.7%	0.7%	2	4.3%	1.7%	\$195	1.3%	0.8%	
	Moderate	12	11.8%	\$1,455	3.7%	16.0%	7	12.7%	7.5%	\$822	3.4%	4.3%	5	10.6%	7.5%	\$633	4.1%	4.3%	
	Middle	8	7.8%	\$1,308	3.3%	17.1%	3	5.5%	16.0%	\$553	2.3%	12.1%	5	10.6%	16.6%	\$755	4.9%	12.5%	
	Upper	76	74.5%	\$32,475	82.6%	42.1%	42	76.4%	50.4%	\$18,876	78.6%	54.9%	34	72.3%	51.3%	\$13,599	88.8%	55.8%	
	Unknown	2	2.0%	\$3,738	9.5%	0.0%	1	1.8%	24.4%	\$3,600	15.0%	27.9%	1	2.1%	22.9%	\$138	0.9%	26.7%	
	Total	102	100.0%	\$39,338	100.0%	100.0%	55	100.0%	100.0%	\$24,018	100.0%	100.0%	47	100.0%	100.0%	\$15,320	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	102	63.0%	\$4,050	39.7%	91.1%	49	64.5%	49.4%	\$2,139	40.1%	30.1%	53	61.6%	37.8%	\$1,911	39.1%	26.9%	
	Over \$1 Million	49	30.2%	\$6,029	59.0%	8.4%	22	28.9%					27	31.4%					
	Total Rev. available	151	93.2%	\$10,079	98.7%	99.5%	71	93.4%					80	93.0%					
	Rev. Not Known	11	6.8%	\$134	1.3%	0.5%	5	6.6%					6	7.0%					
	Total	162	100.0%	\$10,213	100.0%	100.0%	76	100.0%					86	100.0%					
Small Business Loan Size	\$100,000 or Less	153	94.4%	\$6,502	63.7%		71	93.4%	94.1%	\$3,119	58.5%	42.7%	82	95.3%	96.0%	\$3,383	69.3%	54.1%	
	\$100,001 - \$250,000	5	3.1%	\$1,125	11.0%		2	2.6%	3.3%	\$375	7.0%	16.2%	3	3.5%	2.4%	\$750	15.4%	14.4%	
	\$250,001 - \$1 Million	4	2.5%	\$2,586	25.3%		3	3.9%	2.5%	\$1,836	34.4%	41.1%	1	1.2%	1.6%	\$750	15.4%	31.5%	
	Total	162	100.0%	\$10,213	100.0%		76	100.0%	100.0%	\$5,330	100.0%	100.0%	86	100.0%	100.0%	\$4,883	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	88.8%	0	0.0%	40.3%	\$0	0.0%	51.7%	0	0.0%	49.4%	\$0	0.0%	48.3%	
Over \$1 Million	2	100.0%	\$50	100.0%	11.1%	1	100.0%					1	100.0%						
Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%					0	0.0%						
Total	2	100.0%	\$50	100.0%	100.0%	1	100.0%					1	100.0%						
Small Farm Loan Size	\$100,000 or Less	2	100.0%	\$50	100.0%		1	100.0%	80.9%	\$25	100.0%	28.5%	1	100.0%	77.8%	\$25	100.0%	25.6%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.3%	\$0	0.0%	21.6%	0	0.0%	13.1%	\$0	0.0%	28.8%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	9.8%	\$0	0.0%	49.9%	0	0.0%	9.1%	\$0	0.0%	45.6%	
	Total	2	100.0%	\$50	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA Los Angeles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	11	2.5%	\$4,294	1.3%	2.1%	5	2.1%	2.8%	\$2,185	1.1%	2.0%	6	3.1%	2.8%	\$2,109	1.5%	2.0%
	Moderate	111	25.5%	\$40,068	11.9%	16.6%	41	16.9%	17.8%	\$13,710	6.9%	11.9%	70	36.3%	18.2%	\$26,358	18.9%	12.6%
	Middle	37	8.5%	\$20,864	6.2%	28.6%	23	9.5%	28.6%	\$12,620	6.4%	21.5%	14	7.3%	29.1%	\$8,244	5.9%	22.4%
	Upper	276	63.4%	\$272,594	80.7%	52.6%	173	71.5%	50.8%	\$170,090	85.6%	64.5%	103	53.4%	49.9%	\$102,504	73.6%	63.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	435	100.0%	\$337,820	100.0%	100.0%	242	100.0%	100.0%	\$198,605	100.0%	100.0%	193	100.0%	100.0%	\$139,215	100.0%	100.0%
REFINANCE	Low	6	3.0%	\$1,487	1.1%	2.1%	4	3.6%	2.0%	\$963	1.4%	1.3%	2	2.2%	1.9%	\$524	0.8%	1.3%
	Moderate	37	18.4%	\$9,728	7.2%	16.6%	21	18.9%	14.9%	\$5,926	8.5%	10.0%	16	17.8%	14.8%	\$3,802	5.9%	10.2%
	Middle	27	13.4%	\$9,415	7.0%	28.6%	17	15.3%	27.5%	\$4,072	5.8%	20.5%	10	11.1%	27.7%	\$5,343	8.3%	20.9%
	Upper	131	65.2%	\$113,699	84.6%	52.6%	69	62.2%	55.6%	\$58,971	84.3%	68.1%	62	68.9%	55.7%	\$54,728	85.0%	67.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	201	100.0%	\$134,329	100.0%	100.0%	111	100.0%	100.0%	\$69,932	100.0%	100.0%	90	100.0%	100.0%	\$64,397	100.0%	100.0%
HOME IMPROVEMENT	Low	1	3.8%	\$25	0.4%	2.1%	1	5.3%	1.9%	\$25	0.4%	1.2%	0	0.0%	1.8%	\$0	0.0%	1.4%
	Moderate	5	19.2%	\$126	1.9%	16.6%	3	15.8%	14.4%	\$90	1.4%	9.3%	2	28.6%	15.5%	\$36	16.0%	10.5%
	Middle	9	34.6%	\$277	4.1%	28.6%	5	26.3%	27.8%	\$118	1.8%	18.8%	4	57.1%	28.0%	\$159	70.7%	20.9%
	Upper	11	42.3%	\$6,316	93.7%	52.6%	10	52.6%	55.9%	\$6,286	96.4%	70.7%	1	14.3%	54.6%	\$30	13.3%	67.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$6,744	100.0%	100.0%	19	100.0%	100.0%	\$6,519	100.0%	100.0%	7	100.0%	100.0%	\$225	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	14.2%	\$0	0.0%	12.5%	0	0.0%	14.0%	\$0	0.0%	13.8%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	39.9%	\$0	0.0%	31.1%	0	0.0%	40.4%	\$0	0.0%	31.6%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	24.7%	\$0	0.0%	27.3%	0	0.0%	23.8%	\$0	0.0%	25.3%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	21.3%	\$0	0.0%	29.1%	0	0.0%	21.8%	\$0	0.0%	29.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	18	2.7%	\$5,806	1.2%	2.1%	10	2.7%	2.5%	\$3,173	1.2%	2.8%	8	2.8%	2.4%	\$2,633	1.3%	2.8%
	Moderate	153	23.1%	\$49,922	10.4%	16.6%	65	17.5%	16.4%	\$19,726	7.2%	13.0%	88	30.3%	16.4%	\$30,196	14.8%	13.1%
	Middle	73	11.0%	\$30,556	6.4%	28.6%	45	12.1%	27.8%	\$16,810	6.1%	21.6%	28	9.7%	28.0%	\$13,746	6.7%	21.8%
	Upper	418	63.1%	\$392,609	82.0%	52.6%	252	67.7%	53.3%	\$235,347	85.6%	62.6%	166	57.2%	53.2%	\$157,262	77.2%	62.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	662	100.0%	\$478,893	100.0%	100.0%	372	100.0%	100.0%	\$275,056	100.0%	100.0%	290	100.0%	100.0%	\$203,837	100.0%	100.0%
SMALL BUSINESSES	Low	52	16.8%	\$1,652	13.0%	6.1%	21	15.8%	5.7%	\$791	13.4%	7.4%	31	17.5%	5.3%	\$861	12.6%	6.8%
	Moderate	94	30.3%	\$2,938	23.1%	18.3%	40	30.1%	17.8%	\$1,336	22.7%	18.6%	54	30.5%	17.1%	\$1,602	23.5%	18.4%
	Middle	60	19.4%	\$2,234	17.6%	25.4%	26	19.5%	25.5%	\$914	15.5%	25.9%	34	19.2%	24.8%	\$1,320	19.4%	24.9%
	Upper	102	32.9%	\$5,835	45.9%	49.2%	45	33.8%	49.3%	\$2,832	48.0%	45.3%	57	32.2%	50.9%	\$3,003	44.1%	47.1%
	Unknown	2	0.6%	\$50	0.4%	0.9%	1	0.8%	0.8%	\$25	0.4%	2.0%	1	0.6%	0.8%	\$25	0.4%	1.8%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.8%	0	0.0%	1.2%	\$0	0.0%	1.0%
	Total	310	100.0%	\$12,709	100.0%	100.0%	133	100.0%	100.0%	\$5,898	100.0%	100.0%	177	100.0%	100.0%	\$6,811	100.0%	100.0%
SMALL FARM	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	5.2%	\$0	0.0%	9.2%	0	0.0%	3.3%	\$0	0.0%	6.4%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	13.3%	\$0	0.0%	10.7%	0	0.0%	14.8%	\$0	0.0%	14.8%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	26.9%	\$0	0.0%	23.4%	0	0.0%	30.2%	\$0	0.0%	27.5%
	Upper	0	0.0%	\$0	0.0%	62.2%	0	0.0%	50.8%	\$0	0.0%	51.6%	0	0.0%	48.3%	\$0	0.0%	46.8%
	Unknown	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.6%	0	0.0%	1.2%	\$0	0.0%	0.9%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	4.4%	0	0.0%	2.1%	\$0	0.0%	3.7%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA Los Angeles

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016				Bank & Aggregate Lending Comparison													
		Bank		Families by Family Income	2015		2016												
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar									
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
HOME PURCHASE	Low	1	0.2%	\$68	0.0%	24.1%	1	0.4%	0.9%	\$68	0.0%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.3%	
	Moderate	17	3.9%	\$4,073	1.2%	16.4%	13	5.4%	5.2%	\$3,150	1.6%	2.1%	4	2.1%	4.1%	\$923	0.7%	1.6%	
	Middle	29	6.7%	\$7,677	2.3%	17.6%	14	5.8%	14.3%	\$3,909	2.0%	8.3%	15	7.8%	13.6%	\$3,768	2.7%	7.6%	
	Upper	388	89.2%	\$326,002	96.5%	41.9%	214	88.4%	62.1%	\$191,478	96.4%	72.4%	174	90.2%	67.8%	\$134,524	96.6%	77.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.5%	\$0	0.0%	16.9%	0	0.0%	13.9%	\$0	0.0%	13.5%	
	Total	435	100.0%	\$337,820	100.0%	100.0%	242	100.0%	100.0%	\$198,605	100.0%	100.0%	193	100.0%	100.0%	\$139,215	100.0%	100.0%	
REFINANCE	Low	11	5.5%	\$1,851	1.4%	24.1%	7	6.3%	2.1%	\$1,430	2.0%	0.9%	4	4.4%	1.8%	\$421	0.7%	0.8%	
	Moderate	22	10.9%	\$3,906	2.9%	16.4%	16	14.4%	6.3%	\$2,776	4.0%	3.0%	6	6.7%	5.4%	\$1,130	1.8%	2.6%	
	Middle	14	7.0%	\$3,254	2.4%	17.6%	9	8.1%	14.0%	\$2,384	3.4%	8.8%	5	5.6%	13.5%	\$870	1.4%	8.4%	
	Upper	154	76.6%	\$125,318	93.3%	41.9%	79	71.2%	58.5%	\$63,342	90.6%	68.2%	75	83.3%	64.6%	\$61,976	96.2%	72.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.2%	\$0	0.0%	19.2%	0	0.0%	14.7%	\$0	0.0%	15.3%	
	Total	201	100.0%	\$134,329	100.0%	100.0%	111	100.0%	100.0%	\$69,932	100.0%	100.0%	90	100.0%	100.0%	\$64,397	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.1%	0	0.0%	2.1%	\$0	0.0%	0.7%	0	0.0%	2.3%	\$0	0.0%	1.0%	
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	8.4%	\$0	0.0%	3.9%	0	0.0%	7.3%	\$0	0.0%	3.4%	
	Middle	2	7.7%	\$40	0.6%	17.6%	1	5.3%	16.9%	\$25	0.4%	10.0%	1	14.3%	16.8%	\$15	6.7%	10.3%	
	Upper	24	92.3%	\$6,704	99.4%	41.9%	18	94.7%	65.7%	\$6,494	99.6%	77.0%	6	85.7%	69.8%	\$210	93.3%	78.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.9%	\$0	0.0%	8.4%	0	0.0%	3.9%	\$0	0.0%	6.9%	
	Total	26	100.0%	\$6,744	100.0%	100.0%	19	100.0%	100.0%	\$6,519	100.0%	100.0%	7	100.0%	100.0%	\$225	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	12	1.8%	\$1,919	0.4%	24.1%	8	2.2%	1.6%	\$1,498	0.5%	0.6%	4	1.4%	1.4%	\$421	0.2%	0.6%	
	Moderate	39	5.9%	\$7,979	1.7%	16.4%	29	7.8%	5.9%	\$5,926	2.2%	2.4%	10	3.4%	5.0%	\$2,053	1.0%	2.1%	
	Middle	45	6.8%	\$10,971	2.3%	17.6%	24	6.5%	13.9%	\$6,318	2.3%	7.7%	21	7.2%	13.4%	\$4,653	2.3%	7.4%	
	Upper	566	85.5%	\$458,024	95.6%	41.9%	311	83.6%	58.5%	\$261,314	95.0%	62.0%	255	87.9%	64.4%	\$196,710	96.5%	67.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.0%	\$0	0.0%	27.3%	0	0.0%	15.8%	\$0	0.0%	22.9%	
	Total	662	100.0%	\$478,893	100.0%	100.0%	372	100.0%	100.0%	\$275,056	100.0%	100.0%	290	100.0%	100.0%	\$203,837	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	184	59.4%	\$7,696	60.6%	90.8%	78	58.6%	54.1%	\$3,715	63.0%	33.4%	106	59.9%	45.3%	\$3,981	58.4%	31.2%	
	Over \$1 Million	83	26.8%	\$4,691	36.9%	8.8%	35	26.3%					48	27.1%					
	Total Rev. available	267	86.2%	\$12,387	97.5%	99.6%	113	84.9%					154	87.0%					
	Rev. Not Known	43	13.9%	\$322	2.5%	0.4%	20	15.0%					23	13.0%					
	Total	310	100.0%	\$12,709	100.0%	100.0%	133	100.0%					177	100.0%					
Small Business Loan Size	\$100,000 or Less	300	96.8%	\$10,709	84.3%		127	95.5%	95.7%	\$4,673	79.2%	44.1%	173	97.7%	96.4%	\$6,036	88.6%	50.7%	
	\$100,001 - \$250,000	9	2.9%	\$1,650	13.0%		5	3.8%	2.0%	\$875	14.8%	11.8%	4	2.3%	1.8%	\$775	11.4%	11.1%	
	\$250,001 - \$1 Million	1	0.3%	\$350	2.8%		1	0.8%	2.3%	\$350	5.9%	44.1%	0	0.0%	1.8%	\$0	0.0%	38.2%	
	Total	310	100.0%	\$12,709	100.0%		133	100.0%	100.0%	\$5,898	100.0%	100.0%	177	100.0%	100.0%	\$6,811	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.0%	0	0.0%	49.5%	\$0	0.0%	40.2%	0	0.0%	38.7%	\$0	0.0%	28.4%	
Over \$1 Million	0	0.0%	\$0	0.0%	5.0%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	91.6%	\$0	0.0%	54.9%	0	0.0%	93.4%	\$0	0.0%	63.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.1%	\$0	0.0%	32.1%	0	0.0%	5.1%	\$0	0.0%	20.9%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	12.9%	0	0.0%	1.5%	\$0	0.0%	16.1%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA Merced

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	Bank	Agg	\$ (000s)	%	%	Bank	Agg	%	\$ (000s)	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.8%	\$0	0.0%	0.6%
	Moderate	15	45.5%	\$2,222	32.8%	23.8%	7	41.2%	22.3%	\$1,024	27.1%	17.1%	8	50.0%	22.3%	\$1,198	39.9%	17.3%
	Middle	10	30.3%	\$2,121	31.3%	40.4%	4	23.5%	33.7%	\$991	26.2%	32.9%	6	37.5%	32.3%	\$1,130	37.7%	31.8%
	Upper	8	24.2%	\$2,441	36.0%	34.6%	6	35.3%	43.5%	\$1,769	46.7%	49.8%	2	12.5%	44.5%	\$672	22.4%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	33	100.0%	\$6,784	100.0%	100.0%	17	100.0%	100.0%	\$3,784	100.0%	100.0%	16	100.0%	100.0%	\$3,000	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	9	23.7%	\$1,382	20.1%	23.8%	6	24.0%	19.2%	\$1,002	19.3%	16.2%	3	23.1%	17.7%	\$380	22.5%	14.0%
	Middle	18	47.4%	\$2,723	39.5%	40.4%	11	44.0%	34.2%	\$1,837	35.3%	31.8%	7	53.8%	32.6%	\$886	52.4%	31.6%
	Upper	11	28.9%	\$2,785	40.4%	34.6%	8	32.0%	46.3%	\$2,361	45.4%	51.8%	3	23.1%	49.3%	\$424	25.1%	54.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	38	100.0%	\$6,890	100.0%	100.0%	25	100.0%	100.0%	\$5,200	100.0%	100.0%	13	100.0%	100.0%	\$1,690	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.3%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	23.8%	0	0.0%	15.9%	\$0	0.0%	14.0%	0	0.0%	17.1%	\$0	0.0%	13.3%
	Middle	1	50.0%	\$10	28.6%	40.4%	1	50.0%	38.9%	\$10	28.6%	38.4%	0	0.0%	32.2%	\$0	0.0%	33.0%
	Upper	1	50.0%	\$25	71.4%	34.6%	1	50.0%	44.9%	\$25	71.4%	47.2%	0	0.0%	50.5%	\$0	0.0%	53.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$35	100.0%	100.0%	2	100.0%	100.0%	\$35	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	13.3%	\$0	0.0%	4.5%	0	0.0%	14.3%	\$0	0.0%	5.7%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	60.0%	\$0	0.0%	85.5%	0	0.0%	57.1%	\$0	0.0%	43.8%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	26.7%	\$0	0.0%	10.1%	0	0.0%	28.6%	\$0	0.0%	50.5%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.4%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.5%
	Moderate	24	32.9%	\$3,604	26.3%	23.8%	13	29.5%	20.5%	\$2,026	22.5%	17.4%	11	37.9%	19.9%	\$1,578	33.6%	15.9%
	Middle	29	39.7%	\$4,854	35.4%	40.4%	16	36.4%	34.2%	\$2,838	31.5%	32.2%	13	44.8%	32.5%	\$2,016	43.0%	31.9%
	Upper	20	27.4%	\$5,251	38.3%	34.6%	15	34.1%	44.9%	\$4,155	46.1%	50.1%	5	17.2%	47.0%	\$1,096	23.4%	51.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	73	100.0%	\$13,709	100.0%	100.0%	44	100.0%	100.0%	\$9,019	100.0%	100.0%	29	100.0%	100.0%	\$4,690	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	2	1.8%	\$80	1.6%	2.1%	1	1.7%	1.1%	\$40	1.8%	1.7%	1	1.8%	1.1%	\$40	1.4%	1.2%
	Moderate	39	34.5%	\$1,820	35.4%	38.2%	22	37.9%	26.2%	\$975	44.7%	27.1%	17	30.9%	26.5%	\$845	28.6%	30.0%
	Middle	33	29.2%	\$955	18.6%	29.8%	16	27.6%	39.5%	\$374	17.2%	38.3%	17	30.9%	34.5%	\$581	19.7%	31.9%
	Upper	39	34.5%	\$2,279	44.4%	30.0%	19	32.8%	31.0%	\$790	36.3%	31.8%	20	36.4%	33.9%	\$1,489	50.4%	34.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	1.0%	0	0.0%	4.0%	\$0	0.0%	2.5%
Total	113	100.0%	\$5,134	100.0%	100.0%	58	100.0%	100.0%	\$2,179	100.0%	100.0%	55	100.0%	100.0%	\$2,955	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	11.4%	\$0	0.0%	7.4%	0	0.0%	15.0%	\$0	0.0%	12.9%
	Middle	0	0.0%	\$0	0.0%	53.7%	0	0.0%	64.2%	\$0	0.0%	74.2%	0	0.0%	58.9%	\$0	0.0%	62.0%
	Upper	1	100.0%	\$35	100.0%	30.1%	1	100.0%	23.1%	\$35	100.0%	18.0%	0	0.0%	25.0%	\$0	0.0%	24.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.4%	0	0.0%	1.1%	\$0	0.0%	0.3%
Total	1	100.0%	\$35	100.0%	100.0%	1	100.0%	100.0%	\$35	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA Merced

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income	2015					2016							
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ (000s)	\$ %	\$ %	#	%	Agg %	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	3	9.1%	\$239	3.5%	24.8%	1	5.9%	2.0%	\$75	2.0%	1.0%	2	12.5%	0.7%	\$164	5.5%	0.3%	
	Moderate	7	21.2%	\$1,087	16.0%	16.5%	4	23.5%	12.3%	\$711	18.8%	8.7%	3	18.8%	6.6%	\$376	12.5%	4.2%	
	Middle	9	27.3%	\$1,700	25.1%	17.2%	5	29.4%	23.7%	\$924	24.4%	21.8%	4	25.0%	19.8%	\$776	25.9%	15.9%	
	Upper	14	42.4%	\$3,758	55.4%	41.5%	7	41.2%	38.0%	\$2,074	54.8%	44.9%	7	43.8%	53.5%	\$1,684	56.1%	60.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.0%	\$0	0.0%	23.6%	0	0.0%	19.4%	\$0	0.0%	18.9%	
	Total	33	100.0%	\$6,784	100.0%	100.0%	17	100.0%	100.0%	\$3,784	100.0%	100.0%	16	100.0%	100.0%	\$3,000	100.0%	100.0%	
REFINANCE	Low	3	7.9%	\$236	3.4%	24.8%	2	8.0%	4.1%	\$179	3.4%	2.3%	1	7.7%	1.7%	\$57	3.4%	0.9%	
	Moderate	6	15.8%	\$701	10.2%	16.5%	3	12.0%	11.2%	\$362	7.0%	7.5%	3	23.1%	7.0%	\$339	20.1%	4.3%	
	Middle	4	10.5%	\$573	8.3%	17.2%	1	4.0%	18.3%	\$184	3.5%	15.3%	3	23.1%	15.5%	\$389	23.0%	12.3%	
	Upper	25	65.8%	\$5,380	78.1%	41.5%	19	76.0%	40.0%	\$4,475	86.1%	45.8%	6	46.2%	51.9%	\$905	53.6%	54.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	26.3%	\$0	0.0%	29.0%	0	0.0%	23.9%	\$0	0.0%	28.1%	
	Total	38	100.0%	\$6,890	100.0%	100.0%	25	100.0%	100.0%	\$5,200	100.0%	100.0%	13	100.0%	100.0%	\$1,690	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.8%	0	0.0%	2.0%	\$0	0.0%	0.9%	0	0.0%	1.2%	\$0	0.0%	0.5%	
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	12.5%	\$0	0.0%	12.1%	0	0.0%	10.1%	\$0	0.0%	8.1%	
	Middle	0	0.0%	\$0	0.0%	17.2%	0	0.0%	25.7%	\$0	0.0%	26.4%	0	0.0%	19.2%	\$0	0.0%	18.3%	
	Upper	2	100.0%	\$35	100.0%	41.5%	2	100.0%	52.7%	\$35	100.0%	52.1%	0	0.0%	66.4%	\$0	0.0%	68.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.1%	\$0	0.0%	8.4%	0	0.0%	3.1%	\$0	0.0%	4.3%	
	Total	2	100.0%	\$35	100.0%	100.0%	2	100.0%	100.0%	\$35	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	8.2%	\$475	3.5%	24.8%	3	6.8%	3.0%	\$254	2.8%	1.6%	3	10.3%	1.2%	\$221	4.7%	0.6%	
	Moderate	13	17.8%	\$1,788	13.0%	16.5%	7	15.9%	11.8%	\$1,073	11.9%	8.1%	6	20.7%	7.0%	\$715	15.2%	4.3%	
	Middle	13	17.8%	\$2,273	16.6%	17.2%	6	13.6%	21.0%	\$1,108	12.3%	18.5%	7	24.1%	17.7%	\$1,165	24.8%	14.2%	
	Upper	41	56.2%	\$9,173	66.9%	41.5%	28	63.6%	39.6%	\$6,584	73.0%	45.0%	13	44.8%	53.3%	\$2,589	55.2%	57.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.6%	\$0	0.0%	26.7%	0	0.0%	20.8%	\$0	0.0%	23.4%	
	Total	73	100.0%	\$13,709	100.0%	100.0%	44	100.0%	100.0%	\$9,019	100.0%	100.0%	29	100.0%	100.0%	\$4,690	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	66	58.4%	\$3,012	58.7%	92.3%	32	55.2%	56.2%	\$1,220	56.0%	39.5%	34	61.8%	40.0%	\$1,792	60.6%	30.6%	
	Over \$1 Million	34	30.1%	\$2,001	39.0%	7.0%	16	27.6%					18	32.7%					
	Total Rev. available	100	88.5%	\$5,013	97.7%	99.3%	48	82.8%					52	94.5%					
	Rev. Not Known	13	11.5%	\$121	2.4%	0.7%	10	17.2%					3	5.5%					
	Total	113	100.0%	\$5,134	100.0%	100.0%	58	100.0%					55	100.0%					
Small Business Loan Size	\$100,000 or Less	111	98.2%	\$4,582	89.2%		58	100.0%	95.5%	\$2,179	100.0%	48.6%	53	96.4%	96.9%	\$2,403	81.3%	57.1%	
	\$100,001 - \$250,000	1	0.9%	\$172	3.4%		0	0.0%	2.6%	\$0	0.0%	16.0%	1	1.8%	1.9%	\$172	5.8%	14.1%	
	\$250,001 - \$1 Million	1	0.9%	\$380	7.4%		0	0.0%	1.9%	\$0	0.0%	35.4%	1	1.8%	1.2%	\$380	12.9%	28.8%	
	Total	113	100.0%	\$5,134	100.0%		58	100.0%	100.0%	\$2,179	100.0%	100.0%	55	100.0%	100.0%	\$2,955	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	1	100.0%	\$35	100.0%	87.0%	1	100.0%	39.4%	\$35	100.0%	29.0%	0	0.0%	41.8%	\$0	0.0%	22.9%	
Over \$1 Million	0	0.0%	\$0	0.0%	13.0%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	1	100.0%	\$35	100.0%	100.0%	1	100.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$35	100.0%		1	100.0%	64.7%	\$35	100.0%	13.3%	0	0.0%	70.3%	\$0	0.0%	14.8%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	18.1%	\$0	0.0%	29.4%	0	0.0%	14.5%	\$0	0.0%	26.2%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	17.2%	\$0	0.0%	57.2%	0	0.0%	15.3%	\$0	0.0%	59.0%	
	Total	1	100.0%	\$35	100.0%		1	100.0%	100.0%	\$35	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA Oakland

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%
HOME PURCHASE	Low	12	7.1%	\$4,664	3.7%	5.7%	6	6.7%	6.4%	\$2,429	3.5%	3.8%	6	7.7%	6.7%	\$2,235	3.9%	4.2%
	Moderate	38	22.6%	\$16,189	12.7%	15.6%	14	15.6%	16.3%	\$5,343	7.6%	11.9%	24	30.8%	16.8%	\$10,846	19.0%	12.4%
	Middle	32	19.0%	\$18,782	14.7%	36.4%	19	21.1%	38.9%	\$10,338	14.7%	33.6%	13	16.7%	39.5%	\$8,444	14.8%	34.8%
	Upper	86	51.2%	\$87,849	68.9%	42.2%	51	56.7%	38.5%	\$52,207	74.2%	50.7%	35	44.9%	37.1%	\$35,642	62.3%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	168	100.0%	\$127,484	100.0%	100.0%	90	100.0%	100.0%	\$70,317	100.0%	100.0%	78	100.0%	100.0%	\$57,167	100.0%	100.0%
REFINANCE	Low	9	8.3%	\$1,920	3.6%	5.7%	6	8.2%	4.0%	\$1,345	3.8%	2.4%	3	8.6%	4.2%	\$575	3.3%	2.7%
	Moderate	23	21.3%	\$6,188	11.7%	15.6%	15	20.5%	13.6%	\$4,407	12.4%	9.8%	8	22.9%	13.7%	\$1,781	10.2%	10.2%
	Middle	23	21.3%	\$6,624	12.5%	36.4%	14	19.2%	37.9%	\$3,386	9.5%	32.0%	9	25.7%	38.0%	\$3,238	18.5%	32.9%
	Upper	53	49.1%	\$38,373	72.3%	42.2%	38	52.1%	44.5%	\$26,478	74.3%	55.8%	15	42.9%	44.1%	\$11,895	68.0%	54.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	108	100.0%	\$53,105	100.0%	100.0%	73	100.0%	100.0%	\$35,616	100.0%	100.0%	35	100.0%	100.0%	\$17,489	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.7%	0	0.0%	5.3%	\$0	0.0%	3.5%	0	0.0%	5.9%	\$0	0.0%	3.9%
	Moderate	1	50.0%	\$119	82.6%	15.6%	1	50.0%	15.8%	\$119	82.6%	12.1%	0	0.0%	16.0%	\$0	0.0%	12.9%
	Middle	0	0.0%	\$0	0.0%	36.4%	0	0.0%	37.9%	\$0	0.0%	31.7%	0	0.0%	37.0%	\$0	0.0%	31.0%
	Upper	1	50.0%	\$25	17.4%	42.2%	1	50.0%	41.0%	\$25	17.4%	52.6%	0	0.0%	41.1%	\$0	0.0%	52.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$144	100.0%	100.0%	2	100.0%	100.0%	\$144	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	24.5%	\$0	0.0%	18.4%	0	0.0%	26.7%	\$0	0.0%	21.3%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	38.0%	\$0	0.0%	30.4%	0	0.0%	40.0%	\$0	0.0%	31.2%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	26.8%	\$0	0.0%	37.7%	0	0.0%	24.0%	\$0	0.0%	36.1%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	10.6%	\$0	0.0%	13.4%	0	0.0%	9.3%	\$0	0.0%	11.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	21	7.6%	\$6,584	3.6%	5.7%	12	7.3%	5.0%	\$3,774	3.6%	3.8%	9	8.0%	5.2%	\$2,810	3.8%	4.0%
	Moderate	62	22.3%	\$22,496	12.4%	15.6%	30	18.2%	14.7%	\$9,869	9.3%	11.7%	32	28.3%	14.8%	\$12,627	16.9%	11.9%
	Middle	55	19.8%	\$25,406	14.1%	36.4%	33	20.0%	38.1%	\$13,724	12.9%	32.8%	22	19.5%	38.3%	\$11,682	15.6%	33.6%
	Upper	140	50.4%	\$126,247	69.9%	42.2%	90	54.5%	42.2%	\$78,710	74.2%	51.6%	50	44.2%	41.7%	\$47,537	63.7%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	278	100.0%	\$180,733	100.0%	100.0%	165	100.0%	100.0%	\$106,077	100.0%	100.0%	113	100.0%	100.0%	\$74,656	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	9	5.4%	\$158	2.7%	9.9%	5	6.3%	7.7%	\$99	4.0%	9.1%	4	4.5%	7.1%	\$59	1.7%	8.3%
	Moderate	15	9.0%	\$407	6.9%	17.5%	3	3.8%	16.0%	\$75	3.0%	16.6%	12	13.6%	15.3%	\$332	9.7%	15.8%
	Middle	60	35.9%	\$2,083	35.3%	32.5%	25	31.6%	31.5%	\$817	32.8%	28.9%	35	39.8%	31.3%	\$1,266	37.2%	28.0%
	Upper	83	49.7%	\$3,249	55.1%	40.1%	46	58.2%	43.7%	\$1,499	60.2%	44.2%	37	42.0%	44.6%	\$1,750	51.4%	46.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	1.2%	0	0.0%	1.7%	\$0	0.0%	1.5%
Total	167	100.0%	\$5,897	100.0%	100.0%	79	100.0%	100.0%	\$2,490	100.0%	100.0%	88	100.0%	100.0%	\$3,407	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	1.3%	\$0	0.0%	0.3%	0	0.0%	2.8%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	11.5%	0	0.0%	5.4%	\$0	0.0%	1.3%	0	0.0%	9.8%	\$0	0.0%	12.7%
	Middle	0	0.0%	\$0	0.0%	32.7%	0	0.0%	30.9%	\$0	0.0%	21.7%	0	0.0%	24.5%	\$0	0.0%	28.1%
	Upper	0	0.0%	\$0	0.0%	51.8%	0	0.0%	55.0%	\$0	0.0%	71.3%	0	0.0%	59.4%	\$0	0.0%	53.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	7.4%	\$0	0.0%	5.3%	0	0.0%	3.5%	\$0	0.0%	4.4%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA Oakland

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income	2015					2016							
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	
HOME PURCHASE	Low	3	1.8%	\$467	0.4%	23.3%	3	3.3%	2.0%	\$467	0.7%	0.7%	0	0.0%	1.4%	\$0	0.0%	0.5%	
	Moderate	20	11.9%	\$6,088	4.8%	16.4%	10	11.1%	9.9%	\$3,180	4.5%	5.1%	10	12.8%	9.3%	\$2,908	5.1%	4.8%	
	Middle	16	9.5%	\$6,442	5.1%	19.2%	7	7.8%	18.2%	\$2,996	4.3%	13.5%	9	11.5%	19.3%	\$3,446	6.0%	13.7%	
	Upper	129	76.8%	\$114,487	89.8%	41.1%	70	77.8%	52.3%	\$63,674	90.6%	64.2%	59	75.6%	58.2%	\$50,813	88.9%	69.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.6%	\$0	0.0%	16.4%	0	0.0%	11.8%	\$0	0.0%	11.3%	
	Total	168	100.0%	\$127,484	100.0%	100.0%	90	100.0%	100.0%	\$70,317	100.0%	100.0%	78	100.0%	100.0%	\$57,167	100.0%	100.0%	
REFINANCE	Low	9	8.3%	\$1,551	2.9%	23.3%	6	8.2%	3.5%	\$1,247	3.5%	1.5%	3	8.6%	3.1%	\$304	1.7%	1.5%	
	Moderate	26	24.1%	\$5,476	10.3%	16.4%	20	27.4%	10.6%	\$4,199	11.8%	6.3%	6	17.1%	10.7%	\$1,277	7.3%	6.5%	
	Middle	13	12.0%	\$3,612	6.8%	19.2%	7	9.6%	18.5%	\$2,055	5.8%	14.5%	6	17.1%	20.1%	\$1,557	8.9%	15.8%	
	Upper	60	55.6%	\$42,466	80.0%	41.1%	40	54.8%	49.6%	\$28,115	78.9%	60.0%	20	57.1%	54.0%	\$14,351	82.1%	63.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.8%	\$0	0.0%	17.6%	0	0.0%	12.2%	\$0	0.0%	12.4%	
	Total	108	100.0%	\$53,105	100.0%	100.0%	73	100.0%	100.0%	\$35,616	100.0%	100.0%	35	100.0%	100.0%	\$17,489	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.3%	0	0.0%	4.3%	\$0	0.0%	2.0%	0	0.0%	4.3%	\$0	0.0%	2.2%	
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	13.3%	\$0	0.0%	8.7%	0	0.0%	14.1%	\$0	0.0%	8.5%	
	Middle	1	50.0%	\$119	82.6%	19.2%	1	50.0%	22.0%	\$119	82.6%	17.5%	0	0.0%	22.9%	\$0	0.0%	18.5%	
	Upper	1	50.0%	\$25	17.4%	41.1%	1	50.0%	51.8%	\$25	17.4%	62.7%	0	0.0%	54.8%	\$0	0.0%	65.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.5%	\$0	0.0%	9.1%	0	0.0%	4.0%	\$0	0.0%	5.6%	
	Total	2	100.0%	\$144	100.0%	100.0%	2	100.0%	100.0%	\$144	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	12	4.3%	\$2,018	1.1%	23.3%	9	5.5%	3.0%	\$1,714	1.6%	1.2%	3	2.7%	2.6%	\$304	0.4%	1.1%	
	Moderate	46	16.5%	\$11,564	6.4%	16.4%	30	18.2%	10.4%	\$7,379	7.0%	5.6%	16	14.2%	10.4%	\$4,185	5.6%	5.7%	
	Middle	30	10.8%	\$10,173	5.6%	19.2%	15	9.1%	18.4%	\$5,170	4.9%	13.4%	15	13.3%	19.8%	\$5,003	6.7%	14.5%	
	Upper	190	68.3%	\$156,978	86.9%	41.1%	111	67.3%	50.2%	\$91,814	86.6%	58.2%	79	69.9%	54.9%	\$65,164	87.3%	63.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.0%	\$0	0.0%	21.5%	0	0.0%	12.2%	\$0	0.0%	15.6%	
	Total	278	100.0%	\$180,733	100.0%	100.0%	165	100.0%	100.0%	\$106,077	100.0%	100.0%	113	100.0%	100.0%	\$74,656	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	104	62.3%	\$3,548	60.2%	91.1%	53	67.1%	53.1%	\$1,618	65.0%	34.2%	51	58.0%	38.8%	\$1,930	56.6%	29.8%	
	Over \$1 Million	38	22.8%	\$2,151	36.5%	8.5%	16	20.3%					22	25.0%					
	Total Rev. available	142	85.1%	\$5,699	96.7%	99.6%	69	87.4%					73	83.0%					
	Rev. Not Known	25	15.0%	\$198	3.4%	0.4%	10	12.7%					15	17.0%					
	Total	167	100.0%	\$5,897	100.0%	100.0%	79	100.0%					88	100.0%					
Small Business Loan Size	\$100,000 or Less	163	97.6%	\$5,137	87.1%		79	100.0%	95.4%	\$2,490	100.0%	44.1%	84	95.5%	96.7%	\$2,647	77.7%	54.4%	
	\$100,001 - \$250,000	3	1.8%	\$440	7.5%		0	0.0%	2.2%	\$0	0.0%	11.7%	3	3.4%	1.6%	\$440	12.9%	9.9%	
	\$250,001 - \$1 Million	1	0.6%	\$320	5.4%		0	0.0%	2.4%	\$0	0.0%	44.2%	1	1.1%	1.7%	\$320	9.4%	35.7%	
	Total	167	100.0%	\$5,897	100.0%		79	100.0%	100.0%	\$2,490	100.0%	100.0%	88	100.0%	100.0%	\$3,407	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	96.0%	0	0.0%	55.0%	\$0	0.0%	50.2%	0	0.0%	50.3%	\$0	0.0%	46.9%	
Over \$1 Million	0	0.0%	\$0	0.0%	3.9%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.2%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.6%	\$0	0.0%	44.0%	0	0.0%	94.4%	\$0	0.0%	52.5%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.7%	\$0	0.0%	11.6%	0	0.0%	2.8%	\$0	0.0%	16.4%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.7%	\$0	0.0%	44.4%	0	0.0%	2.8%	\$0	0.0%	31.2%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA Sacramento

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	10	5.5%	\$3,417	3.9%	4.4%	4	3.6%	4.2%	\$1,579	3.1%	2.6%	6	8.7%	5.1%	\$1,838	4.9%	3.3%
	Moderate	47	26.0%	\$11,196	12.6%	19.8%	27	24.1%	18.4%	\$5,952	11.5%	12.3%	20	29.0%	19.4%	\$5,244	14.1%	13.5%
	Middle	23	12.7%	\$10,781	12.1%	39.3%	16	14.3%	39.0%	\$7,116	13.8%	36.9%	7	10.1%	38.5%	\$3,665	9.9%	36.8%
	Upper	101	55.8%	\$63,344	71.4%	36.4%	65	58.0%	38.4%	\$36,888	71.6%	48.2%	36	52.2%	37.0%	\$26,456	71.1%	46.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	181	100.0%	\$88,738	100.0%	100.0%	112	100.0%	100.0%	\$51,535	100.0%	100.0%	69	100.0%	100.0%	\$37,203	100.0%	100.0%
REFINANCE	Low	6	6.1%	\$1,246	3.3%	4.4%	3	5.8%	3.1%	\$783	4.2%	2.1%	3	6.4%	3.0%	\$463	2.4%	2.1%
	Moderate	20	20.2%	\$3,111	8.2%	19.8%	11	21.2%	14.8%	\$1,483	7.9%	10.0%	9	19.1%	14.6%	\$1,628	8.5%	10.0%
	Middle	24	24.2%	\$6,639	17.5%	39.3%	14	26.9%	38.2%	\$3,851	20.4%	35.0%	10	21.3%	38.0%	\$2,788	14.5%	35.0%
	Upper	49	49.5%	\$27,036	71.1%	36.4%	24	46.2%	43.9%	\$12,729	67.5%	52.9%	25	53.2%	44.4%	\$14,307	74.6%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	99	100.0%	\$38,032	100.0%	100.0%	52	100.0%	100.0%	\$18,846	100.0%	100.0%	47	100.0%	100.0%	\$19,186	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	3.1%	\$0	0.0%	2.0%	0	0.0%	3.5%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	14.8%	\$0	0.0%	10.5%	0	0.0%	16.8%	\$0	0.0%	13.1%
	Middle	1	12.5%	\$20	10.7%	39.3%	0	0.0%	40.8%	\$0	0.0%	38.6%	1	16.7%	38.4%	\$20	16.5%	36.6%
	Upper	7	87.5%	\$167	89.3%	36.4%	2	100.0%	41.3%	\$66	100.0%	48.9%	5	83.3%	41.4%	\$101	83.5%	47.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$187	100.0%	100.0%	2	100.0%	100.0%	\$66	100.0%	100.0%	6	100.0%	100.0%	\$121	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	15.4%	\$0	0.0%	11.2%	0	0.0%	13.0%	\$0	0.0%	6.8%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	37.9%	\$0	0.0%	43.0%	0	0.0%	47.8%	\$0	0.0%	47.6%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	34.6%	\$0	0.0%	32.7%	0	0.0%	27.5%	\$0	0.0%	32.8%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	12.1%	\$0	0.0%	13.1%	0	0.0%	11.6%	\$0	0.0%	12.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	16	5.6%	\$4,663	3.7%	4.4%	7	4.2%	3.6%	\$2,362	3.4%	2.8%	9	7.4%	3.9%	\$2,301	4.1%	2.8%
	Moderate	67	23.3%	\$14,307	11.3%	19.8%	38	22.9%	16.3%	\$7,435	10.6%	12.8%	29	23.8%	16.6%	\$6,872	12.2%	13.0%
	Middle	48	16.7%	\$17,440	13.7%	39.3%	30	18.1%	38.6%	\$10,967	15.6%	35.8%	18	14.8%	38.2%	\$6,473	11.5%	35.7%
	Upper	157	54.5%	\$90,547	71.3%	36.4%	91	54.8%	41.4%	\$49,683	70.5%	48.6%	66	54.1%	41.3%	\$40,864	72.3%	48.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	288	100.0%	\$126,957	100.0%	100.0%	166	100.0%	100.0%	\$70,447	100.0%	100.0%	122	100.0%	100.0%	\$56,510	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	2	1.5%	\$140	2.1%	6.9%	2	3.1%	6.5%	\$140	4.7%	9.6%	0	0.0%	6.2%	\$0	0.0%	8.0%
	Moderate	19	14.3%	\$1,742	25.7%	21.3%	9	14.1%	19.5%	\$540	18.0%	22.9%	10	14.5%	17.6%	\$1,202	31.7%	20.6%
	Middle	60	45.1%	\$2,768	40.8%	38.6%	27	42.2%	36.7%	\$1,287	43.0%	35.3%	33	47.8%	36.3%	\$1,481	39.0%	34.6%
	Upper	52	39.1%	\$2,140	31.5%	33.2%	26	40.6%	35.4%	\$1,028	34.3%	30.5%	26	37.7%	36.9%	\$1,112	29.3%	34.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	1.6%	0	0.0%	3.1%	\$0	0.0%	2.4%
Total	133	100.0%	\$6,790	100.0%	100.0%	64	100.0%	100.0%	\$2,995	100.0%	100.0%	69	100.0%	100.0%	\$3,795	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	1.8%	\$0	0.0%	0.8%	0	0.0%	2.1%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	8.8%	\$0	0.0%	8.0%	0	0.0%	11.8%	\$0	0.0%	6.8%
	Middle	0	0.0%	\$0	0.0%	47.2%	0	0.0%	47.4%	\$0	0.0%	54.5%	0	0.0%	47.9%	\$0	0.0%	58.8%
	Upper	0	0.0%	\$0	0.0%	37.3%	0	0.0%	40.5%	\$0	0.0%	35.7%	0	0.0%	36.8%	\$0	0.0%	32.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	1.1%	0	0.0%	1.4%	\$0	0.0%	1.4%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA Sacramento

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income	2015			2016									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
HOME PURCHASE	Low	6	3.3%	\$769	0.9%	22.8%	5	4.5%	3.2%	\$629	1.2%	1.5%	1	1.4%	2.1%	\$140	0.4%	1.0%	
	Moderate	33	18.2%	\$6,682	7.5%	17.2%	21	18.8%	14.9%	\$4,234	8.2%	9.5%	12	17.4%	13.0%	\$2,448	6.6%	8.1%	
	Middle	21	11.6%	\$4,942	5.6%	20.1%	10	8.9%	21.5%	\$2,340	4.5%	18.6%	11	15.9%	22.9%	\$2,602	7.0%	18.9%	
	Upper	121	66.9%	\$76,345	86.0%	39.9%	76	67.9%	41.7%	\$44,332	86.0%	52.2%	45	65.2%	48.3%	\$32,013	86.0%	58.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.6%	\$0	0.0%	18.2%	0	0.0%	13.7%	\$0	0.0%	13.7%	
	Total	181	100.0%	\$88,738	100.0%	100.0%	112	100.0%	100.0%	\$51,535	100.0%	100.0%	69	100.0%	100.0%	\$37,203	100.0%	100.0%	
REFINANCE	Low	9	9.1%	\$1,068	2.8%	22.8%	6	11.5%	3.4%	\$717	3.8%	1.7%	3	6.4%	2.9%	\$351	1.8%	1.6%	
	Moderate	22	22.2%	\$3,570	9.4%	17.2%	14	26.9%	11.6%	\$2,190	11.6%	7.7%	8	17.0%	10.4%	\$1,380	7.2%	6.8%	
	Middle	4	4.0%	\$772	2.0%	20.1%	2	3.8%	18.4%	\$300	1.6%	15.5%	2	4.3%	19.0%	\$472	2.5%	15.8%	
	Upper	64	64.6%	\$32,622	85.8%	39.9%	30	57.7%	40.9%	\$15,639	83.0%	47.4%	34	72.3%	47.3%	\$16,983	88.5%	53.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.7%	\$0	0.0%	27.7%	0	0.0%	20.4%	\$0	0.0%	22.2%	
	Total	99	100.0%	\$38,032	100.0%	100.0%	52	100.0%	100.0%	\$18,846	100.0%	100.0%	47	100.0%	100.0%	\$19,186	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	5.0%	\$0	0.0%	3.0%	0	0.0%	3.1%	\$0	0.0%	1.9%	
	Moderate	1	12.5%	\$6	3.2%	17.2%	0	0.0%	14.6%	\$0	0.0%	11.3%	1	16.7%	14.2%	\$6	5.0%	10.2%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	23.6%	\$0	0.0%	22.6%	0	0.0%	24.3%	\$0	0.0%	21.6%	
	Upper	7	87.5%	\$181	96.8%	39.9%	2	100.0%	51.1%	\$66	100.0%	57.5%	5	83.3%	54.4%	\$115	95.0%	60.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	5.5%	0	0.0%	3.9%	\$0	0.0%	6.2%	
	Total	8	100.0%	\$187	100.0%	100.0%	2	100.0%	100.0%	\$66	100.0%	100.0%	6	100.0%	100.0%	\$121	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	15	5.2%	\$1,837	1.4%	22.8%	11	6.6%	3.4%	\$1,346	1.9%	1.6%	4	3.3%	2.6%	\$491	0.9%	1.3%	
	Moderate	56	19.4%	\$10,258	8.1%	17.2%	35	21.1%	13.1%	\$6,424	9.1%	8.1%	21	17.2%	11.6%	\$3,834	6.8%	7.1%	
	Middle	25	8.7%	\$5,714	4.5%	20.1%	12	7.2%	19.9%	\$2,640	3.7%	16.2%	13	10.7%	20.7%	\$3,074	5.4%	16.6%	
	Upper	192	66.7%	\$109,148	86.0%	39.9%	108	65.1%	41.6%	\$60,037	85.2%	47.1%	84	68.9%	47.8%	\$49,111	86.9%	53.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.1%	\$0	0.0%	27.0%	0	0.0%	17.3%	\$0	0.0%	21.3%	
	Total	288	100.0%	\$126,957	100.0%	100.0%	166	100.0%	100.0%	\$70,447	100.0%	100.0%	122	100.0%	100.0%	\$56,510	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	75	56.4%	\$3,848	56.7%	92.6%	34	53.1%	54.1%	\$1,411	47.1%	37.7%	41	59.4%	40.6%	\$2,437	64.2%	30.7%	
	Over \$1 Million	35	26.3%	\$2,367	34.9%	6.8%	18	28.1%					17	24.6%					
	Total Rev. available	110	82.7%	\$6,215	91.6%	99.4%	52	81.2%					58	84.0%					
	Rev. Not Known	23	17.3%	\$575	8.5%	0.6%	12	18.8%					11	15.9%					
	Total	133	100.0%	\$6,790	100.0%	100.0%	64	100.0%					69	100.0%					
Small Business Loan Size	\$100,000 or Less	130	97.7%	\$5,596	82.4%		63	98.4%	95.3%	\$2,745	91.7%	45.0%	67	97.1%	96.4%	\$2,851	75.1%	53.0%	
	\$100,001 - \$250,000	2	1.5%	\$450	6.6%		1	1.6%	2.3%	\$250	8.3%	12.7%	1	1.4%	1.9%	\$200	5.3%	12.0%	
	\$250,001 - \$1 Million	1	0.8%	\$744	11.0%		0	0.0%	2.4%	\$0	0.0%	42.3%	1	1.4%	1.7%	\$744	19.6%	35.0%	
	Total	133	100.0%	\$6,790	100.0%		64	100.0%	100.0%	\$2,995	100.0%	100.0%	69	100.0%	100.0%	\$3,795	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.6%	0	0.0%	61.3%	\$0	0.0%	34.9%	0	0.0%	64.2%	\$0	0.0%	49.9%	
Over \$1 Million	0	0.0%	\$0	0.0%	2.4%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.7%	\$0	0.0%	19.0%	0	0.0%	84.7%	\$0	0.0%	24.6%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.1%	\$0	0.0%	23.5%	0	0.0%	8.7%	\$0	0.0%	29.8%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.2%	\$0	0.0%	57.4%	0	0.0%	6.6%	\$0	0.0%	45.7%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA San Diego

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	12	3.4%	\$4,557	2.0%	3.3%	7	3.2%	3.3%	\$2,624	1.7%	2.2%	5	3.9%	3.5%	\$1,933	2.4%	2.5%
	Moderate	62	17.8%	\$20,635	8.9%	14.3%	31	14.1%	13.8%	\$10,053	6.7%	10.0%	31	24.0%	14.2%	\$10,582	12.9%	10.5%
	Middle	68	19.5%	\$39,137	16.8%	38.8%	37	16.8%	38.0%	\$19,587	13.0%	32.5%	31	24.0%	38.1%	\$19,550	23.8%	33.1%
	Upper	207	59.3%	\$168,101	72.3%	43.6%	145	65.9%	45.0%	\$118,182	78.6%	55.3%	62	48.1%	44.1%	\$49,919	60.9%	53.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	349	100.0%	\$232,430	100.0%	100.0%	220	100.0%	100.0%	\$150,446	100.0%	100.0%	129	100.0%	100.0%	\$81,984	100.0%	100.0%
REFINANCE	Low	9	5.3%	\$2,045	1.9%	3.3%	6	6.5%	2.6%	\$1,147	1.8%	1.8%	3	3.8%	2.8%	\$898	2.0%	2.0%
	Moderate	21	12.3%	\$5,153	4.8%	14.3%	9	9.8%	12.4%	\$2,407	3.9%	9.2%	12	15.2%	12.5%	\$2,746	6.0%	9.6%
	Middle	39	22.8%	\$14,400	13.3%	38.8%	21	22.8%	38.1%	\$6,978	11.2%	32.6%	18	22.8%	38.1%	\$7,422	16.1%	33.3%
	Upper	102	59.6%	\$86,854	80.1%	43.6%	56	60.9%	46.9%	\$51,942	83.1%	56.4%	46	58.2%	46.7%	\$34,912	75.9%	55.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	171	100.0%	\$108,452	100.0%	100.0%	92	100.0%	100.0%	\$62,474	100.0%	100.0%	79	100.0%	100.0%	\$45,978	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.3%	0	0.0%	3.0%	\$0	0.0%	2.1%	0	0.0%	3.8%	\$0	0.0%	2.6%
	Moderate	1	4.3%	\$5	0.1%	14.3%	1	7.1%	13.3%	\$5	0.1%	10.4%	0	0.0%	13.2%	\$0	0.0%	9.8%
	Middle	9	39.1%	\$1,098	23.9%	38.8%	5	35.7%	39.4%	\$971	22.9%	32.0%	4	44.4%	39.2%	\$127	36.2%	32.3%
	Upper	13	56.5%	\$3,483	75.9%	43.6%	8	57.1%	44.3%	\$3,259	77.0%	55.4%	5	55.6%	43.7%	\$224	63.8%	55.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	23	100.0%	\$4,586	100.0%	100.0%	14	100.0%	100.0%	\$4,235	100.0%	100.0%	9	100.0%	100.0%	\$351	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	27.2%	\$0	0.0%	15.5%	0	0.0%	27.4%	\$0	0.0%	15.6%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	34.7%	\$0	0.0%	31.9%	0	0.0%	34.2%	\$0	0.0%	28.6%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	25.8%	\$0	0.0%	31.1%	0	0.0%	26.1%	\$0	0.0%	36.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	12.3%	\$0	0.0%	21.5%	0	0.0%	12.2%	\$0	0.0%	19.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	21	3.9%	\$6,602	1.9%	3.3%	13	4.0%	3.1%	\$3,771	1.7%	2.8%	8	3.7%	3.2%	\$2,831	2.2%	2.9%
	Moderate	84	15.5%	\$25,793	7.5%	14.3%	41	12.6%	13.1%	\$12,465	5.7%	10.9%	43	19.8%	13.2%	\$13,328	10.4%	10.9%
	Middle	116	21.4%	\$54,635	15.8%	38.8%	63	19.3%	38.0%	\$27,536	12.7%	32.5%	53	24.4%	38.1%	\$27,099	21.1%	33.4%
	Upper	322	59.3%	\$258,438	74.8%	43.6%	209	64.1%	45.8%	\$173,383	79.8%	53.9%	113	52.1%	45.5%	\$85,055	66.3%	52.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	543	100.0%	\$345,468	100.0%	100.0%	326	100.0%	100.0%	\$217,155	100.0%	100.0%	217	100.0%	100.0%	\$128,313	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	33	6.6%	\$1,415	6.5%	5.8%	16	6.3%	4.8%	\$685	6.0%	4.8%	17	6.9%	4.3%	\$730	7.0%	4.2%
	Moderate	128	25.6%	\$5,701	26.0%	15.6%	65	25.7%	14.7%	\$2,812	24.5%	16.0%	63	25.5%	13.8%	\$2,889	27.8%	13.9%
	Middle	183	36.6%	\$7,936	36.2%	35.6%	91	36.0%	34.1%	\$4,329	37.7%	33.2%	92	37.2%	33.5%	\$3,607	34.6%	33.7%
	Upper	156	31.2%	\$6,844	31.3%	42.9%	81	32.0%	45.1%	\$3,660	31.9%	44.7%	75	30.4%	45.9%	\$3,184	30.6%	46.2%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	1.2%	0	0.0%	2.4%	\$0	0.0%	1.9%
Total	500	100.0%	\$21,896	100.0%	100.0%	253	100.0%	100.0%	\$11,486	100.0%	100.0%	247	100.0%	100.0%	\$10,410	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.2%	\$0	0.0%	1.1%	0	0.0%	0.7%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	10.3%	0	0.0%	8.3%	\$0	0.0%	5.8%	0	0.0%	11.7%	\$0	0.0%	8.2%
	Middle	0	0.0%	\$0	0.0%	38.0%	0	0.0%	31.2%	\$0	0.0%	30.4%	0	0.0%	35.1%	\$0	0.0%	28.1%
	Upper	0	0.0%	\$0	0.0%	49.8%	0	0.0%	55.3%	\$0	0.0%	58.2%	0	0.0%	48.8%	\$0	0.0%	57.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	1.9%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.0%	\$0	0.0%	4.5%	0	0.0%	3.4%	\$0	0.0%	3.5%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA San Diego

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016				Bank & Aggregate Lending Comparison													
		Bank		Families by Family Income	2015		2016												
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar									
		#	%	\$ (000s)	\$ %	%	#	%	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
HOME PURCHASE	Low	2	0.6%	\$539	0.2%	22.4%	0	0.0%	0.8%	\$0	0.0%	0.3%	2	1.6%	0.7%	\$539	0.7%	0.3%	
	Moderate	30	8.6%	\$6,804	2.9%	17.5%	19	8.6%	6.7%	\$4,072	2.7%	3.3%	11	8.5%	5.8%	\$2,732	3.3%	2.8%	
	Middle	25	7.2%	\$7,074	3.0%	18.7%	13	5.9%	19.3%	\$4,014	2.7%	14.0%	12	9.3%	19.7%	\$3,060	3.7%	14.1%	
	Upper	292	83.7%	\$218,013	93.8%	41.3%	188	85.5%	57.4%	\$142,360	94.6%	67.4%	104	80.6%	60.8%	\$75,653	92.3%	70.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.8%	\$0	0.0%	15.0%	0	0.0%	13.0%	\$0	0.0%	12.7%	
	Total	349	100.0%	\$232,430	100.0%	100.0%	220	100.0%	100.0%	\$150,446	100.0%	100.0%	129	100.0%	100.0%	\$81,984	100.0%	100.0%	
REFINANCE	Low	8	4.7%	\$992	0.9%	22.4%	5	5.4%	2.1%	\$556	0.9%	1.0%	3	3.8%	1.8%	\$436	0.9%	0.9%	
	Moderate	19	11.1%	\$4,050	3.7%	17.5%	9	9.8%	6.8%	\$1,685	2.7%	3.8%	10	12.7%	6.5%	\$2,365	5.1%	3.7%	
	Middle	13	7.6%	\$3,070	2.8%	18.7%	5	5.4%	15.9%	\$935	1.5%	11.7%	8	10.1%	16.2%	\$2,135	4.6%	12.1%	
	Upper	131	76.6%	\$100,340	92.5%	41.3%	73	79.3%	51.6%	\$59,298	94.9%	59.2%	58	73.4%	53.6%	\$41,042	89.3%	60.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.6%	\$0	0.0%	24.4%	0	0.0%	22.0%	\$0	0.0%	23.2%	
	Total	171	100.0%	\$108,452	100.0%	100.0%	92	100.0%	100.0%	\$62,474	100.0%	100.0%	79	100.0%	100.0%	\$45,978	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	4.3%	\$5	0.1%	22.4%	1	7.1%	2.8%	\$5	0.1%	1.1%	0	0.0%	2.6%	\$0	0.0%	1.2%	
	Moderate	4	17.4%	\$192	4.2%	17.5%	3	21.4%	9.7%	\$155	3.7%	5.6%	1	11.1%	9.9%	\$37	10.5%	5.9%	
	Middle	1	4.3%	\$34	0.7%	18.7%	0	0.0%	20.7%	\$0	0.0%	16.0%	1	11.1%	22.6%	\$34	9.7%	17.5%	
	Upper	17	73.9%	\$4,355	95.0%	41.3%	10	71.4%	60.1%	\$4,075	96.2%	68.7%	7	77.8%	59.9%	\$280	79.8%	70.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.7%	\$0	0.0%	8.5%	0	0.0%	5.0%	\$0	0.0%	5.0%	
	Total	23	100.0%	\$4,586	100.0%	100.0%	14	100.0%	100.0%	\$4,235	100.0%	100.0%	9	100.0%	100.0%	\$351	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	11	2.0%	\$1,536	0.4%	22.4%	6	1.8%	1.7%	\$561	0.3%	0.7%	5	2.3%	1.5%	\$975	0.8%	0.6%	
	Moderate	53	9.8%	\$11,046	3.2%	17.5%	31	9.5%	6.8%	\$5,912	2.7%	3.4%	22	10.1%	6.3%	\$5,134	4.0%	3.3%	
	Middle	39	7.2%	\$10,178	2.9%	18.7%	18	5.5%	17.2%	\$4,949	2.3%	11.9%	21	9.7%	17.5%	\$5,229	4.1%	12.3%	
	Upper	440	81.0%	\$322,708	93.4%	41.3%	271	83.1%	53.7%	\$205,733	94.7%	59.0%	169	77.9%	55.9%	\$116,975	91.2%	60.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.7%	\$0	0.0%	24.9%	0	0.0%	18.9%	\$0	0.0%	22.8%	
	Total	543	100.0%	\$345,468	100.0%	100.0%	326	100.0%	100.0%	\$217,155	100.0%	100.0%	217	100.0%	100.0%	\$128,313	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	342	68.4%	\$14,612	66.7%	92.1%	174	68.8%	52.9%	\$7,835	68.2%	35.4%	168	68.0%	41.6%	\$6,777	65.1%	31.3%	
	Over \$1 Million	117	23.4%	\$6,657	30.4%	7.5%	55	21.7%					62	25.1%					
	Total Rev. available	459	91.8%	\$21,269	97.1%	99.6%	229	90.5%					230	93.1%					
	Rev. Not Known	41	8.2%	\$627	2.9%	0.4%	24	9.5%					17	6.9%					
	Total	500	100.0%	\$21,896	100.0%	100.0%	253	100.0%	100.0%	\$11,486	100.0%	100.0%	247	100.0%	100.0%	\$10,410	100.0%	100.0%	
Small Business Loan Size	\$100,000 or Less	490	98.0%	\$19,773	90.3%		245	96.8%	95.6%	\$9,713	84.6%	46.1%	245	99.2%	96.6%	\$10,060	96.6%	55.6%	
	\$100,001 - \$250,000	8	1.6%	\$1,398	6.4%		6	2.4%	2.2%	\$1,048	9.1%	12.4%	2	0.8%	1.8%	\$350	3.4%	11.3%	
	\$250,001 - \$1 Million	2	0.4%	\$725	3.3%		2	0.8%	2.2%	\$725	6.3%	41.5%	0	0.0%	1.6%	\$0	0.0%	33.1%	
	Total	500	100.0%	\$21,896	100.0%		253	100.0%	100.0%	\$11,486	100.0%	100.0%	247	100.0%	100.0%	\$10,410	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.2%	0	0.0%	54.5%	\$0	0.0%	59.1%	0	0.0%	56.0%	\$0	0.0%	43.9%	
Over \$1 Million	0	0.0%	\$0	0.0%	5.8%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	94.5%	\$0	0.0%	54.1%	0	0.0%	92.8%	\$0	0.0%	52.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.2%	\$0	0.0%	16.1%	0	0.0%	4.5%	\$0	0.0%	22.8%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.4%	\$0	0.0%	29.8%	0	0.0%	2.7%	\$0	0.0%	25.1%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA San Francisco

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	2	5.1%	\$2,055	5.2%	1.0%	1	4.5%	1.3%	\$584	2.8%	1.0%	1	5.9%	1.0%	\$1,471	8.1%	0.8%
	Moderate	5	12.8%	\$2,251	5.7%	8.8%	3	13.6%	9.5%	\$1,270	6.1%	6.3%	2	11.8%	10.0%	\$981	5.4%	6.9%
	Middle	12	30.8%	\$11,063	28.2%	45.6%	5	22.7%	47.2%	\$4,650	22.2%	36.1%	7	41.2%	47.2%	\$6,413	35.2%	36.2%
	Upper	20	51.3%	\$23,833	60.8%	44.7%	13	59.1%	42.0%	\$14,485	69.0%	56.7%	7	41.2%	41.8%	\$9,348	51.3%	56.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	39	100.0%	\$39,202	100.0%	100.0%	22	100.0%	100.0%	\$20,989	100.0%	100.0%	17	100.0%	100.0%	\$18,213	100.0%	100.0%
REFINANCE	Low	2	4.3%	\$873	2.4%	1.0%	1	3.7%	1.0%	\$562	2.6%	0.8%	1	5.0%	1.1%	\$311	2.0%	0.8%
	Moderate	6	12.8%	\$2,994	8.1%	8.8%	4	14.8%	9.0%	\$1,842	8.6%	6.3%	2	10.0%	8.7%	\$1,152	7.5%	6.2%
	Middle	12	25.5%	\$5,463	14.9%	45.6%	7	25.9%	45.4%	\$2,401	11.2%	36.3%	5	25.0%	46.4%	\$3,062	20.1%	36.4%
	Upper	27	57.4%	\$27,407	74.6%	44.7%	15	55.6%	44.6%	\$16,664	77.6%	56.6%	12	60.0%	43.9%	\$10,743	70.4%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	47	100.0%	\$36,737	100.0%	100.0%	27	100.0%	100.0%	\$21,469	100.0%	100.0%	20	100.0%	100.0%	\$15,268	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	1.1%	\$0	0.0%	0.8%	0	0.0%	1.2%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	8.8%	0	0.0%	9.3%	\$0	0.0%	6.2%	0	0.0%	8.9%	\$0	0.0%	5.5%
	Middle	2	66.7%	\$40	3.3%	45.6%	2	66.7%	42.5%	\$40	3.3%	30.2%	0	0.0%	40.5%	\$0	0.0%	28.7%
	Upper	1	33.3%	\$1,160	96.7%	44.7%	1	33.3%	47.1%	\$1,160	96.7%	62.9%	0	0.0%	49.5%	\$0	0.0%	64.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$1,200	100.0%	100.0%	3	100.0%	100.0%	\$1,200	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	6.6%	\$0	0.0%	8.3%	0	0.0%	7.9%	\$0	0.0%	11.7%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	33.7%	\$0	0.0%	26.5%	0	0.0%	27.6%	\$0	0.0%	15.6%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	34.1%	\$0	0.0%	31.8%	0	0.0%	40.6%	\$0	0.0%	45.4%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	25.6%	\$0	0.0%	33.5%	0	0.0%	24.0%	\$0	0.0%	27.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	4.5%	\$2,928	3.8%	1.0%	2	3.8%	1.1%	\$1,146	2.6%	1.2%	2	5.4%	1.1%	\$1,782	5.3%	1.3%
	Moderate	11	12.4%	\$5,245	6.8%	8.8%	7	13.5%	9.4%	\$3,112	7.1%	7.3%	4	10.8%	9.2%	\$2,133	6.4%	6.7%
	Middle	26	29.2%	\$16,566	21.5%	45.6%	14	26.9%	45.6%	\$7,091	16.2%	35.7%	12	32.4%	46.2%	\$9,475	28.3%	36.3%
	Upper	48	53.9%	\$52,400	67.9%	44.7%	29	55.8%	43.9%	\$32,309	74.0%	55.8%	19	51.4%	43.6%	\$20,091	60.0%	55.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	89	100.0%	\$77,139	100.0%	100.0%	52	100.0%	100.0%	\$43,658	100.0%	100.0%	37	100.0%	100.0%	\$33,481	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	11	11.1%	\$411	9.6%	3.8%	6	12.8%	3.2%	\$255	13.8%	3.5%	5	9.6%	2.9%	\$156	6.4%	4.3%
	Moderate	13	13.1%	\$426	9.9%	10.5%	7	14.9%	10.2%	\$230	12.4%	12.1%	6	11.5%	10.3%	\$196	8.0%	9.7%
	Middle	43	43.4%	\$1,986	46.3%	44.9%	19	40.4%	47.8%	\$851	46.0%	48.1%	24	46.2%	46.7%	\$1,135	46.4%	48.4%
	Upper	32	32.3%	\$1,471	34.3%	40.7%	15	31.9%	37.4%	\$513	27.7%	35.0%	17	32.7%	37.8%	\$958	39.2%	35.7%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	1.3%	0	0.0%	2.3%	\$0	0.0%	1.9%
Total	99	100.0%	\$4,294	100.0%	100.0%	47	100.0%	100.0%	\$1,849	100.0%	100.0%	52	100.0%	100.0%	\$2,445	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	5.5%	\$0	0.0%	2.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.5%	0	0.0%	5.5%	\$0	0.0%	5.8%	0	0.0%	5.9%	\$0	0.0%	7.0%
	Middle	0	0.0%	\$0	0.0%	31.3%	0	0.0%	36.4%	\$0	0.0%	45.8%	0	0.0%	33.3%	\$0	0.0%	45.6%
	Upper	0	0.0%	\$0	0.0%	61.8%	0	0.0%	41.8%	\$0	0.0%	34.3%	0	0.0%	52.9%	\$0	0.0%	36.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	10.9%	\$0	0.0%	11.7%	0	0.0%	7.8%	\$0	0.0%	11.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA San Francisco

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income	2015					2016							
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ (000s)	\$ %	\$ %	#	%	Agg %	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	2.6%	\$500	1.3%	18.9%	0	0.0%	0.6%	\$0	0.0%	0.2%	1	5.9%	0.6%	\$500	2.7%	0.3%	
	Moderate	1	2.6%	\$300	0.8%	17.0%	0	0.0%	2.5%	\$0	0.0%	0.9%	1	5.9%	4.2%	\$300	1.6%	1.6%	
	Middle	1	2.6%	\$450	1.1%	19.2%	1	4.5%	10.8%	\$450	2.1%	6.0%	0	0.0%	11.9%	\$0	0.0%	6.6%	
	Upper	36	92.3%	\$37,952	96.8%	44.9%	21	95.5%	72.7%	\$20,539	97.9%	81.6%	15	88.2%	74.9%	\$17,413	95.6%	82.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.4%	\$0	0.0%	11.2%	0	0.0%	8.4%	\$0	0.0%	8.9%	
	Total	39	100.0%	\$39,202	100.0%	100.0%	22	100.0%	100.0%	\$20,989	100.0%	100.0%	17	100.0%	100.0%	\$18,213	100.0%	100.0%	
REFINANCE	Low	2	4.3%	\$561	1.5%	18.9%	1	3.7%	2.4%	\$250	1.2%	0.9%	1	5.0%	2.7%	\$311	2.0%	1.1%	
	Moderate	8	17.0%	\$2,208	6.0%	17.0%	5	18.5%	7.2%	\$1,398	6.5%	3.6%	3	15.0%	9.3%	\$810	5.3%	5.0%	
	Middle	1	2.1%	\$300	0.8%	19.2%	1	3.7%	16.3%	\$300	1.4%	11.0%	0	0.0%	18.7%	\$0	0.0%	12.9%	
	Upper	36	76.6%	\$33,668	91.6%	44.9%	20	74.1%	61.3%	\$19,521	90.9%	71.9%	16	80.0%	60.4%	\$14,147	92.7%	71.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.8%	\$0	0.0%	12.6%	0	0.0%	8.9%	\$0	0.0%	9.7%	
	Total	47	100.0%	\$36,737	100.0%	100.0%	27	100.0%	100.0%	\$21,469	100.0%	100.0%	20	100.0%	100.0%	\$15,268	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	33.3%	\$20	1.7%	18.9%	1	33.3%	2.2%	\$20	1.7%	0.6%	0	0.0%	3.6%	\$0	0.0%	1.2%	
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	7.5%	\$0	0.0%	3.2%	0	0.0%	7.1%	\$0	0.0%	3.1%	
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	16.9%	\$0	0.0%	10.3%	0	0.0%	18.4%	\$0	0.0%	11.3%	
	Upper	2	66.7%	\$1,180	98.3%	44.9%	2	66.7%	67.6%	\$1,180	98.3%	78.2%	0	0.0%	67.5%	\$0	0.0%	77.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.9%	\$0	0.0%	7.6%	0	0.0%	3.5%	\$0	0.0%	7.2%	
	Total	3	100.0%	\$1,200	100.0%	100.0%	3	100.0%	100.0%	\$1,200	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	44.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	4.5%	\$1,081	1.4%	18.9%	2	3.8%	1.9%	\$270	0.6%	0.7%	2	5.4%	2.3%	\$811	2.4%	0.9%	
	Moderate	9	10.1%	\$2,508	3.3%	17.0%	5	9.6%	5.9%	\$1,398	3.2%	2.6%	4	10.8%	7.9%	\$1,110	3.3%	3.7%	
	Middle	2	2.2%	\$750	1.0%	19.2%	2	3.8%	14.8%	\$750	1.7%	8.9%	0	0.0%	17.0%	\$0	0.0%	10.5%	
	Upper	74	83.1%	\$72,800	94.4%	44.9%	43	82.7%	63.9%	\$41,240	94.5%	71.7%	31	83.8%	63.4%	\$31,560	94.3%	71.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.5%	\$0	0.0%	16.2%	0	0.0%	9.3%	\$0	0.0%	13.0%	
	Total	89	100.0%	\$77,139	100.0%	100.0%	52	100.0%	100.0%	\$43,658	100.0%	100.0%	37	100.0%	100.0%	\$33,481	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	62	62.6%	\$2,127	49.5%	90.2%	32	68.1%	51.5%	\$1,101	59.5%	36.9%	30	57.7%	36.9%	\$1,026	42.0%	30.0%	
	Over \$1 Million	29	29.3%	\$2,113	49.2%	9.3%	13	27.7%					16	30.8%					
	Total Rev. available	91	91.9%	\$4,240	98.7%	99.5%	45	95.8%					46	88.5%					
	Rev. Not Known	8	8.1%	\$54	1.3%	0.5%	2	4.3%					6	11.5%					
	Total	99	100.0%	\$4,294	100.0%	100.0%	47	100.0%					52	100.0%					
Small Business Loan Size	\$100,000 or Less	96	97.0%	\$3,679	85.7%		47	100.0%	96.2%	\$1,849	100.0%	50.6%	49	94.2%	97.3%	\$1,830	74.8%	59.8%	
	\$100,001 - \$250,000	3	3.0%	\$615	14.3%		0	0.0%	1.9%	\$0	0.0%	10.9%	3	5.8%	1.3%	\$615	25.2%	8.8%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	38.5%	0	0.0%	1.4%	\$0	0.0%	31.4%	
	Total	99	100.0%	\$4,294	100.0%		47	100.0%	100.0%	\$1,849	100.0%	100.0%	52	100.0%	100.0%	\$2,445	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	93.1%	0	0.0%	40.0%	\$0	0.0%	32.0%	0	0.0%	35.3%	\$0	0.0%	20.2%	
Over \$1 Million	0	0.0%	\$0	0.0%	6.9%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	94.5%	\$0	0.0%	71.9%	0	0.0%	94.1%	\$0	0.0%	70.5%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.5%	\$0	0.0%	28.1%	0	0.0%	5.9%	\$0	0.0%	29.5%	
	\$250,001 - \$500,000	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	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA San Jose

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	4	6.6%	\$1,881	4.3%	4.5%	2	4.3%	5.6%	\$908	2.9%	3.7%	2	13.3%	6.7%	\$973	7.9%	4.4%
	Moderate	15	24.6%	\$8,057	18.6%	17.9%	10	21.7%	22.5%	\$5,132	16.6%	16.3%	5	33.3%	22.3%	\$2,925	23.6%	16.6%
	Middle	25	41.0%	\$17,114	39.5%	39.0%	18	39.1%	41.6%	\$10,131	32.8%	37.1%	7	46.7%	42.2%	\$6,983	56.4%	38.1%
	Upper	17	27.9%	\$16,252	37.5%	38.6%	16	34.8%	30.2%	\$14,752	47.7%	42.9%	1	6.7%	28.8%	\$1,500	12.1%	41.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	61	100.0%	\$43,304	100.0%	100.0%	46	100.0%	100.0%	\$30,923	100.0%	100.0%	15	100.0%	100.0%	\$12,381	100.0%	100.0%
REFINANCE	Low	4	6.5%	\$1,558	4.0%	4.5%	2	5.1%	4.5%	\$939	4.0%	3.0%	2	8.7%	4.5%	\$619	4.0%	3.1%
	Moderate	15	24.2%	\$6,664	17.1%	17.9%	10	25.6%	18.5%	\$4,634	19.6%	14.0%	5	21.7%	19.4%	\$2,030	13.2%	15.0%
	Middle	22	35.5%	\$11,337	29.1%	39.0%	13	33.3%	40.2%	\$6,336	26.8%	35.7%	9	39.1%	40.4%	\$5,001	32.4%	36.3%
	Upper	21	33.9%	\$19,454	49.9%	38.6%	14	35.9%	36.8%	\$11,692	49.5%	47.3%	7	30.4%	35.8%	\$7,762	50.4%	45.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	62	100.0%	\$39,013	100.0%	100.0%	39	100.0%	100.0%	\$23,601	100.0%	100.0%	23	100.0%	100.0%	\$15,412	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	5.5%	\$0	0.0%	3.2%	0	0.0%	4.4%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	16.9%	\$0	0.0%	11.0%	0	0.0%	16.6%	\$0	0.0%	11.7%
	Middle	1	50.0%	\$25	11.1%	39.0%	1	50.0%	37.9%	\$25	11.1%	29.9%	0	0.0%	39.8%	\$0	0.0%	32.9%
	Upper	1	50.0%	\$200	88.9%	38.6%	1	50.0%	39.7%	\$200	88.9%	55.9%	0	0.0%	39.2%	\$0	0.0%	52.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$225	100.0%	100.0%	2	100.0%	100.0%	\$225	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	22.1%	\$0	0.0%	17.3%	0	0.0%	15.7%	\$0	0.0%	5.7%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	29.8%	\$0	0.0%	35.9%	0	0.0%	35.8%	\$0	0.0%	29.1%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	30.5%	\$0	0.0%	34.2%	0	0.0%	36.5%	\$0	0.0%	52.2%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	17.6%	\$0	0.0%	12.6%	0	0.0%	11.9%	\$0	0.0%	13.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	8	6.4%	\$3,439	4.2%	4.5%	4	4.6%	5.0%	\$1,847	3.4%	4.1%	4	10.5%	5.1%	\$1,592	5.7%	3.6%
	Moderate	30	24.0%	\$14,721	17.8%	17.9%	20	23.0%	19.7%	\$9,766	17.8%	15.9%	10	26.3%	20.0%	\$4,955	17.8%	16.1%
	Middle	48	38.4%	\$28,476	34.5%	39.0%	32	36.8%	40.4%	\$16,492	30.1%	35.8%	16	42.1%	40.8%	\$11,984	43.1%	37.6%
	Upper	39	31.2%	\$35,906	43.5%	38.6%	31	35.6%	34.9%	\$26,644	48.7%	44.2%	8	21.1%	34.1%	\$9,262	33.3%	42.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	125	100.0%	\$82,542	100.0%	100.0%	87	100.0%	100.0%	\$54,749	100.0%	100.0%	38	100.0%	100.0%	\$27,793	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	6	5.8%	\$290	3.9%	6.1%	3	5.8%	5.4%	\$140	3.2%	6.4%	3	5.9%	5.4%	\$150	5.0%	6.0%
	Moderate	28	27.2%	\$2,752	37.2%	20.6%	15	28.8%	21.8%	\$2,114	48.2%	26.1%	13	25.5%	21.3%	\$638	21.2%	24.6%
	Middle	36	35.0%	\$2,542	34.4%	35.2%	19	36.5%	35.9%	\$1,480	33.8%	33.2%	17	33.3%	36.1%	\$1,062	35.3%	34.0%
	Upper	33	32.0%	\$1,809	24.5%	38.0%	15	28.8%	36.0%	\$649	14.8%	33.5%	18	35.3%	35.7%	\$1,160	38.5%	34.2%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.8%	0	0.0%	1.5%	\$0	0.0%	1.1%
Total	103	100.0%	\$7,393	100.0%	100.0%	52	100.0%	100.0%	\$4,383	100.0%	100.0%	51	100.0%	100.0%	\$3,010	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.0%	\$0	0.0%	0.3%	0	0.0%	2.7%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	17.6%	\$0	0.0%	18.2%	0	0.0%	20.7%	\$0	0.0%	22.5%
	Middle	0	0.0%	\$0	0.0%	31.1%	0	0.0%	38.2%	\$0	0.0%	36.5%	0	0.0%	29.7%	\$0	0.0%	30.1%
	Upper	0	0.0%	\$0	0.0%	49.9%	0	0.0%	41.2%	\$0	0.0%	43.0%	0	0.0%	45.0%	\$0	0.0%	44.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.0%	\$0	0.0%	2.0%	0	0.0%	1.8%	\$0	0.0%	2.3%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA San Jose

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016				Bank & Aggregate Lending Comparison													
		Bank		Families by Family Income	2015		2016												
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar									
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	%			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	1.1%	\$0	0.0%	0.3%	0	0.0%	1.1%	\$0	0.0%	0.3%	
	Moderate	4	6.6%	\$1,233	2.8%	16.2%	3	6.5%	6.3%	\$954	3.1%	2.9%	1	6.7%	5.7%	\$279	2.3%	2.5%	
	Middle	11	18.0%	\$4,339	10.0%	19.3%	8	17.4%	18.1%	\$2,827	9.1%	12.5%	3	20.0%	17.5%	\$1,512	12.2%	11.7%	
	Upper	46	75.4%	\$37,732	87.1%	41.1%	35	76.1%	62.0%	\$27,142	87.8%	72.9%	11	73.3%	67.8%	\$10,590	85.5%	78.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.6%	\$0	0.0%	11.4%	0	0.0%	8.0%	\$0	0.0%	7.4%	
	Total	61	100.0%	\$43,304	100.0%	100.0%	46	100.0%	100.0%	\$30,923	100.0%	100.0%	15	100.0%	100.0%	\$12,381	100.0%	100.0%	
REFINANCE	Low	4	6.5%	\$954	2.4%	23.4%	3	7.7%	3.0%	\$880	3.7%	1.3%	1	4.3%	2.4%	\$74	0.5%	1.2%	
	Moderate	12	19.4%	\$3,122	8.0%	16.2%	8	20.5%	9.4%	\$2,204	9.3%	5.5%	4	17.4%	8.9%	\$918	6.0%	5.3%	
	Middle	6	9.7%	\$2,386	6.1%	19.3%	2	5.1%	18.9%	\$737	3.1%	14.6%	4	17.4%	19.0%	\$1,649	10.7%	14.6%	
	Upper	40	64.5%	\$32,551	83.4%	41.1%	26	66.7%	55.1%	\$19,780	83.8%	65.5%	14	60.9%	60.4%	\$12,771	82.9%	70.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.6%	\$0	0.0%	13.2%	0	0.0%	9.3%	\$0	0.0%	9.0%	
	Total	62	100.0%	\$39,013	100.0%	100.0%	39	100.0%	100.0%	\$23,601	100.0%	100.0%	23	100.0%	100.0%	\$15,412	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	4.4%	\$0	0.0%	1.5%	0	0.0%	4.5%	\$0	0.0%	1.8%	
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	12.5%	\$0	0.0%	6.7%	0	0.0%	11.8%	\$0	0.0%	6.6%	
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	19.1%	\$0	0.0%	13.1%	0	0.0%	20.4%	\$0	0.0%	15.2%	
	Upper	2	100.0%	\$225	100.0%	41.1%	2	100.0%	57.9%	\$225	100.0%	73.5%	0	0.0%	60.9%	\$0	0.0%	73.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.0%	\$0	0.0%	5.2%	0	0.0%	2.3%	\$0	0.0%	3.2%	
	Total	2	100.0%	\$225	100.0%	100.0%	2	100.0%	100.0%	\$225	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	3.2%	\$954	1.2%	23.4%	3	3.4%	2.5%	\$880	1.6%	0.9%	1	2.6%	2.2%	\$74	0.3%	0.9%	
	Moderate	16	12.8%	\$4,355	5.3%	16.2%	11	12.6%	8.6%	\$3,158	5.8%	4.4%	5	13.2%	8.2%	\$1,197	4.3%	4.2%	
	Middle	17	13.6%	\$6,725	8.1%	19.3%	10	11.5%	18.6%	\$3,564	6.5%	13.0%	7	18.4%	18.6%	\$3,161	11.4%	13.0%	
	Upper	88	70.4%	\$70,508	85.4%	41.1%	63	72.4%	56.9%	\$47,147	86.1%	64.4%	25	65.8%	61.9%	\$23,361	84.1%	68.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.5%	\$0	0.0%	17.3%	0	0.0%	9.1%	\$0	0.0%	13.3%	
	Total	125	100.0%	\$82,542	100.0%	100.0%	87	100.0%	100.0%	\$54,749	100.0%	100.0%	38	100.0%	100.0%	\$27,793	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	54	52.4%	\$2,121	28.7%	90.5%	25	48.1%	52.3%	\$873	19.9%	33.7%	29	56.9%	39.4%	\$1,248	41.5%	30.6%	
	Over \$1 Million	42	40.8%	\$5,137	69.5%	9.2%	23	44.2%					19	37.3%					
	Total Rev. available	96	93.2%	\$7,258	98.2%	99.7%	48	92.3%					48	94.2%					
	Rev. Not Known	7	6.8%	\$135	1.8%	0.3%	4	7.7%					3	5.9%					
	Total	103	100.0%	\$7,393	100.0%	100.0%	52	100.0%					51	100.0%					
Small Business Loan Size	\$100,000 or Less	94	91.3%	\$3,863	52.3%		48	92.3%	95.5%	\$1,869	42.6%	45.4%	46	90.2%	96.8%	\$1,994	66.2%	55.7%	
	\$100,001 - \$250,000	6	5.8%	\$1,166	15.8%		1	1.9%	2.2%	\$150	3.4%	12.1%	5	9.8%	1.6%	\$1,016	33.8%	10.0%	
	\$250,001 - \$1 Million	3	2.9%	\$2,364	32.0%		3	5.8%	2.3%	\$2,364	53.9%	42.5%	0	0.0%	1.6%	\$0	0.0%	34.3%	
	Total	103	100.0%	\$7,393	100.0%		52	100.0%	100.0%	\$4,383	100.0%	100.0%	51	100.0%	100.0%	\$3,010	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.0%	0	0.0%	46.1%	\$0	0.0%	26.1%	0	0.0%	55.0%	\$0	0.0%	33.8%	
Over \$1 Million	0	0.0%	\$0	0.0%	6.0%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	91.2%	\$0	0.0%	51.3%	0	0.0%	91.0%	\$0	0.0%	50.4%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.9%	\$0	0.0%	16.5%	0	0.0%	8.1%	\$0	0.0%	38.5%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.9%	\$0	0.0%	32.3%	0	0.0%	0.9%	\$0	0.0%	11.0%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CA Stockton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	Bank	Agg	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	4	5.4%	\$718	3.1%	2.2%	2	6.1%	2.1%	\$352	3.8%	1.2%	2	4.9%	2.0%	\$366	2.6%	1.1%
	Moderate	25	33.8%	\$5,841	25.1%	20.8%	7	21.2%	16.6%	\$1,041	11.2%	10.9%	18	43.9%	17.5%	\$4,800	34.5%	11.7%
	Middle	12	16.2%	\$2,650	11.4%	33.0%	7	21.2%	31.8%	\$1,551	16.7%	28.0%	5	12.2%	31.7%	\$1,099	7.9%	28.3%
	Upper	33	44.6%	\$14,016	60.3%	44.0%	17	51.5%	49.6%	\$6,358	68.4%	60.0%	16	39.0%	48.8%	\$7,658	55.0%	58.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	74	100.0%	\$23,225	100.0%	100.0%	33	100.0%	100.0%	\$9,302	100.0%	100.0%	41	100.0%	100.0%	\$13,923	100.0%	100.0%
REFINANCE	Low	2	2.5%	\$163	1.0%	2.2%	1	3.7%	1.1%	\$68	1.9%	0.7%	1	1.9%	1.1%	\$95	0.7%	0.6%
	Moderate	18	22.2%	\$2,246	13.7%	20.8%	11	40.7%	12.0%	\$1,118	30.8%	8.0%	7	13.0%	11.3%	\$1,128	8.9%	7.4%
	Middle	23	28.4%	\$4,853	29.7%	33.0%	4	14.8%	30.6%	\$564	15.5%	26.4%	19	35.2%	30.2%	\$4,289	33.7%	26.3%
	Upper	38	46.9%	\$9,091	55.6%	44.0%	11	40.7%	56.4%	\$1,882	51.8%	64.9%	27	50.0%	57.5%	\$7,209	56.7%	65.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	81	100.0%	\$16,353	100.0%	100.0%	27	100.0%	100.0%	\$3,632	100.0%	100.0%	54	100.0%	100.0%	\$12,721	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	0.7%	\$0	0.0%	0.6%	0	0.0%	2.1%	\$0	0.0%	1.3%
	Moderate	1	14.3%	\$20	15.4%	20.8%	1	16.7%	14.3%	\$20	16.7%	10.3%	0	0.0%	12.2%	\$0	0.0%	8.8%
	Middle	1	14.3%	\$20	15.4%	33.0%	1	16.7%	35.1%	\$20	16.7%	33.0%	0	0.0%	32.3%	\$0	0.0%	29.0%
	Upper	5	71.4%	\$90	69.2%	44.0%	4	66.7%	49.9%	\$80	66.7%	56.2%	1	100.0%	53.4%	\$10	100.0%	60.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$130	100.0%	100.0%	6	100.0%	100.0%	\$120	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	16.3%	\$0	0.0%	7.3%	0	0.0%	29.4%	\$0	0.0%	31.6%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	36.7%	\$0	0.0%	14.8%	0	0.0%	45.1%	\$0	0.0%	36.2%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	30.6%	\$0	0.0%	34.5%	0	0.0%	21.6%	\$0	0.0%	30.5%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	16.3%	\$0	0.0%	43.4%	0	0.0%	3.9%	\$0	0.0%	1.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	3.7%	\$881	2.2%	2.2%	3	4.5%	1.5%	\$420	3.2%	1.1%	3	3.1%	1.5%	\$461	1.7%	1.3%
	Moderate	44	27.2%	\$8,107	20.4%	20.8%	19	28.8%	14.1%	\$2,179	16.7%	9.5%	25	26.0%	13.9%	\$5,928	22.2%	9.7%
	Middle	36	22.2%	\$7,523	18.9%	33.0%	12	18.2%	31.3%	\$2,135	16.4%	27.5%	24	25.0%	30.9%	\$5,388	20.2%	27.3%
	Upper	76	46.9%	\$23,197	58.4%	44.0%	32	48.5%	53.1%	\$8,320	63.7%	61.9%	44	45.8%	53.7%	\$14,877	55.8%	61.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	162	100.0%	\$39,708	100.0%	100.0%	66	100.0%	100.0%	\$13,054	100.0%	100.0%	96	100.0%	100.0%	\$26,654	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	27	8.0%	\$668	5.1%	7.3%	13	8.3%	4.7%	\$355	5.6%	6.7%	14	7.8%	5.2%	\$313	4.7%	7.9%
	Moderate	82	24.4%	\$3,959	30.3%	22.2%	36	23.1%	18.2%	\$2,151	33.7%	20.8%	46	25.6%	16.8%	\$1,808	27.1%	18.8%
	Middle	101	30.1%	\$3,419	26.2%	31.2%	49	31.4%	29.8%	\$1,510	23.7%	31.7%	52	28.9%	29.0%	\$1,909	28.6%	29.7%
	Upper	126	37.5%	\$5,015	38.4%	39.3%	58	37.2%	45.7%	\$2,362	37.0%	39.6%	68	37.8%	45.8%	\$2,653	39.7%	41.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	1.2%	0	0.0%	3.2%	\$0	0.0%	2.2%	
Total	336	100.0%	\$13,061	100.0%	100.0%	156	100.0%	100.0%	\$6,378	100.0%	100.0%	180	100.0%	100.0%	\$6,683	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	7.2%	\$0	0.0%	6.6%	0	0.0%	5.4%	\$0	0.0%	4.8%
	Moderate	0	0.0%	\$0	0.0%	9.2%	0	0.0%	8.3%	\$0	0.0%	5.3%	0	0.0%	7.3%	\$0	0.0%	6.2%
	Middle	6	75.0%	\$205	85.4%	31.5%	3	75.0%	27.9%	\$135	93.1%	30.6%	3	75.0%	29.9%	\$70	73.7%	31.9%
	Upper	2	25.0%	\$35	14.6%	54.8%	1	25.0%	53.7%	\$10	6.9%	57.0%	1	25.0%	55.3%	\$25	26.3%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	0.5%	0	0.0%	2.1%	\$0	0.0%	0.5%	
Total	8	100.0%	\$240	100.0%	100.0%	4	100.0%	100.0%	\$145	100.0%	100.0%	4	100.0%	100.0%	\$95	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CA Stockton

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison												
		2015, 2016				2015					2016							
		Bank		Families by Family Income		Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	2	2.7%	\$178	0.8%	22.0%	2	6.1%	1.8%	\$178	1.9%	0.8%	0	0.0%	1.3%	\$0	0.0%	0.6%
	Moderate	11	14.9%	\$1,956	8.4%	17.7%	5	15.2%	10.5%	\$912	9.8%	6.3%	6	14.6%	8.6%	\$1,044	7.5%	5.0%
	Middle	16	21.6%	\$3,412	14.7%	19.1%	6	18.2%	21.4%	\$1,124	12.1%	17.8%	10	24.4%	22.2%	\$2,288	16.4%	18.0%
	Upper	45	60.8%	\$17,679	76.1%	41.1%	20	60.6%	46.7%	\$7,088	76.2%	56.9%	25	61.0%	53.2%	\$10,591	76.1%	62.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.5%	\$0	0.0%	18.2%	0	0.0%	14.7%	\$0	0.0%	13.5%
	Total	74	100.0%	\$23,225	100.0%	100.0%	33	100.0%	100.0%	\$9,302	100.0%	100.0%	41	100.0%	100.0%	\$13,923	100.0%	100.0%
REFINANCE	Low	7	8.6%	\$713	4.4%	22.0%	3	11.1%	2.6%	\$240	6.6%	1.3%	4	7.4%	2.1%	\$473	3.7%	1.1%
	Moderate	12	14.8%	\$1,398	8.5%	17.7%	8	29.6%	8.7%	\$812	22.4%	5.6%	4	7.4%	7.6%	\$586	4.6%	4.9%
	Middle	24	29.6%	\$4,596	28.1%	19.1%	7	25.9%	17.3%	\$1,057	29.1%	14.2%	17	31.5%	17.4%	\$3,539	27.8%	14.1%
	Upper	37	45.7%	\$9,466	57.9%	41.1%	9	33.3%	45.1%	\$1,523	41.9%	50.7%	28	51.9%	52.3%	\$7,943	62.4%	58.1%
	Unknown	1	1.2%	\$180	1.1%	0.0%	0	0.0%	26.4%	\$0	0.0%	28.3%	1	1.9%	20.6%	\$180	1.4%	21.8%
	Total	81	100.0%	\$16,353	100.0%	100.0%	27	100.0%	100.0%	\$3,632	100.0%	100.0%	54	100.0%	100.0%	\$12,721	100.0%	100.0%
HOME IMPROVEMENT	Low	1	14.3%	\$20	15.4%	22.0%	1	16.7%	3.1%	\$20	16.7%	1.5%	0	0.0%	2.8%	\$0	0.0%	1.8%
	Moderate	1	14.3%	\$10	7.7%	17.7%	1	16.7%	12.6%	\$10	8.3%	10.4%	0	0.0%	9.7%	\$0	0.0%	6.7%
	Middle	1	14.3%	\$25	19.2%	19.1%	1	16.7%	22.3%	\$25	20.8%	21.5%	0	0.0%	22.1%	\$0	0.0%	20.9%
	Upper	4	57.1%	\$75	57.7%	41.1%	3	50.0%	54.2%	\$65	54.2%	58.1%	1	100.0%	61.2%	\$10	100.0%	66.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.8%	\$0	0.0%	8.5%	0	0.0%	4.2%	\$0	0.0%	4.0%
	Total	7	100.0%	\$130	100.0%	100.0%	6	100.0%	100.0%	\$120	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	10	6.2%	\$911	2.3%	22.0%	6	9.1%	2.3%	\$438	3.4%	1.0%	4	4.2%	1.9%	\$473	1.8%	0.9%
	Moderate	24	14.8%	\$3,364	8.5%	17.7%	14	21.2%	9.6%	\$1,734	13.3%	5.9%	10	10.4%	8.1%	\$1,630	6.1%	4.9%
	Middle	41	25.3%	\$8,033	20.2%	19.1%	14	21.2%	19.2%	\$2,206	16.9%	15.6%	27	28.1%	19.5%	\$5,827	21.9%	15.8%
	Upper	86	53.1%	\$27,220	68.6%	41.1%	32	48.5%	46.1%	\$8,676	66.5%	52.2%	54	56.3%	53.0%	\$18,544	69.6%	59.6%
	Unknown	1	0.6%	\$180	0.5%	0.0%	0	0.0%	22.9%	\$0	0.0%	25.3%	1	1.0%	17.6%	\$180	0.7%	18.8%
	Total	162	100.0%	\$39,708	100.0%	100.0%	66	100.0%	100.0%	\$13,054	100.0%	100.0%	96	100.0%	100.0%	\$26,654	100.0%	100.0%
Small Business Revenue					Total Businesses													
	\$1 Million or Less	255	75.9%	\$8,965	68.6%	91.6%	117	75.0%	55.3%	\$4,163	65.3%	36.8%	138	76.7%	43.4%	\$4,802	71.9%	31.8%
	Over \$1 Million	57	17.0%	\$3,740	28.6%	7.9%	26	16.7%					31	17.2%				
	Total Rev. available	312	92.9%	\$12,705	97.2%	99.5%	143	91.7%					169	93.9%				
	Rev. Not Known	24	7.1%	\$356	2.7%	0.5%	13	8.3%					11	6.1%				
Total	336	100.0%	\$13,061	100.0%	100.0%	156	100.0%	100.0%	\$6,378	100.0%	100.0%	180	100.0%	100.0%	\$6,683	100.0%	100.0%	
Small Business Loan Size	\$100,000 or Less	333	99.1%	\$11,917	91.2%		154	98.7%	93.7%	\$5,410	84.8%	37.2%	179	99.4%	95.2%	\$6,507	97.4%	43.9%
	\$100,001 - \$250,000	1	0.3%	\$176	1.3%		0	0.0%	3.2%	\$0	0.0%	15.3%	1	0.6%	2.4%	\$176	2.6%	13.0%
	\$250,001 - \$1 Million	2	0.6%	\$968	7.4%		2	1.3%	3.1%	\$968	15.2%	47.5%	0	0.0%	2.4%	\$0	0.0%	43.1%
	Total	336	100.0%	\$13,061	100.0%		156	100.0%	100.0%	\$6,378	100.0%	100.0%	180	100.0%	100.0%	\$6,683	100.0%	100.0%
					Total Farms													
Small Farm Revenue	\$1 Million or Less	3	37.5%	\$30	12.5%	89.4%	1	25.0%	47.1%	\$10	6.9%	44.3%	2	50.0%	46.2%	\$20	21.1%	42.0%
	Over \$1 Million	3	37.5%	\$175	72.9%	10.6%	2	50.0%					1	25.0%				
	Not Known	2	25.0%	\$35	14.6%	0.0%	1	25.0%					1	25.0%				
	Total	8	100.0%	\$240	100.0%	100.0%	4	100.0%					4	100.0%				
					Total Farms													
Small Farm Loan Size	\$100,000 or Less	8	100.0%	\$240	100.0%		4	100.0%	61.0%	\$145	100.0%	12.8%	4	100.0%	66.7%	\$95	100.0%	13.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.5%	\$0	0.0%	24.5%	0	0.0%	14.8%	\$0	0.0%	24.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	21.5%	\$0	0.0%	62.7%	0	0.0%	18.5%	\$0	0.0%	62.3%
	Total	8	100.0%	\$240	100.0%		4	100.0%	100.0%	\$145	100.0%	100.0%	4	100.0%	100.0%	\$95	100.0%	100.0%
					Total Farms													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CO Boulder

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	1	2.9%	\$190	1.1%	2.8%	1	4.5%	4.2%	\$190	1.7%	2.3%	0	0.0%	3.7%	\$0	0.0%	2.2%
	Moderate	7	20.0%	\$1,605	9.0%	15.0%	4	18.2%	18.0%	\$755	6.6%	13.0%	3	23.1%	16.7%	\$850	13.2%	12.1%
	Middle	14	40.0%	\$7,704	43.0%	45.8%	8	36.4%	45.8%	\$4,627	40.4%	43.5%	6	46.2%	46.3%	\$3,077	47.9%	43.4%
	Upper	13	37.1%	\$8,397	46.9%	36.5%	9	40.9%	32.0%	\$5,894	51.4%	41.1%	4	30.8%	33.4%	\$2,503	38.9%	42.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	35	100.0%	\$17,896	100.0%	100.0%	22	100.0%	100.0%	\$11,466	100.0%	100.0%	13	100.0%	100.0%	\$6,430	100.0%	100.0%
REFINANCE	Low	3	8.1%	\$413	3.6%	2.8%	1	6.7%	3.1%	\$191	4.3%	1.6%	2	9.1%	2.8%	\$222	3.1%	1.6%
	Moderate	11	29.7%	\$2,280	19.8%	15.0%	4	26.7%	15.7%	\$685	15.3%	10.5%	7	31.8%	15.5%	\$1,595	22.6%	11.2%
	Middle	12	32.4%	\$3,025	26.2%	45.8%	6	40.0%	46.2%	\$1,606	35.8%	43.4%	6	27.3%	47.1%	\$1,419	20.1%	44.8%
	Upper	11	29.7%	\$5,816	50.4%	36.5%	4	26.7%	35.1%	\$2,000	44.6%	44.5%	7	31.8%	34.7%	\$3,816	54.1%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	37	100.0%	\$11,534	100.0%	100.0%	15	100.0%	100.0%	\$4,482	100.0%	100.0%	22	100.0%	100.0%	\$7,052	100.0%	100.0%
HOME IMPROVEMENT	Low	1	50.0%	\$2	2.0%	2.8%	0	0.0%	3.2%	\$0	0.0%	1.2%	1	50.0%	4.7%	\$2	2.0%	4.3%
	Moderate	0	0.0%	\$0	0.0%	15.0%	0	0.0%	16.0%	\$0	0.0%	12.3%	0	0.0%	15.3%	\$0	0.0%	10.7%
	Middle	1	50.0%	\$100	98.0%	45.8%	0	0.0%	46.0%	\$0	0.0%	41.2%	1	50.0%	47.2%	\$100	98.0%	43.6%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	34.8%	\$0	0.0%	45.4%	0	0.0%	32.8%	\$0	0.0%	41.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$102	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$102	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	12.5%	\$0	0.0%	7.9%	0	0.0%	12.1%	\$0	0.0%	4.1%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	41.1%	\$0	0.0%	51.8%	0	0.0%	45.5%	\$0	0.0%	31.9%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	39.3%	\$0	0.0%	25.6%	0	0.0%	39.4%	\$0	0.0%	36.6%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	7.1%	\$0	0.0%	14.7%	0	0.0%	3.0%	\$0	0.0%	27.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	5	6.8%	\$605	2.0%	2.8%	2	5.4%	3.6%	\$381	2.4%	2.3%	3	8.1%	3.2%	\$224	1.6%	2.0%
	Moderate	18	24.3%	\$3,885	13.2%	15.0%	8	21.6%	16.8%	\$1,440	9.0%	14.1%	10	27.0%	16.0%	\$2,445	18.0%	12.2%
	Middle	27	36.5%	\$10,829	36.7%	45.8%	14	37.8%	46.0%	\$6,233	39.1%	42.3%	13	35.1%	46.8%	\$4,596	33.8%	43.9%
	Upper	24	32.4%	\$14,213	48.1%	36.5%	13	35.1%	33.6%	\$7,894	49.5%	41.3%	11	29.7%	34.1%	\$6,319	46.5%	41.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	74	100.0%	\$29,532	100.0%	100.0%	37	100.0%	100.0%	\$15,948	100.0%	100.0%	37	100.0%	100.0%	\$13,584	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	15	5.2%	\$515	5.1%	3.6%	8	5.9%	2.9%	\$234	5.2%	2.7%	7	4.5%	3.1%	\$281	5.0%	3.9%
	Moderate	80	27.6%	\$2,800	27.7%	21.3%	41	30.1%	22.1%	\$1,429	32.0%	29.5%	39	25.3%	20.3%	\$1,371	24.3%	26.3%
	Middle	126	43.4%	\$3,953	39.1%	42.0%	59	43.4%	41.6%	\$1,994	44.6%	41.6%	67	43.5%	40.8%	\$1,959	34.8%	39.5%
	Upper	69	23.8%	\$2,835	28.1%	33.1%	28	20.6%	31.5%	\$812	18.2%	25.1%	41	26.6%	33.5%	\$2,023	35.9%	29.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	1.1%	0	0.0%	2.3%	\$0	0.0%	1.3%
Total	290	100.0%	\$10,103	100.0%	100.0%	136	100.0%	100.0%	\$4,469	100.0%	100.0%	154	100.0%	100.0%	\$5,634	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	1.5%	\$0	0.0%	13.4%	0	0.0%	1.7%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	10.2%	0	0.0%	10.4%	\$0	0.0%	5.9%	0	0.0%	13.3%	\$0	0.0%	17.1%
	Middle	0	0.0%	\$0	0.0%	48.0%	0	0.0%	41.8%	\$0	0.0%	66.7%	0	0.0%	46.7%	\$0	0.0%	53.6%
	Upper	0	0.0%	\$0	0.0%	39.6%	0	0.0%	40.3%	\$0	0.0%	12.7%	0	0.0%	38.3%	\$0	0.0%	28.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CO Boulder

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison													
		2015, 2016				2015					2016								
		Bank		Families by Family Income		Count		Dollar			Count		Dollar						
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
						#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	5	14.3%	\$914	5.1%	22.1%	4	18.2%	7.6%	\$686	6.0%	3.9%	1	7.7%	5.1%	\$228	3.5%	2.5%	
	Moderate	5	14.3%	\$1,006	5.6%	16.6%	4	18.2%	17.5%	\$742	6.5%	12.5%	1	7.7%	14.1%	\$264	4.1%	9.7%	
	Middle	2	5.7%	\$712	4.0%	20.1%	1	4.5%	22.4%	\$436	3.8%	20.1%	1	7.7%	21.1%	\$276	4.3%	17.6%	
	Upper	23	65.7%	\$15,264	85.3%	41.3%	13	59.1%	40.7%	\$9,602	83.7%	52.1%	10	76.9%	49.1%	\$5,662	88.1%	59.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.8%	\$0	0.0%	11.4%	0	0.0%	10.5%	\$0	0.0%	10.4%	
	Total	35	100.0%	\$17,896	100.0%	100.0%	22	100.0%	100.0%	\$11,466	100.0%	100.0%	13	100.0%	100.0%	\$6,430	100.0%	100.0%	
REFINANCE	Low	5	13.5%	\$690	6.0%	22.1%	2	13.3%	9.3%	\$296	6.6%	5.0%	3	13.6%	7.6%	\$394	5.6%	4.1%	
	Moderate	9	24.3%	\$1,475	12.8%	16.6%	4	26.7%	17.9%	\$730	16.3%	12.8%	5	22.7%	15.7%	\$745	10.6%	11.1%	
	Middle	6	16.2%	\$1,415	12.3%	20.1%	4	26.7%	21.6%	\$941	21.0%	19.1%	2	9.1%	23.0%	\$474	6.7%	20.1%	
	Upper	17	45.9%	\$7,954	69.0%	41.3%	5	33.3%	36.1%	\$2,515	56.1%	48.5%	12	54.5%	42.0%	\$5,439	77.1%	53.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.0%	\$0	0.0%	14.6%	0	0.0%	11.6%	\$0	0.0%	11.7%	
	Total	37	100.0%	\$11,534	100.0%	100.0%	15	100.0%	100.0%	\$4,482	100.0%	100.0%	22	100.0%	100.0%	\$7,052	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.1%	0	0.0%	7.6%	\$0	0.0%	3.6%	0	0.0%	8.1%	\$0	0.0%	3.9%	
	Moderate	1	50.0%	\$2	2.0%	16.6%	0	0.0%	17.9%	\$0	0.0%	11.0%	1	50.0%	17.3%	\$2	2.0%	12.5%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	25.1%	\$0	0.0%	22.7%	0	0.0%	23.7%	\$0	0.0%	19.4%	
	Upper	1	50.0%	\$100	98.0%	41.3%	0	0.0%	44.3%	\$0	0.0%	54.1%	1	50.0%	47.5%	\$100	98.0%	60.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.2%	\$0	0.0%	8.5%	0	0.0%	3.4%	\$0	0.0%	4.1%	
	Total	2	100.0%	\$102	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$102	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	10	13.5%	\$1,604	5.4%	22.1%	6	16.2%	8.5%	\$982	6.2%	4.2%	4	10.8%	6.7%	\$622	4.6%	3.3%	
	Moderate	15	20.3%	\$2,483	8.4%	16.6%	8	21.6%	17.6%	\$1,472	9.2%	11.9%	7	18.9%	15.2%	\$1,011	7.4%	10.2%	
	Middle	8	10.8%	\$2,127	7.2%	20.1%	5	13.5%	22.0%	\$1,377	8.6%	18.5%	3	8.1%	22.3%	\$750	5.5%	18.4%	
	Upper	41	55.4%	\$23,318	79.0%	41.3%	18	48.6%	38.2%	\$12,117	76.0%	47.3%	23	62.2%	44.7%	\$11,201	82.5%	54.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.7%	\$0	0.0%	18.1%	0	0.0%	11.1%	\$0	0.0%	14.0%	
	Total	74	100.0%	\$29,532	100.0%	100.0%	37	100.0%	100.0%	\$15,948	100.0%	100.0%	37	100.0%	100.0%	\$13,584	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	197	67.9%	\$7,097	70.2%	92.5%	93	68.4%	50.6%	\$2,974	66.5%	38.5%	104	67.5%	43.0%	\$4,123	73.2%	33.8%	
	Over \$1 Million	46	15.9%	\$2,582	25.6%	6.7%	23	16.9%					23	14.9%					
	Total Rev. available	243	83.8%	\$9,679	95.8%	99.2%	116	85.3%					127	82.4%					
	Rev. Not Known	47	16.2%	\$424	4.2%	0.8%	20	14.7%					27	17.5%					
	Total	290	100.0%	\$10,103	100.0%	100.0%	136	100.0%					154	100.0%					
Small Business Loan Size	\$100,000 or Less	287	99.0%	\$8,938	88.5%		136	100.0%	93.9%	\$4,469	100.0%	37.6%	151	98.1%	94.7%	\$4,469	79.3%	42.5%	
	\$100,001 - \$250,000	1	0.3%	\$125	1.2%		0	0.0%	2.8%	\$0	0.0%	13.7%	1	0.6%	2.5%	\$125	2.2%	13.9%	
	\$250,001 - \$1 Million	2	0.7%	\$1,040	10.3%		0	0.0%	3.3%	\$0	0.0%	48.7%	2	1.3%	2.7%	\$1,040	18.5%	43.6%	
	Total	290	100.0%	\$10,103	100.0%		136	100.0%	100.0%	\$4,469	100.0%	100.0%	154	100.0%	100.0%	\$5,634	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	99.1%	0	0.0%	59.7%	\$0	0.0%	75.2%	0	0.0%	61.7%	\$0	0.0%	84.3%	
Over \$1 Million	0	0.0%	\$0	0.0%	0.9%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	85.1%	\$0	0.0%	27.0%	0	0.0%	88.3%	\$0	0.0%	38.8%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.0%	\$0	0.0%	29.6%	0	0.0%	8.3%	\$0	0.0%	35.0%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.0%	\$0	0.0%	43.4%	0	0.0%	3.3%	\$0	0.0%	26.2%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CO Colorado Springs

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2015, 2016					2015						2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar				
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	5	2.8%	\$1,022	1.1%	2.5%	3	3.4%	2.7%	\$563	1.3%	2.0%	2	2.2%	2.6%	\$459	1.0%	1.9%	
	Moderate	25	13.8%	\$4,363	4.8%	21.9%	13	14.6%	16.3%	\$2,295	5.1%	11.3%	12	13.0%	16.2%	\$2,068	4.5%	11.6%	
	Middle	33	18.2%	\$10,395	11.5%	43.0%	12	13.5%	47.8%	\$4,306	9.6%	43.7%	21	22.8%	47.2%	\$6,089	13.4%	43.4%	
	Upper	118	65.2%	\$74,527	82.5%	32.6%	61	68.5%	33.2%	\$37,567	84.0%	43.1%	57	62.0%	33.9%	\$36,960	81.1%	43.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	181	100.0%	\$90,307	100.0%	100.0%	89	100.0%	100.0%	\$44,731	100.0%	100.0%	92	100.0%	100.0%	\$45,576	100.0%	100.0%	
REFINANCE	Low	2	4.5%	\$221	1.4%	2.5%	1	3.3%	2.1%	\$138	1.3%	1.3%	1	7.1%	1.8%	\$83	1.6%	1.2%	
	Moderate	9	20.5%	\$1,065	6.6%	21.9%	6	20.0%	16.6%	\$717	6.5%	11.1%	3	21.4%	15.6%	\$348	6.6%	10.4%	
	Middle	10	22.7%	\$2,622	16.2%	43.0%	7	23.3%	45.2%	\$1,233	11.3%	40.5%	3	21.4%	44.9%	\$1,389	26.5%	39.9%	
	Upper	23	52.3%	\$12,284	75.9%	32.6%	16	53.3%	36.2%	\$8,867	80.9%	47.0%	7	50.0%	37.7%	\$3,417	65.2%	48.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	44	100.0%	\$16,192	100.0%	100.0%	30	100.0%	100.0%	\$10,955	100.0%	100.0%	14	100.0%	100.0%	\$5,237	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.4%	\$0	0.0%	0.2%	0	0.0%	1.9%	\$0	0.0%	1.2%	
	Moderate	1	14.3%	\$75	5.0%	21.9%	0	0.0%	18.1%	\$0	0.0%	10.5%	1	25.0%	16.6%	\$75	6.4%	13.3%	
	Middle	1	14.3%	\$20	1.3%	43.0%	0	0.0%	44.0%	\$0	0.0%	34.0%	1	25.0%	45.1%	\$20	1.7%	33.9%	
	Upper	5	71.4%	\$1,413	93.7%	32.6%	3	100.0%	36.4%	\$327	100.0%	55.2%	2	50.0%	36.4%	\$1,086	92.0%	51.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	7	100.0%	\$1,508	100.0%	100.0%	3	100.0%	100.0%	\$327	100.0%	100.0%	4	100.0%	100.0%	\$1,181	100.0%	100.0%	
MULTI FAMILY	Multi-Family Units																		
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	12.5%	\$0	0.0%	5.7%	0	0.0%	9.5%	\$0	0.0%	2.9%	
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	44.4%	\$0	0.0%	42.6%	0	0.0%	48.6%	\$0	0.0%	33.1%	
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	31.9%	\$0	0.0%	27.5%	0	0.0%	27.0%	\$0	0.0%	24.0%	
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	11.1%	\$0	0.0%	24.2%	0	0.0%	14.9%	\$0	0.0%	40.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
HMDA TOTALS	Low	7	3.0%	\$1,243	1.2%	2.5%	4	3.3%	2.5%	\$701	1.3%	1.8%	3	2.7%	2.3%	\$542	1.0%	1.7%	
	Moderate	35	15.1%	\$5,503	5.1%	21.9%	19	15.6%	16.5%	\$3,012	5.4%	12.5%	16	14.5%	16.0%	\$2,491	4.8%	12.2%	
	Middle	44	19.0%	\$13,037	12.1%	43.0%	19	15.6%	46.6%	\$5,539	9.9%	41.7%	25	22.7%	46.1%	\$7,498	14.4%	40.9%	
	Upper	146	62.9%	\$88,224	81.7%	32.6%	80	65.6%	34.5%	\$46,761	83.5%	44.0%	66	60.0%	35.6%	\$41,463	79.7%	45.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	232	100.0%	\$108,007	100.0%	100.0%	122	100.0%	100.0%	\$56,013	100.0%	100.0%	110	100.0%	100.0%	\$51,994	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses																		
	Low	13	10.0%	\$530	8.0%	6.3%	5	7.9%	6.4%	\$185	6.7%	9.6%	8	11.9%	5.8%	\$345	9.0%	9.7%	
	Moderate	43	33.1%	\$1,981	30.0%	22.7%	15	23.8%	24.2%	\$532	19.3%	31.6%	28	41.8%	21.8%	\$1,449	37.6%	26.7%	
	Middle	39	30.0%	\$1,731	26.2%	36.3%	21	33.3%	33.7%	\$833	30.3%	26.3%	18	26.9%	33.7%	\$898	23.3%	28.2%	
	Upper	35	26.9%	\$2,361	35.8%	34.7%	22	34.9%	34.2%	\$1,201	43.7%	31.5%	13	19.4%	36.9%	\$1,160	30.1%	34.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	1.0%	0	0.0%	1.8%	\$0	0.0%	1.3%	
Total	130	100.0%	\$6,603	100.0%	100.0%	63	100.0%	100.0%	\$2,751	100.0%	100.0%	67	100.0%	100.0%	\$3,852	100.0%	100.0%		
SMALL FARM	Small Farms																		
	Low	0	0.0%	\$0	0.0%	2.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	1.2%	
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	12.7%	\$0	0.0%	7.5%	0	0.0%	19.2%	\$0	0.0%	21.4%	
	Middle	0	0.0%	\$0	0.0%	35.3%	0	0.0%	34.5%	\$0	0.0%	49.4%	0	0.0%	26.9%	\$0	0.0%	16.8%	
	Upper	0	0.0%	\$0	0.0%	35.0%	0	0.0%	50.9%	\$0	0.0%	41.8%	0	0.0%	50.0%	\$0	0.0%	59.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	1.3%	0	0.0%	1.9%	\$0	0.0%	1.3%	
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CO Colorado Springs

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank		Families by Family Income	2015			2016											
		Count	Dollar		Count	Dollar		Count	Dollar		Dollar								
		#	%	\$ (000s)	%	#	%	Agg	Bank	Agg	#	%	Agg	Bank	Agg				
HOME PURCHASE	Low	10	5.5%	\$1,289	1.4%	20.1%	5	5.6%	6.8%	\$546	1.2%	3.8%	5	5.4%	4.8%	\$743	1.6%	2.7%	
	Moderate	20	11.0%	\$3,608	4.0%	18.2%	9	10.1%	22.4%	\$1,486	3.3%	17.9%	11	12.0%	21.6%	\$2,122	4.7%	17.1%	
	Middle	22	12.2%	\$4,629	5.1%	21.6%	8	9.0%	23.7%	\$1,565	3.5%	23.6%	14	15.2%	24.9%	\$3,064	6.7%	24.1%	
	Upper	129	71.3%	\$80,781	89.5%	40.1%	67	75.3%	28.3%	\$41,134	92.0%	36.3%	62	67.4%	32.5%	\$39,647	87.0%	40.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	18.3%	0	0.0%	16.2%	\$0	0.0%	15.5%	
	Total	181	100.0%	\$90,307	100.0%	100.0%	89	100.0%	100.0%	\$44,731	100.0%	100.0%	92	100.0%	100.0%	\$45,576	100.0%	100.0%	
REFINANCE	Low	3	6.8%	\$229	1.4%	20.1%	2	6.7%	5.7%	\$154	1.4%	3.3%	1	7.1%	4.4%	\$75	1.4%	2.5%	
	Moderate	11	25.0%	\$1,439	8.9%	18.2%	7	23.3%	12.3%	\$937	8.6%	8.8%	4	28.6%	11.7%	\$502	9.6%	8.1%	
	Middle	5	11.4%	\$900	5.6%	21.6%	4	13.3%	16.5%	\$786	7.2%	14.7%	1	7.1%	15.4%	\$114	2.2%	13.7%	
	Upper	25	56.8%	\$13,624	84.1%	40.1%	17	56.7%	27.3%	\$9,078	82.9%	33.1%	8	57.1%	27.9%	\$4,546	86.8%	33.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	38.2%	\$0	0.0%	40.1%	0	0.0%	40.6%	\$0	0.0%	42.7%	
	Total	44	100.0%	\$16,192	100.0%	100.0%	30	100.0%	100.0%	\$10,955	100.0%	100.0%	14	100.0%	100.0%	\$5,237	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	8.2%	\$0	0.0%	3.0%	0	0.0%	6.1%	\$0	0.0%	3.2%	
	Moderate	1	14.3%	\$20	1.3%	18.2%	0	0.0%	18.9%	\$0	0.0%	13.5%	1	25.0%	17.5%	\$20	1.7%	12.6%	
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	26.7%	\$0	0.0%	20.2%	0	0.0%	25.7%	\$0	0.0%	21.1%	
	Upper	6	85.7%	\$1,488	98.7%	40.1%	3	100.0%	41.5%	\$327	100.0%	53.3%	3	75.0%	45.8%	\$1,161	98.3%	55.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.8%	\$0	0.0%	10.0%	0	0.0%	4.9%	\$0	0.0%	7.7%	
	Total	7	100.0%	\$1,508	100.0%	100.0%	3	100.0%	100.0%	\$327	100.0%	100.0%	4	100.0%	100.0%	\$1,181	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	13	5.6%	\$1,518	1.4%	20.1%	7	5.7%	6.4%	\$700	1.2%	3.5%	6	5.5%	4.7%	\$818	1.6%	2.5%	
	Moderate	32	13.8%	\$5,067	4.7%	18.2%	16	13.1%	18.2%	\$2,423	4.3%	13.7%	16	14.5%	17.3%	\$2,644	5.1%	12.7%	
	Middle	27	11.6%	\$5,529	5.1%	21.6%	12	9.8%	20.9%	\$2,351	4.2%	19.3%	15	13.6%	20.9%	\$3,178	6.1%	18.8%	
	Upper	160	69.0%	\$95,893	88.8%	40.1%	87	71.3%	28.2%	\$50,539	90.2%	33.9%	73	66.4%	30.9%	\$45,354	87.2%	36.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	26.3%	\$0	0.0%	29.5%	0	0.0%	26.3%	\$0	0.0%	30.0%	
	Total	232	100.0%	\$108,007	100.0%	100.0%	122	100.0%	100.0%	\$56,013	100.0%	100.0%	110	100.0%	100.0%	\$51,994	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	78	60.0%	\$3,296	49.9%	93.6%	38	60.3%	53.6%	\$1,908	69.4%	40.1%	40	59.7%	46.5%	\$1,388	36.0%	39.4%	
	Over \$1 Million	33	25.4%	\$2,921	44.2%	5.8%	10	15.9%					23	34.3%					
	Total Rev. available	111	85.4%	\$6,217	94.1%	99.4%	48	76.2%					63	94.0%					
	Rev. Not Known	19	14.6%	\$386	5.8%	0.6%	15	23.8%					4	6.0%					
	Total	130	100.0%	\$6,603	100.0%	100.0%	63	100.0%					67	100.0%					
Small Business Loan Size	\$100,000 or Less	123	94.6%	\$4,411	66.8%		61	96.8%	96.5%	\$2,175	79.1%	46.1%	62	92.5%	96.8%	\$2,236	58.0%	52.2%	
	\$100,001 - \$250,000	3	2.3%	\$500	7.6%		1	1.6%	1.6%	\$240	8.7%	11.2%	2	3.0%	1.6%	\$260	6.7%	11.7%	
	\$250,001 - \$1 Million	4	3.1%	\$1,692	25.6%		1	1.6%	1.9%	\$336	12.2%	42.7%	3	4.5%	1.6%	\$1,356	35.2%	36.1%	
	Total	130	100.0%	\$6,603	100.0%		63	100.0%	100.0%	\$2,751	100.0%	100.0%	67	100.0%	100.0%	\$3,852	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.8%	0	0.0%	67.3%	\$0	0.0%	78.7%	0	0.0%	63.5%	\$0	0.0%	67.2%	
Over \$1 Million	0	0.0%	\$0	0.0%	1.2%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	96.4%	\$0	0.0%	59.6%	0	0.0%	94.2%	\$0	0.0%	52.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%	9.6%	0	0.0%	3.8%	\$0	0.0%	25.4%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%	30.8%	0	0.0%	1.9%	\$0	0.0%	22.5%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CO Ft. Collins

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.5%	\$0	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.6%
	Moderate	16	25.0%	\$3,823	18.3%	18.2%	7	22.6%	18.0%	\$1,375	15.2%	15.3%	9	27.3%	18.2%	\$2,448	20.8%	15.7%
	Middle	22	34.4%	\$5,853	28.1%	50.0%	13	41.9%	47.3%	\$2,993	33.1%	44.6%	9	27.3%	46.3%	\$2,860	24.2%	43.7%
	Upper	26	40.6%	\$11,165	53.6%	30.8%	11	35.5%	34.1%	\$4,677	51.7%	39.7%	15	45.5%	34.7%	\$6,488	55.0%	39.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	64	100.0%	\$20,841	100.0%	100.0%	31	100.0%	100.0%	\$9,045	100.0%	100.0%	33	100.0%	100.0%	\$11,796	100.0%	100.0%
REFINANCE	Low	2	5.3%	\$329	2.9%	1.0%	1	5.3%	0.8%	\$184	3.4%	0.7%	1	5.3%	0.5%	\$145	2.4%	0.4%
	Moderate	8	21.1%	\$1,264	11.1%	18.2%	4	21.1%	16.9%	\$718	13.4%	13.7%	4	21.1%	16.6%	\$546	9.1%	13.4%
	Middle	14	36.8%	\$3,487	30.7%	50.0%	6	31.6%	49.5%	\$1,230	23.0%	46.2%	8	42.1%	47.8%	\$2,257	37.6%	45.3%
	Upper	14	36.8%	\$6,261	55.2%	30.8%	8	42.1%	32.7%	\$3,214	60.1%	39.3%	6	31.6%	35.1%	\$3,047	50.8%	40.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	38	100.0%	\$11,341	100.0%	100.0%	19	100.0%	100.0%	\$5,346	100.0%	100.0%	19	100.0%	100.0%	\$5,995	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	1.6%	\$0	0.0%	1.3%	0	0.0%	1.0%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	18.2%	0	0.0%	16.9%	\$0	0.0%	15.3%	0	0.0%	21.0%	\$0	0.0%	17.8%
	Middle	3	75.0%	\$90	72.0%	50.0%	2	100.0%	50.6%	\$40	100.0%	47.8%	1	50.0%	47.6%	\$50	58.8%	45.9%
	Upper	1	25.0%	\$35	28.0%	30.8%	0	0.0%	31.0%	\$0	0.0%	35.5%	1	50.0%	30.5%	\$35	41.2%	35.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$125	100.0%	100.0%	2	100.0%	100.0%	\$40	100.0%	100.0%	2	100.0%	100.0%	\$85	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	6.1%	\$0	0.0%	23.3%	0	0.0%	2.4%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	39.4%	\$0	0.0%	47.3%	0	0.0%	23.8%	\$0	0.0%	8.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	39.4%	\$0	0.0%	6.3%	0	0.0%	54.8%	\$0	0.0%	51.6%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	15.2%	\$0	0.0%	23.2%	0	0.0%	19.0%	\$0	0.0%	39.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	2	1.9%	\$329	1.0%	1.0%	1	1.9%	0.7%	\$184	1.3%	1.7%	1	1.9%	0.6%	\$145	0.8%	0.6%
	Moderate	24	22.6%	\$5,087	15.7%	18.2%	11	21.2%	17.5%	\$2,093	14.5%	16.2%	13	24.1%	17.5%	\$2,994	16.7%	14.2%
	Middle	39	36.8%	\$9,430	29.2%	50.0%	21	40.4%	48.5%	\$4,263	29.5%	43.5%	18	33.3%	47.2%	\$5,167	28.9%	45.0%
	Upper	41	38.7%	\$17,461	54.0%	30.8%	19	36.5%	33.3%	\$7,891	54.7%	38.7%	22	40.7%	34.6%	\$9,570	53.5%	40.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	106	100.0%	\$32,307	100.0%	100.0%	52	100.0%	100.0%	\$14,431	100.0%	100.0%	54	100.0%	100.0%	\$17,876	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	1.3%	\$0	0.0%	1.8%	0	0.0%	1.0%	\$0	0.0%	1.3%
	Moderate	28	20.0%	\$1,150	23.1%	20.6%	14	22.2%	21.5%	\$485	24.6%	27.8%	14	18.2%	21.0%	\$665	22.1%	26.7%
	Middle	69	49.3%	\$2,141	43.0%	49.9%	30	47.6%	43.4%	\$925	47.0%	35.5%	39	50.6%	42.6%	\$1,216	40.4%	37.7%
	Upper	43	30.7%	\$1,686	33.9%	28.5%	19	30.2%	31.9%	\$560	28.4%	33.9%	24	31.2%	33.1%	\$1,126	37.4%	32.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	1.1%	0	0.0%	2.2%	\$0	0.0%	1.6%
Total	140	100.0%	\$4,977	100.0%	100.0%	63	100.0%	100.0%	\$1,970	100.0%	100.0%	77	100.0%	100.0%	\$3,007	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	1.7%	\$0	0.0%	1.0%	0	0.0%	0.9%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	10.5%	0	0.0%	13.4%	\$0	0.0%	6.6%	0	0.0%	15.3%	\$0	0.0%	11.1%
	Middle	0	0.0%	\$0	0.0%	54.3%	0	0.0%	46.2%	\$0	0.0%	43.3%	0	0.0%	43.2%	\$0	0.0%	25.6%
	Upper	0	0.0%	\$0	0.0%	34.3%	0	0.0%	38.7%	\$0	0.0%	49.1%	0	0.0%	40.5%	\$0	0.0%	62.3%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CO Ft. Collins

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank		Families by Family Income		2015		2016											
		Count		Dollar		Count		Dollar		Count		Dollar							
		#	%	\$ (000s)	%	%	%	#	%	\$ (000s)	%	%	#	%	\$ (000s)	%	%		
HOME PURCHASE	Low	6	9.4%	\$949	4.6%	20.2%	5	16.1%	5.4%	\$824	9.1%	3.2%	1	3.0%	3.5%	\$125	1.1%	2.0%	
	Moderate	19	29.7%	\$3,793	18.2%	17.6%	10	32.3%	19.0%	\$1,970	21.8%	15.1%	9	27.3%	16.4%	\$1,823	15.5%	12.9%	
	Middle	11	17.2%	\$2,822	13.5%	22.3%	4	12.9%	23.5%	\$764	8.4%	22.9%	7	21.2%	24.3%	\$2,058	17.4%	23.3%	
	Upper	28	43.8%	\$13,277	63.7%	39.9%	12	38.7%	37.8%	\$5,487	60.7%	45.0%	16	48.5%	43.0%	\$7,790	66.0%	48.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.2%	\$0	0.0%	13.7%	0	0.0%	12.9%	\$0	0.0%	12.9%	
	Total	64	100.0%	\$20,841	100.0%	100.0%	31	100.0%	100.0%	\$9,045	100.0%	100.0%	33	100.0%	100.0%	\$11,796	100.0%	100.0%	
REFINANCE	Low	5	13.2%	\$557	4.9%	20.2%	3	15.8%	6.9%	\$344	6.4%	4.2%	2	10.5%	6.2%	\$213	3.6%	3.7%	
	Moderate	11	28.9%	\$1,630	14.4%	17.6%	4	21.1%	18.9%	\$600	11.2%	15.2%	7	36.8%	15.7%	\$1,030	17.2%	12.3%	
	Middle	3	7.9%	\$657	5.8%	22.3%	2	10.5%	23.7%	\$557	10.4%	22.6%	1	5.3%	24.3%	\$100	1.7%	22.7%	
	Upper	19	50.0%	\$8,497	74.9%	39.9%	10	52.6%	32.0%	\$3,845	71.9%	38.6%	9	47.4%	36.9%	\$4,652	77.6%	43.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.5%	\$0	0.0%	19.3%	0	0.0%	17.0%	\$0	0.0%	17.8%	
	Total	38	100.0%	\$11,341	100.0%	100.0%	19	100.0%	100.0%	\$5,346	100.0%	100.0%	19	100.0%	100.0%	\$5,995	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	6.7%	\$0	0.0%	2.4%	0	0.0%	7.1%	\$0	0.0%	4.2%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	19.9%	\$0	0.0%	16.5%	0	0.0%	20.1%	\$0	0.0%	17.5%	
	Middle	2	50.0%	\$75	60.0%	22.3%	1	50.0%	27.5%	\$25	62.5%	30.4%	1	50.0%	26.1%	\$50	58.8%	24.0%	
	Upper	2	50.0%	\$50	40.0%	39.9%	1	50.0%	39.8%	\$15	37.5%	42.2%	1	50.0%	41.5%	\$35	41.2%	48.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	8.6%	0	0.0%	5.1%	\$0	0.0%	5.8%	
	Total	4	100.0%	\$125	100.0%	100.0%	2	100.0%	100.0%	\$40	100.0%	100.0%	2	100.0%	100.0%	\$85	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	11	10.4%	\$1,506	4.7%	20.2%	8	15.4%	6.1%	\$1,168	8.1%	3.5%	3	5.6%	5.1%	\$338	1.9%	2.7%	
	Moderate	30	28.3%	\$5,423	16.8%	17.6%	14	26.9%	19.0%	\$2,570	17.8%	14.5%	16	29.6%	16.2%	\$2,853	16.0%	11.9%	
	Middle	16	15.1%	\$3,554	11.0%	22.3%	7	13.5%	23.7%	\$1,346	9.3%	21.8%	9	16.7%	24.3%	\$2,208	12.4%	21.4%	
	Upper	49	46.2%	\$21,824	67.6%	39.9%	23	44.2%	35.1%	\$9,347	64.8%	40.0%	26	48.1%	39.7%	\$12,477	69.8%	43.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.1%	\$0	0.0%	20.2%	0	0.0%	14.8%	\$0	0.0%	20.9%	
	Total	106	100.0%	\$32,307	100.0%	100.0%	52	100.0%	100.0%	\$14,431	100.0%	100.0%	54	100.0%	100.0%	\$17,876	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	94	67.1%	\$3,023	60.7%	93.4%	46	73.0%	47.0%	\$1,401	71.1%	36.2%	48	62.3%	41.8%	\$1,622	53.9%	34.9%	
	Over \$1 Million	27	19.3%	\$1,744	35.0%	5.8%	9	14.3%					18	23.4%					
	Total Rev. available	121	86.4%	\$4,767	95.7%	99.2%	55	87.3%					66	85.7%					
	Rev. Not Known	19	13.6%	\$210	4.2%	0.8%	8	12.7%					11	14.3%					
	Total	140	100.0%	\$4,977	100.0%	100.0%	63	100.0%					77	100.0%					
Small Business Loan Size	\$100,000 or Less	138	98.6%	\$4,456	89.5%		63	100.0%	93.8%	\$1,970	100.0%	37.4%	75	97.4%	94.2%	\$2,486	82.7%	39.4%	
	\$100,001 - \$250,000	1	0.7%	\$171	3.4%		0	0.0%	2.9%	\$0	0.0%	14.3%	1	1.3%	2.7%	\$171	5.7%	12.5%	
	\$250,001 - \$1 Million	1	0.7%	\$350	7.0%		0	0.0%	3.2%	\$0	0.0%	48.4%	1	1.3%	3.1%	\$350	11.6%	48.0%	
	Total	140	100.0%	\$4,977	100.0%		63	100.0%	100.0%	\$1,970	100.0%	100.0%	77	100.0%	100.0%	\$3,007	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.9%	0	0.0%	64.7%	\$0	0.0%	61.2%	0	0.0%	53.2%	\$0	0.0%	50.4%	
Over \$1 Million	0	0.0%	\$0	0.0%	2.1%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.7%	\$0	0.0%	32.1%	0	0.0%	80.2%	\$0	0.0%	29.5%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	11.8%	\$0	0.0%	26.8%	0	0.0%	13.5%	\$0	0.0%	32.6%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	7.6%	\$0	0.0%	41.1%	0	0.0%	6.3%	\$0	0.0%	37.9%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: CO Greeley

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	1	1.4%	\$174	1.0%	5.4%	1	2.2%	3.3%	\$174	1.5%	2.0%	0	0.0%	3.2%	\$0	0.0%	2.0%
	Moderate	11	14.9%	\$1,770	9.7%	16.1%	5	10.9%	12.3%	\$673	6.0%	9.1%	6	21.4%	13.0%	\$1,097	15.7%	9.6%
	Middle	36	48.6%	\$7,349	40.3%	47.8%	22	47.8%	45.5%	\$4,042	35.9%	43.1%	14	50.0%	44.0%	\$3,307	47.3%	42.1%
	Upper	26	35.1%	\$8,963	49.1%	30.7%	18	39.1%	38.9%	\$6,373	56.6%	45.7%	8	28.6%	39.8%	\$2,590	37.0%	46.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	74	100.0%	\$18,256	100.0%	100.0%	46	100.0%	100.0%	\$11,262	100.0%	100.0%	28	100.0%	100.0%	\$6,994	100.0%	100.0%
REFINANCE	Low	2	5.1%	\$260	3.5%	5.4%	1	5.6%	2.6%	\$110	3.2%	1.4%	1	4.8%	2.4%	\$150	3.8%	1.3%
	Moderate	9	23.1%	\$1,240	16.8%	16.1%	3	16.7%	12.1%	\$416	12.1%	9.0%	6	28.6%	11.3%	\$824	21.0%	8.3%
	Middle	16	41.0%	\$2,452	33.3%	47.8%	9	50.0%	47.1%	\$1,118	32.4%	43.6%	7	33.3%	47.7%	\$1,334	34.0%	44.8%
	Upper	12	30.8%	\$3,416	46.4%	30.7%	5	27.8%	38.2%	\$1,802	52.3%	46.0%	7	33.3%	38.6%	\$1,614	41.2%	45.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	39	100.0%	\$7,368	100.0%	100.0%	18	100.0%	100.0%	\$3,446	100.0%	100.0%	21	100.0%	100.0%	\$3,922	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	3.8%	\$0	0.0%	2.2%	0	0.0%	2.8%	\$0	0.0%	1.7%
	Moderate	4	50.0%	\$47	4.3%	16.1%	2	40.0%	12.5%	\$26	2.4%	9.4%	2	66.7%	12.6%	\$21	91.3%	10.4%
	Middle	3	37.5%	\$18	1.6%	47.8%	2	40.0%	52.8%	\$16	1.5%	49.4%	1	33.3%	51.1%	\$2	8.7%	46.8%
	Upper	1	12.5%	\$1,037	94.1%	30.7%	1	20.0%	30.9%	\$1,037	96.1%	39.0%	0	0.0%	33.5%	\$0	0.0%	41.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$1,102	100.0%	100.0%	5	100.0%	100.0%	\$1,079	100.0%	100.0%	3	100.0%	100.0%	\$23	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	23.5%	\$0	0.0%	19.9%	0	0.0%	9.5%	\$0	0.0%	4.6%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	50.0%	\$0	0.0%	18.3%	0	0.0%	61.9%	\$0	0.0%	39.6%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	23.5%	\$0	0.0%	43.4%	0	0.0%	19.0%	\$0	0.0%	2.3%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	2.9%	\$0	0.0%	18.4%	0	0.0%	9.5%	\$0	0.0%	53.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	2.5%	\$434	1.6%	5.4%	2	2.9%	3.1%	\$284	1.8%	2.2%	1	1.9%	2.8%	\$150	1.4%	1.7%
	Moderate	24	19.8%	\$3,057	11.4%	16.1%	10	14.5%	12.3%	\$1,115	7.1%	9.3%	14	26.9%	12.2%	\$1,942	17.8%	9.3%
	Middle	55	45.5%	\$9,819	36.7%	47.8%	33	47.8%	46.4%	\$5,176	32.8%	43.5%	22	42.3%	46.1%	\$4,643	42.4%	43.1%
	Upper	39	32.2%	\$13,416	50.2%	30.7%	24	34.8%	38.2%	\$9,212	58.4%	45.0%	15	28.8%	39.0%	\$4,204	38.4%	45.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	121	100.0%	\$26,726	100.0%	100.0%	69	100.0%	100.0%	\$15,787	100.0%	100.0%	52	100.0%	100.0%	\$10,939	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	7	8.3%	\$118	4.4%	4.2%	3	9.1%	4.8%	\$65	6.1%	7.5%	4	7.8%	3.9%	\$53	3.3%	4.6%
	Moderate	16	19.0%	\$530	19.7%	17.3%	10	30.3%	14.7%	\$355	33.6%	16.9%	6	11.8%	14.1%	\$175	10.8%	13.9%
	Middle	27	32.1%	\$806	30.0%	43.6%	10	30.3%	39.7%	\$325	30.7%	33.3%	17	33.3%	40.0%	\$481	29.6%	36.7%
	Upper	34	40.5%	\$1,230	45.8%	34.9%	10	30.3%	38.5%	\$313	29.6%	41.3%	24	47.1%	39.9%	\$917	56.4%	43.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.3%	\$0	0.0%	0.9%	0	0.0%	2.1%	\$0	0.0%	1.2%
Total	84	100.0%	\$2,684	100.0%	100.0%	33	100.0%	100.0%	\$1,058	100.0%	100.0%	51	100.0%	100.0%	\$1,626	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.5%	\$0	0.0%	1.5%	0	0.0%	0.7%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	13.4%	\$0	0.0%	6.1%	0	0.0%	9.6%	\$0	0.0%	5.2%
	Middle	0	0.0%	\$0	0.0%	68.5%	0	0.0%	69.8%	\$0	0.0%	75.9%	0	0.0%	68.9%	\$0	0.0%	76.0%
	Upper	0	0.0%	\$0	0.0%	20.3%	0	0.0%	15.0%	\$0	0.0%	15.4%	0	0.0%	18.8%	\$0	0.0%	16.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	1.1%	0	0.0%	1.9%	\$0	0.0%	0.6%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: CO Greeley

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income	2015			2016									
		Count		Dollar			Bank	Agg	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%			#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	9	12.2%	\$1,142	6.3%	21.0%	6	13.0%	4.2%	\$746	6.6%	2.4%	3	10.7%	3.4%	\$396	5.7%	1.8%	
	Moderate	23	31.1%	\$3,617	19.8%	17.1%	17	37.0%	19.2%	\$2,357	20.9%	14.7%	6	21.4%	16.5%	\$1,260	18.0%	12.6%	
	Middle	12	16.2%	\$2,933	16.1%	21.6%	5	10.9%	25.9%	\$1,085	9.6%	25.3%	7	25.0%	28.3%	\$1,848	26.4%	27.4%	
	Upper	30	40.5%	\$10,564	57.9%	40.3%	18	39.1%	32.9%	\$7,074	62.8%	40.2%	12	42.9%	36.4%	\$3,490	49.9%	43.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.7%	\$0	0.0%	17.3%	0	0.0%	15.4%	\$0	0.0%	15.0%	
	Total	74	100.0%	\$18,256	100.0%	100.0%	46	100.0%	100.0%	\$11,262	100.0%	100.0%	28	100.0%	100.0%	\$6,994	100.0%	100.0%	
REFINANCE	Low	3	7.7%	\$302	4.1%	21.0%	2	11.1%	4.3%	\$159	4.6%	2.5%	1	4.8%	3.9%	\$143	3.6%	2.1%	
	Moderate	8	20.5%	\$1,114	15.1%	17.1%	4	22.2%	15.1%	\$525	15.2%	11.6%	4	19.0%	13.9%	\$589	15.0%	10.5%	
	Middle	11	28.2%	\$1,755	23.8%	21.6%	4	22.2%	22.6%	\$568	16.5%	20.7%	7	33.3%	22.3%	\$1,187	30.3%	20.0%	
	Upper	17	43.6%	\$4,197	57.0%	40.3%	8	44.4%	34.3%	\$2,194	63.7%	40.4%	9	42.9%	36.7%	\$2,003	51.1%	42.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.6%	\$0	0.0%	24.8%	0	0.0%	23.3%	\$0	0.0%	24.4%	
	Total	39	100.0%	\$7,368	100.0%	100.0%	18	100.0%	100.0%	\$3,446	100.0%	100.0%	21	100.0%	100.0%	\$3,922	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	12.5%	\$2	0.2%	21.0%	0	0.0%	5.7%	\$0	0.0%	2.5%	1	33.3%	5.0%	\$2	8.7%	2.9%	
	Moderate	4	50.0%	\$46	4.2%	17.1%	3	60.0%	16.7%	\$29	2.7%	12.1%	1	33.3%	16.3%	\$17	73.9%	13.9%	
	Middle	1	12.5%	\$4	0.4%	21.6%	0	0.0%	28.1%	\$0	0.0%	26.2%	1	33.3%	28.2%	\$4	17.4%	26.2%	
	Upper	2	25.0%	\$1,050	95.3%	40.3%	2	40.0%	42.7%	\$1,050	97.3%	49.3%	0	0.0%	44.9%	\$0	0.0%	52.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.8%	\$0	0.0%	9.9%	0	0.0%	5.6%	\$0	0.0%	4.7%	
	Total	8	100.0%	\$1,102	100.0%	100.0%	5	100.0%	100.0%	\$1,079	100.0%	100.0%	3	100.0%	100.0%	\$23	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	13	10.7%	\$1,446	5.4%	21.0%	8	11.6%	4.3%	\$905	5.7%	2.4%	5	9.6%	3.7%	\$541	4.9%	2.0%	
	Moderate	35	28.9%	\$4,777	17.9%	17.1%	24	34.8%	17.4%	\$2,911	18.4%	13.1%	11	21.2%	15.2%	\$1,866	17.1%	11.6%	
	Middle	24	19.8%	\$4,692	17.6%	21.6%	9	13.0%	24.6%	\$1,653	10.5%	22.9%	15	28.8%	25.3%	\$3,039	27.8%	23.8%	
	Upper	49	40.5%	\$15,811	59.2%	40.3%	28	40.6%	33.8%	\$10,318	65.4%	39.5%	21	40.4%	36.9%	\$5,493	50.2%	43.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.0%	\$0	0.0%	22.2%	0	0.0%	19.0%	\$0	0.0%	19.7%	
	Total	121	100.0%	\$26,726	100.0%	100.0%	69	100.0%	100.0%	\$15,787	100.0%	100.0%	52	100.0%	100.0%	\$10,939	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	51	60.7%	\$1,476	55.0%	92.3%	23	69.7%	49.1%	\$745	70.4%	34.6%	28	54.9%	43.6%	\$731	45.0%	32.6%	
	Over \$1 Million	20	23.8%	\$985	36.7%	6.7%	5	15.2%					15	29.4%					
	Total Rev. available	71	84.5%	\$2,461	91.7%	99.0%	28	84.9%					43	84.3%					
	Rev. Not Known	13	15.5%	\$223	8.3%	1.0%	5	15.2%					8	15.7%					
	Total	84	100.0%	\$2,684	100.0%	100.0%	33	100.0%					51	100.0%					
Small Business Loan Size	\$100,000 or Less	83	98.8%	\$2,392	89.1%		33	100.0%	93.8%	\$1,058	100.0%	39.2%	50	98.0%	94.6%	\$1,334	82.0%	42.8%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	14.9%	0	0.0%	2.6%	\$0	0.0%	13.6%	
	\$250,001 - \$1 Million	1	1.2%	\$292	10.9%		0	0.0%	3.1%	\$0	0.0%	45.9%	1	2.0%	2.8%	\$292	18.0%	43.6%	
	Total	84	100.0%	\$2,684	100.0%		33	100.0%	100.0%	\$1,058	100.0%	100.0%	51	100.0%	100.0%	\$1,626	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.5%	0	0.0%	60.9%	\$0	0.0%	70.7%	0	0.0%	57.4%	\$0	0.0%	63.0%	
Over \$1 Million	0	0.0%	\$0	0.0%	5.5%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	71.4%	\$0	0.0%	22.9%	0	0.0%	72.0%	\$0	0.0%	22.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.6%	\$0	0.0%	33.4%	0	0.0%	14.6%	\$0	0.0%	26.0%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	11.0%	\$0	0.0%	43.8%	0	0.0%	13.4%	\$0	0.0%	52.0%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: FL Ft. Walton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	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%
	Moderate	10	13.5%	\$1,609	6.8%	7.6%	2	4.4%	6.3%	\$378	2.2%	4.8%	8	27.6%	6.3%	\$1,231	20.1%	4.5%
	Middle	34	45.9%	\$7,076	30.1%	64.8%	21	46.7%	61.3%	\$4,841	27.8%	52.2%	13	44.8%	62.0%	\$2,235	36.5%	51.9%
	Upper	30	40.5%	\$14,859	63.1%	27.7%	22	48.9%	32.4%	\$12,200	70.0%	43.0%	8	27.6%	31.7%	\$2,659	43.4%	43.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	74	100.0%	\$23,544	100.0%	100.0%	45	100.0%	100.0%	\$17,419	100.0%	100.0%	29	100.0%	100.0%	\$6,125	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	3	17.6%	\$298	5.9%	7.6%	2	20.0%	7.2%	\$154	4.0%	5.6%	1	14.3%	7.3%	\$144	12.0%	5.7%
	Middle	6	35.3%	\$762	15.2%	64.8%	3	30.0%	61.2%	\$270	7.1%	50.4%	3	42.9%	62.6%	\$492	41.1%	53.4%
	Upper	8	47.1%	\$3,965	78.9%	27.7%	5	50.0%	31.6%	\$3,404	88.9%	44.0%	3	42.9%	30.1%	\$561	46.9%	40.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$5,025	100.0%	100.0%	10	100.0%	100.0%	\$3,828	100.0%	100.0%	7	100.0%	100.0%	\$1,197	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	3	20.0%	\$25	8.9%	7.6%	0	0.0%	10.8%	\$0	0.0%	8.0%	3	27.3%	7.4%	\$25	13.5%	4.5%
	Middle	9	60.0%	\$233	82.6%	64.8%	2	50.0%	64.6%	\$83	85.6%	52.5%	7	63.6%	63.6%	\$150	81.1%	56.4%
	Upper	3	20.0%	\$24	8.5%	27.7%	2	50.0%	24.5%	\$14	14.4%	39.6%	1	9.1%	29.1%	\$10	5.4%	39.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$282	100.0%	100.0%	4	100.0%	100.0%	\$97	100.0%	100.0%	11	100.0%	100.0%	\$185	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$3,100	100.0%	34.4%	0	0.0%	7.7%	\$0	0.0%	3.0%	1	100.0%	10.0%	\$3,100	100.0%	5.5%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	61.5%	\$0	0.0%	44.1%	0	0.0%	70.0%	\$0	0.0%	34.9%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	30.8%	\$0	0.0%	52.9%	0	0.0%	20.0%	\$0	0.0%	59.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$3,100	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$3,100	100.0%	100.0%	
HMDA TOTALS	Low	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%
	Moderate	17	15.9%	\$5,032	15.7%	7.6%	4	6.8%	6.7%	\$532	2.5%	5.0%	13	27.1%	6.7%	\$4,500	42.4%	4.9%
	Middle	49	45.8%	\$8,071	25.3%	64.8%	26	44.1%	61.4%	\$5,194	24.3%	51.4%	23	47.9%	62.3%	\$2,877	27.1%	51.9%
	Upper	41	38.3%	\$18,848	59.0%	27.7%	29	49.2%	31.9%	\$15,618	73.2%	43.6%	12	25.0%	31.1%	\$3,230	30.5%	43.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	107	100.0%	\$31,951	100.0%	100.0%	59	100.0%	100.0%	\$21,344	100.0%	100.0%	48	100.0%	100.0%	\$10,607	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	46	18.3%	\$2,010	17.4%	12.5%	25	21.6%	11.7%	\$982	22.5%	13.3%	21	15.6%	12.9%	\$1,028	14.3%	12.9%
	Middle	155	61.8%	\$7,213	62.4%	60.1%	71	61.2%	56.7%	\$2,593	59.3%	51.9%	84	62.2%	55.9%	\$4,620	64.3%	54.5%
	Upper	50	19.9%	\$2,340	20.2%	27.4%	20	17.2%	29.8%	\$798	18.2%	33.9%	30	22.2%	30.0%	\$1,542	21.4%	32.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	0.9%	0	0.0%	1.2%	\$0	0.0%	0.6%
Total	251	100.0%	\$11,563	100.0%	100.0%	116	100.0%	100.0%	\$4,373	100.0%	100.0%	135	100.0%	100.0%	\$7,190	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	1	100.0%	\$50	100.0%	17.7%	0	0.0%	11.1%	\$0	0.0%	6.5%	1	100.0%	14.3%	\$50	100.0%	40.7%
	Middle	0	0.0%	\$0	0.0%	60.8%	0	0.0%	66.7%	\$0	0.0%	20.9%	0	0.0%	71.4%	\$0	0.0%	42.4%
	Upper	0	0.0%	\$0	0.0%	21.5%	0	0.0%	22.2%	\$0	0.0%	72.5%	0	0.0%	14.3%	\$0	0.0%	16.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$50	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: FL Ft. Walton

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income	2015			2016									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
HOME PURCHASE	Low	6	8.1%	\$608	2.6%	17.7%	3	6.7%	4.6%	\$279	1.6%	1.9%	3	10.3%	3.5%	\$329	5.4%	1.5%	
	Moderate	15	20.3%	\$2,576	10.9%	18.1%	7	15.6%	17.3%	\$1,342	7.7%	11.7%	8	27.6%	15.0%	\$1,234	20.1%	9.7%	
	Middle	8	10.8%	\$1,488	6.3%	23.3%	2	4.4%	22.7%	\$531	3.0%	19.3%	6	20.7%	23.1%	\$957	15.6%	19.2%	
	Upper	45	60.8%	\$18,872	80.2%	40.9%	33	73.3%	40.3%	\$15,267	87.6%	52.3%	12	41.4%	42.2%	\$3,605	58.9%	53.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.0%	\$0	0.0%	14.7%	0	0.0%	16.2%	\$0	0.0%	16.3%	
	Total	74	100.0%	\$23,544	100.0%	100.0%	45	100.0%	100.0%	\$17,419	100.0%	100.0%	29	100.0%	100.0%	\$6,125	100.0%	100.0%	
REFINANCE	Low	3	17.6%	\$256	5.1%	17.7%	1	10.0%	4.0%	\$81	2.1%	1.9%	2	28.6%	3.9%	\$175	14.6%	2.0%	
	Moderate	5	29.4%	\$460	9.2%	18.1%	3	30.0%	9.9%	\$267	7.0%	5.9%	2	28.6%	8.7%	\$193	16.1%	5.3%	
	Middle	2	11.8%	\$306	6.1%	23.3%	1	10.0%	13.7%	\$76	2.0%	10.1%	1	14.3%	12.4%	\$230	19.2%	9.5%	
	Upper	7	41.2%	\$4,003	79.7%	40.9%	5	50.0%	37.5%	\$3,404	88.9%	45.6%	2	28.6%	32.4%	\$599	50.0%	39.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	35.0%	\$0	0.0%	36.5%	0	0.0%	42.5%	\$0	0.0%	43.9%	
	Total	17	100.0%	\$5,025	100.0%	100.0%	10	100.0%	100.0%	\$3,828	100.0%	100.0%	7	100.0%	100.0%	\$1,197	100.0%	100.0%	
HOME IMPROVEMENT	Low	1	6.7%	\$6	2.1%	17.7%	0	0.0%	9.9%	\$0	0.0%	3.2%	1	9.1%	5.8%	\$6	3.2%	3.3%	
	Moderate	4	26.7%	\$31	11.0%	18.1%	1	25.0%	14.6%	\$8	8.2%	13.4%	3	27.3%	12.8%	\$23	12.4%	8.9%	
	Middle	1	6.7%	\$10	3.5%	23.3%	0	0.0%	20.8%	\$0	0.0%	17.1%	1	9.1%	20.5%	\$10	5.4%	16.2%	
	Upper	9	60.0%	\$235	83.3%	40.9%	3	75.0%	46.7%	\$89	91.8%	54.3%	6	54.5%	52.7%	\$146	78.9%	64.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.0%	\$0	0.0%	12.0%	0	0.0%	8.1%	\$0	0.0%	7.5%	
	Total	15	100.0%	\$282	100.0%	100.0%	4	100.0%	100.0%	\$97	100.0%	100.0%	11	100.0%	100.0%	\$185	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	23.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$3,100	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$3,100	100.0%	100.0%	
	Total	1	100.0%	\$3,100	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$3,100	100.0%	100.0%	
HMDA TOTALS	Low	10	9.3%	\$870	2.7%	17.7%	4	6.8%	4.6%	\$360	1.7%	1.9%	6	12.5%	3.7%	\$510	4.8%	1.6%	
	Moderate	24	22.4%	\$3,067	9.6%	18.1%	11	18.6%	14.8%	\$1,617	7.6%	9.5%	13	27.1%	12.9%	\$1,450	13.7%	8.1%	
	Middle	11	10.3%	\$1,804	5.6%	23.3%	3	5.1%	19.7%	\$607	2.8%	15.8%	8	16.7%	19.5%	\$1,197	11.3%	15.7%	
	Upper	61	57.0%	\$23,110	72.3%	40.9%	41	69.5%	39.5%	\$18,760	87.9%	48.5%	20	41.7%	39.2%	\$4,350	41.0%	47.8%	
	Unknown	1	0.9%	\$3,100	9.7%	0.0%	0	0.0%	21.5%	\$0	0.0%	24.3%	1	2.1%	24.7%	\$3,100	29.2%	26.8%	
	Total	107	100.0%	\$31,951	100.0%	100.0%	59	100.0%	100.0%	\$21,344	100.0%	100.0%	48	100.0%	100.0%	\$10,607	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	175	69.7%	\$7,614	65.8%	93.8%	83	71.6%	53.4%	\$3,011	68.9%	45.3%	92	68.1%	44.8%	\$4,603	64.0%	43.8%	
	Over \$1 Million	40	15.9%	\$3,378	29.2%	5.3%	18	15.5%					22	16.3%					
	Total Rev. available	215	85.6%	\$10,992	95.0%	99.1%	101	87.1%					114	84.4%					
	Rev. Not Known	36	14.3%	\$571	4.9%	0.9%	15	12.9%					21	15.6%					
	Total	251	100.0%	\$11,563	100.0%	100.0%	116	100.0%					135	100.0%					
Small Business Loan Size	\$100,000 or Less	236	94.0%	\$7,488	64.8%		113	97.4%	93.2%	\$3,587	82.0%	34.4%	123	91.1%	93.3%	\$3,901	54.3%	34.3%	
	\$100,001 - \$250,000	9	3.6%	\$1,659	14.3%		1	0.9%	3.3%	\$200	4.6%	16.2%	8	5.9%	3.4%	\$1,459	20.3%	16.3%	
	\$250,001 - \$1 Million	6	2.4%	\$2,416	20.9%		2	1.7%	3.5%	\$586	13.4%	49.4%	4	3.0%	3.4%	\$1,830	25.5%	49.3%	
	Total	251	100.0%	\$11,563	100.0%		116	100.0%	100.0%	\$4,373	100.0%	100.0%	135	100.0%	100.0%	\$7,190	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	1	100.0%	\$50	100.0%	97.5%	0	0.0%	66.7%	\$0	0.0%	93.5%	1	100.0%	21.4%	\$50	100.0%	45.9%	
Over \$1 Million	0	0.0%	\$0	0.0%	2.5%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	1	100.0%	\$50	100.0%	100.0%	0	0.0%					1	100.0%						
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$50	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%	
	\$100,001 - \$250,000	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%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$50	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%	

Origination & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: FL Gainesville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%
HOME PURCHASE	Low	3	3.6%	\$328	1.2%	5.1%	1	1.9%	4.0%	\$102	0.6%	1.8%	2	6.5%	4.3%	\$226	2.5%	2.3%
	Moderate	7	8.4%	\$1,366	5.0%	15.0%	4	7.7%	12.7%	\$906	4.9%	8.4%	3	9.7%	10.8%	\$460	5.1%	8.2%
	Middle	18	21.7%	\$3,198	11.7%	30.8%	11	21.2%	28.5%	\$1,851	10.1%	28.2%	7	22.6%	30.8%	\$1,347	15.1%	24.9%
	Upper	55	66.3%	\$22,360	82.0%	49.1%	36	69.2%	54.9%	\$15,447	84.4%	61.6%	19	61.3%	54.1%	\$6,913	77.3%	64.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	83	100.0%	\$27,252	100.0%	100.0%	52	100.0%	100.0%	\$18,306	100.0%	100.0%	31	100.0%	100.0%	\$8,946	100.0%	100.0%
REFINANCE	Low	1	3.6%	\$114	1.3%	5.1%	1	5.0%	3.4%	\$114	2.3%	3.2%	0	0.0%	3.0%	\$0	0.0%	2.2%
	Moderate	4	14.3%	\$922	10.8%	15.0%	3	15.0%	11.2%	\$695	14.0%	7.9%	1	12.5%	10.6%	\$227	6.4%	7.4%
	Middle	5	17.9%	\$624	7.3%	30.8%	4	20.0%	29.2%	\$514	10.3%	25.0%	1	12.5%	27.1%	\$110	3.1%	22.5%
	Upper	18	64.3%	\$6,878	80.6%	49.1%	12	60.0%	56.2%	\$3,659	73.4%	64.0%	6	75.0%	59.3%	\$3,219	90.5%	67.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	28	100.0%	\$8,538	100.0%	100.0%	20	100.0%	100.0%	\$4,982	100.0%	100.0%	8	100.0%	100.0%	\$3,556	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	3.3%	\$0	0.0%	3.0%	0	0.0%	3.9%	\$0	0.0%	0.9%
	Moderate	1	12.5%	\$80	30.1%	15.0%	1	16.7%	12.6%	\$80	34.6%	9.1%	0	0.0%	11.3%	\$0	0.0%	6.4%
	Middle	3	37.5%	\$46	17.3%	30.8%	1	16.7%	29.7%	\$11	4.8%	26.6%	2	100.0%	26.1%	\$35	100.0%	25.3%
	Upper	4	50.0%	\$140	52.6%	49.1%	4	66.7%	54.4%	\$140	60.6%	61.3%	0	0.0%	58.6%	\$0	0.0%	67.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$266	100.0%	100.0%	6	100.0%	100.0%	\$231	100.0%	100.0%	2	100.0%	100.0%	\$35	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	40.0%	\$0	0.0%	31.1%	0	0.0%	34.5%	\$0	0.0%	38.6%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	25.0%	\$0	0.0%	1.4%	0	0.0%	27.6%	\$0	0.0%	28.7%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	20.0%	\$0	0.0%	30.0%	0	0.0%	31.0%	\$0	0.0%	13.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	15.0%	\$0	0.0%	37.4%	0	0.0%	6.9%	\$0	0.0%	19.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	3.4%	\$442	1.2%	5.1%	2	2.6%	3.9%	\$216	0.9%	7.2%	2	4.9%	4.0%	\$226	1.8%	9.7%
	Moderate	12	10.1%	\$2,368	6.6%	15.0%	8	10.3%	12.3%	\$1,681	7.1%	7.1%	4	9.8%	10.9%	\$687	5.5%	12.2%
	Middle	26	21.8%	\$3,868	10.7%	30.8%	16	20.5%	28.7%	\$2,376	10.1%	27.7%	10	24.4%	29.6%	\$1,492	11.9%	22.0%
	Upper	77	64.7%	\$29,378	81.5%	49.1%	52	66.7%	55.1%	\$19,246	81.8%	58.0%	25	61.0%	55.5%	\$10,132	80.8%	56.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	119	100.0%	\$36,056	100.0%	100.0%	78	100.0%	100.0%	\$23,519	100.0%	100.0%	41	100.0%	100.0%	\$12,537	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	23	9.1%	\$1,009	7.6%	9.2%	11	8.5%	9.0%	\$680	9.9%	8.5%	12	9.7%	9.1%	\$329	5.2%	8.4%
	Moderate	73	28.9%	\$3,297	24.9%	16.6%	38	29.5%	17.7%	\$1,740	25.2%	22.1%	35	28.2%	17.7%	\$1,557	24.6%	22.1%
	Middle	71	28.1%	\$4,304	32.5%	30.2%	38	29.5%	26.9%	\$2,684	38.9%	27.1%	33	26.6%	27.6%	\$1,620	25.6%	26.5%
	Upper	86	34.0%	\$4,629	35.0%	44.0%	42	32.6%	44.5%	\$1,798	26.1%	41.5%	44	35.5%	44.2%	\$2,831	44.7%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	0.9%	0	0.0%	1.4%	\$0	0.0%	1.1%
Total	253	100.0%	\$13,239	100.0%	100.0%	129	100.0%	100.0%	\$6,902	100.0%	100.0%	124	100.0%	100.0%	\$6,337	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	1.6%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.3%	0	0.0%	4.7%	\$0	0.0%	1.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	100.0%	\$85	100.0%	52.4%	1	100.0%	43.8%	\$75	100.0%	33.2%	1	100.0%	53.1%	\$10	100.0%	52.4%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	45.3%	\$0	0.0%	63.6%	0	0.0%	43.8%	\$0	0.0%	45.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.7%	\$0	0.0%	1.3%	0	0.0%	3.1%	\$0	0.0%	1.7%
Total	2	100.0%	\$85	100.0%	100.0%	1	100.0%	100.0%	\$75	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: FL Gainesville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2015			2016								
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
HOME PURCHASE	Low	7	8.4%	\$587	2.2%	22.8%	5	9.6%	5.6%	\$451	2.5%	2.4%	2	6.5%	3.4%	\$136	1.5%	1.6%
	Moderate	13	15.7%	\$1,701	6.2%	17.1%	8	15.4%	18.6%	\$1,009	5.5%	12.1%	5	16.1%	14.5%	\$692	7.7%	9.2%
	Middle	7	8.4%	\$1,188	4.4%	18.0%	3	5.8%	19.2%	\$361	2.0%	15.3%	4	12.9%	20.6%	\$827	9.2%	17.3%
	Upper	56	67.5%	\$23,776	87.2%	42.0%	36	69.2%	41.3%	\$16,485	90.1%	51.2%	20	64.5%	45.8%	\$7,291	81.5%	57.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.4%	\$0	0.0%	19.1%	0	0.0%	15.8%	\$0	0.0%	14.1%
	Total	83	100.0%	\$27,252	100.0%	100.0%	52	100.0%	100.0%	\$18,306	100.0%	100.0%	31	100.0%	100.0%	\$8,946	100.0%	100.0%
REFINANCE	Low	2	7.1%	\$184	2.2%	22.8%	1	5.0%	5.6%	\$74	1.5%	2.9%	1	12.5%	3.6%	\$110	3.1%	1.9%
	Moderate	6	21.4%	\$880	10.3%	17.1%	4	20.0%	12.4%	\$596	12.0%	8.5%	2	25.0%	9.4%	\$284	8.0%	5.8%
	Middle	5	17.9%	\$468	5.5%	18.0%	5	25.0%	16.9%	\$468	9.4%	13.1%	0	0.0%	15.4%	\$0	0.0%	12.7%
	Upper	15	53.6%	\$7,006	82.1%	42.0%	10	50.0%	40.8%	\$3,844	77.2%	50.3%	5	62.5%	47.2%	\$3,162	88.9%	55.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.3%	\$0	0.0%	25.2%	0	0.0%	24.4%	\$0	0.0%	24.0%
	Total	28	100.0%	\$8,538	100.0%	100.0%	20	100.0%	100.0%	\$4,982	100.0%	100.0%	8	100.0%	100.0%	\$3,556	100.0%	100.0%
HOME IMPROVEMENT	Low	1	12.5%	\$10	3.8%	22.8%	1	16.7%	4.4%	\$10	4.3%	0.7%	0	0.0%	4.4%	\$0	0.0%	0.3%
	Moderate	1	12.5%	\$11	4.1%	17.1%	1	16.7%	14.3%	\$11	4.8%	8.8%	0	0.0%	10.3%	\$0	0.0%	9.1%
	Middle	3	37.5%	\$115	43.2%	18.0%	1	16.7%	21.4%	\$80	34.6%	17.3%	2	100.0%	27.1%	\$35	100.0%	16.5%
	Upper	3	37.5%	\$130	48.9%	42.0%	3	50.0%	55.5%	\$130	56.3%	70.6%	0	0.0%	53.2%	\$0	0.0%	66.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.4%	\$0	0.0%	2.5%	0	0.0%	4.9%	\$0	0.0%	7.3%
	Total	8	100.0%	\$266	100.0%	100.0%	6	100.0%	100.0%	\$231	100.0%	100.0%	2	100.0%	100.0%	\$35	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	10	8.4%	\$781	2.2%	22.8%	7	9.0%	5.5%	\$535	2.3%	2.1%	3	7.3%	3.5%	\$246	2.0%	1.4%
	Moderate	20	16.8%	\$2,592	7.2%	17.1%	13	16.7%	16.5%	\$1,616	6.9%	9.2%	7	17.1%	12.8%	\$976	7.8%	6.5%
	Middle	15	12.6%	\$1,771	4.9%	18.0%	9	11.5%	18.5%	\$909	3.9%	12.2%	6	14.6%	19.2%	\$862	6.9%	12.7%
	Upper	74	62.2%	\$30,912	85.7%	42.0%	49	62.8%	41.5%	\$20,459	87.0%	42.3%	25	61.0%	46.2%	\$10,453	83.4%	45.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.0%	\$0	0.0%	34.3%	0	0.0%	18.3%	\$0	0.0%	33.7%
	Total	119	100.0%	\$36,056	100.0%	100.0%	78	100.0%	100.0%	\$23,519	100.0%	100.0%	41	100.0%	100.0%	\$12,537	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	151	59.7%	\$6,106	46.1%	92.4%	77	59.7%	52.0%	\$2,709	39.2%	36.7%	74	59.7%	50.5%	\$3,397	53.6%	40.2%
	Over \$1 Million	83	32.8%	\$6,850	51.7%	6.7%	44	34.1%					39	31.5%				
	Total Rev. available	234	92.5%	\$12,956	97.8%	99.1%	121	93.8%					113	91.2%				
	Rev. Not Known	19	7.5%	\$283	2.1%	0.8%	8	6.2%					11	8.9%				
	Total	253	100.0%	\$13,239	100.0%	100.0%	129	100.0%					124	100.0%				
Small Business Loan Size	\$100,000 or Less	240	94.9%	\$9,457	71.4%		123	95.3%	95.6%	\$4,926	71.4%	43.7%	117	94.4%	95.2%	\$4,531	71.5%	46.4%
	\$100,001 - \$250,000	7	2.8%	\$1,112	8.4%		2	1.6%	2.2%	\$332	4.8%	13.9%	5	4.0%	2.7%	\$780	12.3%	17.0%
	\$250,001 - \$1 Million	6	2.4%	\$2,670	20.2%		4	3.1%	2.1%	\$1,644	23.8%	42.4%	2	1.6%	2.0%	\$1,026	16.2%	36.6%
	Total	253	100.0%	\$13,239	100.0%		129	100.0%	100.0%	\$6,902	100.0%	100.0%	124	100.0%	100.0%	\$6,337	100.0%	100.0%
	Total Farms																	
Small Farm Revenue	\$1 Million or Less	1	50.0%	\$75	88.2%	97.5%	1	100.0%	54.7%	\$75	100.0%	51.5%	0	0.0%	60.9%	\$0	0.0%	28.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.5%	0	0.0%					0	0.0%				
	Not Known	1	50.0%	\$10	11.8%	0.0%	0	0.0%					1	100.0%				
	Total	2	100.0%	\$85	100.0%	100.0%	1	100.0%					1	100.0%				
	\$100,000 or Less	2	100.0%	\$85	100.0%		1	100.0%	81.3%	\$75	100.0%	25.7%	1	100.0%	89.1%	\$10	100.0%	34.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.8%	\$0	0.0%	18.1%	0	0.0%	3.1%	\$0	0.0%	8.1%
\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.9%	\$0	0.0%	56.2%	0	0.0%	7.8%	\$0	0.0%	57.5%	
Total	2	100.0%	\$85	100.0%		1	100.0%	100.0%	\$75	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: FL Homosassa Springs

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%
HOME PURCHASE	Low	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%
	Moderate	3	16.7%	\$313	11.8%	8.1%	2	22.2%	7.7%	\$231	18.8%	5.8%	1	11.1%	7.9%	\$82	5.7%	5.4%
	Middle	12	66.7%	\$1,911	72.0%	75.5%	6	66.7%	75.2%	\$832	67.8%	70.0%	6	66.7%	70.2%	\$1,079	75.6%	64.8%
	Upper	3	16.7%	\$431	16.2%	16.4%	1	11.1%	17.1%	\$164	13.4%	24.2%	2	22.2%	22.0%	\$267	18.7%	29.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$2,655	100.0%	100.0%	9	100.0%	100.0%	\$1,227	100.0%	100.0%	9	100.0%	100.0%	\$1,428	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	8.1%	0	0.0%	6.1%	\$0	0.0%	4.4%	0	0.0%	5.9%	\$0	0.0%	4.3%
	Middle	3	75.0%	\$1,150	79.3%	75.5%	0	0.0%	72.6%	\$0	0.0%	68.9%	3	75.0%	71.6%	\$1,150	79.3%	65.6%
	Upper	1	25.0%	\$300	20.7%	16.4%	0	0.0%	21.4%	\$0	0.0%	26.6%	1	25.0%	22.5%	\$300	20.7%	30.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$1,450	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	4	100.0%	100.0%	\$1,450	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	8.1%	0	0.0%	10.5%	\$0	0.0%	3.5%	0	0.0%	9.5%	\$0	0.0%	5.1%
	Middle	1	100.0%	\$8	100.0%	75.5%	1	100.0%	71.5%	\$8	100.0%	72.7%	0	0.0%	69.8%	\$0	0.0%	64.2%
	Upper	0	0.0%	\$0	0.0%	16.4%	0	0.0%	18.0%	\$0	0.0%	23.8%	0	0.0%	20.7%	\$0	0.0%	30.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$8	100.0%	100.0%	1	100.0%	100.0%	\$8	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	25.0%	\$0	0.0%	6.1%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	50.0%	\$0	0.0%	27.5%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	25.0%	\$0	0.0%	66.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	13.0%	\$313	7.6%	8.1%	2	20.0%	7.4%	\$231	18.7%	5.2%	1	7.7%	7.4%	\$82	2.8%	5.1%
	Middle	16	69.6%	\$3,069	74.6%	75.5%	7	70.0%	74.3%	\$840	68.0%	70.4%	9	69.2%	70.6%	\$2,229	77.4%	62.4%
	Upper	4	17.4%	\$731	17.8%	16.4%	1	10.0%	18.4%	\$164	13.3%	24.4%	3	23.1%	22.1%	\$567	19.7%	32.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	23	100.0%	\$4,113	100.0%	100.0%	10	100.0%	100.0%	\$1,235	100.0%	100.0%	13	100.0%	100.0%	\$2,878	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	9	17.6%	\$320	13.5%	9.4%	4	18.2%	8.5%	\$145	17.9%	12.7%	5	17.2%	9.7%	\$175	11.1%	10.6%
	Middle	29	56.9%	\$1,464	61.5%	74.9%	11	50.0%	72.6%	\$328	40.6%	74.4%	18	62.1%	71.9%	\$1,136	72.3%	71.6%
	Upper	13	25.5%	\$595	25.0%	15.8%	7	31.8%	17.1%	\$335	41.5%	12.1%	6	20.7%	17.3%	\$260	16.5%	16.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.8%	0	0.0%	1.0%	\$0	0.0%	0.8%
Total	51	100.0%	\$2,379	100.0%	100.0%	22	100.0%	100.0%	\$808	100.0%	100.0%	29	100.0%	100.0%	\$1,571	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	12.0%	0	0.0%	5.3%	\$0	0.0%	2.7%	0	0.0%	12.5%	\$0	0.0%	3.4%
	Middle	0	0.0%	\$0	0.0%	66.7%	0	0.0%	73.7%	\$0	0.0%	90.2%	0	0.0%	87.5%	\$0	0.0%	96.6%
	Upper	0	0.0%	\$0	0.0%	21.3%	0	0.0%	21.1%	\$0	0.0%	7.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	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%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: FL Homosassa Springs

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank		Families by Family Income	2015		2016											
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar								
		#	%	\$ (000s)	\$ %	%	#	%	Agg	Bank	\$ %	Agg	#	%	Agg	Bank	\$ %	Agg
HOME PURCHASE	Low	1	5.6%	\$120	4.5%	17.5%	1	11.1%	6.6%	\$120	9.8%	3.3%	0	0.0%	7.3%	\$0	0.0%	3.7%
	Moderate	7	38.9%	\$649	24.4%	20.5%	4	44.4%	17.4%	\$392	31.9%	11.5%	3	33.3%	19.2%	\$257	18.0%	13.6%
	Middle	6	33.3%	\$665	25.0%	21.4%	3	33.3%	22.0%	\$395	32.2%	19.2%	3	33.3%	22.2%	\$270	18.9%	19.8%
	Upper	4	22.2%	\$1,221	46.0%	40.6%	1	11.1%	41.5%	\$320	26.1%	53.6%	3	33.3%	37.7%	\$901	63.1%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.6%	\$0	0.0%	12.5%	0	0.0%	13.5%	\$0	0.0%	12.6%
	Total	18	100.0%	\$2,655	100.0%	100.0%	9	100.0%	100.0%	\$1,227	100.0%	100.0%	9	100.0%	100.0%	\$1,428	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	6.9%	\$0	0.0%	4.0%	0	0.0%	7.2%	\$0	0.0%	3.5%
	Moderate	2	50.0%	\$177	12.2%	20.5%	0	0.0%	13.4%	\$0	0.0%	9.5%	2	50.0%	16.0%	\$177	12.2%	10.8%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	19.5%	\$0	0.0%	16.3%	0	0.0%	18.1%	\$0	0.0%	16.8%
	Upper	2	50.0%	\$1,273	87.8%	40.6%	0	0.0%	35.2%	\$0	0.0%	42.0%	2	50.0%	33.5%	\$1,273	87.8%	41.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.9%	\$0	0.0%	28.2%	0	0.0%	25.1%	\$0	0.0%	27.1%
	Total	4	100.0%	\$1,450	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	4	100.0%	100.0%	\$1,450	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	19.0%	\$0	0.0%	6.0%	0	0.0%	9.9%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	16.0%	\$0	0.0%	14.9%	0	0.0%	22.8%	\$0	0.0%	10.7%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	22.0%	\$0	0.0%	24.6%	0	0.0%	25.9%	\$0	0.0%	15.2%
	Upper	1	100.0%	\$8	100.0%	40.6%	1	100.0%	40.0%	\$8	100.0%	51.1%	0	0.0%	38.4%	\$0	0.0%	65.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	3.4%	0	0.0%	3.0%	\$0	0.0%	5.1%
	Total	1	100.0%	\$8	100.0%	100.0%	1	100.0%	100.0%	\$8	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	4.3%	\$120	2.9%	17.5%	1	10.0%	7.4%	\$120	9.7%	3.5%	0	0.0%	7.4%	\$0	0.0%	3.4%
	Moderate	9	39.1%	\$826	20.1%	20.5%	4	40.0%	16.1%	\$392	31.7%	10.7%	5	38.5%	18.5%	\$434	15.1%	11.8%
	Middle	6	26.1%	\$665	16.2%	21.4%	3	30.0%	21.2%	\$395	32.0%	18.0%	3	23.1%	21.2%	\$270	9.4%	17.4%
	Upper	7	30.4%	\$2,502	60.8%	40.6%	2	20.0%	39.5%	\$328	26.6%	48.8%	5	38.5%	36.5%	\$2,174	75.5%	44.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.8%	\$0	0.0%	19.1%	0	0.0%	16.4%	\$0	0.0%	22.7%
	Total	23	100.0%	\$4,113	100.0%	100.0%	10	100.0%	100.0%	\$1,235	100.0%	100.0%	13	100.0%	100.0%	\$2,878	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	40	78.4%	\$1,929	81.1%	95.6%	17	77.3%	57.2%	\$603	74.6%	38.9%	23	79.3%	53.7%	\$1,326	84.4%	39.1%
	Over \$1 Million	8	15.7%	\$410	17.2%	3.9%	3	13.6%					5	17.2%				
	Total Rev. available	48	94.1%	\$2,339	98.3%	99.5%	20	90.9%					28	96.5%				
	Rev. Not Known	3	5.9%	\$40	1.7%	0.5%	2	9.1%					1	3.4%				
	Total	51	100.0%	\$2,379	100.0%	100.0%	22	100.0%					29	100.0%				
Small Business Loan Size	\$100,000 or Less	48	94.1%	\$1,679	70.6%		22	100.0%	96.1%	\$808	100.0%	43.3%	26	89.7%	97.0%	\$871	55.4%	52.9%
	\$100,001 - \$250,000	2	3.9%	\$350	14.7%		0	0.0%	1.8%	\$0	0.0%	12.3%	2	6.9%	1.7%	\$350	22.3%	13.8%
	\$250,001 - \$1 Million	1	2.0%	\$350	14.7%		0	0.0%	2.2%	\$0	0.0%	44.4%	1	3.4%	1.3%	\$350	22.3%	33.2%
	Total	51	100.0%	\$2,379	100.0%		22	100.0%	100.0%	\$808	100.0%	100.0%	29	100.0%	100.0%	\$1,571	100.0%	100.0%
	Small Farm Revenue	Total Farms																
		\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	73.7%	\$0	0.0%	78.3%	0	0.0%	75.0%	\$0	0.0%
Over \$1 Million		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	\$100,001 - \$250,000	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%
	\$250,001 - \$500,000	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	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: FL Ocala

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	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%
	Moderate	4	10.0%	\$417	6.3%	13.0%	2	8.3%	8.7%	\$171	4.3%	7.0%	2	12.5%	9.5%	\$246	9.1%	7.5%
	Middle	27	67.5%	\$4,335	65.1%	73.1%	16	66.7%	76.6%	\$2,336	58.9%	72.0%	11	68.8%	76.5%	\$1,999	74.1%	73.2%
	Upper	9	22.5%	\$1,908	28.6%	13.9%	6	25.0%	14.7%	\$1,457	36.8%	21.0%	3	18.8%	14.0%	\$451	16.7%	19.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	40	100.0%	\$6,660	100.0%	100.0%	24	100.0%	100.0%	\$3,964	100.0%	100.0%	16	100.0%	100.0%	\$2,696	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	2	14.3%	\$233	13.5%	13.0%	1	14.3%	8.5%	\$104	10.3%	7.5%	1	14.3%	8.9%	\$129	17.8%	7.2%
	Middle	9	64.3%	\$1,216	70.2%	73.1%	5	71.4%	73.9%	\$759	75.3%	69.5%	4	57.1%	73.8%	\$457	63.2%	70.2%
	Upper	3	21.4%	\$282	16.3%	13.9%	1	14.3%	17.5%	\$145	14.4%	23.0%	2	28.6%	17.4%	\$137	18.9%	22.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$1,731	100.0%	100.0%	7	100.0%	100.0%	\$1,008	100.0%	100.0%	7	100.0%	100.0%	\$723	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	14.6%	\$0	0.0%	13.0%	0	0.0%	11.0%	\$0	0.0%	9.3%
	Middle	4	66.7%	\$65	56.5%	73.1%	2	50.0%	68.0%	\$40	44.4%	56.5%	2	100.0%	71.3%	\$25	100.0%	68.2%
	Upper	2	33.3%	\$50	43.5%	13.9%	2	50.0%	17.4%	\$50	55.6%	30.5%	0	0.0%	17.7%	\$0	0.0%	22.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$115	100.0%	100.0%	4	100.0%	100.0%	\$90	100.0%	100.0%	2	100.0%	100.0%	\$25	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	38.1%	\$0	0.0%	5.6%	0	0.0%	40.0%	\$0	0.0%	38.9%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	28.6%	\$0	0.0%	41.4%	0	0.0%	40.0%	\$0	0.0%	57.8%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	33.3%	\$0	0.0%	53.0%	0	0.0%	20.0%	\$0	0.0%	3.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	6	10.0%	\$650	7.6%	13.0%	3	8.6%	9.1%	\$275	5.4%	7.1%	3	12.0%	9.4%	\$375	10.9%	8.0%
	Middle	40	66.7%	\$5,616	66.0%	73.1%	23	65.7%	75.2%	\$3,135	61.9%	67.3%	17	68.0%	75.4%	\$2,481	72.0%	72.0%
	Upper	14	23.3%	\$2,240	26.3%	13.9%	9	25.7%	15.7%	\$1,652	32.6%	25.7%	5	20.0%	15.2%	\$588	17.1%	20.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	60	100.0%	\$8,506	100.0%	100.0%	35	100.0%	100.0%	\$5,062	100.0%	100.0%	25	100.0%	100.0%	\$3,444	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	22	16.4%	\$1,657	19.8%	17.7%	9	15.0%	18.2%	\$311	13.8%	19.3%	13	17.6%	17.8%	\$1,346	22.0%	21.4%
	Middle	67	50.0%	\$3,944	47.2%	56.3%	31	51.7%	52.3%	\$1,226	54.5%	38.1%	36	48.6%	52.3%	\$2,718	44.5%	38.6%
	Upper	45	33.6%	\$2,761	33.0%	26.1%	20	33.3%	28.0%	\$711	31.6%	41.8%	25	33.8%	28.6%	\$2,050	33.5%	39.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	0.8%	0	0.0%	1.3%	\$0	0.0%	0.8%
Total	134	100.0%	\$8,362	100.0%	100.0%	60	100.0%	100.0%	\$2,248	100.0%	100.0%	74	100.0%	100.0%	\$6,114	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	15.1%	0	0.0%	8.0%	\$0	0.0%	14.4%	0	0.0%	7.8%	\$0	0.0%	4.4%
	Middle	0	0.0%	\$0	0.0%	54.5%	0	0.0%	64.8%	\$0	0.0%	63.4%	0	0.0%	54.5%	\$0	0.0%	80.6%
	Upper	0	0.0%	\$0	0.0%	30.4%	0	0.0%	22.7%	\$0	0.0%	21.3%	0	0.0%	32.5%	\$0	0.0%	14.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.5%	\$0	0.0%	0.9%	0	0.0%	5.2%	\$0	0.0%	1.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: FL Ocala

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank		Families by Family Income	2015		2016												
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar									
		#	%	\$ (000s)	\$ %	%	#	%	Agg	Bank	\$ %	Agg	#	%	Agg	Bank	\$ %	Agg	
HOME PURCHASE	Low	1	2.5%	\$85	1.3%	18.1%	1	4.2%	4.1%	\$85	2.1%	2.1%	0	0.0%	3.4%	\$0	0.0%	1.7%	
	Moderate	9	22.5%	\$799	12.0%	19.8%	5	20.8%	16.3%	\$459	11.6%	10.7%	4	25.0%	15.6%	\$340	12.6%	10.4%	
	Middle	9	22.5%	\$879	13.2%	22.8%	5	20.8%	21.1%	\$536	13.5%	17.8%	4	25.0%	22.4%	\$343	12.7%	19.0%	
	Upper	21	52.5%	\$4,897	73.5%	39.3%	13	54.2%	39.8%	\$2,884	72.8%	50.3%	8	50.0%	40.8%	\$2,013	74.7%	51.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.6%	\$0	0.0%	19.1%	0	0.0%	17.9%	\$0	0.0%	17.2%	
	Total	40	100.0%	\$6,660	100.0%	100.0%	24	100.0%	100.0%	\$3,964	100.0%	100.0%	16	100.0%	100.0%	\$2,696	100.0%	100.0%	
REFINANCE	Low	2	14.3%	\$145	8.4%	18.1%	1	14.3%	5.3%	\$83	8.2%	2.9%	1	14.3%	4.6%	\$62	8.6%	2.3%	
	Moderate	4	28.6%	\$239	13.8%	19.8%	2	28.6%	12.8%	\$111	11.0%	8.2%	2	28.6%	12.0%	\$128	17.7%	7.4%	
	Middle	3	21.4%	\$324	18.7%	22.8%	2	28.6%	19.8%	\$249	24.7%	15.3%	1	14.3%	19.6%	\$75	10.4%	15.4%	
	Upper	5	35.7%	\$1,023	59.1%	39.3%	2	28.6%	38.1%	\$565	56.1%	46.0%	3	42.9%	38.8%	\$458	63.3%	47.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.1%	\$0	0.0%	27.5%	0	0.0%	25.0%	\$0	0.0%	27.8%	
	Total	14	100.0%	\$1,731	100.0%	100.0%	7	100.0%	100.0%	\$1,008	100.0%	100.0%	7	100.0%	100.0%	\$723	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	18.1%	0	0.0%	11.5%	\$0	0.0%	3.2%	0	0.0%	9.6%	\$0	0.0%	2.1%	
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	16.5%	\$0	0.0%	5.9%	0	0.0%	15.5%	\$0	0.0%	5.1%	
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	22.7%	\$0	0.0%	16.2%	0	0.0%	23.6%	\$0	0.0%	16.7%	
	Upper	6	100.0%	\$115	100.0%	39.3%	4	100.0%	45.1%	\$90	100.0%	64.8%	2	100.0%	48.7%	\$25	100.0%	69.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.3%	\$0	0.0%	9.9%	0	0.0%	2.6%	\$0	0.0%	6.3%	
	Total	6	100.0%	\$115	100.0%	100.0%	4	100.0%	100.0%	\$90	100.0%	100.0%	2	100.0%	100.0%	\$25	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	39.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	5.0%	\$230	2.7%	18.1%	2	5.7%	4.8%	\$168	3.3%	2.1%	1	4.0%	4.0%	\$62	1.8%	1.9%	
	Moderate	13	21.7%	\$1,038	12.2%	19.8%	7	20.0%	15.2%	\$570	11.3%	8.6%	6	24.0%	14.5%	\$468	13.6%	9.3%	
	Middle	12	20.0%	\$1,203	14.1%	22.8%	7	20.0%	20.8%	\$785	15.5%	14.9%	5	20.0%	21.6%	\$418	12.1%	17.6%	
	Upper	32	53.3%	\$6,035	70.9%	39.3%	19	54.3%	39.5%	\$3,539	69.9%	43.0%	13	52.0%	40.6%	\$2,496	72.5%	49.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.7%	\$0	0.0%	31.4%	0	0.0%	19.2%	\$0	0.0%	21.4%	
	Total	60	100.0%	\$8,506	100.0%	100.0%	35	100.0%	100.0%	\$5,062	100.0%	100.0%	25	100.0%	100.0%	\$3,444	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	70	52.2%	\$3,370	40.3%	94.0%	31	51.7%	54.6%	\$918	40.8%	45.4%	39	52.7%	49.9%	\$2,452	40.1%	41.8%	
	Over \$1 Million	49	36.6%	\$4,761	56.9%	5.3%	19	31.7%					30	40.5%					
	Total Rev. available	119	88.8%	\$8,131	97.2%	99.3%	50	83.4%					69	93.2%					
	Rev. Not Known	15	11.2%	\$231	2.8%	0.7%	10	16.7%					5	6.8%					
	Total	134	100.0%	\$8,362	100.0%	100.0%	60	100.0%	100.0%				74	100.0%					
Small Business Loan Size	\$100,000 or Less	128	95.5%	\$4,713	56.4%		59	98.3%	95.0%	\$2,083	92.7%	39.5%	69	93.2%	94.6%	\$2,630	43.0%	42.0%	
	\$100,001 - \$250,000	1	0.7%	\$165	2.0%		1	1.7%	2.4%	\$165	7.3%	13.5%	0	0.0%	3.1%	\$0	0.0%	18.0%	
	\$250,001 - \$1 Million	5	3.7%	\$3,484	41.7%		0	0.0%	2.6%	\$0	0.0%	47.0%	5	6.8%	2.3%	\$3,484	57.0%	40.0%	
	Total	134	100.0%	\$8,362	100.0%		60	100.0%	100.0%	\$2,248	100.0%	100.0%	74	100.0%	100.0%	\$6,114	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	96.8%	0	0.0%	43.2%	\$0	0.0%	53.5%	0	0.0%	39.0%	\$0	0.0%	58.9%	
Over \$1 Million	0	0.0%	\$0	0.0%	3.2%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	90.9%	\$0	0.0%	36.0%	0	0.0%	92.2%	\$0	0.0%	38.8%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.7%	\$0	0.0%	32.5%	0	0.0%	3.9%	\$0	0.0%	21.9%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	31.6%	0	0.0%	3.9%	\$0	0.0%	39.3%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: FL Pensacola

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	24	20.3%	\$3,174	12.1%	17.9%	13	17.3%	8.8%	\$1,687	9.3%	5.5%	11	25.6%	9.2%	\$1,487	18.5%	5.9%
	Middle	39	33.1%	\$8,120	31.0%	49.8%	25	33.3%	48.2%	\$5,594	30.8%	42.4%	14	32.6%	47.9%	\$2,526	31.4%	43.2%
	Upper	55	46.6%	\$14,906	56.9%	31.3%	37	49.3%	42.8%	\$10,866	59.9%	52.0%	18	41.9%	42.7%	\$4,040	50.2%	50.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	118	100.0%	\$26,200	100.0%	100.0%	75	100.0%	100.0%	\$18,147	100.0%	100.0%	43	100.0%	100.0%	\$8,053	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	8	22.9%	\$1,820	22.2%	17.9%	4	22.2%	9.3%	\$376	11.5%	6.5%	4	23.5%	9.1%	\$1,444	29.3%	6.2%
	Middle	14	40.0%	\$3,203	39.0%	49.8%	4	22.2%	48.4%	\$630	19.2%	43.3%	10	58.8%	48.4%	\$2,573	52.2%	43.1%
	Upper	13	37.1%	\$3,185	38.8%	31.3%	10	55.6%	42.1%	\$2,273	69.3%	50.1%	3	17.6%	42.3%	\$912	18.5%	50.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	35	100.0%	\$8,208	100.0%	100.0%	18	100.0%	100.0%	\$3,279	100.0%	100.0%	17	100.0%	100.0%	\$4,929	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.6%	\$0	0.0%	0.2%
	Moderate	3	37.5%	\$38	23.2%	17.9%	0	0.0%	15.7%	\$0	0.0%	9.4%	3	37.5%	15.0%	\$38	23.2%	11.3%
	Middle	2	25.0%	\$21	12.8%	49.8%	0	0.0%	50.8%	\$0	0.0%	47.8%	2	25.0%	46.3%	\$21	12.8%	44.2%
	Upper	3	37.5%	\$105	64.0%	31.3%	0	0.0%	33.2%	\$0	0.0%	42.6%	3	37.5%	38.1%	\$105	64.0%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$164	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	8	100.0%	100.0%	\$164	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	58.3%	\$0	0.0%	73.5%	0	0.0%	28.6%	\$0	0.0%	41.5%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	33.3%	\$0	0.0%	25.4%	0	0.0%	35.7%	\$0	0.0%	15.3%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	8.3%	\$0	0.0%	1.1%	0	0.0%	35.7%	\$0	0.0%	43.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	35	21.7%	\$5,032	14.6%	17.9%	17	18.3%	9.4%	\$2,063	9.6%	7.1%	18	26.5%	9.5%	\$2,969	22.6%	7.2%
	Middle	55	34.2%	\$11,344	32.8%	49.8%	29	31.2%	48.4%	\$6,224	29.0%	42.5%	26	38.2%	47.9%	\$5,120	38.9%	42.3%
	Upper	71	44.1%	\$18,196	52.6%	31.3%	47	50.5%	42.0%	\$13,139	61.3%	50.4%	24	35.3%	42.3%	\$5,057	38.5%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	161	100.0%	\$34,572	100.0%	100.0%	93	100.0%	100.0%	\$21,426	100.0%	100.0%	68	100.0%	100.0%	\$13,146	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	6	2.2%	\$480	2.8%	1.9%	3	2.2%	2.8%	\$315	4.7%	2.5%	3	2.1%	3.4%	\$165	1.6%	4.7%
	Moderate	103	37.1%	\$6,669	39.4%	23.4%	49	35.8%	24.2%	\$2,425	36.0%	31.0%	54	38.3%	24.6%	\$4,244	41.6%	30.1%
	Middle	82	29.5%	\$5,453	32.2%	44.4%	44	32.1%	40.6%	\$2,277	33.8%	39.2%	38	27.0%	40.3%	\$3,176	31.1%	38.2%
	Upper	87	31.3%	\$4,343	25.6%	30.4%	41	29.9%	31.2%	\$1,716	25.5%	26.8%	46	32.6%	30.7%	\$2,627	25.7%	26.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	0.5%	0	0.0%	1.1%	\$0	0.0%	0.6%
Total	278	100.0%	\$16,945	100.0%	100.0%	137	100.0%	100.0%	\$6,733	100.0%	100.0%	141	100.0%	100.0%	\$10,212	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.3%	0	0.0%	5.1%	\$0	0.0%	16.1%	0	0.0%	10.2%	\$0	0.0%	6.7%
	Middle	0	0.0%	\$0	0.0%	70.1%	0	0.0%	74.6%	\$0	0.0%	23.1%	0	0.0%	81.6%	\$0	0.0%	87.9%
	Upper	0	0.0%	\$0	0.0%	20.3%	0	0.0%	18.6%	\$0	0.0%	58.3%	0	0.0%	6.1%	\$0	0.0%	2.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.7%	\$0	0.0%	2.5%	0	0.0%	2.0%	\$0	0.0%	2.7%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: FL Pensacola

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		2015				Families by Family Income	2015					2016							
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
						#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	9	7.6%	\$886	3.4%	21.1%	5	6.7%	6.0%	\$451	2.5%	2.7%	4	9.3%	4.1%	\$435	5.4%	1.9%	
	Moderate	27	22.9%	\$3,423	13.1%	17.6%	14	18.7%	17.3%	\$1,756	9.7%	11.9%	13	30.2%	15.7%	\$1,667	20.7%	10.4%	
	Middle	16	13.6%	\$1,995	7.6%	20.8%	8	10.7%	22.7%	\$1,110	6.1%	20.5%	8	18.6%	23.7%	\$885	11.0%	21.5%	
	Upper	66	55.9%	\$19,896	75.9%	40.4%	48	64.0%	37.1%	\$14,830	81.7%	49.6%	18	41.9%	39.7%	\$5,066	62.9%	50.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.9%	\$0	0.0%	15.4%	0	0.0%	16.8%	\$0	0.0%	15.7%	
	Total	118	100.0%	\$26,200	100.0%	100.0%	75	100.0%	100.0%	\$18,147	100.0%	100.0%	43	100.0%	100.0%	\$8,053	100.0%	100.0%	
REFINANCE	Low	5	14.3%	\$437	5.3%	21.1%	2	11.1%	6.7%	\$211	6.4%	3.6%	3	17.6%	4.6%	\$226	4.6%	2.3%	
	Moderate	6	17.1%	\$722	8.8%	17.6%	4	22.2%	11.9%	\$412	12.6%	7.9%	2	11.8%	10.4%	\$310	6.3%	6.2%	
	Middle	6	17.1%	\$877	10.7%	20.8%	5	27.8%	16.9%	\$806	24.6%	14.0%	1	5.9%	14.9%	\$71	1.4%	11.1%	
	Upper	16	45.7%	\$4,511	55.0%	40.4%	7	38.9%	34.0%	\$1,850	56.4%	41.8%	9	52.9%	35.9%	\$2,661	54.0%	43.1%	
	Unknown	2	5.7%	\$1,661	20.2%	0.0%	0	0.0%	30.5%	\$0	0.0%	32.6%	2	11.8%	34.2%	\$1,661	33.7%	37.2%	
	Total	35	100.0%	\$8,208	100.0%	100.0%	18	100.0%	100.0%	\$3,279	100.0%	100.0%	17	100.0%	100.0%	\$4,929	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	11.8%	\$0	0.0%	6.5%	0	0.0%	7.4%	\$0	0.0%	2.9%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	18.3%	\$0	0.0%	10.0%	0	0.0%	14.3%	\$0	0.0%	6.8%	
	Middle	3	37.5%	\$38	23.2%	20.8%	0	0.0%	21.0%	\$0	0.0%	22.6%	3	37.5%	20.6%	\$38	23.2%	16.6%	
	Upper	5	62.5%	\$126	76.8%	40.4%	0	0.0%	43.6%	\$0	0.0%	54.5%	5	62.5%	49.8%	\$126	76.8%	58.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%	6.4%	0	0.0%	7.7%	\$0	0.0%	15.5%	
	Total	8	100.0%	\$164	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	8	100.0%	100.0%	\$164	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	14	8.7%	\$1,323	3.8%	21.1%	7	7.5%	6.6%	\$662	3.1%	3.0%	7	10.3%	4.4%	\$661	5.0%	2.0%	
	Moderate	33	20.5%	\$4,145	12.0%	17.6%	18	19.4%	15.7%	\$2,168	10.1%	10.5%	15	22.1%	14.0%	\$1,977	15.0%	8.8%	
	Middle	25	15.5%	\$2,910	8.4%	20.8%	13	14.0%	20.8%	\$1,916	8.9%	18.3%	12	17.6%	20.8%	\$994	7.6%	17.7%	
	Upper	87	54.0%	\$24,533	71.0%	40.4%	55	59.1%	36.5%	\$16,680	77.8%	46.5%	32	47.1%	39.1%	\$7,853	59.7%	46.9%	
	Unknown	2	1.2%	\$1,661	4.8%	0.0%	0	0.0%	20.4%	\$0	0.0%	21.8%	2	2.9%	21.6%	\$1,661	12.6%	24.6%	
	Total	161	100.0%	\$34,572	100.0%	100.0%	93	100.0%	100.0%	\$21,426	100.0%	100.0%	68	100.0%	100.0%	\$13,146	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	184	66.2%	\$8,436	49.8%	93.5%	98	71.5%	50.4%	\$4,655	69.1%	41.9%	86	61.0%	44.1%	\$3,781	37.0%	39.3%	
	Over \$1 Million	71	25.5%	\$8,114	47.9%	5.8%	30	21.9%					41	29.1%					
	Total Rev. available	255	91.7%	\$16,550	97.7%	99.3%	128	93.4%					127	90.1%					
	Rev. Not Known	23	8.3%	\$395	2.3%	0.7%	9	6.6%					14	9.9%					
	Total	278	100.0%	\$16,945	100.0%	100.0%	137	100.0%					141	100.0%					
Small Business Loan Size	\$100,000 or Less	254	91.4%	\$10,219	60.3%		130	94.9%	90.9%	\$5,301	78.7%	29.5%	124	87.9%	92.7%	\$4,918	48.2%	36.5%	
	\$100,001 - \$250,000	14	5.0%	\$2,400	14.2%		5	3.6%	4.4%	\$886	13.2%	17.6%	9	6.4%	4.2%	\$1,514	14.8%	20.4%	
	\$250,001 - \$1 Million	10	3.6%	\$4,326	25.5%		2	1.5%	4.7%	\$546	8.1%	52.9%	8	5.7%	3.2%	\$3,780	37.0%	43.1%	
	Total	278	100.0%	\$16,945	100.0%		137	100.0%	100.0%	\$6,733	100.0%	100.0%	141	100.0%	100.0%	\$10,212	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.0%	0	0.0%	22.0%	\$0	0.0%	35.2%	0	0.0%	26.5%	\$0	0.0%	50.9%	
Over \$1 Million	0	0.0%	\$0	0.0%	2.0%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	89.8%	\$0	0.0%	31.0%	0	0.0%	93.9%	\$0	0.0%	42.5%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.8%	\$0	0.0%	31.4%	0	0.0%	4.1%	\$0	0.0%	35.0%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.4%	\$0	0.0%	37.6%	0	0.0%	2.0%	\$0	0.0%	22.6%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: FL Tampa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	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%
	Moderate	4	26.7%	\$358	24.6%	32.6%	2	25.0%	24.5%	\$215	24.0%	19.4%	2	28.6%	24.7%	\$143	25.5%	20.4%
	Middle	11	73.3%	\$1,099	75.4%	63.9%	6	75.0%	73.0%	\$682	76.0%	76.0%	5	71.4%	72.6%	\$417	74.5%	75.3%
	Upper	0	0.0%	\$0	0.0%	3.5%	0	0.0%	2.5%	\$0	0.0%	4.6%	0	0.0%	2.7%	\$0	0.0%	4.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$1,457	100.0%	100.0%	8	100.0%	100.0%	\$897	100.0%	100.0%	7	100.0%	100.0%	\$560	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	6	66.7%	\$501	66.6%	32.6%	3	75.0%	29.0%	\$189	74.4%	24.3%	3	60.0%	23.3%	\$312	62.7%	19.1%
	Middle	3	33.3%	\$251	33.4%	63.9%	1	25.0%	68.0%	\$65	25.6%	71.2%	2	40.0%	73.2%	\$186	37.3%	75.3%
	Upper	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.0%	\$0	0.0%	4.5%	0	0.0%	3.5%	\$0	0.0%	5.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$752	100.0%	100.0%	4	100.0%	100.0%	\$254	100.0%	100.0%	5	100.0%	100.0%	\$498	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	2	66.7%	\$14	41.2%	32.6%	1	100.0%	36.7%	\$9	100.0%	28.3%	1	50.0%	34.5%	\$5	20.0%	23.8%
	Middle	1	33.3%	\$20	58.8%	63.9%	0	0.0%	59.5%	\$0	0.0%	68.1%	1	50.0%	58.5%	\$20	80.0%	60.1%
	Upper	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.9%	\$0	0.0%	3.6%	0	0.0%	7.0%	\$0	0.0%	16.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$34	100.0%	100.0%	1	100.0%	100.0%	\$9	100.0%	100.0%	2	100.0%	100.0%	\$25	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	85.7%	\$0	0.0%	98.4%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	14.3%	\$0	0.0%	1.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	12	44.4%	\$873	38.9%	32.6%	6	46.2%	26.6%	\$413	35.6%	23.7%	6	42.9%	24.8%	\$460	42.5%	21.7%
	Middle	15	55.6%	\$1,370	61.1%	63.9%	7	53.8%	70.6%	\$747	64.4%	71.9%	8	57.1%	72.0%	\$623	57.5%	73.5%
	Upper	0	0.0%	\$0	0.0%	3.5%	0	0.0%	2.8%	\$0	0.0%	4.4%	0	0.0%	3.1%	\$0	0.0%	4.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	27	100.0%	\$2,243	100.0%	100.0%	13	100.0%	100.0%	\$1,160	100.0%	100.0%	14	100.0%	100.0%	\$1,083	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	14	32.6%	\$525	36.3%	34.7%	7	29.2%	36.5%	\$180	22.2%	45.0%	7	36.8%	37.2%	\$345	54.3%	41.5%
	Middle	27	62.8%	\$902	62.3%	60.1%	16	66.7%	56.8%	\$622	76.6%	49.5%	11	57.9%	57.0%	\$280	44.1%	52.6%
	Upper	2	4.7%	\$20	1.4%	5.2%	1	4.2%	5.9%	\$10	1.2%	5.0%	1	5.3%	5.4%	\$10	1.6%	5.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.5%	0	0.0%	0.5%	\$0	0.0%	0.4%
Total	43	100.0%	\$1,447	100.0%	100.0%	24	100.0%	100.0%	\$812	100.0%	100.0%	19	100.0%	100.0%	\$635	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	3.0%
	Middle	0	0.0%	\$0	0.0%	56.1%	0	0.0%	83.3%	\$0	0.0%	88.6%	0	0.0%	72.7%	\$0	0.0%	85.7%
	Upper	0	0.0%	\$0	0.0%	26.1%	0	0.0%	16.7%	\$0	0.0%	11.4%	0	0.0%	18.2%	\$0	0.0%	11.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: FL Tampa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income	2015					2016							
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
HOME PURCHASE	Low	3	20.0%	\$234	16.1%	22.9%	1	12.5%	11.5%	\$74	8.2%	7.5%	2	28.6%	9.2%	\$160	28.6%	5.8%	
	Moderate	6	40.0%	\$626	43.0%	22.9%	3	37.5%	24.3%	\$358	39.9%	21.1%	3	42.9%	25.0%	\$268	47.9%	20.9%	
	Middle	3	20.0%	\$343	23.5%	21.6%	2	25.0%	22.2%	\$287	32.0%	22.7%	1	14.3%	24.7%	\$56	10.0%	25.3%	
	Upper	3	20.0%	\$254	17.4%	32.6%	2	25.0%	23.2%	\$178	19.8%	30.2%	1	14.3%	24.7%	\$76	13.6%	32.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	18.5%	0	0.0%	16.5%	\$0	0.0%	16.0%	
	Total	15	100.0%	\$1,457	100.0%	100.0%	8	100.0%	100.0%	\$897	100.0%	100.0%	7	100.0%	100.0%	\$560	100.0%	100.0%	
REFINANCE	Low	3	33.3%	\$226	30.1%	22.9%	2	50.0%	9.1%	\$135	53.1%	5.7%	1	20.0%	8.5%	\$91	18.3%	5.3%	
	Moderate	4	44.4%	\$305	40.6%	22.9%	2	50.0%	17.9%	\$119	46.9%	14.1%	2	40.0%	17.4%	\$186	37.3%	13.1%	
	Middle	1	11.1%	\$131	17.4%	21.6%	0	0.0%	21.1%	\$0	0.0%	20.6%	1	20.0%	19.6%	\$131	26.3%	18.1%	
	Upper	1	11.1%	\$90	12.0%	32.6%	0	0.0%	23.6%	\$0	0.0%	28.8%	1	20.0%	24.7%	\$90	18.1%	29.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	28.2%	\$0	0.0%	30.8%	0	0.0%	29.9%	\$0	0.0%	33.6%	
	Total	9	100.0%	\$752	100.0%	100.0%	4	100.0%	100.0%	\$254	100.0%	100.0%	5	100.0%	100.0%	\$498	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	11.9%	\$0	0.0%	4.0%	0	0.0%	12.3%	\$0	0.0%	3.3%	
	Moderate	3	100.0%	\$34	100.0%	22.9%	1	100.0%	28.9%	\$9	100.0%	19.9%	2	100.0%	24.4%	\$25	100.0%	16.8%	
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	23.2%	\$0	0.0%	22.1%	0	0.0%	24.4%	\$0	0.0%	23.4%	
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	30.5%	\$0	0.0%	43.9%	0	0.0%	33.5%	\$0	0.0%	43.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.5%	\$0	0.0%	10.2%	0	0.0%	5.4%	\$0	0.0%	13.0%	
	Total	3	100.0%	\$34	100.0%	100.0%	1	100.0%	100.0%	\$9	100.0%	100.0%	2	100.0%	100.0%	\$25	100.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	6	22.2%	\$460	20.5%	22.9%	3	23.1%	10.8%	\$209	18.0%	6.7%	3	21.4%	9.2%	\$251	23.2%	5.5%	
	Moderate	13	48.1%	\$965	43.0%	22.9%	6	46.2%	22.7%	\$486	41.9%	18.3%	7	50.0%	22.7%	\$479	44.2%	18.1%	
	Middle	4	14.8%	\$474	21.1%	21.6%	2	15.4%	21.9%	\$287	24.7%	21.3%	2	14.3%	23.1%	\$187	17.3%	22.6%	
	Upper	4	14.8%	\$344	15.3%	32.6%	2	15.4%	23.7%	\$178	15.3%	29.0%	2	14.3%	25.2%	\$166	15.3%	31.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.8%	\$0	0.0%	24.8%	0	0.0%	19.8%	\$0	0.0%	22.9%	
	Total	27	100.0%	\$2,243	100.0%	100.0%	13	100.0%	100.0%	\$1,160	100.0%	100.0%	14	100.0%	100.0%	\$1,083	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	35	81.4%	\$1,217	84.1%	95.6%	19	79.2%	56.6%	\$662	81.5%	39.7%	16	84.2%	55.5%	\$555	87.4%	39.2%	
	Over \$1 Million	5	11.6%	\$200	13.8%	3.9%	3	12.5%					2	10.5%					
	Total Rev. available	40	93.0%	\$1,417	97.9%	99.5%	22	91.7%					18	94.7%					
	Rev. Not Known	3	7.0%	\$30	2.1%	0.5%	2	8.3%					1	5.3%					
	Total	43	100.0%	\$1,447	100.0%	100.0%	24	100.0%	100.0%				19	100.0%					
Small Business Loan Size	\$100,000 or Less	41	95.3%	\$1,087	75.1%		23	95.8%	96.5%	\$612	75.4%	44.2%	18	94.7%	96.6%	\$475	74.8%	49.1%	
	\$100,001 - \$250,000	2	4.7%	\$360	24.9%		1	4.2%	1.6%	\$200	24.6%	12.8%	1	5.3%	1.9%	\$160	25.2%	15.6%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	43.1%	0	0.0%	1.5%	\$0	0.0%	35.3%	
	Total	43	100.0%	\$1,447	100.0%		24	100.0%	100.0%	\$812	100.0%	100.0%	19	100.0%	100.0%	\$635	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.5%	0	0.0%	50.0%	\$0	0.0%	43.2%	0	0.0%	45.5%	\$0	0.0%	53.4%	
Over \$1 Million	0	0.0%	\$0	0.0%	2.5%	0	0.0%					0	0.0%						
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%						
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%						
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	\$100,001 - \$250,000	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%	
	\$250,001 - \$500,000	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	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: NM Las Cruces

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count		Dollar					
		Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	3	7.7%	\$306	3.1%	4.6%	0	0.0%	2.4%	\$0	0.0%	1.7%	3	13.0%	2.6%	\$306	5.3%	1.7%
	Moderate	6	15.4%	\$1,671	16.9%	31.6%	1	6.3%	11.1%	\$585	14.3%	8.5%	5	21.7%	11.8%	\$1,086	18.7%	9.3%
	Middle	3	7.7%	\$406	4.1%	18.1%	1	6.3%	19.1%	\$82	2.0%	16.9%	2	8.7%	22.5%	\$324	5.6%	19.6%
	Upper	27	69.2%	\$7,504	75.9%	45.7%	14	87.5%	67.4%	\$3,411	83.6%	72.9%	13	56.5%	63.2%	\$4,093	70.5%	69.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	39	100.0%	\$9,887	100.0%	100.0%	16	100.0%	100.0%	\$4,078	100.0%	100.0%	23	100.0%	100.0%	\$5,809	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.6%	0	0.0%	3.5%	\$0	0.0%	2.4%	0	0.0%	2.7%	\$0	0.0%	1.8%
	Moderate	2	13.3%	\$114	5.0%	31.6%	1	16.7%	14.4%	\$30	4.0%	10.4%	1	11.1%	13.8%	\$84	5.4%	10.9%
	Middle	2	13.3%	\$173	7.5%	18.1%	0	0.0%	17.8%	\$0	0.0%	15.7%	2	22.2%	18.1%	\$173	11.2%	17.9%
	Upper	11	73.3%	\$2,014	87.5%	45.7%	5	83.3%	64.3%	\$729	96.0%	71.5%	6	66.7%	65.5%	\$1,285	83.3%	69.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$2,301	100.0%	100.0%	6	100.0%	100.0%	\$759	100.0%	100.0%	9	100.0%	100.0%	\$1,542	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.6%	0	0.0%	4.5%	\$0	0.0%	0.9%	0	0.0%	6.9%	\$0	0.0%	3.7%
	Moderate	1	25.0%	\$5	13.5%	31.6%	1	25.0%	20.1%	\$5	13.5%	16.7%	0	0.0%	26.5%	\$0	0.0%	16.3%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	15.9%	\$0	0.0%	6.6%	0	0.0%	15.3%	\$0	0.0%	12.1%
	Upper	3	75.0%	\$32	86.5%	45.7%	3	75.0%	59.4%	\$32	86.5%	75.8%	0	0.0%	51.3%	\$0	0.0%	67.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$37	100.0%	100.0%	4	100.0%	100.0%	\$37	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	30.8%	\$0	0.0%	40.7%	0	0.0%	30.0%	\$0	0.0%	9.6%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	15.4%	\$0	0.0%	5.8%	0	0.0%	10.0%	\$0	0.0%	22.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	7.7%	\$0	0.0%	1.7%	0	0.0%	10.0%	\$0	0.0%	11.3%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	46.2%	\$0	0.0%	51.7%	0	0.0%	50.0%	\$0	0.0%	57.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	5.2%	\$306	2.5%	4.6%	0	0.0%	3.1%	\$0	0.0%	3.9%	3	9.4%	2.8%	\$306	4.2%	2.0%
	Moderate	9	15.5%	\$1,790	14.6%	31.6%	3	11.5%	12.9%	\$620	12.7%	9.2%	6	18.8%	13.1%	\$1,170	15.9%	10.4%
	Middle	5	8.6%	\$579	4.7%	18.1%	1	3.8%	18.4%	\$82	1.7%	15.5%	4	12.5%	20.6%	\$497	6.8%	18.6%
	Upper	41	70.7%	\$9,550	78.1%	45.7%	22	84.6%	65.7%	\$4,172	85.6%	71.4%	19	59.4%	63.5%	\$5,378	73.2%	68.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	58	100.0%	\$12,225	100.0%	100.0%	26	100.0%	100.0%	\$4,874	100.0%	100.0%	32	100.0%	100.0%	\$7,351	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	4	6.3%	\$200	5.8%	9.6%	2	8.3%	7.0%	\$100	9.3%	6.9%	2	5.1%	6.6%	\$100	4.3%	6.8%
	Moderate	21	33.3%	\$630	18.4%	27.4%	8	33.3%	25.1%	\$310	28.7%	31.2%	13	33.3%	26.1%	\$320	13.7%	24.8%
	Middle	4	6.3%	\$935	27.3%	16.7%	1	4.2%	20.1%	\$50	4.6%	18.5%	3	7.7%	16.5%	\$885	37.8%	16.0%
	Upper	34	54.0%	\$1,654	48.4%	46.3%	13	54.2%	43.6%	\$620	57.4%	39.7%	21	53.8%	46.5%	\$1,034	44.2%	48.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.2%	\$0	0.0%	3.7%	0	0.0%	4.3%	\$0	0.0%	4.0%
Total	63	100.0%	\$3,419	100.0%	100.0%	24	100.0%	100.0%	\$1,080	100.0%	100.0%	39	100.0%	100.0%	\$2,339	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	1.6%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	43.1%	0	0.0%	49.2%	\$0	0.0%	65.0%	0	0.0%	50.0%	\$0	0.0%	57.1%
	Middle	0	0.0%	\$0	0.0%	12.1%	0	0.0%	9.8%	\$0	0.0%	6.7%	0	0.0%	4.3%	\$0	0.0%	3.4%
	Upper	2	100.0%	\$30	100.0%	42.0%	1	100.0%	32.8%	\$20	100.0%	23.2%	1	100.0%	32.6%	\$10	100.0%	32.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.6%	\$0	0.0%	4.8%	0	0.0%	13.0%	\$0	0.0%	7.3%
Total	2	100.0%	\$30	100.0%	100.0%	1	100.0%	100.0%	\$20	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: NM Las Cruces

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016				Bank & Aggregate Lending Comparison												
		Bank		Families by Family Income	2015		2016											
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar								
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	2.6%	\$91	0.9%	25.1%	0	0.0%	2.0%	\$0	0.0%	0.9%	1	4.3%	2.3%	\$91	1.6%	1.0%
	Moderate	11	28.2%	\$1,108	11.2%	16.6%	3	18.8%	10.4%	\$277	6.8%	6.5%	8	34.8%	10.8%	\$831	14.3%	6.3%
	Middle	3	7.7%	\$528	5.3%	16.3%	1	6.3%	21.7%	\$168	4.1%	17.7%	2	8.7%	22.8%	\$360	6.2%	18.5%
	Upper	24	61.5%	\$8,160	82.5%	42.1%	12	75.0%	51.4%	\$3,633	89.1%	60.2%	12	52.2%	49.6%	\$4,527	77.9%	58.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.5%	\$0	0.0%	14.7%	0	0.0%	14.5%	\$0	0.0%	15.3%
	Total	39	100.0%	\$9,887	100.0%	100.0%	16	100.0%	100.0%	\$4,078	100.0%	100.0%	23	100.0%	100.0%	\$5,809	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	25.1%	0	0.0%	1.6%	\$0	0.0%	0.6%	0	0.0%	2.5%	\$0	0.0%	1.1%
	Moderate	3	20.0%	\$332	14.4%	16.6%	1	16.7%	7.7%	\$30	4.0%	4.4%	2	22.2%	5.2%	\$302	19.6%	3.0%
	Middle	2	13.3%	\$392	17.0%	16.3%	1	16.7%	13.8%	\$267	35.2%	10.7%	1	11.1%	12.7%	\$125	8.1%	9.2%
	Upper	10	66.7%	\$1,577	68.5%	42.1%	4	66.7%	45.9%	\$462	60.9%	50.3%	6	66.7%	45.5%	\$1,115	72.3%	48.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	31.0%	\$0	0.0%	33.9%	0	0.0%	34.0%	\$0	0.0%	38.4%
	Total	15	100.0%	\$2,301	100.0%	100.0%	6	100.0%	100.0%	\$759	100.0%	100.0%	9	100.0%	100.0%	\$1,542	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	25.1%	0	0.0%	7.1%	\$0	0.0%	1.8%	0	0.0%	6.3%	\$0	0.0%	1.3%
	Moderate	1	25.0%	\$5	13.5%	16.6%	1	25.0%	7.8%	\$5	13.5%	3.6%	0	0.0%	6.3%	\$0	0.0%	6.6%
	Middle	1	25.0%	\$5	13.5%	16.3%	1	25.0%	15.3%	\$5	13.5%	16.2%	0	0.0%	17.5%	\$0	0.0%	14.1%
	Upper	2	50.0%	\$27	73.0%	42.1%	2	50.0%	60.4%	\$27	73.0%	70.3%	0	0.0%	54.5%	\$0	0.0%	69.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.4%	\$0	0.0%	8.2%	0	0.0%	15.3%	\$0	0.0%	8.6%
	Total	4	100.0%	\$37	100.0%	100.0%	4	100.0%	100.0%	\$37	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	25.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	1.7%	\$91	0.7%	25.1%	0	0.0%	2.2%	\$0	0.0%	0.8%	1	3.1%	2.5%	\$91	1.2%	1.0%
	Moderate	15	25.9%	\$1,445	11.8%	16.6%	5	19.2%	9.2%	\$312	6.4%	5.3%	10	31.3%	8.6%	\$1,133	15.4%	4.9%
	Middle	6	10.3%	\$925	7.6%	16.3%	3	11.5%	18.4%	\$440	9.0%	14.3%	3	9.4%	18.9%	\$485	6.6%	14.3%
	Upper	36	62.1%	\$9,764	79.9%	42.1%	18	69.2%	49.9%	\$4,122	84.6%	53.9%	18	56.3%	48.2%	\$5,642	76.8%	53.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.4%	\$0	0.0%	25.7%	0	0.0%	21.8%	\$0	0.0%	26.7%
	Total	58	100.0%	\$12,225	100.0%	100.0%	26	100.0%	100.0%	\$4,874	100.0%	100.0%	32	100.0%	100.0%	\$7,351	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	48	76.2%	\$2,628	76.9%	90.5%	16	66.7%	50.3%	\$625	57.9%	36.5%	32	82.1%	45.3%	\$2,003	85.6%	37.6%
	Over \$1 Million	11	17.5%	\$750	21.9%	8.6%	6	25.0%					5	12.8%				
	Total Rev. available	59	93.7%	\$3,378	98.8%	99.1%	22	91.7%					37	94.9%				
	Rev. Not Known	4	6.3%	\$41	1.2%	0.8%	2	8.3%					2	5.1%				
Total	63	100.0%	\$3,419	100.0%	100.0%	24	100.0%	100.0%				39	100.0%					
Small Business Loan Size	\$100,000 or Less	61	96.8%	\$2,463	72.0%		24	100.0%	95.6%	\$1,080	100.0%	47.5%	37	94.9%	95.1%	\$1,383	59.1%	43.2%
	\$100,001 - \$250,000	1	1.6%	\$156	4.6%		0	0.0%	2.3%	\$0	0.0%	14.1%	1	2.6%	2.3%	\$156	6.7%	11.7%
	\$250,001 - \$1 Million	1	1.6%	\$800	23.4%		0	0.0%	2.1%	\$0	0.0%	38.4%	1	2.6%	2.6%	\$800	34.2%	45.1%
	Total	63	100.0%	\$3,419	100.0%		24	100.0%	100.0%	\$1,080	100.0%	100.0%	39	100.0%	100.0%	\$2,339	100.0%	100.0%
	Total	63	100.0%	\$3,419	100.0%		24	100.0%	100.0%	\$1,080	100.0%	100.0%	39	100.0%	100.0%	\$2,339	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	2	100.0%	\$30	100.0%	88.3%	1	100.0%	52.5%	\$20	100.0%	69.0%	1	100.0%	52.2%	\$10	100.0%	62.2%
	Over \$1 Million	0	0.0%	\$0	0.0%	11.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	2	100.0%	\$30	100.0%	100.0%	1	100.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	2	100.0%	\$30	100.0%		1	100.0%	91.8%	\$20	100.0%	50.8%	1	100.0%	91.3%	\$10	100.0%	40.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.9%	\$0	0.0%	13.0%	0	0.0%	2.2%	\$0	0.0%	7.6%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.3%	\$0	0.0%	36.2%	0	0.0%	6.5%	\$0	0.0%	51.4%
	Total	2	100.0%	\$30	100.0%		1	100.0%	100.0%	\$20	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%
	Total	2	100.0%	\$30	100.0%		1	100.0%	100.0%	\$20	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: NM Southern NM

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.4%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.4%
	Moderate	6	40.0%	\$652	38.5%	17.0%	0	0.0%	6.8%	\$0	0.0%	3.5%	6	54.5%	6.1%	\$652	53.0%	3.7%
	Middle	5	33.3%	\$549	32.4%	56.3%	3	75.0%	50.6%	\$380	82.3%	47.0%	2	18.2%	50.8%	\$169	13.7%	47.2%
	Upper	4	26.7%	\$491	29.0%	25.4%	1	25.0%	41.8%	\$82	17.7%	49.0%	3	27.3%	42.5%	\$409	33.3%	48.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$1,692	100.0%	100.0%	4	100.0%	100.0%	\$462	100.0%	100.0%	11	100.0%	100.0%	\$1,230	100.0%	100.0%
REFINANCE	Low	1	6.7%	\$55	3.5%	1.4%	1	12.5%	0.5%	\$55	7.3%	0.2%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	2	13.3%	\$84	5.3%	17.0%	0	0.0%	6.1%	\$0	0.0%	4.7%	2	28.6%	5.9%	\$84	10.1%	4.5%
	Middle	7	46.7%	\$865	54.7%	56.3%	4	50.0%	53.7%	\$456	60.6%	53.5%	3	42.9%	52.6%	\$409	49.4%	50.9%
	Upper	5	33.3%	\$576	36.5%	25.4%	3	37.5%	39.7%	\$241	32.0%	41.7%	2	28.6%	40.6%	\$335	40.5%	44.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.3%
	Total	15	100.0%	\$1,580	100.0%	100.0%	8	100.0%	100.0%	\$752	100.0%	100.0%	7	100.0%	100.0%	\$828	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.4%	0	0.0%	1.1%	\$0	0.0%	0.4%	0	0.0%	3.8%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	7.5%	\$0	0.0%	3.9%	0	0.0%	11.3%	\$0	0.0%	14.7%
	Middle	3	100.0%	\$48	100.0%	56.3%	3	100.0%	47.3%	\$48	100.0%	47.4%	0	0.0%	48.8%	\$0	0.0%	42.3%
	Upper	0	0.0%	\$0	0.0%	25.4%	0	0.0%	44.1%	\$0	0.0%	48.3%	0	0.0%	36.3%	\$0	0.0%	41.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$48	100.0%	100.0%	3	100.0%	100.0%	\$48	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	3.0%	\$55	1.7%	1.4%	1	6.7%	0.6%	\$55	4.4%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.4%
	Moderate	8	24.2%	\$736	22.2%	17.0%	0	0.0%	6.6%	\$0	0.0%	3.9%	8	44.4%	6.2%	\$736	35.8%	4.2%
	Middle	15	45.5%	\$1,462	44.0%	56.3%	10	66.7%	51.5%	\$884	70.0%	49.3%	5	27.8%	51.4%	\$578	28.1%	48.5%
	Upper	9	27.3%	\$1,067	32.1%	25.4%	4	26.7%	41.2%	\$323	25.6%	46.3%	5	27.8%	41.6%	\$744	36.2%	46.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	33	100.0%	\$3,320	100.0%	100.0%	15	100.0%	100.0%	\$1,262	100.0%	100.0%	18	100.0%	100.0%	\$2,058	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	6	10.0%	\$1,325	40.7%	7.1%	1	4.8%	4.3%	\$100	12.7%	3.4%	5	12.8%	4.8%	\$1,225	49.7%	9.1%
	Moderate	2	3.3%	\$108	3.3%	13.0%	1	4.8%	10.2%	\$8	1.0%	3.6%	1	2.6%	9.9%	\$100	4.1%	6.4%
	Middle	29	48.3%	\$1,100	33.8%	50.3%	12	57.1%	48.2%	\$425	53.9%	43.3%	17	43.6%	45.5%	\$675	27.4%	39.2%
	Upper	23	38.3%	\$721	22.2%	29.6%	7	33.3%	30.2%	\$255	32.4%	41.8%	16	41.0%	28.8%	\$466	18.9%	35.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	7.0%	\$0	0.0%	8.0%	0	0.0%	11.0%	\$0	0.0%	9.8%
Total	60	100.0%	\$3,254	100.0%	100.0%	21	100.0%	100.0%	\$788	100.0%	100.0%	39	100.0%	100.0%	\$2,466	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.3%	0	0.0%	7.7%	\$0	0.0%	6.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	78.0%	0	0.0%	65.4%	\$0	0.0%	56.7%	0	0.0%	54.2%	\$0	0.0%	48.5%
	Upper	0	0.0%	\$0	0.0%	12.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	8.3%	\$0	0.0%	9.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	26.9%	\$0	0.0%	36.5%	0	0.0%	37.5%	\$0	0.0%	42.4%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size
Assessment Area: NM Southern NM

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2015					2016						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ (000s)	\$ %	\$ %	#	%	Agg %	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	6.7%	\$53	3.1%	19.7%	0	0.0%	3.0%	\$0	0.0%	1.5%	1	9.1%	4.7%	\$53	4.3%	2.0%
	Moderate	4	26.7%	\$339	20.0%	17.4%	1	25.0%	10.1%	\$92	19.9%	6.0%	3	27.3%	11.2%	\$247	20.1%	6.2%
	Middle	4	26.7%	\$407	24.1%	22.5%	1	25.0%	18.0%	\$168	36.4%	15.0%	3	27.3%	16.3%	\$239	19.4%	12.6%
	Upper	6	40.0%	\$893	52.8%	40.5%	2	50.0%	54.9%	\$202	43.7%	63.5%	4	36.4%	47.5%	\$691	56.2%	56.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.0%	\$0	0.0%	14.0%	0	0.0%	20.3%	\$0	0.0%	22.6%
	Total	15	100.0%	\$1,692	100.0%	100.0%	4	100.0%	100.0%	\$462	100.0%	100.0%	11	100.0%	100.0%	\$1,230	100.0%	100.0%
REFINANCE	Low	5	33.3%	\$302	19.1%	19.7%	3	37.5%	3.0%	\$218	29.0%	1.3%	2	28.6%	3.9%	\$84	10.1%	1.8%
	Moderate	1	6.7%	\$126	8.0%	17.4%	0	0.0%	7.5%	\$0	0.0%	4.5%	1	14.3%	6.8%	\$126	15.2%	4.9%
	Middle	1	6.7%	\$98	6.2%	22.5%	1	12.5%	15.9%	\$98	13.0%	12.7%	0	0.0%	12.5%	\$0	0.0%	9.2%
	Upper	8	53.3%	\$1,054	66.7%	40.5%	4	50.0%	40.5%	\$436	58.0%	46.9%	4	57.1%	38.9%	\$618	74.6%	45.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	33.2%	\$0	0.0%	34.6%	0	0.0%	37.9%	\$0	0.0%	38.8%
	Total	15	100.0%	\$1,580	100.0%	100.0%	8	100.0%	100.0%	\$752	100.0%	100.0%	7	100.0%	100.0%	\$828	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.7%	0	0.0%	3.2%	\$0	0.0%	1.3%	0	0.0%	11.3%	\$0	0.0%	4.6%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	8.6%	\$0	0.0%	6.0%	0	0.0%	13.8%	\$0	0.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	22.5%	0	0.0%	17.2%	\$0	0.0%	8.0%	0	0.0%	15.0%	\$0	0.0%	12.3%
	Upper	3	100.0%	\$48	100.0%	40.5%	3	100.0%	64.5%	\$48	100.0%	72.4%	0	0.0%	47.5%	\$0	0.0%	64.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.5%	\$0	0.0%	12.2%	0	0.0%	12.5%	\$0	0.0%	9.6%
	Total	3	100.0%	\$48	100.0%	100.0%	3	100.0%	100.0%	\$48	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	6	18.2%	\$355	10.7%	19.7%	3	20.0%	3.0%	\$218	17.3%	1.4%	3	16.7%	4.7%	\$137	6.7%	2.0%
	Moderate	5	15.2%	\$465	14.0%	17.4%	1	6.7%	9.1%	\$92	7.3%	5.5%	4	22.2%	9.6%	\$373	18.1%	5.7%
	Middle	5	15.2%	\$505	15.2%	22.5%	2	13.3%	17.3%	\$266	21.1%	14.0%	3	16.7%	14.8%	\$239	11.6%	11.3%
	Upper	17	51.5%	\$1,995	60.1%	40.5%	9	60.0%	50.3%	\$686	54.4%	57.6%	8	44.4%	44.3%	\$1,309	63.6%	52.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.3%	\$0	0.0%	21.5%	0	0.0%	26.5%	\$0	0.0%	28.6%
	Total	33	100.0%	\$3,320	100.0%	100.0%	15	100.0%	100.0%	\$1,262	100.0%	100.0%	18	100.0%	100.0%	\$2,058	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	40	66.7%	\$1,360	41.8%	91.4%	17	81.0%	50.4%	\$548	69.5%	46.5%	23	59.0%	46.7%	\$812	32.9%	46.6%
	Over \$1 Million	15	25.0%	\$1,842	56.6%	6.6%	4	19.0%					11	28.2%				
	Total Rev. available	55	91.7%	\$3,202	98.4%	98.0%	21	100.0%					34	87.2%				
	Rev. Not Known	5	8.3%	\$52	1.6%	2.0%	0	0.0%					5	12.8%				
	Total	60	100.0%	\$3,254	100.0%	100.0%	21	100.0%					39	100.0%				
Small Business Loan Size	\$100,000 or Less	56	93.3%	\$2,000	61.5%		21	100.0%	96.2%	\$788	100.0%	55.4%	35	89.7%	97.0%	\$1,212	49.1%	59.8%
	\$100,001 - \$250,000	3	5.0%	\$502	15.4%		0	0.0%	2.7%	\$0	0.0%	21.1%	3	7.7%	1.9%	\$502	20.4%	14.5%
	\$250,001 - \$1 Million	1	1.7%	\$752	23.1%		0	0.0%	1.1%	\$0	0.0%	23.6%	1	2.6%	1.1%	\$752	30.5%	25.7%
	Total	60	100.0%	\$3,254	100.0%		21	100.0%	100.0%	\$788	100.0%	100.0%	39	100.0%	100.0%	\$2,466	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	96.2%	0	0.0%	65.4%	\$0	0.0%	75.9%	0	0.0%	83.3%	\$0	0.0%	92.5%
Over \$1 Million	0	0.0%	\$0	0.0%	3.8%	0	0.0%					0	0.0%					
Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	95.8%	\$0	0.0%	82.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.2%	\$0	0.0%	17.3%
	\$250,001 - \$500,000	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	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Origination & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Abilene

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		#	%	\$ (000s)	%		%	#	%	\$ (000s)		%	%		#	%	\$ (000s)	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	0.7%	\$0	0.0%	0.3%	0	0.0%	1.1%	\$0	0.0%	0.6%
	Moderate	5	38.5%	\$397	17.0%	20.4%	4	40.0%	13.8%	\$362	18.3%	9.8%	1	33.3%	12.5%	\$35	9.8%	8.5%
	Middle	1	7.7%	\$71	3.0%	45.5%	0	0.0%	33.4%	\$0	0.0%	24.5%	1	33.3%	35.5%	\$71	19.9%	26.8%
	Upper	7	53.8%	\$1,862	79.9%	32.2%	6	60.0%	52.2%	\$1,611	81.7%	65.5%	1	33.3%	50.8%	\$251	70.3%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Total	13	100.0%	\$2,330	100.0%	100.0%	10	100.0%	100.0%	\$1,973	100.0%	100.0%	3	100.0%	100.0%	\$357	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	0.4%	\$0	0.0%	0.4%	0	0.0%	0.9%	\$0	0.0%	0.4%
	Moderate	1	20.0%	\$100	11.8%	20.4%	1	20.0%	10.4%	\$100	11.8%	6.8%	0	0.0%	9.2%	\$0	0.0%	5.4%
	Middle	0	0.0%	\$0	0.0%	45.5%	0	0.0%	36.1%	\$0	0.0%	26.0%	0	0.0%	33.3%	\$0	0.0%	25.4%
	Upper	4	80.0%	\$746	88.2%	32.2%	4	80.0%	53.1%	\$746	88.2%	66.9%	0	0.0%	56.5%	\$0	0.0%	68.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Total	5	100.0%	\$846	100.0%	100.0%	5	100.0%	100.0%	\$846	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.5%	\$0	0.0%	0.9%	0	0.0%	1.2%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	20.4%	0	0.0%	14.6%	\$0	0.0%	7.4%	0	0.0%	17.5%	\$0	0.0%	13.8%
	Middle	2	100.0%	\$12	100.0%	45.5%	0	0.0%	44.5%	\$0	0.0%	37.5%	2	100.0%	43.1%	\$12	100.0%	33.2%
	Upper	0	0.0%	\$0	0.0%	32.2%	0	0.0%	39.4%	\$0	0.0%	54.2%	0	0.0%	38.2%	\$0	0.0%	52.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$12	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$12	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	37.5%	\$0	0.0%	29.0%	0	0.0%	61.5%	\$0	0.0%	88.4%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	37.5%	\$0	0.0%	4.8%	0	0.0%	38.5%	\$0	0.0%	11.6%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	25.0%	\$0	0.0%	66.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	0.7%	\$0	0.0%	0.3%	0	0.0%	1.1%	\$0	0.0%	0.5%
	Moderate	6	30.0%	\$497	15.6%	20.4%	5	33.3%	13.1%	\$462	16.4%	9.9%	1	20.0%	12.1%	\$35	9.5%	11.3%
	Middle	3	15.0%	\$83	2.6%	45.5%	0	0.0%	35.0%	\$0	0.0%	24.3%	3	60.0%	35.5%	\$83	22.5%	25.9%
	Upper	11	55.0%	\$2,608	81.8%	32.2%	10	66.7%	51.2%	\$2,357	83.6%	65.5%	1	20.0%	51.3%	\$251	68.0%	62.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Total	20	100.0%	\$3,188	100.0%	100.0%	15	100.0%	100.0%	\$2,819	100.0%	100.0%	5	100.0%	100.0%	\$369	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	2	2.4%	\$23	0.7%	1.9%	2	4.4%	1.6%	\$23	1.6%	2.5%	0	0.0%	1.6%	\$0	0.0%	2.5%
	Moderate	27	31.8%	\$806	26.1%	23.4%	16	35.6%	23.6%	\$526	37.6%	23.6%	11	27.5%	23.6%	\$280	16.6%	21.1%
	Middle	34	40.0%	\$1,042	33.7%	45.2%	17	37.8%	41.8%	\$528	37.7%	39.2%	17	42.5%	43.0%	\$514	30.4%	44.3%
	Upper	22	25.9%	\$1,219	39.4%	29.2%	10	22.2%	30.9%	\$322	23.0%	34.0%	12	30.0%	29.9%	\$897	53.0%	31.4%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	0.6%	0	0.0%	1.6%	\$0	0.0%	0.6%
Total	85	100.0%	\$3,090	100.0%	100.0%	45	100.0%	100.0%	\$1,399	100.0%	100.0%	40	100.0%	100.0%	\$1,691	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.0%	0	0.0%	3.2%	\$0	0.0%	0.7%	0	0.0%	6.9%	\$0	0.0%	4.5%
	Middle	1	100.0%	\$25	100.0%	49.1%	0	0.0%	61.9%	\$0	0.0%	53.0%	1	100.0%	63.6%	\$25	100.0%	57.6%
	Upper	0	0.0%	\$0	0.0%	36.3%	0	0.0%	33.9%	\$0	0.0%	46.1%	0	0.0%	28.3%	\$0	0.0%	37.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.1%	0	0.0%	0.6%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.3%
Total	1	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Abilene

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	3.1%	\$0	0.0%	1.3%	0	0.0%	2.5%	\$0	0.0%	1.1%
	Moderate	2	15.4%	\$106	4.5%	17.2%	0	0.0%	13.7%	\$0	0.0%	9.4%	2	66.7%	13.0%	\$106	29.7%	8.8%
	Middle	2	15.4%	\$231	9.9%	21.2%	2	20.0%	19.5%	\$231	11.7%	17.7%	0	0.0%	20.5%	\$0	0.0%	18.5%
	Upper	9	69.2%	\$1,993	85.5%	40.3%	8	80.0%	37.5%	\$1,742	88.3%	45.8%	1	33.3%	38.7%	\$251	70.3%	46.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	26.3%	\$0	0.0%	25.8%	0	0.0%	25.3%	\$0	0.0%	24.8%
	Total	13	100.0%	\$2,330	100.0%	100.0%	10	100.0%	100.0%	\$1,973	100.0%	100.0%	3	100.0%	100.0%	\$357	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	3.9%	\$0	0.0%	1.6%	0	0.0%	3.2%	\$0	0.0%	1.3%
	Moderate	1	20.0%	\$90	10.6%	17.2%	1	20.0%	9.2%	\$90	10.6%	4.9%	0	0.0%	7.3%	\$0	0.0%	3.9%
	Middle	1	20.0%	\$100	11.8%	21.2%	1	20.0%	13.3%	\$100	11.8%	8.6%	0	0.0%	13.7%	\$0	0.0%	9.6%
	Upper	3	60.0%	\$656	77.5%	40.3%	3	60.0%	40.6%	\$656	77.5%	47.4%	0	0.0%	39.0%	\$0	0.0%	44.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	32.9%	\$0	0.0%	37.5%	0	0.0%	36.8%	\$0	0.0%	40.6%
	Total	5	100.0%	\$846	100.0%	100.0%	5	100.0%	100.0%	\$846	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	6.3%	\$0	0.0%	2.1%	0	0.0%	4.7%	\$0	0.0%	2.6%
	Moderate	1	50.0%	\$2	16.7%	17.2%	0	0.0%	15.1%	\$0	0.0%	8.3%	1	50.0%	16.3%	\$2	16.7%	10.8%
	Middle	1	50.0%	\$10	83.3%	21.2%	0	0.0%	22.9%	\$0	0.0%	15.6%	1	50.0%	25.4%	\$10	83.3%	18.9%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	52.3%	\$0	0.0%	70.4%	0	0.0%	48.1%	\$0	0.0%	60.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	3.6%	0	0.0%	5.5%	\$0	0.0%	7.2%
	Total	2	100.0%	\$12	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$12	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	3.6%	\$0	0.0%	1.4%	0	0.0%	2.8%	\$0	0.0%	1.2%
	Moderate	4	20.0%	\$198	6.2%	17.2%	1	6.7%	12.7%	\$90	3.2%	7.9%	3	60.0%	11.7%	\$108	29.3%	7.1%
	Middle	4	20.0%	\$341	10.7%	21.2%	3	20.0%	18.2%	\$331	11.7%	14.6%	1	20.0%	18.9%	\$10	2.7%	15.2%
	Upper	12	60.0%	\$2,649	83.1%	40.3%	11	73.3%	39.5%	\$2,398	85.1%	44.7%	1	20.0%	39.4%	\$251	68.0%	44.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	26.0%	\$0	0.0%	31.4%	0	0.0%	27.2%	\$0	0.0%	32.0%
	Total	20	100.0%	\$3,188	100.0%	100.0%	15	100.0%	100.0%	\$2,819	100.0%	100.0%	5	100.0%	100.0%	\$369	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	55	64.7%	\$1,770	57.3%	90.3%	30	66.7%	37.7%	\$963	68.8%	32.6%	25	62.5%	33.3%	\$807	47.7%	36.0%
	Over \$1 Million	14	16.5%	\$1,205	39.0%	8.6%	5	11.1%					9	22.5%				
	Total Rev. available	69	81.2%	\$2,975	96.3%	98.9%	35	77.8%					34	85.0%				
	Rev. Not Known	16	18.8%	\$115	3.7%	1.2%	10	22.2%					6	15.0%				
	Total	85	100.0%	\$3,090	100.0%	100.0%	45	100.0%					40	100.0%				
Small Business Loan Size	\$100,000 or Less	84	98.8%	\$2,641	85.5%		45	100.0%	92.5%	\$1,399	100.0%	36.1%	39	97.5%	93.0%	\$1,242	73.4%	37.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.6%	\$0	0.0%	14.6%	0	0.0%	4.1%	\$0	0.0%	19.8%
	\$250,001 - \$1 Million	1	1.2%	\$449	14.5%		0	0.0%	3.9%	\$0	0.0%	49.4%	1	2.5%	2.8%	\$449	26.6%	43.1%
	Total	85	100.0%	\$3,090	100.0%		45	100.0%	100.0%	\$1,399	100.0%	100.0%	40	100.0%	100.0%	\$1,691	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	1	100.0%	\$25	100.0%	97.6%	0	0.0%	36.0%	\$0	0.0%	31.7%	1	100.0%	56.1%	\$25	100.0%	64.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.4%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$25	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$25	100.0%		0	0.0%	85.2%	\$0	0.0%	39.6%	1	100.0%	87.9%	\$25	100.0%	46.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.1%	\$0	0.0%	26.5%	0	0.0%	8.7%	\$0	0.0%	29.2%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	33.9%	0	0.0%	3.5%	\$0	0.0%	23.9%
	Total	1	100.0%	\$25	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Beaumont

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	3	2.7%	\$494	2.9%	2.4%	1	1.6%	0.3%	\$68	0.7%	0.1%	2	4.2%	0.7%	\$426	5.9%	0.4%
	Moderate	23	20.7%	\$2,462	14.6%	18.9%	11	17.5%	6.8%	\$1,096	11.4%	4.3%	12	25.0%	6.6%	\$1,366	19.0%	4.4%
	Middle	41	36.9%	\$4,522	26.9%	45.3%	23	36.5%	45.7%	\$2,530	26.3%	36.3%	18	37.5%	45.9%	\$1,992	27.7%	39.3%
	Upper	42	37.8%	\$8,976	53.4%	33.4%	27	42.9%	46.8%	\$5,790	60.2%	58.7%	15	31.3%	46.3%	\$3,186	44.3%	55.2%
	Unknown	2	1.8%	\$360	2.1%	0.0%	1	1.6%	0.5%	\$134	1.4%	0.6%	1	2.1%	0.5%	\$226	3.1%	0.7%
	Total	111	100.0%	\$16,814	100.0%	100.0%	63	100.0%	100.0%	\$9,618	100.0%	100.0%	48	100.0%	100.0%	\$7,196	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	0.6%	\$0	0.0%	0.4%	0	0.0%	0.6%	\$0	0.0%	0.5%
	Moderate	5	20.8%	\$398	12.0%	18.9%	2	16.7%	7.2%	\$135	7.0%	5.2%	3	25.0%	6.2%	\$263	19.0%	4.2%
	Middle	11	45.8%	\$1,176	35.5%	45.3%	5	41.7%	42.3%	\$639	33.1%	37.2%	6	50.0%	46.2%	\$537	38.8%	40.1%
	Upper	8	33.3%	\$1,738	52.5%	33.4%	5	41.7%	49.7%	\$1,155	59.9%	57.0%	3	25.0%	46.9%	\$583	42.2%	55.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Total	24	100.0%	\$3,312	100.0%	100.0%	12	100.0%	100.0%	\$1,929	100.0%	100.0%	12	100.0%	100.0%	\$1,383	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.0%	\$0	0.0%	0.9%	0	0.0%	1.4%	\$0	0.0%	1.0%
	Moderate	2	12.5%	\$35	13.4%	18.9%	2	40.0%	8.2%	\$35	53.0%	4.7%	0	0.0%	8.0%	\$0	0.0%	5.3%
	Middle	12	75.0%	\$196	75.1%	45.3%	2	40.0%	45.3%	\$11	16.7%	41.1%	10	90.9%	48.5%	\$185	94.9%	45.8%
	Upper	2	12.5%	\$30	11.5%	33.4%	1	20.0%	45.3%	\$20	30.3%	52.6%	1	9.1%	42.1%	\$10	5.1%	47.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	16	100.0%	\$261	100.0%	100.0%	5	100.0%	100.0%	\$66	100.0%	100.0%	11	100.0%	100.0%	\$195	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	4.2%	\$0	0.0%	7.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	25.0%	\$0	0.0%	31.3%	0	0.0%	29.2%	\$0	0.0%	41.7%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	25.0%	\$0	0.0%	23.1%	0	0.0%	41.7%	\$0	0.0%	16.6%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	45.8%	\$0	0.0%	38.1%	0	0.0%	29.2%	\$0	0.0%	41.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	3	2.0%	\$494	2.4%	2.4%	1	1.3%	0.5%	\$68	0.6%	0.8%	2	2.8%	0.7%	\$426	4.9%	0.4%
	Moderate	30	19.9%	\$2,895	14.2%	18.9%	15	18.8%	7.0%	\$1,266	10.9%	6.5%	15	21.1%	6.7%	\$1,629	18.6%	8.3%
	Middle	64	42.4%	\$5,894	28.9%	45.3%	30	37.5%	44.7%	\$3,180	27.4%	35.6%	34	47.9%	46.2%	\$2,714	30.9%	37.3%
	Upper	52	34.4%	\$10,744	52.7%	33.4%	33	41.3%	47.4%	\$6,965	60.0%	56.6%	19	26.8%	46.0%	\$3,779	43.1%	53.5%
	Unknown	2	1.3%	\$360	1.8%	0.0%	1	1.3%	0.4%	\$134	1.2%	0.4%	1	1.4%	0.4%	\$226	2.6%	0.5%
	Total	151	100.0%	\$20,387	100.0%	100.0%	80	100.0%	100.0%	\$11,613	100.0%	100.0%	71	100.0%	100.0%	\$8,774	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	15	2.4%	\$714	2.5%	2.2%	7	2.2%	1.8%	\$351	2.4%	0.9%	8	2.5%	1.7%	\$363	2.7%	1.2%
	Moderate	136	21.7%	\$6,826	24.3%	23.2%	73	23.3%	22.6%	\$3,952	26.6%	25.8%	63	20.1%	22.5%	\$2,874	21.7%	25.1%
	Middle	257	41.0%	\$10,592	37.7%	39.1%	120	38.3%	36.5%	\$4,842	32.6%	34.6%	137	43.6%	36.1%	\$5,750	43.4%	34.3%
	Upper	218	34.8%	\$9,954	35.4%	35.4%	113	36.1%	36.6%	\$5,704	38.4%	37.2%	105	33.4%	37.3%	\$4,250	32.1%	38.1%
	Unknown	1	0.2%	\$10	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.3%	1	0.3%	0.2%	\$10	0.1%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.3%	\$0	0.0%	1.1%	0	0.0%	2.3%	\$0	0.0%	1.2%
Total	627	100.0%	\$28,096	100.0%	100.0%	313	100.0%	100.0%	\$14,849	100.0%	100.0%	314	100.0%	100.0%	\$13,247	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	7.2%	0	0.0%	6.2%	\$0	0.0%	7.4%	0	0.0%	5.3%	\$0	0.0%	9.6%
	Middle	3	60.0%	\$65	41.9%	45.8%	2	66.7%	28.4%	\$40	61.5%	27.5%	1	50.0%	38.7%	\$25	27.8%	35.2%
	Upper	2	40.0%	\$90	58.1%	45.8%	1	33.3%	65.4%	\$25	38.5%	65.2%	1	50.0%	54.7%	\$65	72.2%	55.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	0.2%
Total	5	100.0%	\$155	100.0%	100.0%	3	100.0%	100.0%	\$65	100.0%	100.0%	2	100.0%	100.0%	\$90	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Beaumont

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	6	5.4%	\$371	2.2%	23.5%	4	6.3%	3.0%	\$298	3.1%	1.3%	2	4.2%	1.7%	\$73	1.0%	0.7%
	Moderate	29	26.1%	\$2,578	15.3%	16.2%	12	19.0%	12.1%	\$1,058	11.0%	7.1%	17	35.4%	11.5%	\$1,520	21.1%	7.1%
	Middle	23	20.7%	\$2,755	16.4%	18.2%	17	27.0%	23.6%	\$2,107	21.9%	18.1%	6	12.5%	20.1%	\$648	9.0%	16.6%
	Upper	53	47.7%	\$11,110	66.1%	42.1%	30	47.6%	42.1%	\$6,155	64.0%	49.6%	23	47.9%	48.8%	\$4,955	68.9%	60.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.3%	\$0	0.0%	24.0%	0	0.0%	17.9%	\$0	0.0%	15.3%
	Total	111	100.0%	\$16,814	100.0%	100.0%	63	100.0%	100.0%	\$9,618	100.0%	100.0%	48	100.0%	100.0%	\$7,196	100.0%	100.0%
REFINANCE	Low	1	4.2%	\$68	2.1%	23.5%	0	0.0%	2.7%	\$0	0.0%	1.2%	1	8.3%	2.9%	\$68	4.9%	1.4%
	Moderate	2	8.3%	\$88	2.7%	16.2%	2	16.7%	7.4%	\$88	4.6%	4.4%	0	0.0%	6.8%	\$0	0.0%	3.8%
	Middle	4	16.7%	\$234	7.1%	18.2%	2	16.7%	15.9%	\$159	8.2%	11.5%	2	16.7%	15.5%	\$75	5.4%	11.2%
	Upper	17	70.8%	\$2,922	88.2%	42.1%	8	66.7%	52.9%	\$1,682	87.2%	58.9%	9	75.0%	49.9%	\$1,240	89.7%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.2%	\$0	0.0%	23.9%	0	0.0%	24.9%	\$0	0.0%	27.6%
	Total	24	100.0%	\$3,312	100.0%	100.0%	12	100.0%	100.0%	\$1,929	100.0%	100.0%	12	100.0%	100.0%	\$1,383	100.0%	100.0%
HOME IMPROVEMENT	Low	1	6.3%	\$10	3.8%	23.5%	1	20.0%	4.8%	\$10	15.2%	1.9%	0	0.0%	3.9%	\$0	0.0%	1.8%
	Moderate	5	31.3%	\$56	21.5%	16.2%	2	40.0%	13.6%	\$30	45.5%	9.2%	3	27.3%	12.4%	\$26	13.3%	7.5%
	Middle	3	18.8%	\$30	11.5%	18.2%	0	0.0%	19.7%	\$0	0.0%	13.7%	3	27.3%	19.2%	\$30	15.4%	15.8%
	Upper	7	43.8%	\$165	63.2%	42.1%	2	40.0%	59.5%	\$26	39.4%	70.3%	5	45.5%	62.0%	\$139	71.3%	72.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	4.8%	0	0.0%	2.5%	\$0	0.0%	2.8%
	Total	16	100.0%	\$261	100.0%	100.0%	5	100.0%	100.0%	\$66	100.0%	100.0%	11	100.0%	100.0%	\$195	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	5.3%	\$449	2.2%	23.5%	5	6.3%	3.0%	\$308	2.7%	1.2%	3	4.2%	2.2%	\$141	1.6%	0.8%
	Moderate	36	23.8%	\$2,722	13.4%	16.2%	16	20.0%	10.9%	\$1,176	10.1%	6.0%	20	28.2%	10.3%	\$1,546	17.6%	5.6%
	Middle	30	19.9%	\$3,019	14.8%	18.2%	19	23.8%	21.2%	\$2,266	19.5%	15.2%	11	15.5%	18.8%	\$753	8.6%	13.6%
	Upper	77	51.0%	\$14,197	69.6%	42.1%	40	50.0%	46.0%	\$7,863	67.7%	48.6%	37	52.1%	50.1%	\$6,334	72.2%	53.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.8%	\$0	0.0%	29.0%	0	0.0%	18.6%	\$0	0.0%	26.4%
	Total	151	100.0%	\$20,387	100.0%	100.0%	80	100.0%	100.0%	\$11,613	100.0%	100.0%	71	100.0%	100.0%	\$8,774	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	407	64.9%	\$15,371	54.7%	91.4%	204	65.2%	44.3%	\$8,419	56.7%	34.1%	203	64.6%	40.7%	\$6,952	52.5%	34.2%
	Over \$1 Million	159	25.4%	\$11,306	40.2%	7.7%	77	24.6%					82	26.1%				
	Total Rev. available	566	90.3%	\$26,677	94.9%	99.1%	281	89.8%					285	90.7%				
	Rev. Not Known	61	9.7%	\$1,419	5.1%	0.9%	32	10.2%					29	9.2%				
Total	627	100.0%	\$28,096	100.0%	100.0%	313	100.0%					314	100.0%					
Small Business Loan Size	\$100,000 or Less	609	97.1%	\$23,408	83.3%		302	96.5%	89.3%	\$11,558	77.8%	33.1%	307	97.8%	90.5%	\$11,850	89.5%	35.2%
	\$100,001 - \$250,000	13	2.1%	\$2,149	7.6%		7	2.2%	5.8%	\$1,116	7.5%	19.1%	6	1.9%	5.4%	\$1,033	7.8%	19.6%
	\$250,001 - \$1 Million	5	0.8%	\$2,539	9.0%		4	1.3%	4.9%	\$2,175	14.6%	47.9%	1	0.3%	4.1%	\$364	2.7%	45.1%
	Total	627	100.0%	\$28,096	100.0%		313	100.0%	100.0%	\$14,849	100.0%	100.0%	314	100.0%	100.0%	\$13,247	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	5	100.0%	\$155	100.0%	99.2%	3	100.0%	71.6%	\$65	100.0%	88.2%	2	100.0%	70.7%	\$90	100.0%	79.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.8%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	5	100.0%	\$155	100.0%	100.0%	3	100.0%					2	100.0%				
Small Farm Loan Size	\$100,000 or Less	5	100.0%	\$155	100.0%		3	100.0%	71.6%	\$65	100.0%	22.4%	2	100.0%	74.7%	\$90	100.0%	34.3%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	16.0%	\$0	0.0%	26.7%	0	0.0%	17.3%	\$0	0.0%	30.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.3%	\$0	0.0%	50.9%	0	0.0%	8.0%	\$0	0.0%	34.9%
	Total	5	100.0%	\$155	100.0%		3	100.0%	100.0%	\$65	100.0%	100.0%	2	100.0%	100.0%	\$90	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Brownsville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	14	14.6%	\$2,482	16.5%	23.6%	10	16.1%	10.2%	\$1,156	14.6%	8.1%	4	11.8%	11.1%	\$1,326	18.5%	8.8%
	Middle	39	40.6%	\$4,292	28.5%	47.5%	28	45.2%	43.2%	\$3,227	40.9%	38.7%	11	32.4%	44.2%	\$1,065	14.8%	41.2%
	Upper	43	44.8%	\$8,295	55.0%	27.8%	24	38.7%	46.4%	\$3,508	44.5%	53.1%	19	55.9%	44.5%	\$4,787	66.7%	49.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	96	100.0%	\$15,069	100.0%	100.0%	62	100.0%	100.0%	\$7,891	100.0%	100.0%	34	100.0%	100.0%	\$7,178	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	3	5.7%	\$335	5.0%	23.6%	2	6.9%	8.7%	\$216	5.8%	6.1%	1	4.2%	10.6%	\$119	4.0%	8.5%
	Middle	29	54.7%	\$2,946	44.3%	47.5%	16	55.2%	48.8%	\$1,647	44.5%	45.5%	13	54.2%	47.0%	\$1,299	44.1%	42.7%
	Upper	21	39.6%	\$3,366	50.6%	27.8%	11	37.9%	42.3%	\$1,838	49.7%	48.3%	10	41.7%	42.2%	\$1,528	51.9%	48.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	53	100.0%	\$6,647	100.0%	100.0%	29	100.0%	100.0%	\$3,701	100.0%	100.0%	24	100.0%	100.0%	\$2,946	100.0%	100.0%
HOME IMPROVEMENT	Low	1	6.3%	\$9	3.7%	1.0%	0	0.0%	0.5%	\$0	0.0%	0.1%	1	16.7%	1.2%	\$9	8.6%	0.1%
	Moderate	3	18.8%	\$44	18.2%	23.6%	3	30.0%	22.6%	\$44	32.1%	15.7%	0	0.0%	18.2%	\$0	0.0%	12.5%
	Middle	10	62.5%	\$129	53.3%	47.5%	7	70.0%	46.6%	\$93	67.9%	46.5%	3	50.0%	46.9%	\$36	34.3%	34.6%
	Upper	2	12.5%	\$60	24.8%	27.8%	0	0.0%	30.3%	\$0	0.0%	37.6%	2	33.3%	33.7%	\$60	57.1%	52.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	16	100.0%	\$242	100.0%	100.0%	10	100.0%	100.0%	\$137	100.0%	100.0%	6	100.0%	100.0%	\$105	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	6.9%	\$0	0.0%	3.7%	0	0.0%	2.9%	\$0	0.0%	0.3%
	Moderate	1	100.0%	\$165	100.0%	34.4%	1	100.0%	20.7%	\$165	100.0%	7.2%	0	0.0%	20.6%	\$0	0.0%	9.2%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	37.9%	\$0	0.0%	34.6%	0	0.0%	52.9%	\$0	0.0%	80.5%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	34.5%	\$0	0.0%	54.4%	0	0.0%	23.5%	\$0	0.0%	10.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$165	100.0%	100.0%	1	100.0%	100.0%	\$165	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	0.6%	\$9	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.3%	1	1.6%	0.2%	\$9	0.1%	0.1%
	Moderate	21	12.7%	\$3,026	13.7%	23.6%	16	15.7%	10.4%	\$1,581	13.3%	7.6%	5	7.8%	11.4%	\$1,445	14.1%	8.8%
	Middle	78	47.0%	\$7,367	33.3%	47.5%	51	50.0%	45.0%	\$4,967	41.8%	40.7%	27	42.2%	45.2%	\$2,400	23.5%	44.7%
	Upper	66	39.8%	\$11,721	53.0%	27.8%	35	34.3%	44.3%	\$5,346	44.9%	51.5%	31	48.4%	43.2%	\$6,375	62.3%	46.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	166	100.0%	\$22,123	100.0%	100.0%	102	100.0%	100.0%	\$11,894	100.0%	100.0%	64	100.0%	100.0%	\$10,229	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	47	6.0%	\$2,225	5.8%	4.0%	25	6.4%	4.2%	\$1,310	6.9%	3.2%	22	5.5%	3.9%	\$915	4.7%	2.4%
	Moderate	204	25.9%	\$9,886	25.8%	27.5%	105	26.9%	25.7%	\$5,743	30.2%	28.3%	99	24.9%	25.8%	\$4,143	21.4%	23.9%
	Middle	336	42.6%	\$16,587	43.2%	39.1%	163	41.7%	38.2%	\$7,183	37.8%	38.9%	173	43.5%	37.4%	\$9,404	48.5%	40.8%
	Upper	200	25.3%	\$9,570	24.9%	29.4%	97	24.8%	28.7%	\$4,705	24.8%	27.1%	103	25.9%	30.6%	\$4,865	25.1%	30.8%
	Unknown	2	0.3%	\$100	0.3%	0.1%	1	0.3%	0.3%	\$50	0.3%	0.7%	1	0.3%	0.2%	\$50	0.3%	0.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	1.8%	0	0.0%	2.1%	\$0	0.0%	1.8%
Total	789	100.0%	\$38,368	100.0%	100.0%	391	100.0%	100.0%	\$18,991	100.0%	100.0%	398	100.0%	100.0%	\$19,377	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	20.0%	\$15	2.0%	14.6%	0	0.0%	7.6%	\$0	0.0%	1.7%	1	33.3%	10.5%	\$15	27.3%	3.1%
	Middle	2	40.0%	\$709	92.8%	51.4%	2	100.0%	51.5%	\$709	100.0%	69.3%	0	0.0%	61.8%	\$0	0.0%	79.8%
	Upper	2	40.0%	\$40	5.2%	33.0%	0	0.0%	36.4%	\$0	0.0%	25.3%	2	66.7%	21.1%	\$40	72.7%	8.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.5%	\$0	0.0%	3.7%	0	0.0%	6.6%	\$0	0.0%	9.0%
Total	5	100.0%	\$764	100.0%	100.0%	2	100.0%	100.0%	\$709	100.0%	100.0%	3	100.0%	100.0%	\$55	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Brownsville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	1.0%	\$80	0.5%	24.3%	0	0.0%	0.4%	\$0	0.0%	0.2%	1	2.9%	1.1%	\$80	1.1%	0.4%
	Moderate	9	9.4%	\$791	5.2%	16.0%	6	9.7%	5.4%	\$570	7.2%	2.8%	3	8.8%	6.6%	\$221	3.1%	3.6%
	Middle	14	14.6%	\$1,384	9.2%	17.5%	12	19.4%	12.7%	\$1,135	14.4%	8.8%	2	5.9%	12.8%	\$249	3.5%	9.3%
	Upper	70	72.9%	\$11,723	77.8%	42.1%	43	69.4%	56.7%	\$5,855	74.2%	63.8%	27	79.4%	54.9%	\$5,868	81.7%	62.7%
	Unknown	2	2.1%	\$1,091	7.2%	0.0%	1	1.6%	24.8%	\$331	4.2%	24.5%	1	2.9%	24.5%	\$760	10.6%	24.0%
	Total	96	100.0%	\$15,069	100.0%	100.0%	62	100.0%	100.0%	\$7,891	100.0%	100.0%	34	100.0%	100.0%	\$7,178	100.0%	100.0%
REFINANCE	Low	1	1.9%	\$68	1.0%	24.3%	0	0.0%	1.4%	\$0	0.0%	0.6%	1	4.2%	1.4%	\$68	2.3%	0.6%
	Moderate	5	9.4%	\$425	6.4%	16.0%	2	6.9%	3.6%	\$172	4.6%	1.8%	3	12.5%	4.4%	\$253	8.6%	2.1%
	Middle	3	5.7%	\$294	4.4%	17.5%	1	3.4%	8.0%	\$101	2.7%	4.7%	2	8.3%	10.4%	\$193	6.6%	6.4%
	Upper	44	83.0%	\$5,860	88.2%	42.1%	26	89.7%	61.0%	\$3,428	92.6%	62.3%	18	75.0%	54.7%	\$2,432	82.6%	58.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	26.0%	\$0	0.0%	30.7%	0	0.0%	29.2%	\$0	0.0%	32.3%
	Total	53	100.0%	\$6,647	100.0%	100.0%	29	100.0%	100.0%	\$3,701	100.0%	100.0%	24	100.0%	100.0%	\$2,946	100.0%	100.0%
HOME IMPROVEMENT	Low	1	6.3%	\$3	1.2%	24.3%	1	10.0%	5.0%	\$3	2.2%	0.9%	0	0.0%	6.2%	\$0	0.0%	1.7%
	Moderate	2	12.5%	\$11	4.5%	16.0%	2	20.0%	12.7%	\$11	8.0%	7.0%	0	0.0%	12.0%	\$0	0.0%	5.6%
	Middle	5	31.3%	\$37	15.3%	17.5%	3	30.0%	12.7%	\$23	16.8%	5.1%	2	33.3%	14.0%	\$14	13.3%	7.4%
	Upper	8	50.0%	\$191	78.9%	42.1%	4	40.0%	61.1%	\$100	73.0%	72.1%	4	66.7%	62.8%	\$91	86.7%	64.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.6%	\$0	0.0%	14.9%	0	0.0%	5.0%	\$0	0.0%	20.9%
	Total	16	100.0%	\$242	100.0%	100.0%	10	100.0%	100.0%	\$137	100.0%	100.0%	6	100.0%	100.0%	\$105	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$165	100.0%	0.0%	1	100.0%	100.0%	\$165	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	1	100.0%	\$165	100.0%	100.0%	1	100.0%	100.0%	\$165	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	1.8%	\$151	0.7%	24.3%	1	1.0%	0.9%	\$3	0.0%	0.3%	2	3.1%	1.5%	\$148	1.4%	0.4%
	Moderate	16	9.6%	\$1,227	5.5%	16.0%	10	9.8%	5.2%	\$753	6.3%	2.4%	6	9.4%	6.2%	\$474	4.6%	2.9%
	Middle	22	13.3%	\$1,715	7.8%	17.5%	16	15.7%	11.2%	\$1,259	10.6%	7.1%	6	9.4%	12.1%	\$456	4.5%	7.7%
	Upper	122	73.5%	\$17,774	80.3%	42.1%	73	71.6%	57.9%	\$9,383	78.9%	60.6%	49	76.6%	54.9%	\$8,391	82.0%	56.4%
	Unknown	3	1.8%	\$1,256	5.7%	0.0%	2	2.0%	24.8%	\$496	4.2%	29.6%	1	1.6%	25.5%	\$760	7.4%	32.6%
	Total	166	100.0%	\$22,123	100.0%	100.0%	102	100.0%	100.0%	\$11,894	100.0%	100.0%	64	100.0%	100.0%	\$10,229	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	559	70.8%	\$22,605	58.9%	91.4%	272	69.6%	52.3%	\$10,889	57.3%	44.2%	287	72.1%	39.8%	\$11,716	60.5%	34.5%
	Over \$1 Million	174	22.1%	\$14,886	38.8%	7.7%	85	21.7%					89	22.4%				
	Total Rev. available	733	92.9%	\$37,491	97.7%	99.1%	357	91.3%					376	94.5%				
	Rev. Not Known	56	7.1%	\$877	2.3%	0.9%	34	8.7%					22	5.5%				
Total	789	100.0%	\$38,368	100.0%	100.0%	391	100.0%					398	100.0%					
Small Business Loan Size	\$100,000 or Less	751	95.2%	\$28,054	73.1%		372	95.1%	95.0%	\$13,376	70.4%	48.6%	379	95.2%	95.4%	\$14,678	75.7%	50.1%
	\$100,001 - \$250,000	26	3.3%	\$4,823	12.6%		12	3.1%	2.9%	\$2,138	11.3%	16.7%	14	3.5%	2.8%	\$2,685	13.9%	16.8%
	\$250,001 - \$1 Million	12	1.5%	\$5,491	14.3%		7	1.8%	2.1%	\$3,477	18.3%	34.7%	5	1.3%	1.8%	\$2,014	10.4%	33.1%
	Total	789	100.0%	\$38,368	100.0%		391	100.0%	100.0%	\$18,991	100.0%	100.0%	398	100.0%	100.0%	\$19,377	100.0%	100.0%
	Total Farms																	
Small Farm Revenue	\$1 Million or Less	5	100.0%	\$764	100.0%	96.8%	2	100.0%	50.0%	\$709	100.0%	74.6%	3	100.0%	34.2%	\$55	100.0%	50.1%
	Over \$1 Million	0	0.0%	\$0	0.0%	3.2%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	5	100.0%	\$764	100.0%	100.0%	2	100.0%					3	100.0%				
	Total Farms																	
Small Farm Loan Size	\$100,000 or Less	3	60.0%	\$55	7.2%		0	0.0%	84.8%	\$0	0.0%	28.6%	3	100.0%	96.1%	\$55	100.0%	63.3%
	\$100,001 - \$250,000	1	20.0%	\$225	29.5%		1	50.0%	9.1%	\$225	31.7%	27.9%	0	0.0%	1.3%	\$0	0.0%	6.5%
	\$250,001 - \$500,000	1	20.0%	\$484	63.4%		1	50.0%	6.1%	\$484	68.3%	43.5%	0	0.0%	2.6%	\$0	0.0%	30.2%
	Total	5	100.0%	\$764	100.0%		2	100.0%	100.0%	\$709	100.0%	100.0%	3	100.0%	100.0%	\$55	100.0%	100.0%
	Total Farms																	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Bryan-College Station

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
HOME PURCHASE	Low	1	2.8%	\$91	0.9%	6.0%	0	0.0%	5.2%	\$0	0.0%	4.2%	1	6.7%	5.1%	\$91	2.8%	4.5%
	Moderate	7	19.4%	\$1,153	12.0%	15.8%	2	9.5%	9.7%	\$416	6.6%	8.5%	5	33.3%	9.4%	\$737	22.3%	7.4%
	Middle	5	13.9%	\$976	10.2%	31.1%	2	9.5%	30.1%	\$374	5.9%	27.9%	3	20.0%	31.5%	\$602	18.2%	29.3%
	Upper	23	63.9%	\$7,386	76.9%	47.1%	17	81.0%	54.9%	\$5,511	87.5%	59.4%	6	40.0%	54.0%	\$1,875	56.7%	58.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	36	100.0%	\$9,606	100.0%	100.0%	21	100.0%	100.0%	\$6,301	100.0%	100.0%	15	100.0%	100.0%	\$3,305	100.0%	100.0%
REFINANCE	Low	1	7.1%	\$118	2.4%	6.0%	0	0.0%	4.0%	\$0	0.0%	2.8%	1	25.0%	3.8%	\$118	17.7%	3.1%
	Moderate	3	21.4%	\$1,248	25.3%	15.8%	3	30.0%	9.8%	\$1,248	29.2%	7.5%	0	0.0%	8.6%	\$0	0.0%	5.9%
	Middle	6	42.9%	\$1,197	24.3%	31.1%	3	30.0%	26.4%	\$647	15.2%	21.6%	3	75.0%	27.9%	\$550	82.3%	24.6%
	Upper	4	28.6%	\$2,373	48.1%	47.1%	4	40.0%	59.8%	\$2,373	55.6%	68.0%	0	0.0%	59.6%	\$0	0.0%	66.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$4,936	100.0%	100.0%	10	100.0%	100.0%	\$4,268	100.0%	100.0%	4	100.0%	100.0%	\$668	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	6.0%	0	0.0%	2.6%	\$0	0.0%	1.3%	0	0.0%	3.3%	\$0	0.0%	5.4%
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	12.3%	\$0	0.0%	30.9%	0	0.0%	10.3%	\$0	0.0%	5.3%
	Middle	0	0.0%	\$0	0.0%	31.1%	0	0.0%	32.3%	\$0	0.0%	18.6%	0	0.0%	30.4%	\$0	0.0%	27.8%
	Upper	1	100.0%	\$5	100.0%	47.1%	1	100.0%	52.8%	\$5	100.0%	49.3%	0	0.0%	56.1%	\$0	0.0%	61.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$5	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	28.6%	\$0	0.0%	17.5%	0	0.0%	27.6%	\$0	0.0%	28.3%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	23.8%	\$0	0.0%	30.1%	0	0.0%	27.6%	\$0	0.0%	19.6%
	Middle	2	100.0%	\$20,312	100.0%	24.5%	2	100.0%	47.6%	\$20,312	100.0%	52.4%	0	0.0%	31.0%	\$0	0.0%	35.8%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	13.8%	\$0	0.0%	16.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	2	100.0%	\$20,312	100.0%	100.0%	2	100.0%	100.0%	\$20,312	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	2	3.8%	\$209	0.6%	6.0%	0	0.0%	4.9%	\$0	0.0%	4.9%	2	10.5%	4.8%	\$209	5.3%	6.2%
	Moderate	10	18.9%	\$2,401	6.9%	15.8%	5	14.7%	9.9%	\$1,664	5.4%	10.3%	5	26.3%	9.3%	\$737	18.6%	8.1%
	Middle	13	24.5%	\$22,485	64.5%	31.1%	7	20.6%	29.4%	\$21,333	69.1%	28.3%	6	31.6%	30.6%	\$1,152	29.0%	28.8%
	Upper	28	52.8%	\$9,764	28.0%	47.1%	22	64.7%	55.7%	\$7,889	25.5%	56.5%	6	31.6%	55.3%	\$1,875	47.2%	56.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	53	100.0%	\$34,859	100.0%	100.0%	34	100.0%	100.0%	\$30,886	100.0%	100.0%	19	100.0%	100.0%	\$3,973	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	9	5.3%	\$225	3.2%	9.5%	5	6.0%	7.3%	\$125	3.6%	5.9%	4	4.6%	6.9%	\$100	2.9%	6.5%
	Moderate	35	20.6%	\$1,508	21.7%	16.1%	18	21.7%	19.4%	\$721	20.7%	12.6%	17	19.5%	16.4%	\$787	22.6%	14.9%
	Middle	73	42.9%	\$3,431	49.3%	33.4%	37	44.6%	31.8%	\$1,780	51.2%	36.2%	36	41.4%	34.3%	\$1,651	47.3%	35.3%
	Upper	51	30.0%	\$1,741	25.0%	40.7%	22	26.5%	38.8%	\$822	23.6%	43.7%	29	33.3%	40.2%	\$919	26.4%	41.9%
	Unknown	2	1.2%	\$60	0.9%	0.2%	1	1.2%	0.1%	\$30	0.9%	0.1%	1	1.1%	0.1%	\$30	0.9%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	1.6%	0	0.0%	2.1%	\$0	0.0%	1.3%
Total	170	100.0%	\$6,965	100.0%	100.0%	83	100.0%	100.0%	\$3,478	100.0%	100.0%	87	100.0%	100.0%	\$3,487	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.6%	0	0.0%	4.2%	\$0	0.0%	0.8%	0	0.0%	6.7%	\$0	0.0%	3.0%
	Middle	0	0.0%	\$0	0.0%	35.0%	0	0.0%	36.1%	\$0	0.0%	26.4%	0	0.0%	25.0%	\$0	0.0%	21.5%
	Upper	0	0.0%	\$0	0.0%	57.5%	0	0.0%	55.6%	\$0	0.0%	70.2%	0	0.0%	66.7%	\$0	0.0%	73.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.8%	\$0	0.0%	2.6%	0	0.0%	1.7%	\$0	0.0%	2.5%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Bryan-College Station

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar					
		Count	Dollar	%	%		Bank	Agg		Bank	Agg		Bank	Agg				
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	2.3%	\$0	0.0%	1.1%	0	0.0%	1.5%	\$0	0.0%	0.6%
	Moderate	6	16.7%	\$831	8.7%	13.7%	3	14.3%	9.6%	\$406	6.4%	6.4%	3	20.0%	7.5%	\$425	12.9%	4.7%
	Middle	3	8.3%	\$407	4.2%	18.0%	1	4.8%	16.8%	\$111	1.8%	13.8%	2	13.3%	14.8%	\$296	9.0%	11.8%
	Upper	27	75.0%	\$8,368	87.1%	43.1%	17	81.0%	52.9%	\$5,784	91.8%	58.3%	10	66.7%	58.7%	\$2,584	78.2%	64.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.4%	\$0	0.0%	20.5%	0	0.0%	17.6%	\$0	0.0%	18.6%
	Total	36	100.0%	\$9,606	100.0%	100.0%	21	100.0%	100.0%	\$6,301	100.0%	100.0%	15	100.0%	100.0%	\$3,305	100.0%	100.0%
REFINANCE	Low	1	7.1%	\$69	1.4%	25.2%	1	10.0%	2.0%	\$69	1.6%	0.9%	0	0.0%	1.7%	\$0	0.0%	0.9%
	Moderate	2	14.3%	\$218	4.4%	13.7%	2	20.0%	7.6%	\$218	5.1%	4.4%	0	0.0%	6.0%	\$0	0.0%	3.4%
	Middle	1	7.1%	\$118	2.4%	18.0%	0	0.0%	13.0%	\$0	0.0%	9.1%	1	25.0%	11.9%	\$118	17.7%	8.9%
	Upper	10	71.4%	\$4,531	91.8%	43.1%	7	70.0%	54.3%	\$3,981	93.3%	59.7%	3	75.0%	58.2%	\$550	82.3%	65.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.0%	\$0	0.0%	25.9%	0	0.0%	22.2%	\$0	0.0%	21.4%
	Total	14	100.0%	\$4,936	100.0%	100.0%	10	100.0%	100.0%	\$4,268	100.0%	100.0%	4	100.0%	100.0%	\$668	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	1.5%	\$0	0.0%	0.3%	0	0.0%	1.4%	\$0	0.0%	0.8%
	Moderate	1	100.0%	\$5	100.0%	13.7%	1	100.0%	8.7%	\$5	100.0%	2.0%	0	0.0%	8.9%	\$0	0.0%	5.3%
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	16.4%	\$0	0.0%	6.8%	0	0.0%	13.1%	\$0	0.0%	8.7%
	Upper	0	0.0%	\$0	0.0%	43.1%	0	0.0%	62.1%	\$0	0.0%	52.0%	0	0.0%	67.8%	\$0	0.0%	72.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.3%	\$0	0.0%	39.0%	0	0.0%	8.9%	\$0	0.0%	12.3%
	Total	1	100.0%	\$5	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$20,312	100.0%	0.0%	2	100.0%	100.0%	\$20,312	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	2	100.0%	\$20,312	100.0%	100.0%	2	100.0%	100.0%	\$20,312	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	1.9%	\$69	0.2%	25.2%	1	2.9%	2.2%	\$69	0.2%	0.9%	0	0.0%	1.5%	\$0	0.0%	0.6%
	Moderate	9	17.0%	\$1,054	3.0%	13.7%	6	17.6%	9.1%	\$629	2.0%	5.4%	3	15.8%	7.1%	\$425	10.7%	4.0%
	Middle	4	7.5%	\$525	1.5%	18.0%	1	2.9%	15.9%	\$111	0.4%	11.6%	3	15.8%	13.9%	\$414	10.4%	10.1%
	Upper	37	69.8%	\$12,899	37.0%	43.1%	24	70.6%	53.3%	\$9,765	31.6%	54.0%	13	68.4%	58.6%	\$3,134	78.9%	59.2%
	Unknown	2	3.8%	\$20,312	58.3%	0.0%	2	5.9%	19.5%	\$20,312	65.8%	28.0%	0	0.0%	18.8%	\$0	0.0%	26.0%
	Total	53	100.0%	\$34,859	100.0%	100.0%	34	100.0%	100.0%	\$30,886	100.0%	100.0%	19	100.0%	100.0%	\$3,973	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	124	72.9%	\$4,705	67.6%	90.7%	61	73.5%	44.5%	\$2,233	64.2%	44.7%	63	72.4%	43.0%	\$2,472	70.9%	41.3%
	Over \$1 Million	32	18.8%	\$2,030	29.1%	8.0%	17	20.5%					15	17.2%				
	Total Rev. available	156	91.7%	\$6,735	96.7%	98.7%	78	94.0%					78	89.6%				
	Rev. Not Known	14	8.2%	\$230	3.3%	1.2%	5	6.0%					9	10.3%				
Total	170	100.0%	\$6,965	100.0%	100.0%	83	100.0%					87	100.0%					
Small Business Loan Size	\$100,000 or Less	167	98.2%	\$6,393	91.8%		82	98.8%	93.4%	\$3,278	94.2%	35.5%	85	97.7%	93.5%	\$3,115	89.3%	39.6%
	\$100,001 - \$250,000	3	1.8%	\$572	8.2%		1	1.2%	3.2%	\$200	5.8%	13.8%	2	2.3%	3.4%	\$372	10.7%	15.7%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	3.5%	\$0	0.0%	50.7%	0	0.0%	3.1%	\$0	0.0%	44.7%
	Total	170	100.0%	\$6,965	100.0%		83	100.0%	100.0%	\$3,478	100.0%	100.0%	87	100.0%	100.0%	\$3,487	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.2%	0	0.0%	62.5%	\$0	0.0%	59.8%	0	0.0%	63.3%	\$0	0.0%	73.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.8%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	81.9%	\$0	0.0%	31.3%	0	0.0%	80.0%	\$0	0.0%	29.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.7%	\$0	0.0%	21.6%	0	0.0%	13.3%	\$0	0.0%	31.5%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	8.3%	\$0	0.0%	47.1%	0	0.0%	6.7%	\$0	0.0%	38.9%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Burnet-Gillespie-Kerr

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	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%
	Moderate	1	6.7%	\$131	1.7%	1.1%	0	0.0%	2.1%	\$0	0.0%	1.5%	1	33.3%	1.2%	\$131	21.4%	0.9%
	Middle	6	40.0%	\$1,278	16.9%	50.3%	5	41.7%	47.5%	\$1,168	16.8%	41.9%	1	33.3%	49.3%	\$110	18.0%	45.1%
	Upper	8	53.3%	\$6,151	81.4%	48.6%	7	58.3%	50.3%	\$5,781	83.2%	56.6%	1	33.3%	49.5%	\$370	60.6%	54.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$7,560	100.0%	100.0%	12	100.0%	100.0%	\$6,949	100.0%	100.0%	3	100.0%	100.0%	\$611	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	1.5%	\$0	0.0%	1.0%
	Middle	2	28.6%	\$166	9.6%	50.3%	0	0.0%	42.0%	\$0	0.0%	39.9%	2	50.0%	39.3%	\$166	43.9%	36.7%
	Upper	5	71.4%	\$1,558	90.4%	48.6%	3	100.0%	57.6%	\$1,346	100.0%	59.9%	2	50.0%	59.2%	\$212	56.1%	62.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$1,724	100.0%	100.0%	3	100.0%	100.0%	\$1,346	100.0%	100.0%	4	100.0%	100.0%	\$378	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.7%	\$0	0.0%	0.2%	0	0.0%	0.7%	\$0	0.0%	0.1%
	Middle	2	28.6%	\$55	14.9%	50.3%	0	0.0%	33.6%	\$0	0.0%	22.3%	2	100.0%	41.0%	\$55	100.0%	37.8%
	Upper	5	71.4%	\$315	85.1%	48.6%	5	100.0%	65.7%	\$315	100.0%	77.5%	0	0.0%	58.3%	\$0	0.0%	62.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$370	100.0%	100.0%	5	100.0%	100.0%	\$315	100.0%	100.0%	2	100.0%	100.0%	\$55	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	40.0%	\$0	0.0%	58.8%	0	0.0%	87.5%	\$0	0.0%	83.1%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	60.0%	\$0	0.0%	41.2%	0	0.0%	12.5%	\$0	0.0%	16.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	3.4%	\$131	1.4%	1.1%	0	0.0%	1.5%	\$0	0.0%	1.0%	1	11.1%	1.3%	\$131	12.5%	0.9%
	Middle	10	34.5%	\$1,499	15.5%	50.3%	5	25.0%	45.1%	\$1,168	13.6%	40.9%	5	55.6%	45.6%	\$331	31.7%	42.7%
	Upper	18	62.1%	\$8,024	83.1%	48.6%	15	75.0%	53.5%	\$7,442	86.4%	58.1%	3	33.3%	53.1%	\$582	55.7%	56.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	29	100.0%	\$9,654	100.0%	100.0%	20	100.0%	100.0%	\$8,610	100.0%	100.0%	9	100.0%	100.0%	\$1,044	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.6%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.1%
	Middle	38	39.6%	\$2,035	50.1%	51.0%	19	40.4%	45.0%	\$1,150	56.5%	41.0%	19	38.8%	44.6%	\$885	43.7%	42.6%
	Upper	58	60.4%	\$2,028	49.9%	48.3%	28	59.6%	50.4%	\$887	43.5%	55.9%	30	61.2%	51.0%	\$1,141	56.3%	54.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	2.9%	0	0.0%	3.9%	\$0	0.0%	2.5%
Total	96	100.0%	\$4,063	100.0%	100.0%	47	100.0%	100.0%	\$2,037	100.0%	100.0%	49	100.0%	100.0%	\$2,026	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	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%
	Middle	0	0.0%	\$0	0.0%	47.1%	0	0.0%	43.4%	\$0	0.0%	53.5%	0	0.0%	43.8%	\$0	0.0%	38.4%
	Upper	0	0.0%	\$0	0.0%	52.9%	0	0.0%	53.3%	\$0	0.0%	45.2%	0	0.0%	53.8%	\$0	0.0%	59.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	1.3%	0	0.0%	2.5%	\$0	0.0%	2.4%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Burnet-Gillespie-Kerr

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	15.4%	0	0.0%	1.8%	\$0	0.0%	0.7%	0	0.0%	1.6%	\$0	0.0%	0.7%
	Moderate	1	6.7%	\$110	1.5%	16.1%	0	0.0%	9.9%	\$0	0.0%	5.3%	1	33.3%	8.6%	\$110	18.0%	4.5%
	Middle	4	26.7%	\$472	6.2%	19.2%	3	25.0%	17.8%	\$341	4.9%	12.1%	1	33.3%	16.8%	\$131	21.4%	11.8%
	Upper	10	66.7%	\$6,978	92.3%	49.3%	9	75.0%	54.2%	\$6,608	95.1%	66.5%	1	33.3%	60.3%	\$370	60.6%	71.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.4%	\$0	0.0%	15.4%	0	0.0%	12.7%	\$0	0.0%	11.5%
	Total	15	100.0%	\$7,560	100.0%	100.0%	12	100.0%	100.0%	\$6,949	100.0%	100.0%	3	100.0%	100.0%	\$611	100.0%	100.0%
REFINANCE	Low	1	14.3%	\$85	4.9%	15.4%	0	0.0%	2.9%	\$0	0.0%	1.0%	1	25.0%	2.7%	\$85	22.5%	1.2%
	Moderate	1	14.3%	\$148	8.6%	16.1%	1	33.3%	6.6%	\$148	11.0%	3.1%	0	0.0%	7.0%	\$0	0.0%	3.3%
	Middle	2	28.6%	\$212	12.3%	19.2%	0	0.0%	11.3%	\$0	0.0%	7.1%	2	50.0%	11.8%	\$212	56.1%	7.3%
	Upper	3	42.9%	\$1,279	74.2%	49.3%	2	66.7%	56.2%	\$1,198	89.0%	67.0%	1	25.0%	55.1%	\$81	21.4%	64.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.0%	\$0	0.0%	21.8%	0	0.0%	23.4%	\$0	0.0%	23.8%
	Total	7	100.0%	\$1,724	100.0%	100.0%	3	100.0%	100.0%	\$1,346	100.0%	100.0%	4	100.0%	100.0%	\$378	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	15.4%	0	0.0%	6.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	5.2%	\$0	0.0%	1.6%	0	0.0%	8.3%	\$0	0.0%	3.0%
	Middle	2	28.6%	\$150	40.5%	19.2%	2	40.0%	15.7%	\$150	47.6%	8.7%	0	0.0%	22.2%	\$0	0.0%	15.6%
	Upper	5	71.4%	\$220	59.5%	49.3%	3	60.0%	67.9%	\$165	52.4%	65.9%	2	100.0%	64.6%	\$55	100.0%	77.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.2%	\$0	0.0%	22.7%	0	0.0%	4.9%	\$0	0.0%	4.0%
	Total	7	100.0%	\$370	100.0%	100.0%	5	100.0%	100.0%	\$315	100.0%	100.0%	2	100.0%	100.0%	\$55	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	15.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	49.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	3.4%	\$85	0.9%	15.4%	0	0.0%	2.3%	\$0	0.0%	0.8%	1	11.1%	1.9%	\$85	8.1%	0.8%
	Moderate	2	6.9%	\$258	2.7%	16.1%	1	5.0%	8.6%	\$148	1.7%	4.4%	1	11.1%	8.0%	\$110	10.5%	4.0%
	Middle	8	27.6%	\$834	8.6%	19.2%	5	25.0%	15.5%	\$491	5.7%	10.1%	3	33.3%	15.3%	\$343	32.9%	10.2%
	Upper	18	62.1%	\$8,477	87.8%	49.3%	14	70.0%	55.3%	\$7,971	92.6%	66.1%	4	44.4%	58.6%	\$506	48.5%	67.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.3%	\$0	0.0%	18.7%	0	0.0%	16.2%	\$0	0.0%	17.1%
	Total	29	100.0%	\$9,654	100.0%	100.0%	20	100.0%	100.0%	\$8,610	100.0%	100.0%	9	100.0%	100.0%	\$1,044	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	62	64.6%	\$1,880	46.3%	93.3%	30	63.8%	55.3%	\$874	42.9%	53.4%	32	65.3%	48.9%	\$1,006	49.7%	51.4%
	Over \$1 Million	28	29.2%	\$2,095	51.6%	5.6%	14	29.8%					14	28.6%				
	Total Rev. available	90	93.8%	\$3,975	97.9%	98.9%	44	93.6%					46	93.9%				
	Rev. Not Known	6	6.3%	\$88	2.2%	1.1%	3	6.4%					3	6.1%				
Total	96	100.0%	\$4,063	100.0%	100.0%	47	100.0%					49	100.0%					
Small Business Loan Size	\$100,000 or Less	94	97.9%	\$3,563	87.7%		46	97.9%	94.0%	\$1,737	85.3%	46.2%	48	98.0%	94.9%	\$1,826	90.1%	48.0%
	\$100,001 - \$250,000	1	1.0%	\$200	4.9%		0	0.0%	3.5%	\$0	0.0%	17.3%	1	2.0%	2.9%	\$200	9.9%	14.9%
	\$250,001 - \$1 Million	1	1.0%	\$300	7.4%		1	2.1%	2.4%	\$300	14.7%	36.5%	0	0.0%	2.3%	\$0	0.0%	37.1%
	Total	96	100.0%	\$4,063	100.0%		47	100.0%	100.0%	\$2,037	100.0%	100.0%	49	100.0%	100.0%	\$2,026	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	99.4%	0	0.0%	77.6%	\$0	0.0%	86.2%	0	0.0%	80.0%	\$0	0.0%	72.9%
Over \$1 Million		0	0.0%	\$0	0.0%	0.6%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	86.8%	\$0	0.0%	43.1%	0	0.0%	86.9%	\$0	0.0%	42.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.2%	\$0	0.0%	27.1%	0	0.0%	9.4%	\$0	0.0%	31.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.9%	\$0	0.0%	29.9%	0	0.0%	3.8%	\$0	0.0%	25.7%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Corpus Christi

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	%	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	8.3%	0	0.0%	2.0%	\$0	0.0%	1.1%	0	0.0%	1.9%	\$0	0.0%	1.1%
	Moderate	5	10.0%	\$589	6.1%	20.0%	3	9.4%	5.9%	\$285	4.5%	3.0%	2	11.1%	6.7%	\$304	9.3%	3.5%
	Middle	15	30.0%	\$2,228	23.0%	35.2%	7	21.9%	32.9%	\$1,209	18.9%	29.7%	8	44.4%	31.9%	\$1,019	31.0%	29.3%
	Upper	30	60.0%	\$6,852	70.9%	36.6%	22	68.8%	59.2%	\$4,891	76.6%	66.1%	8	44.4%	59.5%	\$1,961	59.7%	66.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	50	100.0%	\$9,669	100.0%	100.0%	32	100.0%	100.0%	\$6,385	100.0%	100.0%	18	100.0%	100.0%	\$3,284	100.0%	100.0%
REFINANCE	Low	3	13.6%	\$304	7.7%	8.3%	1	7.7%	1.7%	\$107	4.7%	1.0%	2	22.2%	2.0%	\$197	11.7%	0.9%
	Moderate	5	22.7%	\$499	12.6%	20.0%	4	30.8%	7.1%	\$380	16.8%	3.8%	1	11.1%	6.2%	\$119	7.1%	3.3%
	Middle	6	27.3%	\$716	18.1%	35.2%	2	15.4%	33.7%	\$331	14.6%	31.5%	4	44.4%	34.8%	\$385	22.9%	32.6%
	Upper	8	36.4%	\$2,430	61.5%	36.6%	6	46.2%	57.5%	\$1,448	63.9%	63.7%	2	22.2%	57.0%	\$982	58.3%	63.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	22	100.0%	\$3,949	100.0%	100.0%	13	100.0%	100.0%	\$2,266	100.0%	100.0%	9	100.0%	100.0%	\$1,683	100.0%	100.0%
HOME IMPROVEMENT	Low	1	25.0%	\$5	12.2%	8.3%	0	0.0%	4.4%	\$0	0.0%	1.7%	1	100.0%	6.6%	\$5	100.0%	4.0%
	Moderate	1	25.0%	\$15	36.6%	20.0%	1	33.3%	14.1%	\$15	41.7%	8.3%	0	0.0%	12.4%	\$0	0.0%	6.1%
	Middle	2	50.0%	\$21	51.2%	35.2%	2	66.7%	36.6%	\$21	58.3%	35.2%	0	0.0%	38.1%	\$0	0.0%	33.9%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	44.9%	\$0	0.0%	54.7%	0	0.0%	42.9%	\$0	0.0%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$41	100.0%	100.0%	3	100.0%	100.0%	\$36	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	14.3%	\$0	0.0%	30.1%	0	0.0%	16.2%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	14.3%	\$0	0.0%	2.8%	0	0.0%	2.7%	\$0	0.0%	1.8%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	23.8%	\$0	0.0%	21.3%	0	0.0%	37.8%	\$0	0.0%	40.9%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	47.6%	\$0	0.0%	45.9%	0	0.0%	43.2%	\$0	0.0%	55.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	5.3%	\$309	2.3%	8.3%	1	2.1%	2.1%	\$107	1.2%	5.2%	3	10.7%	2.3%	\$202	4.1%	1.2%
	Moderate	11	14.5%	\$1,103	8.1%	20.0%	8	16.7%	6.7%	\$680	7.8%	3.3%	3	10.7%	6.8%	\$423	8.5%	3.4%
	Middle	23	30.3%	\$2,965	21.7%	35.2%	11	22.9%	33.3%	\$1,561	18.0%	29.0%	12	42.9%	33.1%	\$1,404	28.2%	31.2%
	Upper	38	50.0%	\$9,282	68.0%	36.6%	28	58.3%	57.9%	\$6,339	73.0%	62.5%	10	35.7%	57.8%	\$2,943	59.2%	64.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	76	100.0%	\$13,659	100.0%	100.0%	48	100.0%	100.0%	\$8,687	100.0%	100.0%	28	100.0%	100.0%	\$4,972	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	49	28.7%	\$2,164	27.1%	16.0%	23	29.1%	17.5%	\$1,017	30.3%	25.8%	26	28.3%	17.2%	\$1,147	24.8%	22.2%
	Moderate	28	16.4%	\$1,188	14.9%	16.4%	12	15.2%	18.0%	\$480	14.3%	22.6%	16	17.4%	18.5%	\$708	15.3%	22.0%
	Middle	50	29.2%	\$2,405	30.1%	33.7%	24	30.4%	29.6%	\$910	27.1%	27.0%	26	28.3%	29.8%	\$1,495	32.3%	27.9%
	Upper	44	25.7%	\$2,223	27.9%	33.7%	20	25.3%	32.1%	\$945	28.2%	23.3%	24	26.1%	32.6%	\$1,278	27.6%	27.0%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	1.2%	0	0.0%	1.9%	\$0	0.0%	0.9%
Total	171	100.0%	\$7,980	100.0%	100.0%	79	100.0%	100.0%	\$3,352	100.0%	100.0%	92	100.0%	100.0%	\$4,628	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	10.9%	0	0.0%	9.2%	\$0	0.0%	5.8%	0	0.0%	1.4%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	9.3%	0	0.0%	16.9%	\$0	0.0%	8.8%	0	0.0%	12.5%	\$0	0.0%	17.2%
	Middle	1	100.0%	\$75	100.0%	39.1%	0	0.0%	36.9%	\$0	0.0%	36.1%	1	100.0%	43.1%	\$75	100.0%	34.3%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	33.8%	\$0	0.0%	47.1%	0	0.0%	40.3%	\$0	0.0%	46.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	2.2%	0	0.0%	2.8%	\$0	0.0%	1.0%
Total	1	100.0%	\$75	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$75	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Corpus Christi

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	3	6.0%	\$221	2.3%	24.7%	0	0.0%	1.6%	\$0	0.0%	0.7%	3	16.7%	1.5%	\$221	6.7%	0.7%
	Moderate	8	16.0%	\$791	8.2%	16.2%	7	21.9%	8.9%	\$720	11.3%	5.6%	1	5.6%	8.7%	\$71	2.2%	5.5%
	Middle	14	28.0%	\$2,042	21.1%	17.4%	8	25.0%	18.9%	\$1,267	19.8%	15.6%	6	33.3%	19.5%	\$775	23.6%	16.1%
	Upper	25	50.0%	\$6,615	68.4%	41.7%	17	53.1%	49.1%	\$4,398	68.9%	58.5%	8	44.4%	47.1%	\$2,217	67.5%	56.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.5%	\$0	0.0%	19.6%	0	0.0%	23.2%	\$0	0.0%	20.8%
	Total	50	100.0%	\$9,669	100.0%	100.0%	32	100.0%	100.0%	\$6,385	100.0%	100.0%	18	100.0%	100.0%	\$3,284	100.0%	100.0%
REFINANCE	Low	3	13.6%	\$188	4.8%	24.7%	1	7.7%	3.0%	\$56	2.5%	1.6%	2	22.2%	2.3%	\$132	7.8%	1.2%
	Moderate	1	4.5%	\$135	3.4%	16.2%	1	7.7%	6.8%	\$135	6.0%	4.0%	0	0.0%	6.4%	\$0	0.0%	3.3%
	Middle	6	27.3%	\$669	16.9%	17.4%	4	30.8%	14.9%	\$523	23.1%	10.4%	2	22.2%	13.4%	\$146	8.7%	8.8%
	Upper	12	54.5%	\$2,957	74.9%	41.7%	7	53.8%	43.8%	\$1,552	68.5%	49.6%	5	55.6%	42.3%	\$1,405	83.5%	48.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	31.5%	\$0	0.0%	34.5%	0	0.0%	35.6%	\$0	0.0%	38.0%
	Total	22	100.0%	\$3,949	100.0%	100.0%	13	100.0%	100.0%	\$2,266	100.0%	100.0%	9	100.0%	100.0%	\$1,683	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	6.3%	\$0	0.0%	2.1%	0	0.0%	6.6%	\$0	0.0%	2.0%
	Moderate	1	25.0%	\$5	12.2%	16.2%	0	0.0%	14.1%	\$0	0.0%	9.0%	1	100.0%	13.2%	\$5	100.0%	6.5%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	17.1%	\$0	0.0%	12.3%	0	0.0%	20.6%	\$0	0.0%	15.3%
	Upper	3	75.0%	\$36	87.8%	41.7%	3	100.0%	56.3%	\$36	100.0%	66.0%	0	0.0%	54.4%	\$0	0.0%	65.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.3%	\$0	0.0%	10.5%	0	0.0%	5.2%	\$0	0.0%	10.9%
	Total	4	100.0%	\$41	100.0%	100.0%	3	100.0%	100.0%	\$36	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	6	7.9%	\$409	3.0%	24.7%	1	2.1%	2.2%	\$56	0.6%	0.8%	5	17.9%	2.0%	\$353	7.1%	0.8%
	Moderate	10	13.2%	\$931	6.8%	16.2%	8	16.7%	8.6%	\$855	9.8%	4.5%	2	7.1%	8.2%	\$76	1.5%	4.5%
	Middle	20	26.3%	\$2,711	19.8%	17.4%	12	25.0%	17.6%	\$1,790	20.6%	12.2%	8	28.6%	17.7%	\$921	18.5%	12.9%
	Upper	40	52.6%	\$9,608	70.3%	41.7%	27	56.3%	47.9%	\$5,986	68.9%	48.4%	13	46.4%	45.9%	\$3,622	72.8%	50.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.7%	\$0	0.0%	34.1%	0	0.0%	26.2%	\$0	0.0%	31.5%
	Total	76	100.0%	\$13,659	100.0%	100.0%	48	100.0%	100.0%	\$8,687	100.0%	100.0%	28	100.0%	100.0%	\$4,972	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	108	63.2%	\$3,922	49.1%	90.7%	51	64.6%	46.5%	\$1,974	58.9%	38.8%	57	62.0%	38.2%	\$1,948	42.1%	34.5%
	Over \$1 Million	48	28.1%	\$3,192	40.0%	8.4%	22	27.8%					26	28.3%				
	Total Rev. available	156	91.3%	\$7,114	89.1%	99.1%	73	92.4%					83	90.3%				
	Rev. Not Known	15	8.8%	\$866	10.9%	0.9%	6	7.6%					9	9.8%				
	Total	171	100.0%	\$7,980	100.0%	100.0%	79	100.0%					92	100.0%				
Small Business Loan Size	\$100,000 or Less	168	98.2%	\$6,801	85.2%		78	98.7%	90.6%	\$3,073	91.7%	30.8%	90	97.8%	92.3%	\$3,728	80.6%	36.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.0%	\$0	0.0%	19.0%	0	0.0%	4.4%	\$0	0.0%	19.9%
	\$250,001 - \$1 Million	3	1.8%	\$1,179	14.8%		1	1.3%	4.3%	\$279	8.3%	50.1%	2	2.2%	3.3%	\$900	19.4%	44.1%
	Total	171	100.0%	\$7,980	100.0%		79	100.0%	100.0%	\$3,352	100.0%	100.0%	92	100.0%	100.0%	\$4,628	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.1%	0	0.0%	47.7%	\$0	0.0%	67.1%	0	0.0%	41.7%	\$0	0.0%	72.2%
	Over \$1 Million	1	100.0%	\$75	100.0%	1.9%	0	0.0%					1	100.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$75	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$75	100.0%		0	0.0%	75.4%	\$0	0.0%	19.3%	1	100.0%	80.6%	\$75	100.0%	26.8%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.2%	\$0	0.0%	12.7%	0	0.0%	5.6%	\$0	0.0%	11.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	18.5%	\$0	0.0%	67.9%	0	0.0%	13.9%	\$0	0.0%	61.3%
	Total	1	100.0%	\$75	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$75	100.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX East TX

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	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%
	Moderate	6	20.7%	\$845	16.7%	19.5%	3	18.8%	16.6%	\$649	21.0%	16.4%	3	23.1%	16.1%	\$196	9.9%	14.8%
	Middle	23	79.3%	\$4,229	83.3%	80.5%	13	81.3%	83.2%	\$2,447	79.0%	83.5%	10	76.9%	83.6%	\$1,782	90.1%	85.0%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Total	29	100.0%	\$5,074	100.0%	100.0%	16	100.0%	100.0%	\$3,096	100.0%	100.0%	13	100.0%	100.0%	\$1,978	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	2	28.6%	\$213	16.0%	19.5%	1	25.0%	15.9%	\$118	15.2%	17.5%	1	33.3%	16.9%	\$95	17.1%	15.4%
	Middle	5	71.4%	\$1,118	84.0%	80.5%	3	75.0%	83.8%	\$657	84.8%	82.1%	2	66.7%	83.1%	\$461	82.9%	84.6%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$1,331	100.0%	100.0%	4	100.0%	100.0%	\$775	100.0%	100.0%	3	100.0%	100.0%	\$556	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	1	8.3%	\$7	7.3%	19.5%	1	20.0%	23.1%	\$7	23.3%	23.7%	0	0.0%	16.1%	\$0	0.0%	14.7%
	Middle	11	91.7%	\$89	92.7%	80.5%	4	80.0%	76.9%	\$23	76.7%	76.3%	7	100.0%	83.9%	\$66	100.0%	85.3%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$96	100.0%	100.0%	5	100.0%	100.0%	\$30	100.0%	100.0%	7	100.0%	100.0%	\$66	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	9	18.8%	\$1,065	16.4%	19.5%	5	20.0%	17.1%	\$774	19.8%	17.1%	4	17.4%	16.3%	\$291	11.2%	14.9%
	Middle	39	81.3%	\$5,436	83.6%	80.5%	20	80.0%	82.7%	\$3,127	80.2%	82.7%	19	82.6%	83.5%	\$2,309	88.8%	85.0%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Total	48	100.0%	\$6,501	100.0%	100.0%	25	100.0%	100.0%	\$3,901	100.0%	100.0%	23	100.0%	100.0%	\$2,600	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	31	27.0%	\$844	18.0%	28.4%	17	30.9%	23.8%	\$465	21.6%	18.7%	14	23.3%	20.9%	\$379	14.9%	15.8%
	Middle	84	73.0%	\$3,856	82.0%	71.6%	38	69.1%	71.4%	\$1,691	78.4%	75.8%	46	76.7%	74.2%	\$2,165	85.1%	81.6%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.9%	\$0	0.0%	5.5%	0	0.0%	4.9%	\$0	0.0%	2.6%
Total	115	100.0%	\$4,700	100.0%	100.0%	55	100.0%	100.0%	\$2,156	100.0%	100.0%	60	100.0%	100.0%	\$2,544	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	2	33.3%	\$100	58.8%	15.9%	1	25.0%	14.0%	\$50	52.6%	6.3%	1	50.0%	24.3%	\$50	66.7%	24.7%
	Middle	4	66.7%	\$70	41.2%	84.1%	3	75.0%	81.4%	\$45	47.4%	89.9%	1	50.0%	73.0%	\$25	33.3%	72.6%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.7%	\$0	0.0%	3.8%	0	0.0%	2.7%	\$0	0.0%	2.7%
Total	6	100.0%	\$170	100.0%	100.0%	4	100.0%	100.0%	\$95	100.0%	100.0%	2	100.0%	100.0%	\$75	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX East TX

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	26.3%	0	0.0%	3.4%	\$0	0.0%	1.5%	0	0.0%	2.8%	\$0	0.0%	1.1%
	Moderate	8	27.6%	\$700	13.8%	20.0%	2	12.5%	11.2%	\$153	4.9%	5.9%	6	46.2%	11.0%	\$547	27.7%	6.1%
	Middle	5	17.2%	\$635	12.5%	19.4%	5	31.3%	21.7%	\$635	20.5%	16.7%	0	0.0%	18.9%	\$0	0.0%	14.4%
	Upper	16	55.2%	\$3,739	73.7%	34.3%	9	56.3%	50.8%	\$2,308	74.5%	62.7%	7	53.8%	53.4%	\$1,431	72.3%	65.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.0%	\$0	0.0%	13.2%	0	0.0%	13.9%	\$0	0.0%	12.9%
	Total	29	100.0%	\$5,074	100.0%	100.0%	16	100.0%	100.0%	\$3,096	100.0%	100.0%	13	100.0%	100.0%	\$1,978	100.0%	100.0%
REFINANCE	Low	1	14.3%	\$61	4.6%	26.3%	0	0.0%	1.9%	\$0	0.0%	1.1%	1	33.3%	3.2%	\$61	11.0%	1.4%
	Moderate	1	14.3%	\$95	7.1%	20.0%	0	0.0%	8.1%	\$0	0.0%	4.5%	1	33.3%	5.8%	\$95	17.1%	2.6%
	Middle	1	14.3%	\$118	8.9%	19.4%	1	25.0%	16.8%	\$118	15.2%	12.1%	0	0.0%	11.4%	\$0	0.0%	8.2%
	Upper	4	57.1%	\$1,057	79.4%	34.3%	3	75.0%	52.6%	\$657	84.8%	60.0%	1	33.3%	59.2%	\$400	71.9%	68.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.6%	\$0	0.0%	22.3%	0	0.0%	20.4%	\$0	0.0%	18.9%
	Total	7	100.0%	\$1,331	100.0%	100.0%	4	100.0%	100.0%	\$775	100.0%	100.0%	3	100.0%	100.0%	\$556	100.0%	100.0%
HOME IMPROVEMENT	Low	4	33.3%	\$21	21.9%	26.3%	2	40.0%	10.4%	\$9	30.0%	1.4%	2	28.6%	6.9%	\$12	18.2%	0.4%
	Moderate	2	16.7%	\$27	28.1%	20.0%	1	20.0%	20.9%	\$7	23.3%	11.9%	1	14.3%	20.7%	\$20	30.3%	7.7%
	Middle	6	50.0%	\$48	50.0%	19.4%	2	40.0%	20.9%	\$14	46.7%	18.3%	4	57.1%	20.7%	\$34	51.5%	19.6%
	Upper	0	0.0%	\$0	0.0%	34.3%	0	0.0%	45.5%	\$0	0.0%	65.8%	0	0.0%	50.6%	\$0	0.0%	71.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.2%	\$0	0.0%	2.6%	0	0.0%	1.1%	\$0	0.0%	0.7%
	Total	12	100.0%	\$96	100.0%	100.0%	5	100.0%	100.0%	\$30	100.0%	100.0%	7	100.0%	100.0%	\$66	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	26.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	34.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	5	10.4%	\$82	1.3%	26.3%	2	8.0%	3.7%	\$9	0.2%	1.4%	3	13.0%	3.1%	\$73	2.8%	1.1%
	Moderate	11	22.9%	\$822	12.6%	20.0%	3	12.0%	11.4%	\$160	4.1%	5.7%	8	34.8%	10.3%	\$662	25.5%	5.2%
	Middle	12	25.0%	\$801	12.3%	19.4%	8	32.0%	20.5%	\$767	19.7%	15.6%	4	17.4%	17.3%	\$34	1.3%	12.7%
	Upper	20	41.7%	\$4,796	73.8%	34.3%	12	48.0%	50.7%	\$2,965	76.0%	61.9%	8	34.8%	54.5%	\$1,831	70.4%	66.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.7%	\$0	0.0%	15.5%	0	0.0%	14.8%	\$0	0.0%	15.0%
	Total	48	100.0%	\$6,501	100.0%	100.0%	25	100.0%	100.0%	\$3,901	100.0%	100.0%	23	100.0%	100.0%	\$2,600	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	83	72.2%	\$2,847	60.6%	92.5%	41	74.5%	45.3%	\$1,362	63.2%	45.3%	42	70.0%	35.4%	\$1,485	58.4%	31.0%
	Over \$1 Million	20	17.4%	\$1,736	36.9%	5.5%	9	16.4%					11	18.3%				
	Total Rev. available	103	89.6%	\$4,583	97.5%	98.0%	50	90.9%					53	88.3%				
	Rev. Not Known	12	10.4%	\$117	2.5%	2.1%	5	9.1%					7	11.7%				
Total	115	100.0%	\$4,700	100.0%	100.0%	55	100.0%					60	100.0%					
Small Business Loan Size	\$100,000 or Less	111	96.5%	\$3,800	80.9%		53	96.4%	96.0%	\$1,756	81.4%	51.3%	58	96.7%	97.1%	\$2,044	80.3%	61.6%
	\$100,001 - \$250,000	3	2.6%	\$600	12.8%		2	3.6%	2.3%	\$400	18.6%	13.9%	1	1.7%	1.8%	\$200	7.9%	12.2%
	\$250,001 - \$1 Million	1	0.9%	\$300	6.4%		0	0.0%	1.7%	\$0	0.0%	34.8%	1	1.7%	1.2%	\$300	11.8%	26.2%
	Total	115	100.0%	\$4,700	100.0%		55	100.0%	100.0%	\$2,156	100.0%	100.0%	60	100.0%	100.0%	\$2,544	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		3	50.0%	\$110	64.7%	92.6%	2	50.0%	60.5%	\$60	63.2%	82.1%	1	50.0%	70.3%	\$50	66.7%	91.3%
Over \$1 Million		2	33.3%	\$50	29.4%	7.4%	1	25.0%					1	50.0%				
Not Known		1	16.7%	\$10	5.9%	0.0%	1	25.0%					0	0.0%				
Total		6	100.0%	\$170	100.0%	100.0%	4	100.0%					2	100.0%				
Small Farm Loan Size	\$100,000 or Less	6	100.0%	\$170	100.0%		4	100.0%	95.3%	\$95	100.0%	69.0%	2	100.0%	86.5%	\$75	100.0%	42.3%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.7%	\$0	0.0%	31.0%	0	0.0%	10.8%	\$0	0.0%	35.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.7%	\$0	0.0%	21.8%
	Total	6	100.0%	\$170	100.0%		4	100.0%	100.0%	\$95	100.0%	100.0%	2	100.0%	100.0%	\$75	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX El Paso

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	1	0.7%	\$81	0.3%	1.7%	1	1.0%	0.5%	\$81	0.5%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Moderate	22	15.8%	\$2,252	9.5%	28.4%	14	14.3%	17.2%	\$1,227	7.7%	14.3%	8	19.5%	17.1%	\$1,025	13.2%	14.1%
	Middle	39	28.1%	\$5,837	24.6%	31.6%	28	28.6%	38.7%	\$4,180	26.2%	35.1%	11	26.8%	38.1%	\$1,657	21.3%	34.7%
	Upper	77	55.4%	\$15,555	65.6%	38.3%	55	56.1%	43.7%	\$10,450	65.6%	50.4%	22	53.7%	44.4%	\$5,105	65.6%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	139	100.0%	\$23,725	100.0%	100.0%	98	100.0%	100.0%	\$15,938	100.0%	100.0%	41	100.0%	100.0%	\$7,787	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	10	23.8%	\$893	16.6%	28.4%	3	16.7%	14.1%	\$242	9.0%	10.3%	7	29.2%	13.8%	\$651	24.4%	10.6%
	Middle	11	26.2%	\$865	16.1%	31.6%	5	27.8%	33.5%	\$438	16.2%	29.8%	6	25.0%	35.5%	\$427	16.0%	32.2%
	Upper	21	50.0%	\$3,607	67.2%	38.3%	10	55.6%	51.9%	\$2,018	74.8%	59.6%	11	45.8%	50.2%	\$1,589	59.6%	57.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	42	100.0%	\$5,365	100.0%	100.0%	18	100.0%	100.0%	\$2,698	100.0%	100.0%	24	100.0%	100.0%	\$2,667	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.9%	\$0	0.0%	0.6%	0	0.0%	1.1%	\$0	0.0%	0.9%
	Moderate	10	41.7%	\$225	17.2%	28.4%	6	50.0%	24.5%	\$155	60.1%	19.4%	4	33.3%	23.1%	\$70	6.7%	18.6%
	Middle	3	12.5%	\$670	51.3%	31.6%	2	16.7%	32.6%	\$60	23.3%	30.6%	1	8.3%	30.8%	\$610	58.2%	28.5%
	Upper	11	45.8%	\$412	31.5%	38.3%	4	33.3%	42.0%	\$43	16.7%	49.4%	7	58.3%	45.0%	\$369	35.2%	52.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	24	100.0%	\$1,307	100.0%	100.0%	12	100.0%	100.0%	\$258	100.0%	100.0%	12	100.0%	100.0%	\$1,049	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	15.5%	\$0	0.0%	14.1%	0	0.0%	16.7%	\$0	0.0%	1.8%
	Moderate	1	33.3%	\$708	13.9%	34.4%	0	0.0%	32.8%	\$0	0.0%	17.8%	1	50.0%	35.7%	\$708	50.3%	43.1%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	24.1%	\$0	0.0%	27.2%	0	0.0%	28.6%	\$0	0.0%	31.1%
	Upper	2	66.7%	\$4,397	86.1%	24.3%	1	100.0%	27.6%	\$3,697	100.0%	40.9%	1	50.0%	19.0%	\$700	49.7%	24.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	3	100.0%	\$5,105	100.0%	100.0%	1	100.0%	100.0%	\$3,697	100.0%	100.0%	2	100.0%	100.0%	\$1,408	100.0%	100.0%	
HMDA TOTALS	Low	1	0.5%	\$81	0.2%	1.7%	1	0.8%	0.5%	\$81	0.4%	1.3%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	43	20.7%	\$4,078	11.5%	28.4%	23	17.8%	16.9%	\$1,624	7.2%	13.6%	20	25.3%	16.7%	\$2,454	19.0%	14.8%
	Middle	53	25.5%	\$7,372	20.8%	31.6%	35	27.1%	36.7%	\$4,678	20.7%	33.0%	18	22.8%	36.7%	\$2,694	20.9%	33.7%
	Upper	111	53.4%	\$23,971	67.5%	38.3%	70	54.3%	45.9%	\$16,208	71.7%	52.0%	41	51.9%	46.1%	\$7,763	60.1%	51.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	208	100.0%	\$35,502	100.0%	100.0%	129	100.0%	100.0%	\$22,591	100.0%	100.0%	79	100.0%	100.0%	\$12,911	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	31	6.3%	\$2,030	7.5%	6.3%	15	6.6%	6.3%	\$950	8.2%	6.1%	16	6.1%	6.2%	\$1,080	6.9%	5.8%
	Moderate	182	37.0%	\$9,522	35.0%	28.2%	82	35.8%	28.9%	\$3,680	31.9%	34.2%	100	38.0%	28.5%	\$5,842	37.3%	33.4%
	Middle	131	26.6%	\$8,233	30.3%	27.5%	60	26.2%	26.6%	\$3,219	27.9%	24.5%	71	27.0%	26.7%	\$5,014	32.0%	24.0%
	Upper	145	29.5%	\$7,190	26.5%	37.5%	71	31.0%	36.3%	\$3,573	31.0%	32.5%	74	28.1%	36.9%	\$3,617	23.1%	35.4%
	Unknown	3	0.6%	\$205	0.8%	0.4%	1	0.4%	0.6%	\$100	0.9%	1.7%	2	0.8%	0.4%	\$105	0.7%	0.8%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	1.1%	0	0.0%	1.3%	\$0	0.0%	0.7%
Total	492	100.0%	\$27,180	100.0%	100.0%	229	100.0%	100.0%	\$11,522	100.0%	100.0%	263	100.0%	100.0%	\$15,658	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	3.3%	0	0.0%	7.1%	\$0	0.0%	9.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	32.2%	0	0.0%	14.3%	\$0	0.0%	16.8%	0	0.0%	19.5%	\$0	0.0%	14.9%
	Middle	1	50.0%	\$22	68.8%	28.1%	0	0.0%	17.9%	\$0	0.0%	19.8%	1	50.0%	31.2%	\$22	68.8%	51.8%
	Upper	1	50.0%	\$10	31.3%	36.4%	0	0.0%	25.0%	\$0	0.0%	38.9%	1	50.0%	36.4%	\$10	31.3%	29.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	35.7%	\$0	0.0%	14.9%	0	0.0%	13.0%	\$0	0.0%	3.5%
Total	2	100.0%	\$32	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$32	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX El Paso

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	13	9.4%	\$984	4.1%	23.5%	8	8.2%	2.8%	\$624	3.9%	1.3%	5	12.2%	2.4%	\$360	4.6%	1.2%
	Moderate	32	23.0%	\$3,005	12.7%	17.0%	26	26.5%	10.8%	\$2,452	15.4%	6.9%	6	14.6%	11.3%	\$553	7.1%	7.3%
	Middle	33	23.7%	\$3,653	15.4%	17.8%	27	27.6%	22.9%	\$2,946	18.5%	19.8%	6	14.6%	21.5%	\$707	9.1%	18.5%
	Upper	61	43.9%	\$16,083	67.8%	41.7%	37	37.8%	44.0%	\$9,916	62.2%	54.9%	24	58.5%	47.4%	\$6,167	79.2%	57.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.6%	\$0	0.0%	17.2%	0	0.0%	17.3%	\$0	0.0%	15.2%
	Total	139	100.0%	\$23,725	100.0%	100.0%	98	100.0%	100.0%	\$15,938	100.0%	100.0%	41	100.0%	100.0%	\$7,787	100.0%	100.0%
REFINANCE	Low	3	7.1%	\$186	3.5%	23.5%	1	5.6%	3.7%	\$59	2.2%	1.9%	2	8.3%	2.7%	\$127	4.8%	1.4%
	Moderate	8	19.0%	\$693	12.9%	17.0%	2	11.1%	7.3%	\$217	8.0%	4.2%	6	25.0%	6.5%	\$476	17.8%	3.4%
	Middle	6	14.3%	\$590	11.0%	17.8%	2	11.1%	15.2%	\$166	6.2%	10.8%	4	16.7%	10.5%	\$424	15.9%	6.9%
	Upper	25	59.5%	\$3,896	72.6%	41.7%	13	72.2%	42.1%	\$2,256	83.6%	45.7%	12	50.0%	40.0%	\$1,640	61.5%	41.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	31.8%	\$0	0.0%	37.3%	0	0.0%	40.3%	\$0	0.0%	47.0%
	Total	42	100.0%	\$5,365	100.0%	100.0%	18	100.0%	100.0%	\$2,698	100.0%	100.0%	24	100.0%	100.0%	\$2,667	100.0%	100.0%
HOME IMPROVEMENT	Low	2	8.3%	\$9	0.7%	23.5%	2	16.7%	6.9%	\$9	3.5%	4.6%	0	0.0%	4.5%	\$0	0.0%	3.5%
	Moderate	2	8.3%	\$9	0.7%	17.0%	1	8.3%	9.6%	\$5	1.9%	8.5%	1	8.3%	12.2%	\$4	0.4%	10.5%
	Middle	4	16.7%	\$96	7.3%	17.8%	2	16.7%	22.8%	\$46	17.8%	19.0%	2	16.7%	19.2%	\$50	4.8%	15.4%
	Upper	16	66.7%	\$1,193	91.3%	41.7%	7	58.3%	59.1%	\$198	76.7%	61.7%	9	75.0%	62.2%	\$995	94.9%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.7%	\$0	0.0%	6.2%	0	0.0%	1.8%	\$0	0.0%	6.7%
	Total	24	100.0%	\$1,307	100.0%	100.0%	12	100.0%	100.0%	\$258	100.0%	100.0%	12	100.0%	100.0%	\$1,049	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	3	100.0%	\$5,105	100.0%	0.0%	1	100.0%	100.0%	\$3,697	100.0%	100.0%	2	100.0%	100.0%	\$1,408	100.0%	100.0%
	Total	3	100.0%	\$5,105	100.0%	100.0%	1	100.0%	100.0%	\$3,697	100.0%	100.0%	2	100.0%	100.0%	\$1,408	100.0%	100.0%
HMDA TOTALS	Low	18	8.7%	\$1,179	3.3%	23.5%	11	8.5%	3.3%	\$692	3.1%	1.4%	7	8.9%	2.7%	\$487	3.8%	1.2%
	Moderate	42	20.2%	\$3,707	10.4%	17.0%	29	22.5%	9.6%	\$2,674	11.8%	5.7%	13	16.5%	9.9%	\$1,033	8.0%	5.9%
	Middle	43	20.7%	\$4,339	12.2%	17.8%	31	24.0%	20.5%	\$3,158	14.0%	15.9%	12	15.2%	18.0%	\$1,181	9.1%	14.2%
	Upper	102	49.0%	\$21,172	59.6%	41.7%	57	44.2%	44.4%	\$12,370	54.8%	48.3%	45	57.0%	46.4%	\$8,802	68.2%	50.3%
	Unknown	3	1.4%	\$5,105	14.4%	0.0%	1	0.8%	22.1%	\$3,697	16.4%	28.7%	2	2.5%	23.0%	\$1,408	10.9%	28.4%
	Total	208	100.0%	\$35,502	100.0%	100.0%	129	100.0%	100.0%	\$22,591	100.0%	100.0%	79	100.0%	100.0%	\$12,911	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	297	60.4%	\$13,791	50.7%	91.3%	137	59.8%	46.8%	\$6,413	55.7%	38.2%	160	60.8%	39.0%	\$7,378	47.1%	34.7%
	Over \$1 Million	145	29.5%	\$12,858	47.3%	8.1%	67	29.3%					78	29.7%				
	Total Rev. available	442	89.9%	\$26,649	98.0%	99.4%	204	89.1%					238	90.5%				
	Rev. Not Known	50	10.2%	\$531	2.0%	0.6%	25	10.9%					25	9.5%				
Total	492	100.0%	\$27,180	100.0%	100.0%	229	100.0%					263	100.0%					
Small Business Loan Size	\$100,000 or Less	466	94.7%	\$18,190	66.9%		218	95.2%	93.4%	\$8,313	72.1%	37.7%	248	94.3%	93.8%	\$9,877	63.1%	39.2%
	\$100,001 - \$250,000	14	2.8%	\$2,623	9.7%		8	3.5%	3.7%	\$1,592	13.8%	18.0%	6	2.3%	3.5%	\$1,031	6.6%	17.6%
	\$250,001 - \$1 Million	12	2.4%	\$6,367	23.4%		3	1.3%	2.9%	\$1,617	14.0%	44.3%	9	3.4%	2.7%	\$4,750	30.3%	43.2%
	Total	492	100.0%	\$27,180	100.0%		229	100.0%	100.0%	\$11,522	100.0%	100.0%	263	100.0%	100.0%	\$15,658	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	2	100.0%	\$32	100.0%	95.3%	0	0.0%	50.0%	\$0	0.0%	73.3%	2	100.0%	28.6%	\$32	100.0%	26.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	2	100.0%	\$32	100.0%	100.0%	0	0.0%					2	100.0%				
Small Farm Loan Size	\$100,000 or Less	2	100.0%	\$32	100.0%		0	0.0%	96.4%	\$0	0.0%	80.7%	2	100.0%	97.4%	\$32	100.0%	77.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.6%	\$0	0.0%	19.3%	0	0.0%	1.3%	\$0	0.0%	9.6%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	13.0%
	Total	2	100.0%	\$32	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$32	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Grimes-Walker-Washington

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	3	13.6%	\$357	7.7%	2.4%	2	16.7%	3.3%	\$236	9.7%	1.8%	1	10.0%	2.7%	\$121	5.5%	1.9%
	Moderate	2	9.1%	\$236	5.1%	11.0%	2	16.7%	8.8%	\$236	9.7%	7.9%	0	0.0%	9.3%	\$0	0.0%	7.8%
	Middle	10	45.5%	\$1,922	41.7%	41.4%	5	41.7%	44.3%	\$874	36.0%	42.6%	5	50.0%	44.5%	\$1,048	47.9%	41.7%
	Upper	7	31.8%	\$2,096	45.5%	45.0%	3	25.0%	43.5%	\$1,079	44.5%	47.7%	4	40.0%	43.5%	\$1,017	46.5%	48.5%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	22	100.0%	\$4,611	100.0%	100.0%	12	100.0%	100.0%	\$2,425	100.0%	100.0%	10	100.0%	100.0%	\$2,186	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	2.2%	\$0	0.0%	1.0%	0	0.0%	1.1%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	11.0%	0	0.0%	8.1%	\$0	0.0%	7.4%	0	0.0%	7.0%	\$0	0.0%	5.6%
	Middle	2	66.7%	\$270	67.2%	41.4%	1	50.0%	40.2%	\$130	49.6%	39.2%	1	100.0%	43.5%	\$140	100.0%	39.5%
	Upper	1	33.3%	\$132	32.8%	45.0%	1	50.0%	48.9%	\$132	50.4%	51.4%	0	0.0%	48.4%	\$0	0.0%	54.1%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$402	100.0%	100.0%	2	100.0%	100.0%	\$262	100.0%	100.0%	1	100.0%	100.0%	\$140	100.0%	100.0%
HOME IMPROVEMENT	Low	1	16.7%	\$3	3.8%	2.4%	0	0.0%	0.8%	\$0	0.0%	0.4%	1	25.0%	1.3%	\$3	6.7%	0.1%
	Moderate	2	33.3%	\$50	62.5%	11.0%	1	50.0%	12.8%	\$25	71.4%	6.3%	1	25.0%	9.8%	\$25	55.6%	8.9%
	Middle	2	33.3%	\$25	31.3%	41.4%	1	50.0%	42.9%	\$10	28.6%	31.3%	1	25.0%	46.4%	\$15	33.3%	40.3%
	Upper	1	16.7%	\$2	2.5%	45.0%	0	0.0%	43.6%	\$0	0.0%	62.1%	1	25.0%	42.5%	\$2	4.4%	50.7%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$80	100.0%	100.0%	2	100.0%	100.0%	\$35	100.0%	100.0%	4	100.0%	100.0%	\$45	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	33.3%	\$0	0.0%	7.8%	0	0.0%	22.2%	\$0	0.0%	27.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	16.7%	\$0	0.0%	6.6%	0	0.0%	44.4%	\$0	0.0%	46.5%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	33.3%	\$0	0.0%	65.1%	0	0.0%	22.2%	\$0	0.0%	5.3%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	16.7%	\$0	0.0%	20.5%	0	0.0%	11.1%	\$0	0.0%	21.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	12.9%	\$360	7.1%	2.4%	2	12.5%	2.9%	\$236	8.7%	1.7%	2	13.3%	2.2%	\$124	5.2%	1.8%
	Moderate	4	12.9%	\$286	5.6%	11.0%	3	18.8%	8.9%	\$261	9.6%	7.7%	1	6.7%	8.8%	\$25	1.1%	7.5%
	Middle	14	45.2%	\$2,217	43.5%	41.4%	7	43.8%	43.1%	\$1,014	37.3%	41.9%	7	46.7%	44.2%	\$1,203	50.7%	40.6%
	Upper	9	29.0%	\$2,230	43.8%	45.0%	4	25.0%	44.9%	\$1,211	44.5%	48.5%	5	33.3%	44.7%	\$1,019	43.0%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	31	100.0%	\$5,093	100.0%	100.0%	16	100.0%	100.0%	\$2,722	100.0%	100.0%	15	100.0%	100.0%	\$2,371	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	3	2.9%	\$45	1.0%	2.9%	2	3.8%	2.7%	\$35	1.9%	2.6%	1	1.9%	2.3%	\$10	0.4%	2.3%
	Moderate	15	14.4%	\$811	18.3%	12.7%	6	11.5%	11.2%	\$185	9.8%	11.9%	9	17.3%	13.0%	\$626	24.5%	14.2%
	Middle	36	34.6%	\$1,359	30.6%	39.9%	18	34.6%	39.2%	\$743	39.5%	39.9%	18	34.6%	37.7%	\$616	24.1%	40.3%
	Upper	50	48.1%	\$2,225	50.1%	44.4%	26	50.0%	42.3%	\$918	48.8%	42.9%	24	46.2%	42.8%	\$1,307	51.1%	40.7%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.7%	\$0	0.0%	2.7%	0	0.0%	4.1%	\$0	0.0%	2.5%
Total	104	100.0%	\$4,440	100.0%	100.0%	52	100.0%	100.0%	\$1,881	100.0%	100.0%	52	100.0%	100.0%	\$2,559	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.0%	0	0.0%	12.0%	\$0	0.0%	7.5%	0	0.0%	10.3%	\$0	0.0%	11.2%
	Middle	0	0.0%	\$0	0.0%	32.1%	0	0.0%	30.4%	\$0	0.0%	34.8%	0	0.0%	32.5%	\$0	0.0%	30.2%
	Upper	2	100.0%	\$42	100.0%	54.6%	2	100.0%	55.2%	\$42	100.0%	56.3%	0	0.0%	54.0%	\$0	0.0%	57.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.4%	\$0	0.0%	1.3%	0	0.0%	3.2%	\$0	0.0%	1.6%
Total	2	100.0%	\$42	100.0%	100.0%	2	100.0%	100.0%	\$42	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Grimes-Walker-Washington

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count #	% %	Dollar \$ (000s) \$ %			Count #	% %	Agg %	Dollar \$ (000s) \$ % \$ %			Count # % % \$ (000s) \$ % \$ %					
				Count #	% %	\$ (000s)				% %	Count #	% %	Agg %	\$ (000s)	% %	\$ %	Count #	% %
HOME PURCHASE	Low	2	9.1%	\$161	3.5%	21.7%	0	0.0%	1.4%	\$0	0.0%	0.6%	2	20.0%	1.8%	\$161	7.4%	0.7%
	Moderate	4	18.2%	\$425	9.2%	16.9%	3	25.0%	10.8%	\$305	12.6%	6.0%	1	10.0%	8.9%	\$120	5.5%	5.0%
	Middle	4	18.2%	\$468	10.1%	17.2%	3	25.0%	16.7%	\$382	15.8%	11.9%	1	10.0%	20.1%	\$86	3.9%	15.5%
	Upper	12	54.5%	\$3,557	77.1%	44.2%	6	50.0%	57.1%	\$1,738	71.7%	67.4%	6	60.0%	54.1%	\$1,819	83.2%	64.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.0%	\$0	0.0%	14.0%	0	0.0%	15.1%	\$0	0.0%	14.6%
	Total	22	100.0%	\$4,611	100.0%	100.0%	12	100.0%	100.0%	\$2,425	100.0%	100.0%	10	100.0%	100.0%	\$2,186	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	1.5%	\$0	0.0%	0.7%	0	0.0%	3.2%	\$0	0.0%	1.9%
	Moderate	1	33.3%	\$132	32.8%	16.9%	1	50.0%	8.1%	\$132	50.4%	4.4%	0	0.0%	5.0%	\$0	0.0%	2.5%
	Middle	1	33.3%	\$130	32.3%	17.2%	1	50.0%	13.4%	\$130	49.6%	9.3%	0	0.0%	11.9%	\$0	0.0%	7.9%
	Upper	1	33.3%	\$140	34.8%	44.2%	0	0.0%	55.9%	\$0	0.0%	64.9%	1	100.0%	57.1%	\$140	100.0%	63.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.1%	\$0	0.0%	20.7%	0	0.0%	22.8%	\$0	0.0%	24.2%
	Total	3	100.0%	\$402	100.0%	100.0%	2	100.0%	100.0%	\$262	100.0%	100.0%	1	100.0%	100.0%	\$140	100.0%	100.0%
HOME IMPROVEMENT	Low	1	16.7%	\$15	18.8%	21.7%	0	0.0%	6.0%	\$0	0.0%	2.0%	1	25.0%	5.2%	\$15	33.3%	1.3%
	Moderate	2	33.3%	\$5	6.3%	16.9%	0	0.0%	11.3%	\$0	0.0%	6.3%	2	50.0%	9.2%	\$5	11.1%	3.5%
	Middle	1	16.7%	\$10	12.5%	17.2%	1	50.0%	17.3%	\$10	28.6%	14.6%	0	0.0%	12.4%	\$0	0.0%	2.5%
	Upper	2	33.3%	\$50	62.5%	44.2%	1	50.0%	59.4%	\$25	71.4%	69.9%	1	25.0%	67.3%	\$25	55.6%	69.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.0%	\$0	0.0%	7.2%	0	0.0%	5.9%	\$0	0.0%	22.9%
	Total	6	100.0%	\$80	100.0%	100.0%	2	100.0%	100.0%	\$35	100.0%	100.0%	4	100.0%	100.0%	\$45	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	44.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	9.7%	\$176	3.5%	21.7%	0	0.0%	1.7%	\$0	0.0%	0.7%	3	20.0%	2.4%	\$176	7.4%	1.1%
	Moderate	7	22.6%	\$562	11.0%	16.9%	4	25.0%	10.1%	\$437	16.1%	5.5%	3	20.0%	7.8%	\$125	5.3%	4.1%
	Middle	6	19.4%	\$608	11.9%	17.2%	5	31.3%	15.8%	\$522	19.2%	11.0%	1	6.7%	17.2%	\$86	3.6%	12.6%
	Upper	15	48.4%	\$3,747	73.6%	44.2%	7	43.8%	56.8%	\$1,763	64.8%	65.4%	8	53.3%	55.6%	\$1,984	83.7%	63.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.7%	\$0	0.0%	17.5%	0	0.0%	17.0%	\$0	0.0%	18.7%
	Total	31	100.0%	\$5,093	100.0%	100.0%	16	100.0%	100.0%	\$2,722	100.0%	100.0%	15	100.0%	100.0%	\$2,371	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	81	77.9%	\$3,306	74.5%	91.5%	38	73.1%	44.3%	\$1,250	66.5%	36.3%	43	82.7%	41.7%	\$2,056	80.3%	45.4%
	Over \$1 Million	18	17.3%	\$1,100	24.8%	7.0%	10	19.2%					8	15.4%				
	Total Rev. available	99	95.2%	\$4,406	99.3%	98.5%	48	92.3%					51	98.1%				
	Rev. Not Known	5	4.8%	\$34	0.8%	1.5%	4	7.7%					1	1.9%				
Total	104	100.0%	\$4,440	100.0%	100.0%	52	100.0%					52	100.0%					
Small Business Loan Size	\$100,000 or Less	101	97.1%	\$3,689	83.1%		52	100.0%	94.7%	\$1,881	100.0%	44.5%	49	94.2%	95.2%	\$1,808	70.7%	45.0%
	\$100,001 - \$250,000	1	1.0%	\$101	2.3%		0	0.0%	2.9%	\$0	0.0%	15.2%	1	1.9%	2.5%	\$101	3.9%	14.6%
	\$250,001 - \$1 Million	2	1.9%	\$650	14.6%		0	0.0%	2.4%	\$0	0.0%	40.3%	2	3.8%	2.3%	\$650	25.4%	40.4%
	Total	104	100.0%	\$4,440	100.0%		52	100.0%	100.0%	\$1,881	100.0%	100.0%	52	100.0%	100.0%	\$2,559	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		1	50.0%	\$32	76.2%	98.0%	1	50.0%	49.6%	\$32	76.2%	72.7%	0	0.0%	54.0%	\$0	0.0%	68.8%
Over \$1 Million		0	0.0%	\$0	0.0%	2.0%	0	0.0%					0	0.0%				
Not Known		1	50.0%	\$10	23.8%	0.0%	1	50.0%					0	0.0%				
Total		2	100.0%	\$42	100.0%	100.0%	2	100.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	2	100.0%	\$42	100.0%		2	100.0%	91.2%	\$42	100.0%	48.9%	0	0.0%	92.1%	\$0	0.0%	50.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.6%	\$0	0.0%	19.9%	0	0.0%	5.6%	\$0	0.0%	23.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.2%	\$0	0.0%	31.2%	0	0.0%	2.4%	\$0	0.0%	25.5%
	Total	2	100.0%	\$42	100.0%		2	100.0%	100.0%	\$42	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Hale

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	#	%	\$ (000s)	%	%	#	%	\$ (000s)	%	%	
HOME PURCHASE	Low	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%
	Moderate	3	50.0%	\$213	52.0%	38.2%	0	0.0%	22.4%	\$0	0.0%	14.7%	3	100.0%	25.6%	\$213	100.0%	19.5%
	Middle	2	33.3%	\$122	29.8%	16.3%	2	66.7%	8.5%	\$122	61.9%	6.2%	0	0.0%	14.1%	\$0	0.0%	10.2%
	Upper	1	16.7%	\$75	18.3%	45.5%	1	33.3%	69.1%	\$75	38.1%	79.0%	0	0.0%	60.3%	\$0	0.0%	70.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$410	100.0%	100.0%	3	100.0%	100.0%	\$197	100.0%	100.0%	3	100.0%	100.0%	\$213	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	38.2%	0	0.0%	18.7%	\$0	0.0%	17.2%	0	0.0%	23.0%	\$0	0.0%	13.3%
	Middle	0	0.0%	\$0	0.0%	16.3%	0	0.0%	20.0%	\$0	0.0%	15.6%	0	0.0%	18.0%	\$0	0.0%	12.9%
	Upper	1	100.0%	\$75	100.0%	45.5%	1	100.0%	61.3%	\$75	100.0%	67.2%	0	0.0%	59.0%	\$0	0.0%	73.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$75	100.0%	100.0%	1	100.0%	100.0%	\$75	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	38.2%	0	0.0%	33.3%	\$0	0.0%	23.1%	0	0.0%	37.9%	\$0	0.0%	22.4%
	Middle	0	0.0%	\$0	0.0%	16.3%	0	0.0%	7.4%	\$0	0.0%	1.0%	0	0.0%	24.1%	\$0	0.0%	16.9%
	Upper	0	0.0%	\$0	0.0%	45.5%	0	0.0%	59.3%	\$0	0.0%	76.0%	0	0.0%	37.9%	\$0	0.0%	60.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	66.7%	\$0	0.0%	42.6%	0	0.0%	50.0%	\$0	0.0%	85.6%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	33.3%	\$0	0.0%	57.4%	0	0.0%	50.0%	\$0	0.0%	14.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	42.9%	\$213	43.9%	38.2%	0	0.0%	22.7%	\$0	0.0%	15.8%	3	100.0%	25.9%	\$213	100.0%	21.7%
	Middle	2	28.6%	\$122	25.2%	16.3%	2	50.0%	10.3%	\$122	44.9%	7.4%	0	0.0%	15.4%	\$0	0.0%	10.4%
	Upper	2	28.6%	\$150	30.9%	45.5%	2	50.0%	67.0%	\$150	55.1%	76.7%	0	0.0%	58.7%	\$0	0.0%	68.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$485	100.0%	100.0%	4	100.0%	100.0%	\$272	100.0%	100.0%	3	100.0%	100.0%	\$213	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	1	4.8%	\$10	1.3%	30.2%	1	10.0%	31.9%	\$10	2.6%	32.8%	0	0.0%	29.8%	\$0	0.0%	26.2%
	Middle	7	33.3%	\$375	48.1%	20.6%	4	40.0%	17.4%	\$180	47.4%	16.2%	3	27.3%	15.3%	\$195	48.8%	12.0%
	Upper	13	61.9%	\$395	50.6%	49.2%	5	50.0%	48.6%	\$190	50.0%	49.0%	8	72.7%	50.6%	\$205	51.3%	59.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	1.9%	0	0.0%	4.2%	\$0	0.0%	2.9%
Total	21	100.0%	\$780	100.0%	100.0%	10	100.0%	100.0%	\$380	100.0%	100.0%	11	100.0%	100.0%	\$400	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	23.7%	\$0	0.0%	18.1%	0	0.0%	22.7%	\$0	0.0%	17.7%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	13.8%	\$0	0.0%	14.3%	0	0.0%	17.7%	\$0	0.0%	22.5%
	Upper	0	0.0%	\$0	0.0%	58.5%	0	0.0%	61.6%	\$0	0.0%	67.5%	0	0.0%	59.6%	\$0	0.0%	59.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.9%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Hale

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
HOME PURCHASE	Low	2	33.3%	\$122	29.8%	22.7%	2	66.7%	6.8%	\$122	61.9%	3.5%	0	0.0%	4.6%	\$0	0.0%	2.2%
	Moderate	1	16.7%	\$75	18.3%	20.6%	1	33.3%	14.7%	\$75	38.1%	10.1%	0	0.0%	12.6%	\$0	0.0%	9.6%
	Middle	3	50.0%	\$213	52.0%	20.1%	0	0.0%	24.1%	\$0	0.0%	22.5%	3	100.0%	19.8%	\$213	100.0%	18.5%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	36.5%	\$0	0.0%	46.3%	0	0.0%	39.1%	\$0	0.0%	48.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.9%	\$0	0.0%	17.5%	0	0.0%	23.9%	\$0	0.0%	21.1%
	Total	6	100.0%	\$410	100.0%	100.0%	3	100.0%	100.0%	\$197	100.0%	100.0%	3	100.0%	100.0%	\$213	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	2.7%	\$0	0.0%	2.2%	0	0.0%	3.0%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	20.6%	0	0.0%	5.3%	\$0	0.0%	3.1%	0	0.0%	5.0%	\$0	0.0%	3.1%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	13.3%	\$0	0.0%	10.3%	0	0.0%	21.0%	\$0	0.0%	14.2%
	Upper	1	100.0%	\$75	100.0%	36.5%	1	100.0%	40.0%	\$75	100.0%	51.1%	0	0.0%	38.0%	\$0	0.0%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	38.7%	\$0	0.0%	33.3%	0	0.0%	33.0%	\$0	0.0%	31.7%
	Total	1	100.0%	\$75	100.0%	100.0%	1	100.0%	100.0%	\$75	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.6%	0	0.0%	14.8%	\$0	0.0%	7.4%	0	0.0%	6.9%	\$0	0.0%	6.5%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	3.7%	\$0	0.0%	4.6%	0	0.0%	13.8%	\$0	0.0%	10.2%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	77.8%	\$0	0.0%	78.0%	0	0.0%	65.5%	\$0	0.0%	64.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.7%	\$0	0.0%	10.0%	0	0.0%	13.8%	\$0	0.0%	19.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	28.6%	\$122	25.2%	22.7%	2	50.0%	5.6%	\$122	44.9%	3.2%	0	0.0%	4.0%	\$0	0.0%	2.1%
	Moderate	1	14.3%	\$75	15.5%	20.6%	1	25.0%	13.0%	\$75	27.6%	8.8%	0	0.0%	10.6%	\$0	0.0%	7.7%
	Middle	3	42.9%	\$213	43.9%	20.1%	0	0.0%	20.9%	\$0	0.0%	19.8%	3	100.0%	19.6%	\$213	100.0%	16.5%
	Upper	1	14.3%	\$75	15.5%	36.5%	1	25.0%	39.3%	\$75	27.6%	46.8%	0	0.0%	40.3%	\$0	0.0%	46.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.1%	\$0	0.0%	21.4%	0	0.0%	25.5%	\$0	0.0%	27.3%
	Total	7	100.0%	\$485	100.0%	100.0%	4	100.0%	100.0%	\$272	100.0%	100.0%	3	100.0%	100.0%	\$213	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	17	81.0%	\$480	61.5%	91.4%	8	80.0%	53.9%	\$230	60.5%	57.3%	9	81.8%	49.0%	\$250	62.5%	52.6%
	Over \$1 Million	2	9.5%	\$200	25.6%	6.9%	1	10.0%					1	9.1%				
	Total Rev. available	19	90.5%	\$680	87.1%	98.3%	9	90.0%					10	90.9%				
	Rev. Not Known	2	9.5%	\$100	12.8%	1.7%	1	10.0%					1	9.1%				
Total	21	100.0%	\$780	100.0%	100.0%	10	100.0%					11	100.0%					
Small Business Loan Size	\$100,000 or Less	21	100.0%	\$780	100.0%		10	100.0%	92.7%	\$380	100.0%	43.7%	11	100.0%	95.0%	\$400	100.0%	50.3%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.4%	\$0	0.0%	19.2%	0	0.0%	2.4%	\$0	0.0%	12.2%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	37.0%	0	0.0%	2.6%	\$0	0.0%	37.6%
	Total	21	100.0%	\$780	100.0%		10	100.0%	100.0%	\$380	100.0%	100.0%	11	100.0%	100.0%	\$400	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.4%	0	0.0%	60.8%	\$0	0.0%	75.0%	0	0.0%	62.7%	\$0	0.0%	83.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.6%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	70.7%	\$0	0.0%	21.9%	0	0.0%	75.4%	\$0	0.0%	25.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	15.5%	\$0	0.0%	26.3%	0	0.0%	15.0%	\$0	0.0%	31.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	13.8%	\$0	0.0%	51.8%	0	0.0%	9.6%	\$0	0.0%	43.1%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Harrison

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	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%
	Moderate	3	60.0%	\$318	51.4%	12.4%	1	33.3%	7.8%	\$100	24.9%	3.7%	2	100.0%	6.9%	\$218	100.0%	3.8%
	Middle	0	0.0%	\$0	0.0%	33.2%	0	0.0%	23.4%	\$0	0.0%	21.2%	0	0.0%	24.3%	\$0	0.0%	23.1%
	Upper	2	40.0%	\$301	48.6%	54.4%	2	66.7%	68.8%	\$301	75.1%	75.1%	0	0.0%	68.8%	\$0	0.0%	73.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$619	100.0%	100.0%	3	100.0%	100.0%	\$401	100.0%	100.0%	2	100.0%	100.0%	\$218	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	12.4%	0	0.0%	5.4%	\$0	0.0%	3.7%	0	0.0%	5.6%	\$0	0.0%	3.7%
	Middle	0	0.0%	\$0	0.0%	33.2%	0	0.0%	23.3%	\$0	0.0%	21.4%	0	0.0%	23.3%	\$0	0.0%	21.1%
	Upper	3	100.0%	\$401	100.0%	54.4%	2	100.0%	71.3%	\$166	100.0%	74.9%	1	100.0%	71.2%	\$235	100.0%	75.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$401	100.0%	100.0%	2	100.0%	100.0%	\$166	100.0%	100.0%	1	100.0%	100.0%	\$235	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	12.4%	0	0.0%	15.7%	\$0	0.0%	11.2%	0	0.0%	10.8%	\$0	0.0%	5.3%
	Middle	0	0.0%	\$0	0.0%	33.2%	0	0.0%	24.8%	\$0	0.0%	15.0%	0	0.0%	20.6%	\$0	0.0%	28.3%
	Upper	1	100.0%	\$25	100.0%	54.4%	0	0.0%	59.5%	\$0	0.0%	73.8%	1	100.0%	68.6%	\$25	100.0%	66.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	25.0%	\$0	0.0%	7.3%	0	0.0%	33.3%	\$0	0.0%	77.9%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	75.0%	\$0	0.0%	92.7%	0	0.0%	66.7%	\$0	0.0%	22.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	33.3%	\$318	30.4%	12.4%	1	20.0%	7.7%	\$100	17.6%	3.9%	2	50.0%	6.7%	\$218	45.6%	3.7%
	Middle	0	0.0%	\$0	0.0%	33.2%	0	0.0%	23.5%	\$0	0.0%	20.9%	0	0.0%	23.7%	\$0	0.0%	23.7%
	Upper	6	66.7%	\$727	69.6%	54.4%	4	80.0%	68.8%	\$467	82.4%	75.2%	2	50.0%	69.5%	\$260	54.4%	72.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$1,045	100.0%	100.0%	5	100.0%	100.0%	\$567	100.0%	100.0%	4	100.0%	100.0%	\$478	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	4	36.4%	\$120	19.2%	21.4%	2	40.0%	18.8%	\$60	16.2%	22.4%	2	33.3%	18.0%	\$60	23.5%	14.6%
	Middle	3	27.3%	\$400	64.0%	28.9%	2	40.0%	23.9%	\$300	81.1%	27.3%	1	16.7%	23.1%	\$100	39.2%	26.9%
	Upper	4	36.4%	\$105	16.8%	49.6%	1	20.0%	54.8%	\$10	2.7%	49.5%	3	50.0%	56.1%	\$95	37.3%	57.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	0.9%	0	0.0%	2.8%	\$0	0.0%	1.0%
Total	11	100.0%	\$625	100.0%	100.0%	5	100.0%	100.0%	\$370	100.0%	100.0%	6	100.0%	100.0%	\$255	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	1.6%	0	0.0%	8.1%	\$0	0.0%	11.7%	0	0.0%	3.6%	\$0	0.0%	1.7%
	Middle	0	0.0%	\$0	0.0%	44.3%	0	0.0%	43.2%	\$0	0.0%	29.2%	0	0.0%	35.7%	\$0	0.0%	29.4%
	Upper	0	0.0%	\$0	0.0%	54.1%	0	0.0%	48.6%	\$0	0.0%	59.1%	0	0.0%	57.1%	\$0	0.0%	66.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	2.1%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Harrison

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	19.0%	0	0.0%	2.0%	\$0	0.0%	1.0%	0	0.0%	3.1%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	9.7%	\$0	0.0%	5.5%	0	0.0%	9.9%	\$0	0.0%	5.4%
	Middle	3	60.0%	\$332	53.6%	18.1%	1	33.3%	14.3%	\$114	28.4%	11.0%	2	100.0%	16.6%	\$218	100.0%	12.9%
	Upper	2	40.0%	\$287	46.4%	48.0%	2	66.7%	57.0%	\$287	71.6%	68.9%	0	0.0%	54.1%	\$0	0.0%	65.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.9%	\$0	0.0%	13.6%	0	0.0%	16.2%	\$0	0.0%	15.7%
	Total	5	100.0%	\$619	100.0%	100.0%	3	100.0%	100.0%	\$401	100.0%	100.0%	2	100.0%	100.0%	\$218	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	19.0%	0	0.0%	2.9%	\$0	0.0%	1.3%	0	0.0%	2.3%	\$0	0.0%	1.4%
	Moderate	1	33.3%	\$86	21.4%	14.9%	1	50.0%	5.2%	\$86	51.8%	2.8%	0	0.0%	5.1%	\$0	0.0%	2.6%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	12.0%	\$0	0.0%	8.0%	0	0.0%	10.5%	\$0	0.0%	7.6%
	Upper	2	66.7%	\$315	78.6%	48.0%	1	50.0%	53.7%	\$80	48.2%	56.3%	1	100.0%	54.0%	\$235	100.0%	58.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	26.2%	\$0	0.0%	31.7%	0	0.0%	28.1%	\$0	0.0%	29.8%
	Total	3	100.0%	\$401	100.0%	100.0%	2	100.0%	100.0%	\$166	100.0%	100.0%	1	100.0%	100.0%	\$235	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.0%	0	0.0%	5.8%	\$0	0.0%	1.8%	0	0.0%	4.9%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	9.1%	\$0	0.0%	4.1%	0	0.0%	10.8%	\$0	0.0%	6.2%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	12.4%	\$0	0.0%	9.2%	0	0.0%	19.6%	\$0	0.0%	10.0%
	Upper	1	100.0%	\$25	100.0%	48.0%	0	0.0%	63.6%	\$0	0.0%	76.5%	1	100.0%	57.8%	\$25	100.0%	74.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	8.4%	0	0.0%	6.9%	\$0	0.0%	7.2%
	Total	1	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	48.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	19.0%	0	0.0%	2.6%	\$0	0.0%	1.1%	0	0.0%	3.0%	\$0	0.0%	1.1%
	Moderate	1	11.1%	\$86	8.2%	14.9%	1	20.0%	8.3%	\$86	15.2%	4.6%	0	0.0%	8.5%	\$0	0.0%	4.5%
	Middle	3	33.3%	\$332	31.8%	18.1%	1	20.0%	13.4%	\$114	20.1%	9.9%	2	50.0%	15.0%	\$218	45.6%	11.0%
	Upper	5	55.6%	\$627	60.0%	48.0%	3	60.0%	56.4%	\$367	64.7%	64.8%	2	50.0%	54.2%	\$260	54.4%	62.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.3%	\$0	0.0%	19.5%	0	0.0%	19.3%	\$0	0.0%	21.3%
	Total	9	100.0%	\$1,045	100.0%	100.0%	5	100.0%	100.0%	\$567	100.0%	100.0%	4	100.0%	100.0%	\$478	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	7	63.6%	\$415	66.4%	92.2%	3	60.0%	48.1%	\$310	83.8%	41.5%	4	66.7%	45.3%	\$105	41.2%	46.3%
	Over \$1 Million	3	27.3%	\$200	32.0%	7.0%	1	20.0%					2	33.3%				
	Total Rev. available	10	90.9%	\$615	98.4%	99.2%	4	80.0%					6	100.0%				
	Rev. Not Known	1	9.1%	\$10	1.6%	0.8%	1	20.0%					0	0.0%				
Total	11	100.0%	\$625	100.0%	100.0%	5	100.0%					6	100.0%					
Small Business Loan Size	\$100,000 or Less	10	90.9%	\$425	68.0%		4	80.0%	87.5%	\$170	45.9%	27.0%	6	100.0%	88.3%	\$255	100.0%	26.5%
	\$100,001 - \$250,000	1	9.1%	\$200	32.0%		1	20.0%	6.3%	\$200	54.1%	18.5%	0	0.0%	5.8%	\$0	0.0%	17.1%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	6.1%	\$0	0.0%	54.5%	0	0.0%	5.9%	\$0	0.0%	56.4%
	Total	11	100.0%	\$625	100.0%		5	100.0%	100.0%	\$370	100.0%	100.0%	6	100.0%	100.0%	\$255	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	98.4%	0	0.0%	83.8%	\$0	0.0%	71.3%	0	0.0%	85.7%	\$0	0.0%	73.0%
Over \$1 Million		0	0.0%	\$0	0.0%	1.6%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	81.1%	\$0	0.0%	29.5%	0	0.0%	85.7%	\$0	0.0%	42.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.8%	\$0	0.0%	22.5%	0	0.0%	7.1%	\$0	0.0%	13.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	8.1%	\$0	0.0%	48.0%	0	0.0%	7.1%	\$0	0.0%	44.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Howard-Runnels

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	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%
	Moderate	6	31.6%	\$435	20.7%	16.1%	4	36.4%	11.4%	\$313	23.8%	9.0%	2	25.0%	10.3%	\$122	15.6%	7.9%
	Middle	13	68.4%	\$1,663	79.3%	60.2%	7	63.6%	66.3%	\$1,003	76.2%	63.0%	6	75.0%	66.9%	\$660	84.4%	64.3%
	Upper	0	0.0%	\$0	0.0%	23.7%	0	0.0%	22.0%	\$0	0.0%	27.8%	0	0.0%	22.8%	\$0	0.0%	27.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	19	100.0%	\$2,098	100.0%	100.0%	11	100.0%	100.0%	\$1,316	100.0%	100.0%	8	100.0%	100.0%	\$782	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	1	33.3%	\$57	15.0%	16.1%	1	50.0%	9.1%	\$57	46.7%	5.8%	0	0.0%	5.6%	\$0	0.0%	3.8%
	Middle	2	66.7%	\$322	85.0%	60.2%	1	50.0%	66.7%	\$65	53.3%	60.7%	1	100.0%	59.6%	\$257	100.0%	51.5%
	Upper	0	0.0%	\$0	0.0%	23.7%	0	0.0%	24.2%	\$0	0.0%	33.5%	0	0.0%	34.8%	\$0	0.0%	44.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$379	100.0%	100.0%	2	100.0%	100.0%	\$122	100.0%	100.0%	1	100.0%	100.0%	\$257	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	22.2%	\$0	0.0%	14.3%	0	0.0%	13.5%	\$0	0.0%	7.9%
	Middle	0	0.0%	\$0	0.0%	60.2%	0	0.0%	60.0%	\$0	0.0%	53.0%	0	0.0%	53.8%	\$0	0.0%	36.8%
	Upper	0	0.0%	\$0	0.0%	23.7%	0	0.0%	17.8%	\$0	0.0%	32.7%	0	0.0%	32.7%	\$0	0.0%	55.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
HMDA TOTALS	Low	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%
	Moderate	7	31.8%	\$492	19.9%	16.1%	5	38.5%	11.4%	\$370	25.7%	8.2%	2	22.2%	9.5%	\$122	11.7%	6.9%
	Middle	15	68.2%	\$1,985	80.1%	60.2%	8	61.5%	66.1%	\$1,068	74.3%	62.6%	7	77.8%	64.3%	\$917	88.3%	60.4%
	Upper	0	0.0%	\$0	0.0%	23.7%	0	0.0%	22.2%	\$0	0.0%	29.0%	0	0.0%	26.2%	\$0	0.0%	32.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	22	100.0%	\$2,477	100.0%	100.0%	13	100.0%	100.0%	\$1,438	100.0%	100.0%	9	100.0%	100.0%	\$1,039	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	7	20.0%	\$241	21.0%	22.3%	5	26.3%	18.0%	\$71	13.1%	19.3%	2	12.5%	21.1%	\$170	28.1%	24.7%
	Middle	18	51.4%	\$545	47.4%	57.6%	10	52.6%	52.9%	\$358	65.8%	48.0%	8	50.0%	48.0%	\$187	30.9%	40.7%
	Upper	10	28.6%	\$363	31.6%	20.1%	4	21.1%	25.2%	\$115	21.1%	30.7%	6	37.5%	26.3%	\$248	41.0%	32.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	2.0%	0	0.0%	4.5%	\$0	0.0%	2.3%
Total	35	100.0%	\$1,149	100.0%	100.0%	19	100.0%	100.0%	\$544	100.0%	100.0%	16	100.0%	100.0%	\$605	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	3.0%	0	0.0%	1.6%	\$0	0.0%	2.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	48.0%	0	0.0%	32.8%	\$0	0.0%	33.8%	0	0.0%	32.0%	\$0	0.0%	42.1%
	Upper	0	0.0%	\$0	0.0%	49.0%	0	0.0%	65.6%	\$0	0.0%	63.9%	0	0.0%	68.0%	\$0	0.0%	57.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Howard-Runnels

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income			Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	5.3%	\$94	4.5%	22.9%	0	0.0%	1.9%	\$0	0.0%	0.8%	1	12.5%	3.1%	\$94	12.0%	1.3%
	Moderate	5	26.3%	\$416	19.8%	16.9%	3	27.3%	8.9%	\$201	15.3%	5.7%	2	25.0%	9.6%	\$215	27.5%	5.5%
	Middle	6	31.6%	\$642	30.6%	16.4%	3	27.3%	19.3%	\$292	22.2%	16.4%	3	37.5%	20.1%	\$350	44.8%	17.8%
	Upper	7	36.8%	\$946	45.1%	43.8%	5	45.5%	42.0%	\$823	62.5%	50.2%	2	25.0%	43.7%	\$123	15.7%	53.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	27.8%	\$0	0.0%	26.8%	0	0.0%	23.6%	\$0	0.0%	22.0%
	Total	19	100.0%	\$2,098	100.0%	100.0%	11	100.0%	100.0%	\$1,316	100.0%	100.0%	8	100.0%	100.0%	\$782	100.0%	100.0%
REFINANCE	Low	1	33.3%	\$57	15.0%	22.9%	1	50.0%	2.7%	\$57	46.7%	1.4%	0	0.0%	2.5%	\$0	0.0%	0.9%
	Moderate	1	33.3%	\$65	17.2%	16.9%	1	50.0%	5.9%	\$65	53.3%	3.3%	0	0.0%	3.7%	\$0	0.0%	1.5%
	Middle	0	0.0%	\$0	0.0%	16.4%	0	0.0%	12.9%	\$0	0.0%	9.6%	0	0.0%	9.9%	\$0	0.0%	6.7%
	Upper	1	33.3%	\$257	67.8%	43.8%	0	0.0%	45.2%	\$0	0.0%	49.7%	1	100.0%	46.6%	\$257	100.0%	50.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	33.3%	\$0	0.0%	36.0%	0	0.0%	37.3%	\$0	0.0%	40.8%
	Total	3	100.0%	\$379	100.0%	100.0%	2	100.0%	100.0%	\$122	100.0%	100.0%	1	100.0%	100.0%	\$257	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	6.7%	\$0	0.0%	2.0%	0	0.0%	1.9%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	6.7%	\$0	0.0%	2.7%	0	0.0%	7.7%	\$0	0.0%	4.5%
	Middle	0	0.0%	\$0	0.0%	16.4%	0	0.0%	17.8%	\$0	0.0%	13.3%	0	0.0%	13.5%	\$0	0.0%	4.1%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	60.0%	\$0	0.0%	72.0%	0	0.0%	71.2%	\$0	0.0%	84.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.9%	\$0	0.0%	10.1%	0	0.0%	5.8%	\$0	0.0%	7.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	2	9.1%	\$151	6.1%	22.9%	1	7.7%	2.4%	\$57	4.0%	1.0%	1	11.1%	2.9%	\$94	9.0%	1.2%
	Moderate	6	27.3%	\$481	19.4%	16.9%	4	30.8%	8.0%	\$266	18.5%	5.0%	2	22.2%	8.1%	\$215	20.7%	4.5%
	Middle	6	27.3%	\$642	25.9%	16.4%	3	23.1%	17.6%	\$292	20.3%	14.6%	3	33.3%	17.4%	\$350	33.7%	14.7%
	Upper	8	36.4%	\$1,203	48.6%	43.8%	5	38.5%	43.8%	\$823	57.2%	50.0%	3	33.3%	46.3%	\$380	36.6%	53.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	28.2%	\$0	0.0%	29.4%	0	0.0%	25.3%	\$0	0.0%	26.1%
	Total	22	100.0%	\$2,477	100.0%	100.0%	13	100.0%	100.0%	\$1,438	100.0%	100.0%	9	100.0%	100.0%	\$1,039	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	22	62.9%	\$806	70.1%	90.6%	11	57.9%	40.3%	\$350	64.3%	40.7%	11	68.8%	39.7%	\$456	75.4%	41.7%
	Over \$1 Million	8	22.9%	\$324	28.2%	7.9%	4	21.1%					4	25.0%				
	Total Rev. available	30	85.8%	\$1,130	98.3%	98.5%	15	79.0%					15	93.8%				
	Rev. Not Known	5	14.3%	\$19	1.7%	1.5%	4	21.1%					1	6.3%				
Total	35	100.0%	\$1,149	100.0%	100.0%	19	100.0%					16	100.0%					
Small Business Loan Size	\$100,000 or Less	34	97.1%	\$1,029	89.6%		19	100.0%	94.7%	\$544	100.0%	48.0%	15	93.8%	94.3%	\$485	80.2%	46.4%
	\$100,001 - \$250,000	1	2.9%	\$120	10.4%		0	0.0%	3.3%	\$0	0.0%	19.8%	1	6.3%	4.0%	\$120	19.8%	21.8%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	32.2%	0	0.0%	1.8%	\$0	0.0%	31.8%
	Total	35	100.0%	\$1,149	100.0%		19	100.0%	100.0%	\$544	100.0%	100.0%	16	100.0%	100.0%	\$605	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	98.5%	0	0.0%	43.8%	\$0	0.0%	67.5%	0	0.0%	45.3%	\$0	0.0%	62.7%
Over \$1 Million		0	0.0%	\$0	0.0%	1.5%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	90.6%	\$0	0.0%	46.6%	0	0.0%	90.7%	\$0	0.0%	45.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	9.6%	0	0.0%	4.0%	\$0	0.0%	16.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.3%	\$0	0.0%	43.8%	0	0.0%	5.3%	\$0	0.0%	38.6%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Killeen-Temple

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2015, 2016					2015					2016							
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	1	1.4%	\$50	0.5%	1.6%	1	2.1%	0.4%	\$50	0.7%	0.4%	0	0.0%	0.4%	\$0	0.0%	0.4%	
	Moderate	3	4.3%	\$260	2.4%	9.3%	2	4.2%	5.1%	\$174	2.3%	3.5%	1	4.5%	7.9%	\$86	2.6%	6.5%	
	Middle	41	58.6%	\$5,653	51.5%	57.8%	27	56.3%	58.3%	\$4,043	53.2%	54.6%	14	63.6%	55.9%	\$1,610	47.8%	52.1%	
	Upper	25	35.7%	\$5,006	45.6%	31.3%	18	37.5%	36.2%	\$3,334	43.9%	41.5%	7	31.8%	35.8%	\$1,672	49.6%	41.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	70	100.0%	\$10,969	100.0%	100.0%	48	100.0%	100.0%	\$7,601	100.0%	100.0%	22	100.0%	100.0%	\$3,368	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.8%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.4%	
	Moderate	4	11.8%	\$581	10.4%	9.3%	3	13.6%	6.2%	\$509	15.4%	4.6%	1	8.3%	4.2%	\$72	3.2%	3.1%	
	Middle	11	32.4%	\$1,768	31.8%	57.8%	7	31.8%	56.8%	\$780	23.7%	51.6%	4	33.3%	59.6%	\$988	43.7%	54.5%	
	Upper	19	55.9%	\$3,211	57.8%	31.3%	12	54.5%	36.3%	\$2,008	60.9%	42.8%	7	58.3%	36.0%	\$1,203	53.2%	42.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	34	100.0%	\$5,560	100.0%	100.0%	22	100.0%	100.0%	\$3,297	100.0%	100.0%	12	100.0%	100.0%	\$2,263	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	1.5%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.3%	
	Moderate	0	0.0%	\$0	0.0%	9.3%	0	0.0%	7.9%	\$0	0.0%	6.0%	0	0.0%	7.3%	\$0	0.0%	5.5%	
	Middle	7	50.0%	\$154	49.2%	57.8%	2	33.3%	57.1%	\$55	35.7%	54.6%	5	62.5%	55.0%	\$99	62.3%	40.3%	
	Upper	7	50.0%	\$159	50.8%	31.3%	4	66.7%	33.5%	\$99	64.3%	38.9%	3	37.5%	36.9%	\$60	37.7%	53.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	14	100.0%	\$313	100.0%	100.0%	6	100.0%	100.0%	\$154	100.0%	100.0%	8	100.0%	100.0%	\$159	100.0%	100.0%	
MULTI FAMILY	Multi-Family Units																		
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	8.0%	\$0	0.0%	15.6%	0	0.0%	13.6%	\$0	0.0%	8.5%	
	Moderate	1	100.0%	\$2,500	100.0%	34.4%	1	100.0%	60.0%	\$2,500	100.0%	53.5%	0	0.0%	31.8%	\$0	0.0%	46.0%	
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	20.0%	\$0	0.0%	26.2%	0	0.0%	54.5%	\$0	0.0%	45.5%	
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	12.0%	\$0	0.0%	4.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	1	100.0%	\$2,500	100.0%	100.0%	1	100.0%	100.0%	\$2,500	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
HMDA TOTALS	Low	1	0.8%	\$50	0.3%	1.6%	1	1.3%	0.6%	\$50	0.4%	1.1%	0	0.0%	0.4%	\$0	0.0%	0.5%	
	Moderate	8	6.7%	\$3,341	17.3%	9.3%	6	7.8%	5.6%	\$3,183	23.5%	5.4%	2	4.8%	6.7%	\$158	2.7%	5.9%	
	Middle	59	49.6%	\$7,575	39.2%	57.8%	36	46.8%	57.7%	\$4,878	36.0%	52.9%	23	54.8%	57.1%	\$2,697	46.6%	52.7%	
	Upper	51	42.9%	\$8,376	43.3%	31.3%	34	44.2%	36.1%	\$5,441	40.1%	40.7%	17	40.5%	35.8%	\$2,935	50.7%	40.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	119	100.0%	\$19,342	100.0%	100.0%	77	100.0%	100.0%	\$13,552	100.0%	100.0%	42	100.0%	100.0%	\$5,790	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses																		
	Low	5	2.0%	\$135	1.4%	2.0%	2	1.5%	1.3%	\$60	1.1%	1.4%	3	2.5%	1.4%	\$75	1.7%	0.8%	
	Moderate	47	18.7%	\$1,964	19.7%	18.1%	25	18.9%	15.5%	\$977	17.7%	20.8%	22	18.5%	16.0%	\$987	22.2%	19.3%	
	Middle	116	46.2%	\$4,190	42.1%	49.8%	62	47.0%	46.6%	\$2,581	46.9%	39.3%	54	45.4%	46.1%	\$1,609	36.2%	44.4%	
	Upper	83	33.1%	\$3,665	36.8%	30.0%	43	32.6%	34.6%	\$1,888	34.3%	37.6%	40	33.6%	34.4%	\$1,777	40.0%	34.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	0.8%	0	0.0%	2.1%	\$0	0.0%	1.3%	
Total	251	100.0%	\$9,954	100.0%	100.0%	132	100.0%	100.0%	\$5,506	100.0%	100.0%	119	100.0%	100.0%	\$4,448	100.0%	100.0%		
SMALL FARM	Small Farms																		
	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	2.0%	\$0	0.0%	3.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	5.9%	0	0.0%	3.4%	\$0	0.0%	0.9%	0	0.0%	7.5%	\$0	0.0%	3.9%	
	Middle	1	100.0%	\$18	100.0%	60.5%	0	0.0%	49.7%	\$0	0.0%	74.9%	1	100.0%	55.6%	\$18	100.0%	69.4%	
	Upper	0	0.0%	\$0	0.0%	32.4%	0	0.0%	45.0%	\$0	0.0%	21.0%	0	0.0%	35.6%	\$0	0.0%	25.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	1.1%	
Total	1	100.0%	\$18	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$18	100.0%	100.0%		

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Killeen-Temple

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	2	2.9%	\$165	1.5%	19.6%	1	2.1%	3.0%	\$92	1.2%	1.4%	1	4.5%	3.0%	\$73	2.2%	1.5%
	Moderate	23	32.9%	\$2,354	21.5%	18.5%	16	33.3%	14.2%	\$1,552	20.4%	9.9%	7	31.8%	14.6%	\$802	23.8%	10.3%
	Middle	11	15.7%	\$1,444	13.2%	21.4%	8	16.7%	25.1%	\$1,101	14.5%	23.5%	3	13.6%	26.1%	\$343	10.2%	24.5%
	Upper	34	48.6%	\$7,006	63.9%	40.5%	23	47.9%	40.9%	\$4,856	63.9%	51.1%	11	50.0%	41.1%	\$2,150	63.8%	50.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.9%	\$0	0.0%	14.0%	0	0.0%	15.2%	\$0	0.0%	13.5%
	Total	70	100.0%	\$10,969	100.0%	100.0%	48	100.0%	100.0%	\$7,601	100.0%	100.0%	22	100.0%	100.0%	\$3,368	100.0%	100.0%
REFINANCE	Low	2	5.9%	\$181	3.3%	19.6%	1	4.5%	2.3%	\$81	2.5%	1.4%	1	8.3%	1.8%	\$100	4.4%	1.0%
	Moderate	5	14.7%	\$360	6.5%	18.5%	4	18.2%	5.0%	\$229	6.9%	2.8%	1	8.3%	3.9%	\$131	5.8%	2.2%
	Middle	3	8.8%	\$334	6.0%	21.4%	1	4.5%	8.2%	\$140	4.2%	5.9%	2	16.7%	7.0%	\$194	8.6%	4.8%
	Upper	24	70.6%	\$4,685	84.3%	40.5%	16	72.7%	23.7%	\$2,847	86.4%	26.2%	8	66.7%	18.9%	\$1,838	81.2%	21.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	60.7%	\$0	0.0%	63.7%	0	0.0%	68.5%	\$0	0.0%	70.4%
	Total	34	100.0%	\$5,560	100.0%	100.0%	22	100.0%	100.0%	\$3,297	100.0%	100.0%	12	100.0%	100.0%	\$2,263	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	4.7%	\$0	0.0%	1.5%	0	0.0%	3.8%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	18.5%	0	0.0%	14.3%	\$0	0.0%	5.3%	0	0.0%	15.7%	\$0	0.0%	7.8%
	Middle	3	21.4%	\$70	22.4%	21.4%	0	0.0%	21.9%	\$0	0.0%	11.7%	3	37.5%	17.9%	\$70	44.0%	10.6%
	Upper	11	78.6%	\$243	77.6%	40.5%	6	100.0%	52.8%	\$154	100.0%	60.9%	5	62.5%	58.8%	\$89	56.0%	72.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.4%	\$0	0.0%	20.7%	0	0.0%	3.8%	\$0	0.0%	8.0%
	Total	14	100.0%	\$313	100.0%	100.0%	6	100.0%	100.0%	\$154	100.0%	100.0%	8	100.0%	100.0%	\$159	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$2,500	100.0%	0.0%	1	100.0%	100.0%	\$2,500	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	1	100.0%	\$2,500	100.0%	100.0%	1	100.0%	100.0%	\$2,500	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	3.4%	\$346	1.8%	19.6%	2	2.6%	2.8%	\$173	1.3%	1.4%	2	4.8%	2.6%	\$173	3.0%	1.3%
	Moderate	28	23.5%	\$2,714	14.0%	18.5%	20	26.0%	11.4%	\$1,781	13.1%	7.6%	8	19.0%	11.1%	\$933	16.1%	7.5%
	Middle	17	14.3%	\$1,848	9.6%	21.4%	9	11.7%	19.9%	\$1,241	9.2%	17.7%	8	19.0%	19.5%	\$607	10.5%	17.7%
	Upper	69	58.0%	\$11,934	61.7%	40.5%	45	58.4%	36.0%	\$7,857	58.0%	42.7%	24	57.1%	34.2%	\$4,077	70.4%	40.5%
	Unknown	1	0.8%	\$2,500	12.9%	0.0%	1	1.3%	30.0%	\$2,500	18.4%	30.7%	0	0.0%	32.6%	\$0	0.0%	32.9%
	Total	119	100.0%	\$19,342	100.0%	100.0%	77	100.0%	100.0%	\$13,552	100.0%	100.0%	42	100.0%	100.0%	\$5,790	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	169	67.3%	\$5,868	59.0%	93.4%	88	66.7%	48.1%	\$3,240	58.8%	41.9%	81	68.1%	45.4%	\$2,628	59.1%	47.3%
	Over \$1 Million	53	21.1%	\$3,659	36.8%	5.7%	25	18.9%					28	23.5%				
	Total Rev. available	222	88.4%	\$9,527	95.8%	99.1%	113	85.6%					109	91.6%				
	Rev. Not Known	29	11.6%	\$427	4.3%	0.9%	19	14.4%					10	8.4%				
Total	251	100.0%	\$9,954	100.0%	100.0%	132	100.0%					119	100.0%					
Small Business Loan Size	\$100,000 or Less	245	97.6%	\$8,301	83.4%		128	97.0%	94.4%	\$4,303	78.2%	40.1%	117	98.3%	95.1%	\$3,998	89.9%	43.2%
	\$100,001 - \$250,000	4	1.6%	\$753	7.6%		2	1.5%	2.8%	\$303	5.5%	15.1%	2	1.7%	2.7%	\$450	10.1%	15.9%
	\$250,001 - \$1 Million	2	0.8%	\$900	9.0%		2	1.5%	2.8%	\$900	16.3%	44.9%	0	0.0%	2.1%	\$0	0.0%	40.9%
	Total	251	100.0%	\$9,954	100.0%		132	100.0%	100.0%	\$5,506	100.0%	100.0%	119	100.0%	100.0%	\$4,448	100.0%	100.0%
	Total Farms																	
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.1%	0	0.0%	46.3%	\$0	0.0%	62.5%	0	0.0%	43.8%	\$0	0.0%	59.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.9%	0	0.0%					0	0.0%				
	Not Known	1	100.0%	\$18	100.0%	0.0%	0	0.0%					1	100.0%				
	Total	1	100.0%	\$18	100.0%	100.0%	0	0.0%					1	100.0%				
	Total Farms																	
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$18	100.0%		0	0.0%	85.9%	\$0	0.0%	29.3%	1	100.0%	85.0%	\$18	100.0%	33.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.4%	\$0	0.0%	36.1%	0	0.0%	11.9%	\$0	0.0%	43.1%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.7%	\$0	0.0%	34.6%	0	0.0%	3.1%	\$0	0.0%	23.3%
	Total	1	100.0%	\$18	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$18	100.0%	100.0%
	Total Farms																	

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Kleberg

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar			Count		Dollar		
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	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%
	Moderate	1	33.3%	\$157	53.2%	35.0%	0	0.0%	12.3%	\$0	0.0%	8.0%	1	100.0%	20.8%	\$157	100.0%	15.7%
	Middle	2	66.7%	\$138	46.8%	39.1%	2	100.0%	65.4%	\$138	100.0%	65.8%	0	0.0%	59.0%	\$0	0.0%	59.3%
	Upper	0	0.0%	\$0	0.0%	26.0%	0	0.0%	22.3%	\$0	0.0%	26.2%	0	0.0%	20.1%	\$0	0.0%	25.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$295	100.0%	100.0%	2	100.0%	100.0%	\$138	100.0%	100.0%	1	100.0%	100.0%	\$157	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	35.0%	0	0.0%	15.1%	\$0	0.0%	10.9%	0	0.0%	25.0%	\$0	0.0%	18.9%
	Middle	0	0.0%	\$0	0.0%	39.1%	0	0.0%	52.8%	\$0	0.0%	50.1%	0	0.0%	51.7%	\$0	0.0%	49.2%
	Upper	0	0.0%	\$0	0.0%	26.0%	0	0.0%	32.1%	\$0	0.0%	39.0%	0	0.0%	23.3%	\$0	0.0%	31.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	35.0%	0	0.0%	26.1%	\$0	0.0%	30.3%	0	0.0%	23.1%	\$0	0.0%	38.4%
	Middle	0	0.0%	\$0	0.0%	39.1%	0	0.0%	52.2%	\$0	0.0%	41.7%	0	0.0%	57.7%	\$0	0.0%	47.9%
	Upper	0	0.0%	\$0	0.0%	26.0%	0	0.0%	21.7%	\$0	0.0%	28.0%	0	0.0%	19.2%	\$0	0.0%	13.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	66.7%	\$0	0.0%	12.3%	0	0.0%	71.4%	\$0	0.0%	69.5%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	33.3%	\$0	0.0%	87.7%	0	0.0%	28.6%	\$0	0.0%	30.5%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	33.3%	\$157	53.2%	35.0%	0	0.0%	14.1%	\$0	0.0%	9.4%	1	100.0%	22.9%	\$157	100.0%	40.8%
	Middle	2	66.7%	\$138	46.8%	39.1%	2	100.0%	61.4%	\$138	100.0%	64.1%	0	0.0%	56.6%	\$0	0.0%	44.7%
	Upper	0	0.0%	\$0	0.0%	26.0%	0	0.0%	24.5%	\$0	0.0%	26.5%	0	0.0%	20.6%	\$0	0.0%	14.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$295	100.0%	100.0%	2	100.0%	100.0%	\$138	100.0%	100.0%	1	100.0%	100.0%	\$157	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	13	65.0%	\$443	61.7%	34.1%	6	66.7%	35.8%	\$215	68.3%	31.5%	7	63.6%	38.1%	\$228	56.6%	27.8%
	Middle	6	30.0%	\$250	34.8%	46.2%	3	33.3%	37.5%	\$100	31.7%	40.1%	3	27.3%	38.8%	\$150	37.2%	58.2%
	Upper	1	5.0%	\$25	3.5%	19.7%	0	0.0%	20.7%	\$0	0.0%	15.6%	1	9.1%	18.9%	\$25	6.2%	9.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	6.0%	\$0	0.0%	12.8%	0	0.0%	4.1%	\$0	0.0%	4.4%
Total	20	100.0%	\$718	100.0%	100.0%	9	100.0%	100.0%	\$315	100.0%	100.0%	11	100.0%	100.0%	\$403	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	1	100.0%	\$25	100.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	12.5%	\$25	100.0%	9.0%
	Middle	0	0.0%	\$0	0.0%	12.1%	0	0.0%	7.7%	\$0	0.0%	3.9%	0	0.0%	12.5%	\$0	0.0%	3.6%
	Upper	0	0.0%	\$0	0.0%	69.7%	0	0.0%	76.9%	\$0	0.0%	84.4%	0	0.0%	75.0%	\$0	0.0%	87.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	15.4%	\$0	0.0%	11.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Kleberg

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar					
		Count	Dollar	%	%		Bank	Agg		Bank	Agg		Bank	Agg				
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	26.8%	0	0.0%	1.0%	\$0	0.0%	0.4%	0	0.0%	0.7%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	8.0%	\$0	0.0%	5.2%	0	0.0%	6.1%	\$0	0.0%	3.0%
	Middle	3	100.0%	\$295	100.0%	18.2%	2	100.0%	18.3%	\$138	100.0%	15.5%	1	100.0%	16.7%	\$157	100.0%	13.2%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	54.8%	\$0	0.0%	60.9%	0	0.0%	48.1%	\$0	0.0%	55.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.9%	\$0	0.0%	18.0%	0	0.0%	28.3%	\$0	0.0%	27.7%
	Total	3	100.0%	\$295	100.0%	100.0%	2	100.0%	100.0%	\$138	100.0%	100.0%	1	100.0%	100.0%	\$157	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	26.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	3.8%	\$0	0.0%	1.6%	0	0.0%	3.4%	\$0	0.0%	1.7%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	8.5%	\$0	0.0%	3.6%	0	0.0%	5.2%	\$0	0.0%	2.6%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	50.9%	\$0	0.0%	50.4%	0	0.0%	50.0%	\$0	0.0%	52.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	36.8%	\$0	0.0%	44.4%	0	0.0%	41.4%	\$0	0.0%	43.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	26.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	8.7%	\$0	0.0%	8.3%	0	0.0%	3.8%	\$0	0.0%	1.2%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	26.1%	\$0	0.0%	26.1%	0	0.0%	19.2%	\$0	0.0%	14.4%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	56.5%	\$0	0.0%	56.0%	0	0.0%	73.1%	\$0	0.0%	61.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.7%	\$0	0.0%	9.7%	0	0.0%	3.8%	\$0	0.0%	23.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	26.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	26.8%	0	0.0%	0.7%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	6.9%	\$0	0.0%	3.9%	0	0.0%	5.2%	\$0	0.0%	1.4%
	Middle	3	100.0%	\$295	100.0%	18.2%	2	100.0%	16.2%	\$138	100.0%	11.4%	1	100.0%	13.6%	\$157	100.0%	5.7%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	53.6%	\$0	0.0%	52.4%	0	0.0%	49.3%	\$0	0.0%	30.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.6%	\$0	0.0%	32.0%	0	0.0%	31.4%	\$0	0.0%	62.7%
	Total	3	100.0%	\$295	100.0%	100.0%	2	100.0%	100.0%	\$138	100.0%	100.0%	1	100.0%	100.0%	\$157	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	14	70.0%	\$388	54.0%	92.2%	6	66.7%	47.8%	\$185	58.7%	48.1%	8	72.7%	40.9%	\$203	50.4%	55.4%
	Over \$1 Million	6	30.0%	\$330	46.0%	6.0%	3	33.3%					3	27.3%				
	Total Rev. available	20	100.0%	\$718	100.0%	98.2%	9	100.0%					11	100.0%				
	Rev. Not Known	0	0.0%	\$0	0.0%	1.9%	0	0.0%					0	0.0%				
Small Business Loan Size	Total Businesses																	
	\$100,000 or Less	20	100.0%	\$718	100.0%		9	100.0%	98.7%	\$315	100.0%	80.1%	11	100.0%	97.6%	\$403	100.0%	60.8%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	6.9%	0	0.0%	0.7%	\$0	0.0%	5.1%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	0.4%	\$0	0.0%	12.9%	0	0.0%	1.7%	\$0	0.0%	34.1%
	Total	20	100.0%	\$718	100.0%		9	100.0%	100.0%	\$315	100.0%	100.0%	11	100.0%	100.0%	\$403	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	1	100.0%	\$25	100.0%	100.0%	0	0.0%	46.2%	\$0	0.0%	51.6%	1	100.0%	62.5%	\$25	100.0%	91.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$25	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	Total Farms																	
	\$100,000 or Less	1	100.0%	\$25	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	87.5%	\$25	100.0%	59.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	12.5%	\$0	0.0%	40.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$25	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Limestone

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	6.0%	\$0	0.0%	3.8%	0	0.0%	7.7%	\$0	0.0%	5.3%
	Middle	1	33.3%	\$102	47.2%	61.4%	1	50.0%	66.2%	\$102	67.1%	56.6%	0	0.0%	65.8%	\$0	0.0%	59.7%
	Upper	2	66.7%	\$114	52.8%	26.8%	1	50.0%	27.8%	\$50	32.9%	39.6%	1	100.0%	26.5%	\$64	100.0%	35.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$216	100.0%	100.0%	2	100.0%	100.0%	\$152	100.0%	100.0%	1	100.0%	100.0%	\$64	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	4.3%	\$0	0.0%	2.2%	0	0.0%	3.1%	\$0	0.0%	1.0%
	Middle	1	100.0%	\$68	100.0%	61.4%	0	0.0%	66.7%	\$0	0.0%	66.1%	1	100.0%	64.6%	\$68	100.0%	57.8%
	Upper	0	0.0%	\$0	0.0%	26.8%	0	0.0%	27.5%	\$0	0.0%	30.6%	0	0.0%	30.8%	\$0	0.0%	39.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	1.1%	0	0.0%	1.5%	\$0	0.0%	1.7%
	Total	1	100.0%	\$68	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$68	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	11.1%	\$0	0.0%	6.0%	0	0.0%	10.0%	\$0	0.0%	7.2%
	Middle	1	100.0%	\$5	100.0%	61.4%	0	0.0%	72.2%	\$0	0.0%	75.5%	1	100.0%	70.0%	\$5	100.0%	68.4%
	Upper	0	0.0%	\$0	0.0%	26.8%	0	0.0%	16.7%	\$0	0.0%	18.5%	0	0.0%	20.0%	\$0	0.0%	24.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	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%
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	5.9%	\$0	0.0%	3.2%	0	0.0%	6.5%	\$0	0.0%	3.9%
	Middle	3	60.0%	\$175	60.6%	61.4%	1	50.0%	66.8%	\$102	67.1%	60.9%	2	66.7%	65.8%	\$73	53.3%	59.5%
	Upper	2	40.0%	\$114	39.4%	26.8%	1	50.0%	26.9%	\$50	32.9%	35.5%	1	33.3%	27.3%	\$64	46.7%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.4%	0	0.0%	0.4%	\$0	0.0%	0.6%
	Total	5	100.0%	\$289	100.0%	100.0%	2	100.0%	100.0%	\$152	100.0%	100.0%	3	100.0%	100.0%	\$137	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	7	26.9%	\$193	21.7%	13.9%	4	26.7%	14.2%	\$98	20.6%	19.6%	3	27.3%	12.0%	\$95	22.8%	25.9%
	Middle	16	61.5%	\$643	72.2%	68.8%	10	66.7%	55.5%	\$367	77.3%	56.3%	6	54.5%	63.1%	\$276	66.3%	57.8%
	Upper	3	11.5%	\$55	6.2%	17.2%	1	6.7%	20.3%	\$10	2.1%	20.0%	2	18.2%	21.2%	\$45	10.8%	11.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	4.1%	0	0.0%	3.7%	\$0	0.0%	4.4%
Total	26	100.0%	\$891	100.0%	100.0%	15	100.0%	100.0%	\$475	100.0%	100.0%	11	100.0%	100.0%	\$416	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.2%	\$0	0.0%	2.2%	0	0.0%	3.4%	\$0	0.0%	1.1%
	Middle	0	0.0%	\$0	0.0%	64.5%	0	0.0%	36.6%	\$0	0.0%	34.1%	0	0.0%	30.5%	\$0	0.0%	37.9%
	Upper	1	100.0%	\$10	100.0%	35.5%	0	0.0%	59.2%	\$0	0.0%	63.7%	1	100.0%	66.1%	\$10	100.0%	61.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	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%
Total	1	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Limestone

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	4.6%	\$0	0.0%	2.1%	0	0.0%	4.5%	\$0	0.0%	2.7%
	Moderate	2	66.7%	\$166	76.9%	16.9%	1	50.0%	19.9%	\$102	67.1%	12.0%	1	100.0%	11.0%	\$64	100.0%	6.5%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	16.6%	\$0	0.0%	14.4%	0	0.0%	20.6%	\$0	0.0%	17.9%
	Upper	1	33.3%	\$50	23.1%	45.0%	1	50.0%	39.7%	\$50	32.9%	51.6%	0	0.0%	47.7%	\$0	0.0%	59.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.2%	\$0	0.0%	19.9%	0	0.0%	16.1%	\$0	0.0%	14.0%
	Total	3	100.0%	\$216	100.0%	100.0%	2	100.0%	100.0%	\$152	100.0%	100.0%	1	100.0%	100.0%	\$64	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	2.9%	\$0	0.0%	2.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$68	100.0%	16.9%	0	0.0%	14.5%	\$0	0.0%	8.3%	1	100.0%	6.2%	\$68	100.0%	2.7%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	7.2%	\$0	0.0%	4.9%	0	0.0%	16.9%	\$0	0.0%	9.9%
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	50.7%	\$0	0.0%	61.2%	0	0.0%	52.3%	\$0	0.0%	64.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.6%	\$0	0.0%	23.0%	0	0.0%	24.6%	\$0	0.0%	22.9%
	Total	1	100.0%	\$68	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$68	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	11.1%	\$0	0.0%	2.1%	0	0.0%	10.0%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	16.7%	\$0	0.0%	18.2%	0	0.0%	20.0%	\$0	0.0%	8.5%
	Middle	1	100.0%	\$5	100.0%	18.9%	0	0.0%	11.1%	\$0	0.0%	3.8%	1	100.0%	20.0%	\$5	100.0%	1.4%
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	55.6%	\$0	0.0%	70.8%	0	0.0%	50.0%	\$0	0.0%	89.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	5.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	4.6%	\$0	0.0%	2.3%	0	0.0%	3.5%	\$0	0.0%	1.7%
	Moderate	3	60.0%	\$234	81.0%	16.9%	1	50.0%	18.1%	\$102	67.1%	10.7%	2	66.7%	10.0%	\$132	96.4%	5.3%
	Middle	1	20.0%	\$5	1.7%	18.9%	0	0.0%	13.4%	\$0	0.0%	10.3%	1	33.3%	19.5%	\$5	3.6%	14.8%
	Upper	1	20.0%	\$50	17.3%	45.0%	1	50.0%	44.1%	\$50	32.9%	55.9%	0	0.0%	48.9%	\$0	0.0%	61.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.7%	\$0	0.0%	20.8%	0	0.0%	18.2%	\$0	0.0%	16.8%
	Total	5	100.0%	\$289	100.0%	100.0%	2	100.0%	100.0%	\$152	100.0%	100.0%	3	100.0%	100.0%	\$137	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	13	50.0%	\$411	46.1%	91.0%	7	46.7%	39.9%	\$196	41.3%	32.4%	6	54.5%	46.1%	\$215	51.7%	45.7%
	Over \$1 Million	6	23.1%	\$385	43.2%	6.7%	3	20.0%					3	27.3%				
	Total Rev. available	19	73.1%	\$796	89.3%	97.7%	10	66.7%					9	81.8%				
	Rev. Not Known	7	26.9%	\$95	10.7%	2.4%	5	33.3%					2	18.2%				
Total	26	100.0%	\$891	100.0%	100.0%	15	100.0%					11	100.0%					
Small Business Loan Size	\$100,000 or Less	26	100.0%	\$891	100.0%		15	100.0%	93.6%	\$475	100.0%	41.4%	11	100.0%	96.3%	\$416	100.0%	55.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.6%	\$0	0.0%	14.8%	0	0.0%	2.1%	\$0	0.0%	14.7%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	2.8%	\$0	0.0%	43.8%	0	0.0%	1.7%	\$0	0.0%	30.1%
	Total	26	100.0%	\$891	100.0%		15	100.0%	100.0%	\$475	100.0%	100.0%	11	100.0%	100.0%	\$416	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	1	100.0%	\$10	100.0%	96.9%	0	0.0%	87.3%	\$0	0.0%	93.4%	1	100.0%	84.7%	\$10	100.0%	81.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	3.1%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$10	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$10	100.0%		0	0.0%	87.3%	\$0	0.0%	45.7%	1	100.0%	89.8%	\$10	100.0%	60.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.5%	\$0	0.0%	22.8%	0	0.0%	8.5%	\$0	0.0%	28.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.2%	\$0	0.0%	31.5%	0	0.0%	1.7%	\$0	0.0%	11.6%
	Total	1	100.0%	\$10	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Longview

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	5.0%	\$114	4.4%	1.8%	1	5.9%	0.6%	\$114	5.1%	0.5%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	6	30.0%	\$616	24.0%	20.4%	4	23.5%	15.0%	\$416	18.6%	8.0%	2	66.7%	14.2%	\$200	61.7%	8.7%
	Middle	8	40.0%	\$1,159	45.2%	44.3%	8	47.1%	42.2%	\$1,159	51.7%	42.0%	0	0.0%	44.9%	\$0	0.0%	44.8%
	Upper	5	25.0%	\$677	26.4%	33.5%	4	23.5%	42.2%	\$553	24.7%	49.6%	1	33.3%	40.3%	\$124	38.3%	46.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	20	100.0%	\$2,566	100.0%	100.0%	17	100.0%	100.0%	\$2,242	100.0%	100.0%	3	100.0%	100.0%	\$324	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	20.4%	0	0.0%	13.2%	\$0	0.0%	8.6%	0	0.0%	12.2%	\$0	0.0%	7.8%
	Middle	2	40.0%	\$250	36.5%	44.3%	1	50.0%	46.0%	\$116	46.4%	44.4%	1	33.3%	42.3%	\$134	30.8%	40.5%
	Upper	3	60.0%	\$435	63.5%	33.5%	1	50.0%	40.3%	\$134	53.6%	46.8%	2	66.7%	44.7%	\$301	69.2%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	5	100.0%	\$685	100.0%	100.0%	2	100.0%	100.0%	\$250	100.0%	100.0%	3	100.0%	100.0%	\$435	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.4%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.4%	0	0.0%	18.6%	\$0	0.0%	13.1%	0	0.0%	17.1%	\$0	0.0%	13.5%
	Middle	1	100.0%	\$70	100.0%	44.3%	0	0.0%	46.9%	\$0	0.0%	50.2%	1	100.0%	44.3%	\$70	100.0%	46.2%
	Upper	0	0.0%	\$0	0.0%	33.5%	0	0.0%	33.1%	\$0	0.0%	36.3%	0	0.0%	38.6%	\$0	0.0%	40.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$70	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$70	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	33.3%	\$0	0.0%	12.0%	0	0.0%	50.0%	\$0	0.0%	13.2%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	40.0%	\$0	0.0%	33.6%	0	0.0%	50.0%	\$0	0.0%	86.8%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	26.7%	\$0	0.0%	54.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	3.8%	\$114	3.4%	1.8%	1	5.3%	0.6%	\$114	4.6%	0.4%	0	0.0%	0.6%	\$0	0.0%	0.2%
	Moderate	6	23.1%	\$616	18.5%	20.4%	4	21.1%	14.8%	\$416	16.7%	8.6%	2	28.6%	13.8%	\$200	24.1%	8.9%
	Middle	11	42.3%	\$1,479	44.5%	44.3%	9	47.4%	43.6%	\$1,275	51.2%	42.1%	2	28.6%	44.1%	\$204	24.6%	45.9%
	Upper	8	30.8%	\$1,112	33.5%	33.5%	5	26.3%	41.0%	\$687	27.6%	49.0%	3	42.9%	41.4%	\$425	51.3%	45.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$3,321	100.0%	100.0%	19	100.0%	100.0%	\$2,492	100.0%	100.0%	7	100.0%	100.0%	\$829	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.6%	\$0	0.0%	0.1%	0	0.0%	0.6%	\$0	0.0%	0.2%
	Moderate	8	28.6%	\$198	18.6%	31.1%	3	25.0%	31.1%	\$105	21.2%	36.0%	5	31.3%	30.9%	\$93	16.3%	34.6%
	Middle	11	39.3%	\$460	43.2%	39.3%	5	41.7%	37.5%	\$225	45.5%	36.7%	6	37.5%	36.6%	\$235	41.3%	34.6%
	Upper	9	32.1%	\$406	38.2%	28.6%	4	33.3%	27.3%	\$165	33.3%	26.0%	5	31.3%	29.0%	\$241	42.4%	29.4%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.6%	0	0.0%	0.3%	\$0	0.0%	0.4%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	0.7%	0	0.0%	2.6%	\$0	0.0%	0.8%
Total	28	100.0%	\$1,064	100.0%	100.0%	12	100.0%	100.0%	\$495	100.0%	100.0%	16	100.0%	100.0%	\$569	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	12.1%	0	0.0%	12.9%	\$0	0.0%	6.4%	0	0.0%	5.6%	\$0	0.0%	2.9%
	Middle	0	0.0%	\$0	0.0%	57.6%	0	0.0%	38.7%	\$0	0.0%	44.1%	0	0.0%	41.7%	\$0	0.0%	20.3%
	Upper	0	0.0%	\$0	0.0%	30.3%	0	0.0%	48.4%	\$0	0.0%	49.5%	0	0.0%	52.8%	\$0	0.0%	76.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	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%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Longview

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	2.7%	\$0	0.0%	1.6%	0	0.0%	2.3%	\$0	0.0%	1.1%
	Moderate	8	40.0%	\$879	34.3%	17.8%	6	35.3%	13.4%	\$655	29.2%	9.3%	2	66.7%	13.3%	\$224	69.1%	9.0%
	Middle	7	35.0%	\$922	35.9%	19.1%	6	35.3%	20.0%	\$822	36.7%	18.2%	1	33.3%	21.8%	\$100	30.9%	19.3%
	Upper	5	25.0%	\$765	29.8%	40.9%	5	29.4%	40.3%	\$765	34.1%	51.9%	0	0.0%	38.5%	\$0	0.0%	50.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.5%	\$0	0.0%	19.0%	0	0.0%	24.0%	\$0	0.0%	20.3%
	Total	20	100.0%	\$2,566	100.0%	100.0%	17	100.0%	100.0%	\$2,242	100.0%	100.0%	3	100.0%	100.0%	\$324	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	2.7%	\$0	0.0%	1.5%	0	0.0%	3.5%	\$0	0.0%	1.4%
	Moderate	2	40.0%	\$219	32.0%	17.8%	1	50.0%	9.8%	\$116	46.4%	6.2%	1	33.3%	9.3%	\$103	23.7%	5.8%
	Middle	1	20.0%	\$134	19.6%	19.1%	1	50.0%	17.7%	\$134	53.6%	12.8%	0	0.0%	16.5%	\$0	0.0%	12.9%
	Upper	2	40.0%	\$332	48.5%	40.9%	0	0.0%	41.6%	\$0	0.0%	48.5%	2	66.7%	39.7%	\$332	76.3%	45.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	28.2%	\$0	0.0%	31.1%	0	0.0%	31.1%	\$0	0.0%	34.6%
	Total	5	100.0%	\$685	100.0%	100.0%	2	100.0%	100.0%	\$250	100.0%	100.0%	3	100.0%	100.0%	\$435	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	6.9%	\$0	0.0%	4.8%	0	0.0%	5.7%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	13.8%	\$0	0.0%	7.9%	0	0.0%	9.5%	\$0	0.0%	4.8%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	17.9%	\$0	0.0%	14.7%	0	0.0%	20.3%	\$0	0.0%	18.6%
	Upper	1	100.0%	\$70	100.0%	40.9%	0	0.0%	57.2%	\$0	0.0%	69.0%	1	100.0%	53.2%	\$70	100.0%	57.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	3.5%	0	0.0%	11.4%	\$0	0.0%	17.2%
	Total	1	100.0%	\$70	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$70	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	2.9%	\$0	0.0%	1.5%	0	0.0%	2.9%	\$0	0.0%	1.2%
	Moderate	10	38.5%	\$1,098	33.1%	17.8%	7	36.8%	12.3%	\$771	30.9%	7.7%	3	42.9%	11.9%	\$327	39.4%	7.6%
	Middle	8	30.8%	\$1,056	31.8%	19.1%	7	36.8%	19.1%	\$956	38.4%	15.2%	1	14.3%	20.1%	\$100	12.1%	16.6%
	Upper	8	30.8%	\$1,167	35.1%	40.9%	5	26.3%	41.4%	\$765	30.7%	47.0%	3	42.9%	39.7%	\$402	48.5%	46.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.2%	\$0	0.0%	28.5%	0	0.0%	25.5%	\$0	0.0%	28.2%
	Total	26	100.0%	\$3,321	100.0%	100.0%	19	100.0%	100.0%	\$2,492	100.0%	100.0%	7	100.0%	100.0%	\$829	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	17	60.7%	\$695	65.3%	89.0%	9	75.0%	44.7%	\$360	72.7%	43.7%	8	50.0%	43.8%	\$335	58.9%	45.2%
	Over \$1 Million	7	25.0%	\$341	32.0%	10.2%	2	16.7%					5	31.3%				
	Total Rev. available	24	85.7%	\$1,036	97.3%	99.2%	11	91.7%					13	81.3%				
	Rev. Not Known	4	14.3%	\$28	2.6%	0.7%	1	8.3%					3	18.8%				
Total	28	100.0%	\$1,064	100.0%	100.0%	12	100.0%					16	100.0%					
Small Business Loan Size	\$100,000 or Less	28	100.0%	\$1,064	100.0%		12	100.0%	85.0%	\$495	100.0%	24.7%	16	100.0%	86.0%	\$569	100.0%	25.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.9%	\$0	0.0%	20.8%	0	0.0%	7.4%	\$0	0.0%	21.3%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	7.1%	\$0	0.0%	54.5%	0	0.0%	6.6%	\$0	0.0%	52.7%
	Total	28	100.0%	\$1,064	100.0%		12	100.0%	100.0%	\$495	100.0%	100.0%	16	100.0%	100.0%	\$569	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.1%	0	0.0%	74.2%	\$0	0.0%	77.1%	0	0.0%	75.0%	\$0	0.0%	67.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.9%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	83.9%	\$0	0.0%	35.6%	0	0.0%	88.9%	\$0	0.0%	47.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	12.9%	\$0	0.0%	41.1%	0	0.0%	5.6%	\$0	0.0%	17.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.2%	\$0	0.0%	23.3%	0	0.0%	5.6%	\$0	0.0%	34.6%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Lubbock

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	1	1.8%	\$212	2.8%	4.3%	1	2.1%	1.4%	\$212	3.2%	0.9%	0	0.0%	2.0%	\$0	0.0%	1.1%
	Moderate	6	10.7%	\$520	6.8%	17.7%	4	8.5%	9.0%	\$354	5.3%	5.4%	2	22.2%	11.3%	\$166	16.7%	5.8%
	Middle	28	50.0%	\$3,752	48.8%	36.7%	21	44.7%	36.7%	\$2,924	43.6%	33.1%	7	77.8%	35.4%	\$828	83.3%	34.5%
	Upper	21	37.5%	\$3,211	41.7%	41.3%	21	44.7%	52.8%	\$3,211	47.9%	60.5%	0	0.0%	51.3%	\$0	0.0%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	56	100.0%	\$7,695	100.0%	100.0%	47	100.0%	100.0%	\$6,701	100.0%	100.0%	9	100.0%	100.0%	\$994	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.3%	0	0.0%	1.4%	\$0	0.0%	0.9%	0	0.0%	1.6%	\$0	0.0%	0.7%
	Moderate	1	6.7%	\$61	2.4%	17.7%	1	12.5%	8.3%	\$61	8.1%	4.0%	0	0.0%	8.9%	\$0	0.0%	4.4%
	Middle	7	46.7%	\$602	24.2%	36.7%	4	50.0%	33.8%	\$321	42.5%	28.5%	3	42.9%	33.6%	\$281	16.2%	32.0%
	Upper	7	46.7%	\$1,829	73.4%	41.3%	3	37.5%	56.5%	\$373	49.4%	66.6%	4	57.1%	55.9%	\$1,456	83.8%	62.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$2,492	100.0%	100.0%	8	100.0%	100.0%	\$755	100.0%	100.0%	7	100.0%	100.0%	\$1,737	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.3%	0	0.0%	1.6%	\$0	0.0%	1.8%	0	0.0%	3.8%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	18.5%	\$0	0.0%	10.8%	0	0.0%	12.9%	\$0	0.0%	4.6%
	Middle	0	0.0%	\$0	0.0%	36.7%	0	0.0%	36.4%	\$0	0.0%	31.8%	0	0.0%	32.6%	\$0	0.0%	29.2%
	Upper	0	0.0%	\$0	0.0%	41.3%	0	0.0%	43.5%	\$0	0.0%	55.5%	0	0.0%	50.8%	\$0	0.0%	64.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	17.9%	\$0	0.0%	6.1%	0	0.0%	14.8%	\$0	0.0%	17.3%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	17.9%	\$0	0.0%	29.9%	0	0.0%	14.8%	\$0	0.0%	2.8%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	50.0%	\$0	0.0%	43.3%	0	0.0%	33.3%	\$0	0.0%	40.6%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	14.3%	\$0	0.0%	20.6%	0	0.0%	37.0%	\$0	0.0%	39.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	1.4%	\$212	2.1%	4.3%	1	1.8%	1.5%	\$212	2.8%	1.4%	0	0.0%	2.0%	\$0	0.0%	1.8%
	Moderate	7	9.9%	\$581	5.7%	17.7%	5	9.1%	9.2%	\$415	5.6%	7.3%	2	12.5%	10.8%	\$166	6.1%	5.3%
	Middle	35	49.3%	\$4,354	42.7%	36.7%	25	45.5%	36.1%	\$3,245	43.5%	33.0%	10	62.5%	34.9%	\$1,109	40.6%	34.1%
	Upper	28	39.4%	\$5,040	49.5%	41.3%	24	43.6%	53.2%	\$3,584	48.1%	58.3%	4	25.0%	52.4%	\$1,456	53.3%	58.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	71	100.0%	\$10,187	100.0%	100.0%	55	100.0%	100.0%	\$7,456	100.0%	100.0%	16	100.0%	100.0%	\$2,731	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	6	6.1%	\$215	3.7%	4.6%	3	6.3%	5.5%	\$65	2.4%	6.3%	3	5.9%	4.7%	\$150	4.9%	4.4%
	Moderate	16	16.2%	\$760	13.1%	14.8%	9	18.8%	10.9%	\$435	16.1%	9.7%	7	13.7%	10.9%	\$325	10.5%	10.6%
	Middle	34	34.3%	\$2,826	48.8%	37.6%	17	35.4%	38.5%	\$1,296	47.9%	42.3%	17	33.3%	37.0%	\$1,530	49.5%	40.1%
	Upper	43	43.4%	\$1,993	34.4%	43.0%	19	39.6%	43.2%	\$908	33.6%	40.8%	24	47.1%	44.9%	\$1,085	35.1%	43.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.4%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.9%	0	0.0%	2.5%	\$0	0.0%	1.1%
Total	99	100.0%	\$5,794	100.0%	100.0%	48	100.0%	100.0%	\$2,704	100.0%	100.0%	51	100.0%	100.0%	\$3,090	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.7%	\$0	0.0%	1.7%	0	0.0%	0.7%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	8.5%	0	0.0%	6.0%	\$0	0.0%	5.6%	0	0.0%	4.2%	\$0	0.0%	5.4%
	Middle	1	100.0%	\$120	100.0%	41.3%	1	100.0%	50.0%	\$120	100.0%	54.5%	0	0.0%	51.0%	\$0	0.0%	57.3%
	Upper	0	0.0%	\$0	0.0%	49.1%	0	0.0%	43.1%	\$0	0.0%	38.3%	0	0.0%	43.7%	\$0	0.0%	35.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.0%
Total	1	100.0%	\$120	100.0%	100.0%	1	100.0%	100.0%	\$120	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Lubbock

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
HOME PURCHASE	Low	3	5.4%	\$265	3.4%	21.0%	2	4.3%	2.8%	\$178	2.7%	1.5%	1	11.1%	3.1%	\$87	8.8%	1.6%
	Moderate	14	25.0%	\$1,695	22.0%	17.8%	13	27.7%	12.0%	\$1,617	24.1%	8.2%	1	11.1%	10.8%	\$78	7.8%	7.4%
	Middle	16	28.6%	\$2,099	27.3%	19.1%	12	25.5%	16.7%	\$1,644	24.5%	14.3%	4	44.4%	16.9%	\$455	45.8%	14.7%
	Upper	23	41.1%	\$3,636	47.3%	42.1%	20	42.6%	39.6%	\$3,262	48.7%	48.6%	3	33.3%	42.2%	\$374	37.6%	51.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	28.8%	\$0	0.0%	27.5%	0	0.0%	27.0%	\$0	0.0%	25.1%
	Total	56	100.0%	\$7,695	100.0%	100.0%	47	100.0%	100.0%	\$6,701	100.0%	100.0%	9	100.0%	100.0%	\$994	100.0%	100.0%
REFINANCE	Low	1	6.7%	\$75	3.0%	21.0%	0	0.0%	3.1%	\$0	0.0%	1.4%	1	14.3%	2.3%	\$75	4.3%	1.1%
	Moderate	5	33.3%	\$425	17.1%	17.8%	3	37.5%	7.9%	\$227	30.1%	4.1%	2	28.6%	7.2%	\$198	11.4%	3.8%
	Middle	1	6.7%	\$61	2.4%	19.1%	1	12.5%	14.3%	\$61	8.1%	9.9%	0	0.0%	12.6%	\$0	0.0%	8.8%
	Upper	8	53.3%	\$1,931	77.5%	42.1%	4	50.0%	43.4%	\$467	61.9%	52.5%	4	57.1%	43.1%	\$1,464	84.3%	50.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	31.3%	\$0	0.0%	32.0%	0	0.0%	34.8%	\$0	0.0%	35.7%
	Total	15	100.0%	\$2,492	100.0%	100.0%	8	100.0%	100.0%	\$755	100.0%	100.0%	7	100.0%	100.0%	\$1,737	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	6.5%	\$0	0.0%	2.4%	0	0.0%	4.4%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	9.1%	\$0	0.0%	3.7%	0	0.0%	9.1%	\$0	0.0%	3.8%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	14.9%	\$0	0.0%	12.8%	0	0.0%	17.6%	\$0	0.0%	16.1%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	58.4%	\$0	0.0%	64.6%	0	0.0%	57.1%	\$0	0.0%	69.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.0%	\$0	0.0%	16.5%	0	0.0%	11.9%	\$0	0.0%	9.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	5.6%	\$340	3.3%	21.0%	2	3.6%	3.0%	\$178	2.4%	1.3%	2	12.5%	2.9%	\$162	5.9%	1.4%
	Moderate	19	26.8%	\$2,120	20.8%	17.8%	16	29.1%	10.9%	\$1,844	24.7%	6.6%	3	18.8%	9.9%	\$276	10.1%	6.1%
	Middle	17	23.9%	\$2,160	21.2%	19.1%	13	23.6%	16.1%	\$1,705	22.9%	12.1%	4	25.0%	15.8%	\$455	16.7%	12.6%
	Upper	31	43.7%	\$5,567	54.6%	42.1%	24	43.6%	41.0%	\$3,729	50.0%	45.5%	7	43.8%	42.8%	\$1,838	67.3%	48.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	29.0%	\$0	0.0%	34.4%	0	0.0%	28.6%	\$0	0.0%	31.3%
	Total	71	100.0%	\$10,187	100.0%	100.0%	55	100.0%	100.0%	\$7,456	100.0%	100.0%	16	100.0%	100.0%	\$2,731	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	61	61.6%	\$3,261	56.3%	91.9%	29	60.4%	45.9%	\$1,501	55.5%	38.6%	32	62.7%	38.9%	\$1,760	57.0%	37.8%
	Over \$1 Million	35	35.4%	\$2,515	43.4%	7.4%	17	35.4%					18	35.3%				
	Total Rev. available	96	97.0%	\$5,776	99.7%	99.3%	46	95.8%					50	98.0%				
	Rev. Not Known	3	3.0%	\$18	0.3%	0.7%	2	4.2%					1	2.0%				
Total	99	100.0%	\$5,794	100.0%	100.0%	48	100.0%					51	100.0%					
Small Business Loan Size	\$100,000 or Less	97	98.0%	\$4,444	76.7%		47	97.9%	91.2%	\$2,104	77.8%	35.2%	50	98.0%	92.1%	\$2,340	75.7%	37.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.2%	\$0	0.0%	20.4%	0	0.0%	4.3%	\$0	0.0%	18.0%
	\$250,001 - \$1 Million	2	2.0%	\$1,350	23.3%		1	2.1%	3.7%	\$600	22.2%	44.4%	1	2.0%	3.6%	\$750	24.3%	44.7%
	Total	99	100.0%	\$5,794	100.0%		48	100.0%	100.0%	\$2,704	100.0%	100.0%	51	100.0%	100.0%	\$3,090	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	1	100.0%	\$120	100.0%	97.4%	1	100.0%	58.1%	\$120	100.0%	81.1%	0	0.0%	60.8%	\$0	0.0%	76.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.6%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$120	100.0%	100.0%	1	100.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	76.4%	\$0	0.0%	25.2%	0	0.0%	77.4%	\$0	0.0%	25.7%
	\$100,001 - \$250,000	1	100.0%	\$120	100.0%		1	100.0%	14.0%	\$120	100.0%	30.0%	0	0.0%	12.2%	\$0	0.0%	25.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	9.5%	\$0	0.0%	44.8%	0	0.0%	10.4%	\$0	0.0%	48.5%
	Total	1	100.0%	\$120	100.0%		1	100.0%	100.0%	\$120	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX McAllen

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	%	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	23	12.8%	\$2,453	6.5%	28.5%	11	10.6%	12.2%	\$826	3.7%	9.5%	12	15.8%	13.0%	\$1,627	10.7%	10.9%
	Middle	53	29.4%	\$8,871	23.6%	42.2%	20	19.2%	33.9%	\$3,507	15.7%	32.9%	33	43.4%	34.4%	\$5,364	35.1%	32.0%
	Upper	104	57.8%	\$26,333	69.9%	28.7%	73	70.2%	53.8%	\$18,060	80.7%	57.6%	31	40.8%	52.5%	\$8,273	54.2%	57.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	180	100.0%	\$37,657	100.0%	100.0%	104	100.0%	100.0%	\$22,393	100.0%	100.0%	76	100.0%	100.0%	\$15,264	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	14	19.2%	\$1,478	12.5%	28.5%	9	25.0%	13.4%	\$808	15.4%	12.3%	5	13.5%	14.4%	\$670	10.2%	12.3%
	Middle	17	23.3%	\$1,641	13.9%	42.2%	8	22.2%	32.6%	\$790	15.1%	29.6%	9	24.3%	33.7%	\$851	12.9%	31.5%
	Upper	42	57.5%	\$8,703	73.6%	28.7%	19	52.8%	53.8%	\$3,633	69.5%	57.9%	23	62.2%	51.8%	\$5,070	76.9%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	73	100.0%	\$11,822	100.0%	100.0%	36	100.0%	100.0%	\$5,231	100.0%	100.0%	37	100.0%	100.0%	\$6,591	100.0%	100.0%
HOME IMPROVEMENT	Low	1	1.6%	\$15	1.5%	0.6%	0	0.0%	0.3%	\$0	0.0%	0.2%	1	2.7%	0.4%	\$15	2.6%	0.1%
	Moderate	22	34.9%	\$269	26.6%	28.5%	8	30.8%	28.6%	\$80	19.0%	16.6%	14	37.8%	30.2%	\$189	32.1%	19.9%
	Middle	18	28.6%	\$271	26.8%	42.2%	8	30.8%	38.4%	\$120	28.4%	34.7%	10	27.0%	38.2%	\$151	25.7%	30.8%
	Upper	22	34.9%	\$455	45.0%	28.7%	10	38.5%	32.7%	\$222	52.6%	48.5%	12	32.4%	31.2%	\$233	39.6%	49.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	63	100.0%	\$1,010	100.0%	100.0%	26	100.0%	100.0%	\$422	100.0%	100.0%	37	100.0%	100.0%	\$588	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	9.7%	\$0	0.0%	7.5%	0	0.0%	12.2%	\$0	0.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	51.6%	\$0	0.0%	35.0%	0	0.0%	47.3%	\$0	0.0%	28.8%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	38.7%	\$0	0.0%	57.5%	0	0.0%	40.5%	\$0	0.0%	61.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	0.3%	\$15	0.0%	0.6%	0	0.0%	0.1%	\$0	0.0%	0.1%	1	0.7%	0.1%	\$15	0.1%	0.0%
	Moderate	59	18.7%	\$4,200	8.3%	28.5%	28	16.9%	13.7%	\$1,714	6.1%	10.3%	31	20.7%	14.7%	\$2,486	11.1%	11.4%
	Middle	88	27.8%	\$10,783	21.4%	42.2%	36	21.7%	33.9%	\$4,417	15.7%	32.1%	52	34.7%	34.6%	\$6,366	28.4%	31.7%
	Upper	168	53.2%	\$35,491	70.3%	28.7%	102	61.4%	52.2%	\$21,915	78.1%	57.5%	66	44.0%	50.6%	\$13,576	60.5%	56.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	316	100.0%	\$50,489	100.0%	100.0%	166	100.0%	100.0%	\$28,046	100.0%	100.0%	150	100.0%	100.0%	\$22,443	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	3	0.3%	\$135	0.3%	0.2%	1	0.2%	0.3%	\$50	0.2%	0.1%	2	0.3%	0.3%	\$85	0.3%	0.2%
	Moderate	234	21.0%	\$9,146	17.3%	22.5%	111	20.6%	21.8%	\$4,199	16.7%	20.3%	123	21.4%	21.6%	\$4,947	17.8%	22.2%
	Middle	444	39.8%	\$19,899	37.7%	34.6%	210	39.0%	33.7%	\$9,289	37.1%	39.6%	234	40.6%	35.6%	\$10,610	38.3%	36.9%
	Upper	432	38.7%	\$23,595	44.7%	42.6%	216	40.1%	42.4%	\$11,521	46.0%	38.8%	216	37.5%	40.7%	\$12,074	43.5%	39.5%
	Unknown	2	0.2%	\$20	0.0%	0.0%	1	0.2%	0.2%	\$10	0.0%	0.4%	1	0.2%	0.1%	\$10	0.0%	0.2%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.7%	\$0	0.0%	0.9%	0	0.0%	1.8%	\$0	0.0%	1.0%
Total	1,115	100.0%	\$52,795	100.0%	100.0%	539	100.0%	100.0%	\$25,069	100.0%	100.0%	576	100.0%	100.0%	\$27,726	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	3.1%	\$0	0.0%	4.2%	0	0.0%	0.7%	\$0	0.0%	0.1%
	Moderate	3	60.0%	\$120	50.0%	30.0%	2	100.0%	26.5%	\$60	100.0%	29.4%	1	33.3%	30.9%	\$60	33.3%	41.9%
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	37.8%	\$0	0.0%	46.0%	0	0.0%	37.5%	\$0	0.0%	42.0%
	Upper	2	40.0%	\$120	50.0%	39.2%	0	0.0%	25.5%	\$0	0.0%	13.4%	2	66.7%	29.6%	\$120	66.7%	15.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.1%	\$0	0.0%	7.0%	0	0.0%	1.3%	\$0	0.0%	0.1%
Total	5	100.0%	\$240	100.0%	100.0%	2	100.0%	100.0%	\$60	100.0%	100.0%	3	100.0%	100.0%	\$180	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX McAllen

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	0.6%	\$68	0.2%	25.3%	0	0.0%	0.5%	\$0	0.0%	0.2%	1	1.3%	0.5%	\$68	0.4%	0.3%
	Moderate	12	6.7%	\$991	2.6%	15.5%	5	4.8%	4.1%	\$374	1.7%	2.2%	7	9.2%	5.7%	\$617	4.0%	3.1%
	Middle	21	11.7%	\$1,941	5.2%	16.8%	9	8.7%	12.2%	\$757	3.4%	8.6%	12	15.8%	12.9%	\$1,184	7.8%	9.6%
	Upper	146	81.1%	\$34,657	92.0%	42.4%	90	86.5%	59.4%	\$21,262	94.9%	65.2%	56	73.7%	54.7%	\$13,395	87.8%	62.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.8%	\$0	0.0%	23.8%	0	0.0%	26.2%	\$0	0.0%	24.9%
	Total	180	100.0%	\$37,657	100.0%	100.0%	104	100.0%	100.0%	\$22,393	100.0%	100.0%	76	100.0%	100.0%	\$15,264	100.0%	100.0%
REFINANCE	Low	1	1.4%	\$51	0.4%	25.3%	1	2.8%	1.1%	\$51	1.0%	0.7%	0	0.0%	1.0%	\$0	0.0%	0.5%
	Moderate	3	4.1%	\$181	1.5%	15.5%	3	8.3%	3.8%	\$181	3.5%	2.1%	0	0.0%	3.7%	\$0	0.0%	1.7%
	Middle	11	15.1%	\$854	7.2%	16.8%	4	11.1%	9.4%	\$323	6.2%	5.8%	7	18.9%	7.7%	\$531	8.1%	4.7%
	Upper	58	79.5%	\$10,736	90.8%	42.4%	28	77.8%	60.5%	\$4,676	89.4%	61.8%	30	81.1%	55.8%	\$6,060	91.9%	57.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.2%	\$0	0.0%	29.7%	0	0.0%	31.8%	\$0	0.0%	35.5%
	Total	73	100.0%	\$11,822	100.0%	100.0%	36	100.0%	100.0%	\$5,231	100.0%	100.0%	37	100.0%	100.0%	\$6,591	100.0%	100.0%
HOME IMPROVEMENT	Low	6	9.5%	\$41	4.1%	25.3%	1	3.8%	5.6%	\$3	0.7%	1.2%	5	13.5%	7.1%	\$38	6.5%	2.2%
	Moderate	9	14.3%	\$91	9.0%	15.5%	3	11.5%	9.0%	\$39	9.2%	3.7%	6	16.2%	12.5%	\$52	8.8%	4.1%
	Middle	13	20.6%	\$166	16.4%	16.8%	5	19.2%	13.4%	\$52	12.3%	6.0%	8	21.6%	15.7%	\$114	19.4%	8.9%
	Upper	35	55.6%	\$712	70.5%	42.4%	17	65.4%	61.9%	\$328	77.7%	82.7%	18	48.6%	54.4%	\$384	65.3%	77.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	6.5%	0	0.0%	10.3%	\$0	0.0%	7.4%
	Total	63	100.0%	\$1,010	100.0%	100.0%	26	100.0%	100.0%	\$422	100.0%	100.0%	37	100.0%	100.0%	\$588	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	25.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	2.5%	\$160	0.3%	25.3%	2	1.2%	1.1%	\$54	0.2%	0.3%	6	4.0%	1.2%	\$106	0.5%	0.4%
	Moderate	24	7.6%	\$1,263	2.5%	15.5%	11	6.6%	4.3%	\$594	2.1%	2.0%	13	8.7%	5.5%	\$669	3.0%	2.5%
	Middle	45	14.2%	\$2,961	5.9%	16.8%	18	10.8%	11.3%	\$1,132	4.0%	7.1%	27	18.0%	11.3%	\$1,829	8.1%	7.5%
	Upper	239	75.6%	\$46,105	91.3%	42.4%	135	81.3%	59.5%	\$26,266	93.7%	59.9%	104	69.3%	54.6%	\$19,839	88.4%	57.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.8%	\$0	0.0%	30.6%	0	0.0%	27.4%	\$0	0.0%	32.2%
	Total	316	100.0%	\$50,489	100.0%	100.0%	166	100.0%	100.0%	\$28,046	100.0%	100.0%	150	100.0%	100.0%	\$22,443	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	720	64.6%	\$29,223	55.4%	92.5%	340	63.1%	48.1%	\$13,509	53.9%	40.7%	380	66.0%	37.9%	\$15,714	56.7%	32.7%
	Over \$1 Million	297	26.6%	\$22,572	42.8%	6.8%	146	27.1%					151	26.2%				
	Total Rev. available	1,017	91.2%	\$51,795	98.2%	99.3%	486	90.2%					531	92.2%				
	Rev. Not Known	98	8.8%	\$1,000	1.9%	0.6%	53	9.8%					45	7.8%				
Total	1,115	100.0%	\$52,795	100.0%	100.0%	539	100.0%					576	100.0%					
Small Business Loan Size	\$100,000 or Less	1,063	95.3%	\$39,532	74.9%		515	95.5%	92.7%	\$19,434	77.5%	35.3%	548	95.1%	93.7%	\$20,098	72.5%	40.5%
	\$100,001 - \$250,000	32	2.9%	\$5,389	10.2%		16	3.0%	3.8%	\$2,617	10.4%	17.4%	16	2.8%	3.5%	\$2,772	10.0%	17.0%
	\$250,001 - \$1 Million	20	1.8%	\$7,874	14.9%		8	1.5%	3.5%	\$3,018	12.0%	47.4%	12	2.1%	2.9%	\$4,856	17.5%	42.5%
	Total	1,115	100.0%	\$52,795	100.0%		539	100.0%	100.0%	\$25,069	100.0%	100.0%	576	100.0%	100.0%	\$27,726	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	5	100.0%	\$240	100.0%	90.4%	2	100.0%	34.7%	\$60	100.0%	51.1%	3	100.0%	30.3%	\$180	100.0%	51.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	9.6%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	5	100.0%	\$240	100.0%	100.0%	2	100.0%					3	100.0%				
Small Farm Loan Size	\$100,000 or Less	5	100.0%	\$240	100.0%		2	100.0%	81.6%	\$60	100.0%	25.9%	3	100.0%	85.5%	\$180	100.0%	34.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.2%	\$0	0.0%	21.4%	0	0.0%	7.2%	\$0	0.0%	20.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.2%	\$0	0.0%	52.6%	0	0.0%	7.2%	\$0	0.0%	45.1%
	Total	5	100.0%	\$240	100.0%		2	100.0%	100.0%	\$60	100.0%	100.0%	3	100.0%	100.0%	\$180	100.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Odessa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	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%
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	8.8%	\$0	0.0%	5.3%	0	0.0%	8.2%	\$0	0.0%	4.6%
	Middle	3	42.9%	\$645	38.6%	48.0%	2	40.0%	37.8%	\$344	28.5%	32.0%	1	50.0%	32.5%	\$301	64.6%	26.6%
	Upper	4	57.1%	\$1,028	61.4%	30.1%	3	60.0%	53.4%	\$863	71.5%	62.7%	1	50.0%	59.3%	\$165	35.4%	68.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$1,673	100.0%	100.0%	5	100.0%	100.0%	\$1,207	100.0%	100.0%	2	100.0%	100.0%	\$466	100.0%	100.0%
REFINANCE	Low	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%
	Moderate	1	50.0%	\$64	39.3%	21.9%	0	0.0%	4.6%	\$0	0.0%	2.9%	1	50.0%	7.3%	\$64	39.3%	4.1%
	Middle	0	0.0%	\$0	0.0%	48.0%	0	0.0%	34.7%	\$0	0.0%	29.1%	0	0.0%	34.7%	\$0	0.0%	28.6%
	Upper	1	50.0%	\$99	60.7%	30.1%	0	0.0%	60.7%	\$0	0.0%	68.0%	1	50.0%	58.0%	\$99	60.7%	67.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$163	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$163	100.0%	100.0%
HOME IMPROVEMENT	Low	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%
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	15.6%	\$0	0.0%	11.0%	0	0.0%	16.2%	\$0	0.0%	9.7%
	Middle	3	75.0%	\$51	83.6%	48.0%	1	100.0%	45.7%	\$25	100.0%	42.0%	2	66.7%	46.7%	\$26	72.2%	52.9%
	Upper	1	25.0%	\$10	16.4%	30.1%	0	0.0%	38.7%	\$0	0.0%	47.0%	1	33.3%	37.1%	\$10	27.8%	37.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$61	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	3	100.0%	100.0%	\$36	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	69.2%	\$0	0.0%	79.2%	0	0.0%	57.1%	\$0	0.0%	44.1%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	30.8%	\$0	0.0%	20.8%	0	0.0%	42.9%	\$0	0.0%	55.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	7.7%	\$64	3.4%	21.9%	0	0.0%	8.1%	\$0	0.0%	3.9%	1	14.3%	8.3%	\$64	9.6%	4.5%
	Middle	6	46.2%	\$696	36.7%	48.0%	3	50.0%	37.6%	\$369	30.0%	41.2%	3	42.9%	33.8%	\$327	49.2%	27.8%
	Upper	6	46.2%	\$1,137	59.9%	30.1%	3	50.0%	54.3%	\$863	70.0%	54.9%	3	42.9%	57.9%	\$274	41.2%	67.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	13	100.0%	\$1,897	100.0%	100.0%	6	100.0%	100.0%	\$1,232	100.0%	100.0%	7	100.0%	100.0%	\$665	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	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%
	Moderate	9	15.5%	\$650	26.8%	17.6%	4	12.5%	16.1%	\$300	25.0%	14.9%	5	19.2%	14.8%	\$350	28.6%	16.1%
	Middle	11	19.0%	\$180	7.4%	43.9%	7	21.9%	43.0%	\$134	11.2%	40.2%	4	15.4%	42.4%	\$46	3.8%	41.6%
	Upper	38	65.5%	\$1,595	65.8%	38.5%	21	65.6%	37.4%	\$767	63.9%	43.0%	17	65.4%	39.2%	\$828	67.6%	40.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	2.0%	0	0.0%	3.6%	\$0	0.0%	1.7%
Total	58	100.0%	\$2,425	100.0%	100.0%	32	100.0%	100.0%	\$1,201	100.0%	100.0%	26	100.0%	100.0%	\$1,224	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	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%
	Moderate	0	0.0%	\$0	0.0%	9.3%	0	0.0%	10.0%	\$0	0.0%	0.4%	0	0.0%	16.7%	\$0	0.0%	38.1%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	40.0%	\$0	0.0%	15.9%	0	0.0%	33.3%	\$0	0.0%	0.9%
	Upper	0	0.0%	\$0	0.0%	51.9%	0	0.0%	40.0%	\$0	0.0%	82.8%	0	0.0%	50.0%	\$0	0.0%	61.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Odessa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.4%	0	0.0%	4.0%	\$0	0.0%	1.9%	0	0.0%	2.7%	\$0	0.0%	1.1%
	Moderate	2	28.6%	\$290	17.3%	15.7%	1	20.0%	20.9%	\$125	10.4%	15.3%	1	50.0%	15.4%	\$165	35.4%	10.6%
	Middle	1	14.3%	\$115	6.9%	19.2%	1	20.0%	25.2%	\$115	9.5%	24.7%	0	0.0%	25.2%	\$0	0.0%	23.3%
	Upper	4	57.1%	\$1,268	75.8%	40.7%	3	60.0%	31.3%	\$967	80.1%	39.4%	1	50.0%	33.3%	\$301	64.6%	42.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.7%	\$0	0.0%	18.7%	0	0.0%	23.4%	\$0	0.0%	22.7%
	Total	7	100.0%	\$1,673	100.0%	100.0%	5	100.0%	100.0%	\$1,207	100.0%	100.0%	2	100.0%	100.0%	\$466	100.0%	100.0%
REFINANCE	Low	2	100.0%	\$163	100.0%	24.4%	0	0.0%	2.4%	\$0	0.0%	1.3%	2	100.0%	3.7%	\$163	100.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	8.8%	\$0	0.0%	5.4%	0	0.0%	6.6%	\$0	0.0%	3.4%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	15.9%	\$0	0.0%	11.8%	0	0.0%	13.8%	\$0	0.0%	10.1%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	37.7%	\$0	0.0%	42.1%	0	0.0%	35.9%	\$0	0.0%	42.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	35.1%	\$0	0.0%	39.4%	0	0.0%	40.0%	\$0	0.0%	42.1%
	Total	2	100.0%	\$163	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$163	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.4%	0	0.0%	7.5%	\$0	0.0%	2.9%	0	0.0%	10.8%	\$0	0.0%	4.3%
	Moderate	1	25.0%	\$10	16.4%	15.7%	0	0.0%	18.5%	\$0	0.0%	11.4%	1	33.3%	12.6%	\$10	27.8%	9.0%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	28.3%	\$0	0.0%	25.2%	0	0.0%	20.4%	\$0	0.0%	15.2%
	Upper	3	75.0%	\$51	83.6%	40.7%	1	100.0%	44.5%	\$25	100.0%	60.2%	2	66.7%	50.9%	\$26	72.2%	60.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	0.3%	0	0.0%	5.4%	\$0	0.0%	11.5%
	Total	4	100.0%	\$61	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	3	100.0%	100.0%	\$36	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	15.4%	\$163	8.6%	24.4%	0	0.0%	3.8%	\$0	0.0%	1.4%	2	28.6%	3.3%	\$163	24.5%	1.3%
	Moderate	3	23.1%	\$300	15.8%	15.7%	1	16.7%	18.0%	\$125	10.1%	10.3%	2	28.6%	12.8%	\$175	26.3%	8.4%
	Middle	1	7.7%	\$115	6.1%	19.2%	1	16.7%	23.1%	\$115	9.3%	17.4%	0	0.0%	21.8%	\$0	0.0%	19.3%
	Upper	7	53.8%	\$1,319	69.5%	40.7%	4	66.7%	33.3%	\$992	80.5%	32.3%	3	42.9%	34.8%	\$327	49.2%	42.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.9%	\$0	0.0%	38.7%	0	0.0%	27.3%	\$0	0.0%	28.5%
	Total	13	100.0%	\$1,897	100.0%	100.0%	6	100.0%	100.0%	\$1,232	100.0%	100.0%	7	100.0%	100.0%	\$665	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	33	56.9%	\$1,076	44.4%	88.4%	18	56.3%	30.4%	\$616	51.3%	22.7%	15	57.7%	26.7%	\$460	37.6%	22.8%
	Over \$1 Million	19	32.8%	\$1,300	53.6%	11.3%	11	34.4%					8	30.8%				
	Total Rev. available	52	89.7%	\$2,376	98.0%	99.7%	29	90.7%					23	88.5%				
	Rev. Not Known	6	10.3%	\$49	2.0%	0.4%	3	9.4%					3	11.5%				
Total	58	100.0%	\$2,425	100.0%	100.0%	32	100.0%					26	100.0%					
Small Business Loan Size	\$100,000 or Less	55	94.8%	\$1,725	71.1%		31	96.9%	94.2%	\$1,001	83.3%	38.8%	24	92.3%	94.9%	\$724	59.2%	42.3%
	\$100,001 - \$250,000	2	3.4%	\$400	16.5%		1	3.1%	3.2%	\$200	16.7%	16.2%	1	3.8%	2.8%	\$200	16.3%	15.9%
	\$250,001 - \$1 Million	1	1.7%	\$300	12.4%		0	0.0%	2.7%	\$0	0.0%	45.0%	1	3.8%	2.3%	\$300	24.5%	41.8%
	Total	58	100.0%	\$2,425	100.0%		32	100.0%	100.0%	\$1,201	100.0%	100.0%	26	100.0%	100.0%	\$1,224	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	20.0%	\$0	0.0%	9.4%	0	0.0%	16.7%	\$0	0.0%	38.1%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.0%	\$0	0.0%	18.6%	0	0.0%	50.0%	\$0	0.0%	4.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.0%	\$0	0.0%	33.9%	0	0.0%	16.7%	\$0	0.0%	23.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.0%	\$0	0.0%	47.5%	0	0.0%	33.3%	\$0	0.0%	71.4%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX San Angelo

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Agg		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	4	40.0%	\$326	26.0%	26.2%	3	42.9%	17.8%	\$286	42.2%	12.1%	1	33.3%	17.0%	\$40	7.0%	10.7%
	Middle	5	50.0%	\$464	37.0%	45.3%	4	57.1%	49.2%	\$392	57.8%	47.7%	1	33.3%	49.1%	\$72	12.5%	47.1%
	Upper	1	10.0%	\$463	37.0%	27.2%	0	0.0%	32.5%	\$0	0.0%	39.9%	1	33.3%	33.3%	\$463	80.5%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$1,253	100.0%	100.0%	7	100.0%	100.0%	\$678	100.0%	100.0%	3	100.0%	100.0%	\$575	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.4%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	1	50.0%	\$75	38.1%	26.2%	1	50.0%	15.5%	\$75	38.1%	8.3%	0	0.0%	13.0%	\$0	0.0%	7.1%
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	41.7%	\$0	0.0%	38.3%	0	0.0%	47.0%	\$0	0.0%	43.6%
	Upper	1	50.0%	\$122	61.9%	27.2%	1	50.0%	42.3%	\$122	61.9%	53.2%	0	0.0%	39.7%	\$0	0.0%	49.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$197	100.0%	100.0%	2	100.0%	100.0%	\$197	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.7%	\$0	0.0%	0.2%	0	0.0%	1.6%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	26.2%	0	0.0%	20.0%	\$0	0.0%	10.0%	0	0.0%	20.7%	\$0	0.0%	11.4%
	Middle	1	100.0%	\$10	100.0%	45.3%	1	100.0%	48.8%	\$10	100.0%	46.1%	0	0.0%	48.0%	\$0	0.0%	44.3%
	Upper	0	0.0%	\$0	0.0%	27.2%	0	0.0%	30.5%	\$0	0.0%	43.7%	0	0.0%	29.7%	\$0	0.0%	43.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$10	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	50.0%	\$0	0.0%	8.2%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	33.3%	\$0	0.0%	28.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	16.7%	\$0	0.0%	0.4%	0	0.0%	50.0%	\$0	0.0%	91.8%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	50.0%	\$0	0.0%	70.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	5	38.5%	\$401	27.5%	26.2%	4	40.0%	17.4%	\$361	40.8%	11.5%	1	33.3%	16.0%	\$40	7.0%	9.5%
	Middle	6	46.2%	\$474	32.5%	45.3%	5	50.0%	47.0%	\$402	45.4%	43.8%	1	33.3%	48.4%	\$72	12.5%	46.3%
	Upper	2	15.4%	\$585	40.1%	27.2%	1	10.0%	35.1%	\$122	13.8%	44.5%	1	33.3%	35.0%	\$463	80.5%	43.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	13	100.0%	\$1,460	100.0%	100.0%	10	100.0%	100.0%	\$885	100.0%	100.0%	3	100.0%	100.0%	\$575	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	1	7.7%	\$15	2.3%	10.9%	1	14.3%	8.4%	\$15	6.8%	10.0%	0	0.0%	7.6%	\$0	0.0%	25.8%
	Moderate	3	23.1%	\$175	26.7%	15.1%	1	14.3%	14.6%	\$50	22.7%	12.2%	2	33.3%	15.9%	\$125	28.7%	11.5%
	Middle	5	38.5%	\$220	33.6%	45.7%	3	42.9%	44.4%	\$120	54.5%	49.3%	2	33.3%	44.2%	\$100	23.0%	35.2%
	Upper	4	30.8%	\$245	37.4%	28.0%	2	28.6%	30.6%	\$35	15.9%	27.2%	2	33.3%	29.3%	\$210	48.3%	26.1%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	1.3%	0	0.0%	2.5%	\$0	0.0%	1.2%
Total	13	100.0%	\$655	100.0%	100.0%	7	100.0%	100.0%	\$220	100.0%	100.0%	6	100.0%	100.0%	\$435	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	2.4%	\$0	0.0%	3.2%	0	0.0%	3.7%	\$0	0.0%	5.2%
	Moderate	0	0.0%	\$0	0.0%	4.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.9%	0	0.0%	25.9%	\$0	0.0%	26.1%	0	0.0%	23.2%	\$0	0.0%	44.3%
	Upper	1	100.0%	\$25	100.0%	54.2%	0	0.0%	70.6%	\$0	0.0%	70.3%	1	100.0%	70.7%	\$25	100.0%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	0.4%	0	0.0%	2.4%	\$0	0.0%	0.4%
Total	1	100.0%	\$25	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX San Angelo

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$(000s)	%	#	%	%	\$(000s)	\$(000s)	\$(000s)	#	%	%	\$(000s)	\$(000s)	\$(000s)		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	22.0%	0	0.0%	3.9%	\$0	0.0%	1.9%	0	0.0%	3.6%	\$0	0.0%	1.9%
	Moderate	5	50.0%	\$393	31.4%	18.3%	4	57.1%	14.0%	\$321	47.3%	9.7%	1	33.3%	14.0%	\$72	12.5%	9.7%
	Middle	3	30.0%	\$357	28.5%	19.4%	3	42.9%	23.7%	\$357	52.7%	21.5%	0	0.0%	22.0%	\$0	0.0%	19.9%
	Upper	2	20.0%	\$503	40.1%	40.2%	0	0.0%	36.9%	\$0	0.0%	46.0%	2	66.7%	39.1%	\$503	87.5%	49.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.5%	\$0	0.0%	20.9%	0	0.0%	21.3%	\$0	0.0%	19.5%
	Total	10	100.0%	\$1,253	100.0%	100.0%	7	100.0%	100.0%	\$678	100.0%	100.0%	3	100.0%	100.0%	\$575	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	22.0%	0	0.0%	2.6%	\$0	0.0%	1.1%	0	0.0%	3.9%	\$0	0.0%	1.6%
	Moderate	1	50.0%	\$75	38.1%	18.3%	1	50.0%	10.7%	\$75	38.1%	5.8%	0	0.0%	8.5%	\$0	0.0%	4.7%
	Middle	1	50.0%	\$122	61.9%	19.4%	1	50.0%	19.7%	\$122	61.9%	14.7%	0	0.0%	14.5%	\$0	0.0%	10.3%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	41.3%	\$0	0.0%	49.1%	0	0.0%	40.7%	\$0	0.0%	49.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.7%	\$0	0.0%	29.2%	0	0.0%	32.4%	\$0	0.0%	34.4%
	Total	2	100.0%	\$197	100.0%	100.0%	2	100.0%	100.0%	\$197	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.0%	0	0.0%	7.5%	\$0	0.0%	2.4%	0	0.0%	11.3%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	17.6%	\$0	0.0%	9.8%	0	0.0%	15.2%	\$0	0.0%	7.7%
	Middle	1	100.0%	\$10	100.0%	19.4%	1	100.0%	23.4%	\$10	100.0%	18.4%	0	0.0%	22.3%	\$0	0.0%	16.5%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	49.2%	\$0	0.0%	65.8%	0	0.0%	46.9%	\$0	0.0%	65.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.4%	\$0	0.0%	3.6%	0	0.0%	4.3%	\$0	0.0%	7.8%
	Total	1	100.0%	\$10	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	22.0%	0	0.0%	3.9%	\$0	0.0%	1.7%	0	0.0%	4.2%	\$0	0.0%	1.8%
	Moderate	6	46.2%	\$468	32.1%	18.3%	5	50.0%	13.4%	\$396	44.7%	8.4%	1	33.3%	12.4%	\$72	12.5%	7.9%
	Middle	5	38.5%	\$489	33.5%	19.4%	5	50.0%	22.5%	\$489	55.3%	18.9%	0	0.0%	19.6%	\$0	0.0%	16.5%
	Upper	2	15.4%	\$503	34.5%	40.2%	0	0.0%	39.1%	\$0	0.0%	46.1%	2	66.7%	40.1%	\$503	87.5%	49.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.2%	\$0	0.0%	24.9%	0	0.0%	23.6%	\$0	0.0%	24.7%
	Total	13	100.0%	\$1,460	100.0%	100.0%	10	100.0%	100.0%	\$885	100.0%	100.0%	3	100.0%	100.0%	\$575	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	8	61.5%	\$330	50.4%	91.8%	5	71.4%	40.4%	\$155	70.5%	31.5%	3	50.0%	39.7%	\$175	40.2%	30.5%
	Over \$1 Million	4	30.8%	\$310	47.3%	7.5%	1	14.3%					3	50.0%				
	Total Rev. available	12	92.3%	\$640	97.7%	99.3%	6	85.7%					6	100.0%				
	Rev. Not Known	1	7.7%	\$15	2.3%	0.7%	1	14.3%					0	0.0%				
Total	13	100.0%	\$655	100.0%	100.0%	7	100.0%					6	100.0%					
Small Business Loan Size	\$100,000 or Less	12	92.3%	\$455	69.5%		7	100.0%	95.2%	\$220	100.0%	43.8%	5	83.3%	95.4%	\$235	54.0%	43.6%
	\$100,001 - \$250,000	1	7.7%	\$200	30.5%		0	0.0%	2.8%	\$0	0.0%	16.8%	1	16.7%	2.6%	\$200	46.0%	17.5%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	39.3%	0	0.0%	2.0%	\$0	0.0%	38.9%
	Total	13	100.0%	\$655	100.0%		7	100.0%	100.0%	\$220	100.0%	100.0%	6	100.0%	100.0%	\$435	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	1	100.0%	\$25	100.0%	96.5%	0	0.0%	18.8%	\$0	0.0%	30.1%	1	100.0%	48.8%	\$25	100.0%	80.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	3.5%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	1	100.0%	\$25	100.0%	100.0%	0	0.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$25	100.0%		0	0.0%	78.8%	\$0	0.0%	28.3%	1	100.0%	81.7%	\$25	100.0%	29.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.4%	\$0	0.0%	20.8%	0	0.0%	11.0%	\$0	0.0%	26.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	11.8%	\$0	0.0%	50.8%	0	0.0%	7.3%	\$0	0.0%	44.1%
	Total	1	100.0%	\$25	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX San Antonio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	%	#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	10	2.0%	\$1,026	0.7%	4.6%	3	1.0%	1.6%	\$401	0.5%	1.0%	7	3.5%	1.4%	\$625	1.2%	1.0%
	Moderate	88	17.6%	\$11,316	8.2%	23.7%	52	17.4%	11.7%	\$6,927	8.1%	6.9%	36	18.0%	10.4%	\$4,389	8.4%	6.6%
	Middle	94	18.8%	\$14,353	10.4%	32.9%	68	22.7%	34.3%	\$10,351	12.0%	26.1%	26	13.0%	33.7%	\$4,002	7.7%	26.7%
	Upper	307	61.5%	\$111,248	80.6%	38.8%	176	58.9%	52.4%	\$68,292	79.4%	65.9%	131	65.5%	54.6%	\$42,956	82.7%	65.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	499	100.0%	\$137,943	100.0%	100.0%	299	100.0%	100.0%	\$85,971	100.0%	100.0%	200	100.0%	100.0%	\$51,972	100.0%	100.0%
REFINANCE	Low	2	1.4%	\$158	0.4%	4.6%	1	1.1%	1.5%	\$99	0.5%	0.8%	1	1.8%	1.3%	\$59	0.3%	0.8%
	Moderate	20	13.7%	\$2,318	5.9%	23.7%	13	14.6%	11.9%	\$1,731	8.0%	7.0%	7	12.3%	10.0%	\$587	3.3%	6.0%
	Middle	26	17.8%	\$2,925	7.4%	32.9%	18	20.2%	33.4%	\$1,802	8.4%	24.3%	8	14.0%	31.8%	\$1,123	6.3%	24.1%
	Upper	98	67.1%	\$34,021	86.3%	38.8%	57	64.0%	53.1%	\$17,943	83.2%	67.9%	41	71.9%	57.0%	\$16,078	90.1%	69.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	146	100.0%	\$39,422	100.0%	100.0%	89	100.0%	100.0%	\$21,575	100.0%	100.0%	57	100.0%	100.0%	\$17,847	100.0%	100.0%
HOME IMPROVEMENT	Low	4	7.7%	\$57	2.8%	4.6%	0	0.0%	4.5%	\$0	0.0%	3.0%	4	12.1%	4.0%	\$57	3.8%	2.7%
	Moderate	22	42.3%	\$305	15.2%	23.7%	8	42.1%	20.1%	\$43	8.7%	10.2%	14	42.4%	18.8%	\$262	17.3%	9.0%
	Middle	11	21.2%	\$936	46.6%	32.9%	7	36.8%	27.3%	\$114	23.2%	21.9%	4	12.1%	26.8%	\$822	54.2%	21.1%
	Upper	15	28.8%	\$711	35.4%	38.8%	4	21.1%	48.1%	\$335	68.1%	64.9%	11	33.3%	50.4%	\$376	24.8%	67.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	52	100.0%	\$2,009	100.0%	100.0%	19	100.0%	100.0%	\$492	100.0%	100.0%	33	100.0%	100.0%	\$1,517	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	15.3%	\$0	0.0%	3.1%	0	0.0%	7.6%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	36.9%	\$0	0.0%	24.2%	0	0.0%	43.5%	\$0	0.0%	34.5%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	27.0%	\$0	0.0%	28.9%	0	0.0%	29.8%	\$0	0.0%	28.8%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	20.7%	\$0	0.0%	43.8%	0	0.0%	19.1%	\$0	0.0%	33.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	16	2.3%	\$1,241	0.7%	4.6%	4	1.0%	1.7%	\$500	0.5%	1.1%	12	4.1%	1.5%	\$741	1.0%	1.1%
	Moderate	130	18.7%	\$13,939	7.8%	23.7%	73	17.9%	12.0%	\$8,701	8.1%	8.2%	57	19.7%	10.5%	\$5,238	7.3%	8.1%
	Middle	131	18.8%	\$18,214	10.2%	32.9%	93	22.9%	33.8%	\$12,267	11.4%	25.8%	38	13.1%	32.8%	\$5,947	8.3%	26.0%
	Upper	420	60.3%	\$145,980	81.4%	38.8%	237	58.2%	52.4%	\$86,570	80.1%	64.9%	183	63.1%	55.2%	\$59,410	83.3%	64.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	697	100.0%	\$179,374	100.0%	100.0%	407	100.0%	100.0%	\$108,038	100.0%	100.0%	290	100.0%	100.0%	\$71,336	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	159	7.0%	\$8,338	7.9%	4.6%	80	7.0%	5.7%	\$4,242	8.1%	6.9%	79	6.9%	4.8%	\$4,096	7.8%	6.7%
	Moderate	499	21.9%	\$20,188	19.2%	20.0%	253	22.2%	20.3%	\$10,471	19.9%	19.0%	246	21.6%	18.4%	\$9,717	18.5%	18.2%
	Middle	641	28.1%	\$30,758	29.3%	30.8%	332	29.1%	27.2%	\$16,576	31.5%	27.8%	309	27.1%	27.6%	\$14,182	27.0%	26.6%
	Upper	978	42.9%	\$45,821	43.6%	44.5%	474	41.6%	45.3%	\$21,325	40.5%	45.2%	504	44.2%	47.5%	\$24,496	46.6%	47.3%
	Unknown	1	0.0%	\$25	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.4%	1	0.1%	0.2%	\$25	0.0%	0.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	0.7%	0	0.0%	1.5%	\$0	0.0%	0.9%
Total	2,278	100.0%	\$105,130	100.0%	100.0%	1,139	100.0%	100.0%	\$52,614	100.0%	100.0%	1,139	100.0%	100.0%	\$52,516	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	3.8%	\$0	0.0%	5.9%	0	0.0%	1.6%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	11.7%	0	0.0%	21.7%	\$0	0.0%	8.9%	0	0.0%	17.3%	\$0	0.0%	18.5%
	Middle	1	50.0%	\$500	98.0%	35.2%	0	0.0%	34.0%	\$0	0.0%	32.0%	1	100.0%	37.2%	\$500	100.0%	38.4%
	Upper	1	50.0%	\$10	2.0%	51.1%	1	100.0%	39.6%	\$10	100.0%	52.7%	0	0.0%	39.3%	\$0	0.0%	38.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.5%	0	0.0%	4.7%	\$0	0.0%	1.2%
Total	2	100.0%	\$510	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	1	100.0%	100.0%	\$500	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX San Antonio

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	23	4.6%	\$1,924	1.4%	22.6%	14	4.7%	3.3%	\$1,192	1.4%	1.4%	9	4.5%	2.5%	\$732	1.4%	1.1%
	Moderate	82	16.4%	\$10,452	7.6%	16.9%	52	17.4%	13.2%	\$6,542	7.6%	8.5%	30	15.0%	10.2%	\$3,910	7.5%	6.4%
	Middle	74	14.8%	\$11,408	8.3%	19.1%	47	15.7%	21.8%	\$7,457	8.7%	18.8%	27	13.5%	21.8%	\$3,951	7.6%	18.2%
	Upper	320	64.1%	\$114,159	82.8%	41.5%	186	62.2%	41.5%	\$70,780	82.3%	53.9%	134	67.0%	46.4%	\$43,379	83.5%	57.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.2%	\$0	0.0%	17.4%	0	0.0%	19.1%	\$0	0.0%	16.9%
	Total	499	100.0%	\$137,943	100.0%	100.0%	299	100.0%	100.0%	\$85,971	100.0%	100.0%	200	100.0%	100.0%	\$51,972	100.0%	100.0%
REFINANCE	Low	7	4.8%	\$505	1.3%	22.6%	4	4.5%	4.0%	\$281	1.3%	1.7%	3	5.3%	2.9%	\$224	1.3%	1.2%
	Moderate	20	13.7%	\$2,386	6.1%	16.9%	13	14.6%	9.6%	\$1,665	7.7%	5.2%	7	12.3%	6.9%	\$721	4.0%	3.6%
	Middle	20	13.7%	\$2,509	6.4%	19.1%	12	13.5%	16.5%	\$1,490	6.9%	11.4%	8	14.0%	13.1%	\$1,019	5.7%	8.8%
	Upper	99	67.8%	\$34,022	86.3%	41.5%	60	67.4%	37.9%	\$18,139	84.1%	46.6%	39	68.4%	38.8%	\$15,883	89.0%	44.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	32.0%	\$0	0.0%	35.1%	0	0.0%	38.3%	\$0	0.0%	42.2%
	Total	146	100.0%	\$39,422	100.0%	100.0%	89	100.0%	100.0%	\$21,575	100.0%	100.0%	57	100.0%	100.0%	\$17,847	100.0%	100.0%
HOME IMPROVEMENT	Low	6	11.5%	\$50	2.5%	22.6%	3	15.8%	8.3%	\$15	3.0%	2.3%	3	9.1%	7.6%	\$35	2.3%	2.0%
	Moderate	11	21.2%	\$106	5.3%	16.9%	2	10.5%	12.9%	\$17	3.5%	6.8%	9	27.3%	12.4%	\$89	5.9%	6.4%
	Middle	12	23.1%	\$141	7.0%	19.1%	4	21.1%	20.4%	\$50	10.2%	14.1%	8	24.2%	17.5%	\$91	6.0%	11.5%
	Upper	23	44.2%	\$1,712	85.2%	41.5%	10	52.6%	52.2%	\$410	83.3%	69.4%	13	39.4%	58.0%	\$1,302	85.8%	74.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.2%	\$0	0.0%	7.4%	0	0.0%	4.5%	\$0	0.0%	5.8%
	Total	52	100.0%	\$2,009	100.0%	100.0%	19	100.0%	100.0%	\$492	100.0%	100.0%	33	100.0%	100.0%	\$1,517	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	36	5.2%	\$2,479	1.4%	22.6%	21	5.2%	3.7%	\$1,488	1.4%	1.4%	15	5.2%	2.8%	\$991	1.4%	1.1%
	Moderate	113	16.2%	\$12,944	7.2%	16.9%	67	16.5%	12.0%	\$8,224	7.6%	7.0%	46	15.9%	9.1%	\$4,720	6.6%	5.3%
	Middle	106	15.2%	\$14,058	7.8%	19.1%	63	15.5%	20.0%	\$8,997	8.3%	15.5%	43	14.8%	18.7%	\$5,061	7.1%	14.4%
	Upper	442	63.4%	\$149,893	83.6%	41.5%	256	62.9%	40.6%	\$89,329	82.7%	48.3%	186	64.1%	44.2%	\$60,564	84.9%	50.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.8%	\$0	0.0%	27.7%	0	0.0%	25.2%	\$0	0.0%	28.7%
	Total	697	100.0%	\$179,374	100.0%	100.0%	407	100.0%	100.0%	\$108,038	100.0%	100.0%	290	100.0%	100.0%	\$71,336	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	1,503	66.0%	\$60,098	57.2%	91.8%	750	65.8%	47.0%	\$30,009	57.0%	32.2%	753	66.1%	40.2%	\$30,089	57.3%	30.9%
	Over \$1 Million	574	25.2%	\$40,804	38.8%	7.4%	288	25.3%					286	25.1%				
	Total Rev. available	2,077	91.2%	\$100,902	96.0%	99.2%	1,038	91.1%					1,039	91.2%				
	Rev. Not Known	201	8.8%	\$4,228	4.0%	0.8%	101	8.9%					100	8.8%				
Small Business Loan Size	Total	2,278	100.0%	\$105,130	100.0%	100.0%	1,139	100.0%	100.0%	\$52,614	100.0%	100.0%	1,139	100.0%	100.0%	\$52,516	100.0%	100.0%
	\$100,000 or Less	2,200	96.6%	\$81,942	77.9%		1,094	96.0%	92.1%	\$40,538	77.0%	34.0%	1,106	97.1%	93.5%	\$41,404	78.8%	38.8%
	\$100,001 - \$250,000	50	2.2%	\$8,618	8.2%		32	2.8%	3.9%	\$5,436	10.3%	16.4%	18	1.6%	3.3%	\$3,182	6.1%	15.3%
	\$250,001 - \$1 Million	28	1.2%	\$14,570	13.9%		13	1.1%	4.0%	\$6,640	12.6%	49.6%	15	1.3%	3.2%	\$7,930	15.1%	45.9%
	Total	2,278	100.0%	\$105,130	100.0%	100.0%	1,139	100.0%	100.0%	\$52,614	100.0%	100.0%	1,139	100.0%	100.0%	\$52,516	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	2	100.0%	\$510	100.0%	98.8%	1	100.0%	58.5%	\$10	100.0%	83.1%	1	100.0%	57.1%	\$500	100.0%	68.2%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.2%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	2	100.0%	\$510	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	1	100.0%	100.0%	\$500	100.0%	100.0%
Small Farm Loan Size	\$100,000 or Less	1	50.0%	\$10	2.0%		1	100.0%	86.8%	\$10	100.0%	32.1%	0	0.0%	87.4%	\$0	0.0%	38.8%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.6%	\$0	0.0%	16.8%	0	0.0%	8.4%	\$0	0.0%	30.6%
	\$250,001 - \$500,000	1	50.0%	\$500	98.0%		0	0.0%	6.6%	\$0	0.0%	51.1%	1	100.0%	4.2%	\$500	100.0%	30.6%
	Total	2	100.0%	\$510	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	1	100.0%	100.0%	\$500	100.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Starr-Willacy

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	4	30.8%	\$541	17.8%	30.8%	2	25.0%	25.6%	\$325	27.2%	26.4%	2	40.0%	22.4%	\$216	11.7%	21.9%
	Moderate	7	53.8%	\$2,218	72.9%	56.9%	4	50.0%	57.1%	\$587	49.0%	55.9%	3	60.0%	60.6%	\$1,631	88.3%	60.6%
	Middle	2	15.4%	\$285	9.4%	12.4%	2	25.0%	17.3%	\$285	23.8%	17.8%	0	0.0%	17.0%	\$0	0.0%	17.5%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	13	100.0%	\$3,044	100.0%	100.0%	8	100.0%	100.0%	\$1,197	100.0%	100.0%	5	100.0%	100.0%	\$1,847	100.0%	100.0%
REFINANCE	Low	1	20.0%	\$55	6.7%	30.8%	1	33.3%	22.0%	\$55	11.7%	21.5%	0	0.0%	24.0%	\$0	0.0%	18.0%
	Moderate	4	80.0%	\$763	93.3%	56.9%	2	66.7%	56.9%	\$416	88.3%	52.4%	2	100.0%	55.8%	\$347	100.0%	61.0%
	Middle	0	0.0%	\$0	0.0%	12.4%	0	0.0%	21.1%	\$0	0.0%	26.2%	0	0.0%	20.2%	\$0	0.0%	21.0%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$818	100.0%	100.0%	3	100.0%	100.0%	\$471	100.0%	100.0%	2	100.0%	100.0%	\$347	100.0%	100.0%
HOME IMPROVEMENT	Low	3	30.0%	\$16	8.2%	30.8%	0	0.0%	23.5%	\$0	0.0%	22.4%	3	50.0%	28.5%	\$16	34.8%	17.6%
	Moderate	4	40.0%	\$136	70.1%	56.9%	3	75.0%	57.5%	\$133	89.9%	52.3%	1	16.7%	58.3%	\$3	6.5%	76.0%
	Middle	3	30.0%	\$42	21.6%	12.4%	1	25.0%	19.0%	\$15	10.1%	25.3%	2	33.3%	13.2%	\$27	58.7%	6.4%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$194	100.0%	100.0%	4	100.0%	100.0%	\$148	100.0%	100.0%	6	100.0%	100.0%	\$46	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	8	28.6%	\$612	15.1%	30.8%	3	20.0%	23.7%	\$380	20.9%	23.9%	5	38.5%	24.7%	\$232	10.4%	19.2%
	Moderate	15	53.6%	\$3,117	76.8%	56.9%	9	60.0%	57.4%	\$1,136	62.6%	54.5%	6	46.2%	58.7%	\$1,981	88.4%	63.0%
	Middle	5	17.9%	\$327	8.1%	12.4%	3	20.0%	18.9%	\$300	16.5%	21.6%	2	15.4%	16.6%	\$27	1.2%	17.8%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	28	100.0%	\$4,056	100.0%	100.0%	15	100.0%	100.0%	\$1,816	100.0%	100.0%	13	100.0%	100.0%	\$2,240	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	20	22.2%	\$945	28.9%	24.6%	11	28.2%	21.4%	\$790	50.9%	30.1%	9	17.6%	22.7%	\$155	9.0%	21.6%
	Moderate	64	71.1%	\$2,193	67.0%	65.8%	27	69.2%	62.6%	\$711	45.8%	58.6%	37	72.5%	60.9%	\$1,482	86.0%	64.1%
	Middle	6	6.7%	\$137	4.2%	9.6%	1	2.6%	11.9%	\$50	3.2%	8.5%	5	9.8%	12.2%	\$87	5.0%	11.3%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	2.8%	0	0.0%	4.3%	\$0	0.0%	3.0%
Total	90	100.0%	\$3,275	100.0%	100.0%	39	100.0%	100.0%	\$1,551	100.0%	100.0%	51	100.0%	100.0%	\$1,724	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	2	66.7%	\$118	70.2%	25.0%	0	0.0%	32.1%	\$0	0.0%	10.3%	2	100.0%	43.5%	\$118	100.0%	39.6%
	Moderate	1	33.3%	\$50	29.8%	64.1%	1	100.0%	39.3%	\$50	100.0%	75.3%	0	0.0%	43.5%	\$0	0.0%	10.1%
	Middle	0	0.0%	\$0	0.0%	10.9%	0	0.0%	25.0%	\$0	0.0%	13.2%	0	0.0%	8.7%	\$0	0.0%	48.6%
	Upper	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%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	1.3%	0	0.0%	4.3%	\$0	0.0%	1.7%
Total	3	100.0%	\$168	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%	2	100.0%	100.0%	\$118	100.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Starr-Willacy

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	\$ %	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	7.7%	\$57	1.9%	44.3%	0	0.0%	6.4%	\$0	0.0%	4.3%	1	20.0%	4.2%	\$57	3.1%	2.3%
	Moderate	3	23.1%	\$346	11.4%	17.0%	1	12.5%	10.3%	\$130	10.9%	8.9%	2	40.0%	12.7%	\$216	11.7%	9.8%
	Middle	2	15.4%	\$194	6.4%	16.0%	1	12.5%	25.6%	\$104	8.7%	22.6%	1	20.0%	24.8%	\$90	4.9%	20.4%
	Upper	6	46.2%	\$963	31.6%	22.7%	6	75.0%	33.3%	\$963	80.5%	41.5%	0	0.0%	32.1%	\$0	0.0%	38.3%
	Unknown	1	7.7%	\$1,484	48.8%	0.0%	0	0.0%	24.4%	\$0	0.0%	22.6%	1	20.0%	26.1%	\$1,484	80.3%	29.2%
	Total	13	100.0%	\$3,044	100.0%	100.0%	8	100.0%	100.0%	\$1,197	100.0%	100.0%	5	100.0%	100.0%	\$1,847	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	44.3%	0	0.0%	2.4%	\$0	0.0%	1.3%	0	0.0%	4.7%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	8.1%	\$0	0.0%	5.4%	0	0.0%	7.0%	\$0	0.0%	3.7%
	Middle	1	20.0%	\$55	6.7%	16.0%	1	33.3%	22.0%	\$55	11.7%	22.5%	0	0.0%	14.7%	\$0	0.0%	9.3%
	Upper	4	80.0%	\$763	93.3%	22.7%	2	66.7%	49.6%	\$416	88.3%	51.2%	2	100.0%	51.9%	\$347	100.0%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.9%	\$0	0.0%	19.6%	0	0.0%	21.7%	\$0	0.0%	25.4%
	Total	5	100.0%	\$818	100.0%	100.0%	3	100.0%	100.0%	\$471	100.0%	100.0%	2	100.0%	100.0%	\$347	100.0%	100.0%
HOME IMPROVEMENT	Low	2	20.0%	\$12	6.2%	44.3%	0	0.0%	4.6%	\$0	0.0%	0.7%	2	33.3%	7.6%	\$12	26.1%	2.4%
	Moderate	2	20.0%	\$10	5.2%	17.0%	1	25.0%	9.2%	\$8	5.4%	1.6%	1	16.7%	4.9%	\$2	4.3%	1.6%
	Middle	2	20.0%	\$103	53.1%	16.0%	1	25.0%	10.5%	\$100	67.6%	12.9%	1	16.7%	13.2%	\$3	6.5%	6.3%
	Upper	4	40.0%	\$69	35.6%	22.7%	2	50.0%	24.2%	\$40	27.0%	45.0%	2	33.3%	21.5%	\$29	63.0%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	51.6%	\$0	0.0%	39.9%	0	0.0%	52.8%	\$0	0.0%	39.5%
	Total	10	100.0%	\$194	100.0%	100.0%	4	100.0%	100.0%	\$148	100.0%	100.0%	6	100.0%	100.0%	\$46	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	44.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	22.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	10.7%	\$69	1.7%	44.3%	0	0.0%	4.6%	\$0	0.0%	2.8%	3	23.1%	5.4%	\$69	3.1%	1.9%
	Moderate	5	17.9%	\$356	8.8%	17.0%	2	13.3%	9.2%	\$138	7.6%	6.8%	3	23.1%	8.4%	\$218	9.7%	6.3%
	Middle	5	17.9%	\$352	8.7%	16.0%	3	20.0%	19.1%	\$259	14.3%	21.5%	2	15.4%	17.9%	\$93	4.2%	14.0%
	Upper	14	50.0%	\$1,795	44.3%	22.7%	10	66.7%	34.6%	\$1,419	78.1%	45.4%	4	30.8%	34.2%	\$376	16.8%	47.3%
	Unknown	1	3.6%	\$1,484	36.6%	0.0%	0	0.0%	32.5%	\$0	0.0%	23.5%	1	7.7%	34.0%	\$1,484	66.3%	30.5%
	Total	28	100.0%	\$4,056	100.0%	100.0%	15	100.0%	100.0%	\$1,816	100.0%	100.0%	13	100.0%	100.0%	\$2,240	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	74	82.2%	\$2,941	89.8%	93.1%	33	84.6%	53.6%	\$1,497	96.5%	58.3%	41	80.4%	44.2%	\$1,444	83.8%	37.3%
	Over \$1 Million	3	3.3%	\$265	8.1%	5.0%	1	2.6%					2	3.9%				
	Total Rev. available	77	85.5%	\$3,206	97.9%	98.1%	34	87.2%					43	84.3%				
	Rev. Not Known	13	14.4%	\$69	2.1%	1.9%	5	12.8%					8	15.7%				
Total	90	100.0%	\$3,275	100.0%	100.0%	39	100.0%					51	100.0%					
Small Business Loan Size	\$100,000 or Less	85	94.4%	\$1,858	56.7%		36	92.3%	97.6%	\$766	49.4%	63.7%	49	96.1%	97.8%	\$1,092	63.3%	65.0%
	\$100,001 - \$250,000	3	3.3%	\$550	16.8%		2	5.1%	1.5%	\$335	21.6%	9.8%	1	2.0%	1.5%	\$215	12.5%	12.2%
	\$250,001 - \$1 Million	2	2.2%	\$867	26.5%		1	2.6%	1.0%	\$450	29.0%	26.5%	1	2.0%	0.7%	\$417	24.2%	22.8%
	Total	90	100.0%	\$3,275	100.0%		39	100.0%	100.0%	\$1,551	100.0%	100.0%	51	100.0%	100.0%	\$1,724	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		3	100.0%	\$168	100.0%	92.8%	1	100.0%	50.0%	\$50	100.0%	91.1%	2	100.0%	21.7%	\$118	100.0%	77.3%
Over \$1 Million		0	0.0%	\$0	0.0%	7.2%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		3	100.0%	\$168	100.0%	100.0%	1	100.0%					2	100.0%				
Small Farm Loan Size	\$100,000 or Less	3	100.0%	\$168	100.0%		1	100.0%	96.4%	\$50	100.0%	55.0%	2	100.0%	95.7%	\$118	100.0%	66.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.3%	\$0	0.0%	33.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.6%	\$0	0.0%	45.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$168	100.0%		1	100.0%	100.0%	\$50	100.0%	100.0%	2	100.0%	100.0%	\$118	100.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Tyler

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	10	43.5%	\$1,171	27.0%	21.7%	7	50.0%	11.3%	\$780	31.8%	7.6%	3	33.3%	10.8%	\$391	20.9%	6.9%
	Middle	5	21.7%	\$1,160	26.8%	42.2%	2	14.3%	42.0%	\$555	22.6%	40.0%	3	33.3%	42.0%	\$605	32.3%	41.6%
	Upper	8	34.8%	\$1,999	46.2%	34.9%	5	35.7%	46.3%	\$1,121	45.6%	52.2%	3	33.3%	46.8%	\$878	46.9%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	23	100.0%	\$4,330	100.0%	100.0%	14	100.0%	100.0%	\$2,456	100.0%	100.0%	9	100.0%	100.0%	\$1,874	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.4%
	Moderate	1	16.7%	\$539	42.5%	21.7%	1	25.0%	11.0%	\$539	55.1%	7.4%	0	0.0%	9.4%	\$0	0.0%	6.3%
	Middle	4	66.7%	\$564	44.4%	42.2%	3	75.0%	41.1%	\$440	44.9%	40.2%	1	50.0%	40.8%	\$124	42.8%	39.9%
	Upper	1	16.7%	\$166	13.1%	34.9%	0	0.0%	47.5%	\$0	0.0%	52.1%	1	50.0%	49.2%	\$166	57.2%	53.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$1,269	100.0%	100.0%	4	100.0%	100.0%	\$979	100.0%	100.0%	2	100.0%	100.0%	\$290	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	2.4%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	21.7%	0	0.0%	15.4%	\$0	0.0%	8.5%	0	0.0%	17.7%	\$0	0.0%	10.6%
	Middle	0	0.0%	\$0	0.0%	42.2%	0	0.0%	41.3%	\$0	0.0%	45.3%	0	0.0%	47.1%	\$0	0.0%	49.3%
	Upper	0	0.0%	\$0	0.0%	34.9%	0	0.0%	43.0%	\$0	0.0%	45.9%	0	0.0%	32.8%	\$0	0.0%	38.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	11.8%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	18.8%	\$0	0.0%	4.1%	0	0.0%	17.6%	\$0	0.0%	17.2%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	31.3%	\$0	0.0%	21.5%	0	0.0%	64.7%	\$0	0.0%	80.5%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	50.0%	\$0	0.0%	74.5%	0	0.0%	5.9%	\$0	0.0%	0.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.4%
	Moderate	11	37.9%	\$1,710	30.5%	21.7%	8	44.4%	11.5%	\$1,319	38.4%	7.3%	3	27.3%	10.9%	\$391	18.1%	7.3%
	Middle	9	31.0%	\$1,724	30.8%	42.2%	5	27.8%	41.7%	\$995	29.0%	38.5%	4	36.4%	42.1%	\$729	33.7%	42.9%
	Upper	9	31.0%	\$2,165	38.7%	34.9%	5	27.8%	46.4%	\$1,121	32.6%	54.0%	4	36.4%	46.4%	\$1,044	48.2%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	29	100.0%	\$5,599	100.0%	100.0%	18	100.0%	100.0%	\$3,435	100.0%	100.0%	11	100.0%	100.0%	\$2,164	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	4	6.8%	\$110	4.5%	6.7%	2	7.4%	7.4%	\$55	4.5%	7.0%	2	6.3%	7.2%	\$55	4.5%	7.0%
	Moderate	12	20.3%	\$317	13.0%	19.3%	4	14.8%	17.7%	\$110	8.9%	17.5%	8	25.0%	17.3%	\$207	17.1%	16.2%
	Middle	15	25.4%	\$605	24.7%	36.0%	7	25.9%	34.4%	\$290	23.5%	32.4%	8	25.0%	35.0%	\$315	26.0%	33.3%
	Upper	28	47.5%	\$1,415	57.8%	37.8%	14	51.9%	39.0%	\$780	63.2%	42.6%	14	43.8%	38.5%	\$635	52.4%	42.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	1.7%	\$0	0.0%	0.5%
Total	59	100.0%	\$2,447	100.0%	100.0%	27	100.0%	100.0%	\$1,235	100.0%	100.0%	32	100.0%	100.0%	\$1,212	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.6%	\$0	0.0%	1.6%	0	0.0%	1.0%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	13.5%	0	0.0%	18.4%	\$0	0.0%	13.7%	0	0.0%	20.3%	\$0	0.0%	15.7%
	Middle	0	0.0%	\$0	0.0%	52.0%	0	0.0%	58.7%	\$0	0.0%	54.5%	0	0.0%	62.5%	\$0	0.0%	59.0%
	Upper	0	0.0%	\$0	0.0%	32.5%	0	0.0%	22.3%	\$0	0.0%	30.3%	0	0.0%	15.6%	\$0	0.0%	24.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.4%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Tyler

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	%	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	4.3%	\$30	0.7%	21.6%	1	7.1%	2.7%	\$30	1.2%	1.2%	0	0.0%	4.6%	\$0	0.0%	2.1%
	Moderate	7	30.4%	\$869	20.1%	17.2%	3	21.4%	12.1%	\$334	13.6%	7.2%	4	44.4%	16.1%	\$535	28.5%	11.0%
	Middle	9	39.1%	\$1,345	31.1%	19.5%	5	35.7%	21.3%	\$643	26.2%	17.3%	4	44.4%	19.5%	\$702	37.5%	17.2%
	Upper	6	26.1%	\$2,086	48.2%	41.7%	5	35.7%	45.5%	\$1,449	59.0%	56.7%	1	11.1%	40.1%	\$637	34.0%	51.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.4%	\$0	0.0%	17.7%	0	0.0%	19.7%	\$0	0.0%	18.1%
	Total	23	100.0%	\$4,330	100.0%	100.0%	14	100.0%	100.0%	\$2,456	100.0%	100.0%	9	100.0%	100.0%	\$1,874	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	3.6%	\$0	0.0%	1.7%	0	0.0%	4.6%	\$0	0.0%	2.1%
	Moderate	1	16.7%	\$124	9.8%	17.2%	0	0.0%	10.5%	\$0	0.0%	6.0%	1	50.0%	11.3%	\$124	42.8%	6.5%
	Middle	1	16.7%	\$95	7.5%	19.5%	1	25.0%	18.5%	\$95	9.7%	13.5%	0	0.0%	14.9%	\$0	0.0%	11.1%
	Upper	4	66.7%	\$1,050	82.7%	41.7%	3	75.0%	45.7%	\$884	90.3%	56.7%	1	50.0%	42.3%	\$166	57.2%	52.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.7%	\$0	0.0%	22.0%	0	0.0%	27.0%	\$0	0.0%	27.7%
	Total	6	100.0%	\$1,269	100.0%	100.0%	4	100.0%	100.0%	\$979	100.0%	100.0%	2	100.0%	100.0%	\$290	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	6.0%	\$0	0.0%	2.1%	0	0.0%	6.9%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	11.7%	\$0	0.0%	5.8%	0	0.0%	17.7%	\$0	0.0%	10.6%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	18.5%	\$0	0.0%	14.4%	0	0.0%	21.4%	\$0	0.0%	17.7%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	59.7%	\$0	0.0%	73.4%	0	0.0%	49.7%	\$0	0.0%	64.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	4.4%	0	0.0%	4.2%	\$0	0.0%	4.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	3.4%	\$30	0.5%	21.6%	1	5.6%	3.1%	\$30	0.9%	1.2%	0	0.0%	4.7%	\$0	0.0%	2.1%
	Moderate	8	27.6%	\$993	17.7%	17.2%	3	16.7%	11.7%	\$334	9.7%	6.3%	5	45.5%	14.9%	\$659	30.5%	9.4%
	Middle	10	34.5%	\$1,440	25.7%	19.5%	6	33.3%	20.3%	\$738	21.5%	14.8%	4	36.4%	18.3%	\$702	32.4%	15.0%
	Upper	10	34.5%	\$3,136	56.0%	41.7%	8	44.4%	46.2%	\$2,333	67.9%	52.1%	2	18.2%	41.2%	\$803	37.1%	50.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.7%	\$0	0.0%	25.6%	0	0.0%	20.9%	\$0	0.0%	23.4%
	Total	29	100.0%	\$5,599	100.0%	100.0%	18	100.0%	100.0%	\$3,435	100.0%	100.0%	11	100.0%	100.0%	\$2,164	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	35	59.3%	\$1,402	57.3%	91.1%	15	55.6%	49.3%	\$715	57.9%	44.0%	20	62.5%	43.9%	\$687	56.7%	43.2%
	Over \$1 Million	20	33.9%	\$990	40.5%	8.0%	9	33.3%					11	34.4%				
	Total Rev. available	55	93.2%	\$2,392	97.8%	99.1%	24	88.9%					31	96.9%				
	Rev. Not Known	4	6.8%	\$55	2.2%	0.9%	3	11.1%					1	3.1%				
Total	59	100.0%	\$2,447	100.0%	100.0%	27	100.0%					32	100.0%					
Small Business Loan Size	\$100,000 or Less	56	94.9%	\$1,997	81.6%		25	92.6%	89.1%	\$935	75.7%	30.3%	31	96.9%	89.5%	\$1,062	87.6%	30.5%
	\$100,001 - \$250,000	3	5.1%	\$450	18.4%		2	7.4%	5.8%	\$300	24.3%	19.1%	1	3.1%	5.9%	\$150	12.4%	20.1%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	5.0%	\$0	0.0%	50.6%	0	0.0%	4.6%	\$0	0.0%	49.4%
	Total	59	100.0%	\$2,447	100.0%		27	100.0%	100.0%	\$1,235	100.0%	100.0%	32	100.0%	100.0%	\$1,212	100.0%	100.0%
	Small Farm Revenue	Total Farms																
\$1 Million or Less		0	0.0%	\$0	0.0%	94.3%	0	0.0%	81.0%	\$0	0.0%	69.3%	0	0.0%	66.7%	\$0	0.0%	64.1%
Over \$1 Million		0	0.0%	\$0	0.0%	5.7%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
Total		0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	87.7%	\$0	0.0%	46.3%	0	0.0%	90.6%	\$0	0.0%	52.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	10.1%	\$0	0.0%	36.5%	0	0.0%	5.7%	\$0	0.0%	18.9%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.2%	\$0	0.0%	17.2%	0	0.0%	3.6%	\$0	0.0%	28.6%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Val Verde-Maverick

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Agg		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	1.9%	\$0	0.0%	1.2%	0	0.0%	2.3%	\$0	0.0%	1.6%
	Moderate	14	53.8%	\$2,280	60.9%	53.9%	4	44.4%	41.1%	\$522	43.8%	34.1%	10	58.8%	45.2%	\$1,758	68.9%	39.7%
	Middle	9	34.6%	\$933	24.9%	23.7%	3	33.3%	25.3%	\$308	25.9%	25.8%	6	35.3%	22.9%	\$625	24.5%	22.8%
	Upper	3	11.5%	\$530	14.2%	17.7%	2	22.2%	31.6%	\$361	30.3%	38.9%	1	5.9%	29.7%	\$169	6.6%	35.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$3,743	100.0%	100.0%	9	100.0%	100.0%	\$1,191	100.0%	100.0%	17	100.0%	100.0%	\$2,552	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	0.9%	\$0	0.0%	0.5%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	4	44.4%	\$308	30.7%	53.9%	2	40.0%	35.6%	\$122	22.1%	32.4%	2	50.0%	40.4%	\$186	41.2%	35.7%
	Middle	4	44.4%	\$484	48.2%	23.7%	2	40.0%	25.4%	\$219	39.6%	23.4%	2	50.0%	23.9%	\$265	58.8%	22.2%
	Upper	1	11.1%	\$212	21.1%	17.7%	1	20.0%	38.1%	\$212	38.3%	43.7%	0	0.0%	35.4%	\$0	0.0%	42.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$1,004	100.0%	100.0%	5	100.0%	100.0%	\$553	100.0%	100.0%	4	100.0%	100.0%	\$451	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	1.8%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	14	66.7%	\$244	73.3%	53.9%	7	87.5%	37.5%	\$87	85.3%	27.9%	7	53.8%	46.9%	\$157	68.0%	36.0%
	Middle	6	28.6%	\$79	23.7%	23.7%	1	12.5%	21.4%	\$15	14.7%	34.2%	5	38.5%	32.7%	\$64	27.7%	41.6%
	Upper	1	4.8%	\$10	3.0%	17.7%	0	0.0%	39.3%	\$0	0.0%	37.1%	1	7.7%	20.4%	\$10	4.3%	22.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	21	100.0%	\$333	100.0%	100.0%	8	100.0%	100.0%	\$102	100.0%	100.0%	13	100.0%	100.0%	\$231	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	66.7%	\$0	0.0%	74.3%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	33.3%	\$0	0.0%	25.7%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	1.6%	\$0	0.0%	1.0%	0	0.0%	1.6%	\$0	0.0%	1.0%
	Moderate	32	57.1%	\$2,832	55.7%	53.9%	13	59.1%	39.7%	\$731	39.6%	34.0%	19	55.9%	44.0%	\$2,101	65.0%	42.4%
	Middle	19	33.9%	\$1,496	29.4%	23.7%	6	27.3%	25.1%	\$542	29.4%	25.1%	13	38.2%	23.5%	\$954	29.5%	23.1%
	Upper	5	8.9%	\$752	14.8%	17.7%	3	13.6%	33.6%	\$573	31.0%	39.9%	2	5.9%	30.8%	\$179	5.5%	33.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	56	100.0%	\$5,080	100.0%	100.0%	22	100.0%	100.0%	\$1,846	100.0%	100.0%	34	100.0%	100.0%	\$3,234	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	1	0.5%	\$3	0.0%	1.2%	0	0.0%	0.7%	\$0	0.0%	0.2%	1	0.8%	0.9%	\$3	0.1%	0.3%
	Moderate	118	57.6%	\$6,127	62.0%	46.9%	52	59.8%	46.5%	\$2,938	68.0%	39.9%	66	55.9%	45.6%	\$3,189	57.4%	45.4%
	Middle	72	35.1%	\$3,236	32.7%	32.7%	27	31.0%	31.0%	\$1,114	25.8%	40.5%	45	38.1%	30.9%	\$2,122	38.2%	36.7%
	Upper	14	6.8%	\$516	5.2%	19.1%	8	9.2%	19.0%	\$271	6.3%	18.6%	6	5.1%	20.4%	\$245	4.4%	16.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.7%	\$0	0.0%	0.8%	0	0.0%	2.1%	\$0	0.0%	0.9%
Total	205	100.0%	\$9,882	100.0%	100.0%	87	100.0%	100.0%	\$4,323	100.0%	100.0%	118	100.0%	100.0%	\$5,559	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$15	100.0%	33.3%	1	100.0%	25.9%	\$15	100.0%	15.7%	0	0.0%	41.5%	\$0	0.0%	32.8%
	Middle	0	0.0%	\$0	0.0%	28.9%	0	0.0%	37.0%	\$0	0.0%	43.0%	0	0.0%	22.0%	\$0	0.0%	37.8%
	Upper	0	0.0%	\$0	0.0%	35.6%	0	0.0%	37.0%	\$0	0.0%	41.3%	0	0.0%	34.1%	\$0	0.0%	29.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.4%	\$0	0.0%	0.1%
Total	1	100.0%	\$15	100.0%	100.0%	1	100.0%	100.0%	\$15	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Val Verde-Maverick

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income			Count		Dollar			Count		Dollar				
		Count	Dollar			%	Bank	Agg	Bank	Agg			Bank	Agg	Bank	Agg		
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	4	15.4%	\$239	6.4%	32.3%	1	11.1%	3.7%	\$80	6.7%	1.9%	3	17.6%	3.9%	\$159	6.2%	1.9%
	Moderate	3	11.5%	\$290	7.7%	21.3%	2	22.2%	12.1%	\$157	13.2%	8.6%	1	5.9%	13.1%	\$133	5.2%	9.3%
	Middle	5	19.2%	\$585	15.6%	17.4%	1	11.1%	20.2%	\$154	12.9%	18.8%	4	23.5%	20.6%	\$431	16.9%	18.9%
	Upper	14	53.8%	\$2,629	70.2%	29.0%	5	55.6%	41.0%	\$800	67.2%	50.0%	9	52.9%	36.2%	\$1,829	71.7%	45.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.9%	\$0	0.0%	20.7%	0	0.0%	26.2%	\$0	0.0%	24.7%
	Total	26	100.0%	\$3,743	100.0%	100.0%	9	100.0%	100.0%	\$1,191	100.0%	100.0%	17	100.0%	100.0%	\$2,552	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	32.3%	0	0.0%	3.0%	\$0	0.0%	1.5%	0	0.0%	3.0%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	21.3%	0	0.0%	7.3%	\$0	0.0%	5.2%	0	0.0%	5.5%	\$0	0.0%	3.4%
	Middle	4	44.4%	\$350	34.9%	17.4%	2	40.0%	17.8%	\$184	33.3%	14.6%	2	50.0%	13.2%	\$166	36.8%	10.2%
	Upper	5	55.6%	\$654	65.1%	29.0%	3	60.0%	41.7%	\$369	66.7%	45.0%	2	50.0%	44.0%	\$285	63.2%	46.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	30.2%	\$0	0.0%	33.7%	0	0.0%	34.3%	\$0	0.0%	38.3%
	Total	9	100.0%	\$1,004	100.0%	100.0%	5	100.0%	100.0%	\$553	100.0%	100.0%	4	100.0%	100.0%	\$451	100.0%	100.0%
HOME IMPROVEMENT	Low	1	4.8%	\$20	6.0%	32.3%	1	12.5%	8.9%	\$20	19.6%	2.2%	0	0.0%	6.1%	\$0	0.0%	2.7%
	Moderate	3	14.3%	\$20	6.0%	21.3%	1	12.5%	5.4%	\$10	9.8%	2.1%	2	15.4%	12.2%	\$10	4.3%	4.2%
	Middle	6	28.6%	\$49	14.7%	17.4%	1	12.5%	16.1%	\$5	4.9%	7.3%	5	38.5%	16.3%	\$44	19.0%	6.2%
	Upper	10	47.6%	\$184	55.3%	29.0%	5	62.5%	57.1%	\$67	65.7%	67.7%	5	38.5%	59.2%	\$117	50.6%	83.4%
	Unknown	1	4.8%	\$60	18.0%	0.0%	0	0.0%	12.5%	\$0	0.0%	20.8%	1	7.7%	6.1%	\$60	26.0%	3.5%
	Total	21	100.0%	\$333	100.0%	100.0%	8	100.0%	100.0%	\$102	100.0%	100.0%	13	100.0%	100.0%	\$231	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	32.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	29.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	5	8.9%	\$259	5.1%	32.3%	2	9.1%	3.8%	\$100	5.4%	1.8%	3	8.8%	3.7%	\$159	4.9%	1.6%
	Moderate	6	10.7%	\$310	6.1%	21.3%	3	13.6%	10.5%	\$167	9.0%	7.6%	3	8.8%	10.9%	\$143	4.4%	6.8%
	Middle	15	26.8%	\$984	19.4%	17.4%	4	18.2%	19.4%	\$343	18.6%	17.5%	11	32.4%	18.3%	\$641	19.8%	14.6%
	Upper	29	51.8%	\$3,467	68.2%	29.0%	13	59.1%	41.8%	\$1,236	67.0%	48.7%	16	47.1%	39.0%	\$2,231	69.0%	41.1%
	Unknown	1	1.8%	\$60	1.2%	0.0%	0	0.0%	24.5%	\$0	0.0%	24.4%	1	2.9%	28.0%	\$60	1.9%	36.0%
	Total	56	100.0%	\$5,080	100.0%	100.0%	22	100.0%	100.0%	\$1,846	100.0%	100.0%	34	100.0%	100.0%	\$3,234	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	132	64.4%	\$6,190	62.6%	92.3%	53	60.9%	51.0%	\$2,464	57.0%	44.9%	79	66.9%	46.8%	\$3,726	67.0%	53.1%
	Over \$1 Million	40	19.5%	\$3,372	34.1%	6.4%	21	24.1%					19	16.1%				
	Total Rev. available	172	83.9%	\$9,562	96.7%	98.7%	74	85.0%					98	83.0%				
	Rev. Not Known	33	16.1%	\$320	3.2%	1.3%	13	14.9%					20	16.9%				
Total	205	100.0%	\$9,882	100.0%	100.0%	87	100.0%					118	100.0%					
Small Business Loan Size	\$100,000 or Less	196	95.6%	\$6,952	70.4%		83	95.4%	92.0%	\$3,042	70.4%	38.1%	113	95.8%	93.7%	\$3,910	70.3%	46.4%
	\$100,001 - \$250,000	5	2.4%	\$1,070	10.8%		2	2.3%	4.8%	\$405	9.4%	22.1%	3	2.5%	4.0%	\$665	12.0%	22.0%
	\$250,001 - \$1 Million	4	2.0%	\$1,860	18.8%		2	2.3%	3.2%	\$876	20.3%	39.8%	2	1.7%	2.3%	\$984	17.7%	31.5%
	Total	205	100.0%	\$9,882	100.0%		87	100.0%	100.0%	\$4,323	100.0%	100.0%	118	100.0%	100.0%	\$5,559	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.7%	0	0.0%	70.4%	\$0	0.0%	57.6%	0	0.0%	41.5%	\$0	0.0%	46.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.3%	0	0.0%					0	0.0%				
	Not Known	1	100.0%	\$15	100.0%	0.0%	1	100.0%					0	0.0%				
	Total	1	100.0%	\$15	100.0%	100.0%	1	100.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$15	100.0%		1	100.0%	88.9%	\$15	100.0%	60.9%	0	0.0%	82.9%	\$0	0.0%	47.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	11.1%	\$0	0.0%	39.1%	0	0.0%	12.2%	\$0	0.0%	32.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.9%	\$0	0.0%	20.9%
	Total	1	100.0%	\$15	100.0%		1	100.0%	100.0%	\$15	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: TX Waco

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units		Count	Count		Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	Count	Agg		Bank	Agg	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	4	9.8%	\$428	5.6%	5.4%	3	11.5%	3.2%	\$335	6.8%	2.8%	1	6.7%	3.7%	\$93	3.5%	3.5%
	Moderate	10	24.4%	\$1,112	14.6%	15.4%	5	19.2%	9.4%	\$512	10.4%	5.3%	5	33.3%	9.5%	\$600	22.3%	5.5%
	Middle	7	17.1%	\$742	9.8%	33.5%	3	11.5%	24.9%	\$406	8.3%	20.3%	4	26.7%	24.5%	\$336	12.5%	20.4%
	Upper	20	48.8%	\$5,325	70.0%	45.7%	15	57.7%	62.5%	\$3,664	74.5%	71.6%	5	33.3%	62.4%	\$1,661	61.7%	70.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	41	100.0%	\$7,607	100.0%	100.0%	26	100.0%	100.0%	\$4,917	100.0%	100.0%	15	100.0%	100.0%	\$2,690	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	2.3%	\$0	0.0%	4.8%	0	0.0%	1.8%	\$0	0.0%	1.7%
	Moderate	2	15.4%	\$2,752	64.8%	15.4%	0	0.0%	7.3%	\$0	0.0%	4.2%	2	28.6%	7.0%	\$2,752	84.8%	4.6%
	Middle	5	38.5%	\$705	16.6%	33.5%	3	50.0%	27.3%	\$500	49.9%	22.2%	2	28.6%	23.0%	\$205	6.3%	22.1%
	Upper	6	46.2%	\$790	18.6%	45.7%	3	50.0%	63.1%	\$503	50.1%	68.8%	3	42.9%	68.1%	\$287	8.8%	71.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	13	100.0%	\$4,247	100.0%	100.0%	6	100.0%	100.0%	\$1,003	100.0%	100.0%	7	100.0%	100.0%	\$3,244	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	4.0%	\$0	0.0%	5.9%	0	0.0%	5.9%	\$0	0.0%	3.9%
	Moderate	1	16.7%	\$8	8.5%	15.4%	0	0.0%	9.4%	\$0	0.0%	3.7%	1	33.3%	14.5%	\$8	13.8%	6.9%
	Middle	2	33.3%	\$22	23.4%	33.5%	1	33.3%	37.3%	\$12	33.3%	30.4%	1	33.3%	28.2%	\$10	17.2%	26.0%
	Upper	3	50.0%	\$64	68.1%	45.7%	2	66.7%	49.3%	\$24	66.7%	60.0%	1	33.3%	51.5%	\$40	69.0%	63.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$94	100.0%	100.0%	3	100.0%	100.0%	\$36	100.0%	100.0%	3	100.0%	100.0%	\$58	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	38.6%	\$0	0.0%	37.3%	0	0.0%	40.9%	\$0	0.0%	58.8%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	20.5%	\$0	0.0%	20.6%	0	0.0%	22.7%	\$0	0.0%	16.3%
	Middle	0	0.0%	\$0	0.0%	24.5%	0	0.0%	29.5%	\$0	0.0%	8.2%	0	0.0%	22.7%	\$0	0.0%	8.4%
	Upper	0	0.0%	\$0	0.0%	24.3%	0	0.0%	11.4%	\$0	0.0%	33.9%	0	0.0%	13.6%	\$0	0.0%	16.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	4	6.7%	\$428	3.6%	5.4%	3	8.6%	3.3%	\$335	5.6%	8.5%	1	4.0%	3.5%	\$93	1.6%	6.6%
	Moderate	13	21.7%	\$3,872	32.4%	15.4%	5	14.3%	8.9%	\$512	8.6%	7.4%	8	32.0%	9.2%	\$3,360	56.1%	6.0%
	Middle	14	23.3%	\$1,469	12.3%	33.5%	7	20.0%	26.3%	\$918	15.4%	19.1%	7	28.0%	24.3%	\$551	9.2%	20.2%
	Upper	29	48.3%	\$6,179	51.7%	45.7%	20	57.1%	61.5%	\$4,191	70.4%	65.0%	9	36.0%	63.1%	\$1,988	33.2%	67.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	60	100.0%	\$11,948	100.0%	100.0%	35	100.0%	100.0%	\$5,956	100.0%	100.0%	25	100.0%	100.0%	\$5,992	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	10	6.5%	\$1,139	14.7%	5.2%	5	6.3%	4.9%	\$150	5.3%	5.0%	5	6.7%	5.1%	\$989	20.1%	7.0%
	Moderate	28	18.1%	\$1,174	15.2%	19.5%	14	17.5%	18.7%	\$277	9.8%	16.3%	14	18.7%	17.2%	\$897	18.3%	19.5%
	Middle	64	41.3%	\$2,710	35.1%	32.1%	36	45.0%	29.9%	\$1,452	51.5%	36.2%	28	37.3%	31.8%	\$1,258	25.6%	31.7%
	Upper	53	34.2%	\$2,704	35.0%	42.9%	25	31.3%	42.4%	\$939	33.3%	38.6%	28	37.3%	43.3%	\$1,765	36.0%	39.2%
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.9%	\$0	0.0%	3.9%	0	0.0%	2.4%	\$0	0.0%	2.4%
Total	155	100.0%	\$7,727	100.0%	100.0%	80	100.0%	100.0%	\$2,818	100.0%	100.0%	75	100.0%	100.0%	\$4,909	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.4%	\$0	0.0%	1.7%	0	0.0%	0.5%	\$0	0.0%	2.4%
	Moderate	0	0.0%	\$0	0.0%	2.2%	0	0.0%	7.5%	\$0	0.0%	2.9%	0	0.0%	5.0%	\$0	0.0%	2.3%
	Middle	0	0.0%	\$0	0.0%	53.0%	0	0.0%	78.9%	\$0	0.0%	83.2%	0	0.0%	73.1%	\$0	0.0%	72.6%
	Upper	0	0.0%	\$0	0.0%	43.9%	0	0.0%	13.2%	\$0	0.0%	12.2%	0	0.0%	20.5%	\$0	0.0%	22.2%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.9%	\$0	0.0%	0.6%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX Waco

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015			2016								
		Count #	% %	Dollar \$ (000s) \$ %			Bank #	Agg %	Dollar \$ (000s) \$ % \$ %			Bank #	Agg %	Dollar \$ (000s) \$ % \$ %				
HOME PURCHASE	Low	2	4.9%	\$91	1.2%	22.5%	1	3.8%	2.3%	\$50	1.0%	1.0%	1	6.7%	1.9%	\$41	1.5%	0.7%
	Moderate	11	26.8%	\$924	12.1%	17.5%	5	19.2%	12.9%	\$497	10.1%	8.0%	6	40.0%	8.3%	\$427	15.9%	4.8%
	Middle	8	19.5%	\$852	11.2%	19.4%	6	23.1%	19.6%	\$688	14.0%	16.7%	2	13.3%	17.4%	\$164	6.1%	13.4%
	Upper	20	48.8%	\$5,740	75.5%	40.6%	14	53.8%	43.9%	\$3,682	74.9%	53.8%	6	40.0%	52.7%	\$2,058	76.5%	63.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.2%	\$0	0.0%	20.5%	0	0.0%	19.8%	\$0	0.0%	17.8%
	Total	41	100.0%	\$7,607	100.0%	100.0%	26	100.0%	100.0%	\$4,917	100.0%	100.0%	15	100.0%	100.0%	\$2,690	100.0%	100.0%
REFINANCE	Low	2	15.4%	\$128	3.0%	22.5%	1	16.7%	4.0%	\$91	9.1%	1.9%	1	14.3%	1.6%	\$37	1.1%	0.7%
	Moderate	1	7.7%	\$144	3.4%	17.5%	1	16.7%	7.7%	\$144	14.4%	4.5%	0	0.0%	5.1%	\$0	0.0%	2.3%
	Middle	4	30.8%	\$347	8.2%	19.4%	1	16.7%	14.9%	\$109	10.9%	10.1%	3	42.9%	13.0%	\$238	7.3%	8.8%
	Upper	5	38.5%	\$913	21.5%	40.6%	3	50.0%	47.1%	\$659	65.7%	53.2%	2	28.6%	51.7%	\$254	7.8%	57.5%
	Unknown	1	7.7%	\$2,715	63.9%	0.0%	0	0.0%	26.3%	\$0	0.0%	30.3%	1	14.3%	28.6%	\$2,715	83.7%	30.7%
	Total	13	100.0%	\$4,247	100.0%	100.0%	6	100.0%	100.0%	\$1,003	100.0%	100.0%	7	100.0%	100.0%	\$3,244	100.0%	100.0%
HOME IMPROVEMENT	Low	1	16.7%	\$10	10.6%	22.5%	0	0.0%	5.4%	\$0	0.0%	1.7%	1	33.3%	5.9%	\$10	17.2%	1.7%
	Moderate	1	16.7%	\$12	12.8%	17.5%	1	33.3%	10.8%	\$12	33.3%	5.2%	0	0.0%	10.5%	\$0	0.0%	6.6%
	Middle	1	16.7%	\$6	6.4%	19.4%	1	33.3%	15.1%	\$6	16.7%	10.5%	0	0.0%	16.1%	\$0	0.0%	10.6%
	Upper	3	50.0%	\$66	70.2%	40.6%	1	33.3%	61.0%	\$18	50.0%	70.5%	2	66.7%	60.9%	\$48	82.8%	74.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.7%	\$0	0.0%	12.1%	0	0.0%	6.7%	\$0	0.0%	6.1%
	Total	6	100.0%	\$94	100.0%	100.0%	3	100.0%	100.0%	\$36	100.0%	100.0%	3	100.0%	100.0%	\$58	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	5	8.3%	\$229	1.9%	22.5%	2	5.7%	2.9%	\$141	2.4%	1.1%	3	12.0%	2.0%	\$88	1.5%	0.7%
	Moderate	13	21.7%	\$1,080	9.0%	17.5%	7	20.0%	11.3%	\$653	11.0%	5.9%	6	24.0%	7.5%	\$427	7.1%	3.9%
	Middle	13	21.7%	\$1,205	10.1%	19.4%	8	22.9%	17.9%	\$803	13.5%	12.5%	5	20.0%	16.1%	\$402	6.7%	11.3%
	Upper	28	46.7%	\$6,719	56.2%	40.6%	18	51.4%	45.5%	\$4,359	73.2%	45.9%	10	40.0%	52.7%	\$2,360	39.4%	58.0%
	Unknown	1	1.7%	\$2,715	22.7%	0.0%	0	0.0%	22.3%	\$0	0.0%	34.6%	1	4.0%	21.6%	\$2,715	45.3%	26.2%
	Total	60	100.0%	\$11,948	100.0%	100.0%	35	100.0%	100.0%	\$5,956	100.0%	100.0%	25	100.0%	100.0%	\$5,992	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	95	61.3%	\$4,046	52.4%	90.4%	48	60.0%	42.9%	\$1,344	47.7%	38.1%	47	62.7%	38.6%	\$2,702	55.0%	38.8%
	Over \$1 Million	36	23.2%	\$3,171	41.0%	8.4%	17	21.3%					19	25.3%				
	Total Rev. available	131	84.5%	\$7,217	93.4%	98.8%	65	81.3%					66	88.0%				
	Rev. Not Known	24	15.5%	\$510	6.6%	1.2%	15	18.8%					9	12.0%				
	Total	155	100.0%	\$7,727	100.0%	100.0%	80	100.0%					75	100.0%				
Small Business Loan Size	\$100,000 or Less	150	96.8%	\$5,339	69.1%		80	100.0%	95.7%	\$2,818	100.0%	44.8%	70	93.3%	95.5%	\$2,521	51.4%	47.6%
	\$100,001 - \$250,000	2	1.3%	\$380	4.9%		0	0.0%	2.1%	\$0	0.0%	11.9%	2	2.7%	2.7%	\$380	7.7%	17.5%
	\$250,001 - \$1 Million	3	1.9%	\$2,008	26.0%		0	0.0%	2.2%	\$0	0.0%	43.3%	3	4.0%	1.7%	\$2,008	40.9%	34.9%
	Total	155	100.0%	\$7,727	100.0%		80	100.0%	100.0%	\$2,818	100.0%	100.0%	75	100.0%	100.0%	\$4,909	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	99.3%	0	0.0%	61.7%	\$0	0.0%	71.6%	0	0.0%	47.5%	\$0	0.0%	78.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	81.1%	\$0	0.0%	30.5%	0	0.0%	86.3%	\$0	0.0%	38.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	13.7%	\$0	0.0%	36.1%	0	0.0%	11.0%	\$0	0.0%	40.6%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	33.5%	0	0.0%	2.7%	\$0	0.0%	21.2%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data, ACS 2010 data, and 2016 D&B Information

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APPENDIX I – LIMITED-SCOPE DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: AL Anniston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	9.7	1,625	5.2	767	47.2	7,147	22.9
Moderate-income	8	25.8	5,333	17.1	935	17.5	5,621	18.0
Middle-income	11	35.5	14,527	46.6	2,041	14.0	5,807	18.6
Upper-income	6	19.4	9,691	31.1	1,012	10.4	12,626	40.5
Unknown-income	3	9.7	25	0.1	0	0.0	0	0.0
Total Assessment Area	31	100.0	31,201	100.0	4,755	15.2	31,201	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,802	1,280	3.9	33.7	1,589	41.8	933	24.5
Moderate-income	11,482	5,490	16.7	47.8	3,825	33.3	2,167	18.9
Middle-income	22,998	15,288	46.6	66.5	5,323	23.1	2,387	10.4
Upper-income	14,787	10,735	32.7	72.6	2,866	19.4	1,186	8.0
Unknown-income	25	25	0.1	100.0	0	0.0	0	0.0
Total Assessment Area	53,094	32,818	100.0	61.8	13,603	25.6	6,673	12.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	185	4.9	168	4.9	14	4.2	3	7.5
Moderate-income	1,091	28.7	948	27.6	135	40.9	8	20.0
Middle-income	1,589	41.8	1,445	42.1	122	37.0	22	55.0
Upper-income	928	24.4	863	25.2	58	17.6	7	17.5
Unknown-income	8	0.2	7	0.2	1	0.3	0	0.0
Total Assessment Area	3,801	100.0	3,431	100.0	330	100.0	40	100.0
Percentage of Total Businesses:			90.3		8.7		1.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	1.3	1	1.3	0	0.0	0	0.0
Moderate-income	7	8.9	7	8.9	0	0.0	0	0.0
Middle-income	37	46.8	37	46.8	0	0.0	0	0.0
Upper-income	34	43.0	34	43.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	79	100.0	79	100.0	0	.0	0	.0
Percentage of Total Farms:			100.0		.0		.0	

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: AL Auburn

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	11.1	1,229	3.8	419	34.1	7,414	23.1
Moderate-income	4	14.8	4,228	13.2	752	17.8	5,234	16.3
Middle-income	15	55.6	19,133	59.7	2,068	10.8	6,660	20.8
Upper-income	5	18.5	7,446	23.2	283	3.8	12,728	39.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	27	100.0	32,036	100.0	3,522	11.0	32,036	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,858	1,524	4.4	31.4	2,614	53.8	720	14.8
Moderate-income	10,438	5,434	15.7	52.1	3,706	35.5	1,298	12.4
Middle-income	33,643	19,843	57.2	59.0	10,270	30.5	3,530	10.5
Upper-income	11,600	7,885	22.7	68.0	2,740	23.6	975	8.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	60,539	34,686	100.0	57.3	19,330	31.9	6,523	10.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	173	3.9	151	3.7	21	5.7	1	2.6
Moderate-income	764	17.2	663	16.4	91	24.6	10	26.3
Middle-income	2,615	58.8	2,400	59.4	195	52.7	20	52.6
Upper-income	896	20.1	826	20.4	63	17.0	7	18.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,448	100.0	4,040	100.0	370	100.0	38	100.0
Percentage of Total Businesses:				90.8		8.3		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	2.7	2	2.8	0	0.0	0	0.0
Moderate-income	10	13.5	9	12.5	1	50.0	0	0.0
Middle-income	44	59.5	43	59.7	1	50.0	0	0.0
Upper-income	18	24.3	18	25.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	74	100.0	72	100.0	2	100.0	0	.0
Percentage of Total Farms:				97.3		2.7		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: AL Daphne-Fairhope-Foley

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	9,733	19.4	
Moderate-income	5	15.6	7,460	14.9	872	11.7	9,357	18.6	
Middle-income	20	62.5	30,934	61.6	3,206	10.4	10,811	21.5	
Upper-income	6	18.8	11,801	23.5	505	4.3	20,294	40.4	
Unknown-income	1	3.1	0	0.0	0	0.0	0	0.0	
Total Assessment Area	32	100.0	50,195	100.0	4,583	9.1	50,195	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	12,496	8,072	15.1	64.6	2,142	17.1	2,282	18.3	
Middle-income	63,790	32,027	60.1	50.2	11,588	18.2	20,175	31.6	
Upper-income	24,807	13,210	24.8	53.3	2,437	9.8	9,160	36.9	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	101,093	53,309	100.0	52.7	16,167	16.0	31,617	31.3	
	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	901	10.1	825	10.0	60	9.0	16	20.8	
Middle-income	6,247	69.8	5,718	69.6	479	72.1	50	64.9	
Upper-income	1,803	20.1	1,667	20.3	125	18.8	11	14.3	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	8,951	100.0	8,210	100.0	664	100.0	77	100.0	
Percentage of Total Businesses:				91.7		7.4		.9	
	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	54	27.1	51	27.3	3	25.0	0	0.0	
Middle-income	118	59.3	113	60.4	5	41.7	0	0.0	
Upper-income	27	13.6	23	12.3	4	33.3	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	199	100.0	187	100.0	12	100.0	0	.0	
Percentage of Total Farms:				94.0		6.0		.0	

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: AL Decatur

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.7	626	1.9	215	34.3	6,786	20.7
Moderate-income	5	18.5	5,497	16.8	1,185	21.6	5,630	17.2
Middle-income	12	44.4	15,476	47.2	1,451	9.4	6,549	20.0
Upper-income	9	33.3	11,168	34.1	710	6.4	13,802	42.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	27	100.0	32,767	100.0	3,561	10.9	32,767	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,247	564	1.7	45.2	519	41.6	164	13.2
Moderate-income	9,749	4,583	13.5	47.0	4,338	44.5	828	8.5
Middle-income	24,941	17,096	50.4	68.5	5,084	20.4	2,761	11.1
Upper-income	14,887	11,666	34.4	78.4	2,525	17.0	696	4.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	50,824	33,909	100.0	66.7	12,466	24.5	4,449	8.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	56	1.3	49	1.3	7	1.7	0	0.0
Moderate-income	934	22.0	814	21.4	117	28.4	3	7.5
Middle-income	2,112	49.6	1,922	50.5	165	40.0	25	62.5
Upper-income	1,153	27.1	1,018	26.8	123	29.9	12	30.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,255	100.0	3,803	100.0	412	100.0	40	100.0
Percentage of Total Businesses:				89.4		9.7		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.8	1	0.8	0	0.0	0	0.0
Moderate-income	1	0.8	1	0.8	0	0.0	0	0.0
Middle-income	89	69.5	86	68.8	3	100.0	0	0.0
Upper-income	37	28.9	37	29.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	128	100.0	125	100.0	3	100.0	0	.0
Percentage of Total Farms:				97.7		2.3		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: AL Dothan

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	4.5	400	1.5	187	46.8	5,487	21.0
Moderate-income	5	22.7	4,121	15.8	1,089	26.4	4,206	16.1
Middle-income	11	50.0	12,811	49.0	1,562	12.2	4,786	18.3
Upper-income	5	22.7	8,794	33.7	493	5.6	11,647	44.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	22	100.0	26,126	100.0	3,331	12.7	26,126	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,184	191	0.7	16.1	660	55.7	333	28.1
Moderate-income	7,821	3,417	13.3	43.7	3,137	40.1	1,267	16.2
Middle-income	22,019	12,938	50.5	58.8	5,842	26.5	3,239	14.7
Upper-income	13,609	9,096	35.5	66.8	2,754	20.2	1,759	12.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	44,633	25,642	100.0	57.5	12,393	27.8	6,598	14.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	307	7.2	272	7.3	30	6.5	5	11.4
Moderate-income	766	18.1	608	16.3	155	33.4	3	6.8
Middle-income	1,640	38.7	1,476	39.5	144	31.0	20	45.5
Upper-income	1,528	36.0	1,377	36.9	135	29.1	16	36.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,241	100.0	3,733	100.0	464	100.0	44	100.0
Percentage of Total Businesses:				88.0		10.9		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.7	1	0.7	0	0.0	0	0.0
Moderate-income	7	4.6	7	4.6	0	0.0	0	0.0
Middle-income	99	64.7	98	64.5	1	100.0	0	0.0
Upper-income	46	30.1	46	30.3	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	153	100.0	152	100.0	1	100.0	0	.0
Percentage of Total Farms:				99.3		.7		.0

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Assessment Area: AL Eufaula

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	1,786	26.8
Moderate-income	1	11.1	662	9.9	189	28.5	961	14.4
Middle-income	7	77.8	5,607	84.1	1,115	19.9	1,415	21.2
Upper-income	1	11.1	399	6.0	25	6.3	2,506	37.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	9	100.0	6,668	100.0	1,329	19.9	6,668	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	1,490	792	11.9	53.2	339	22.8	359	24.1
Middle-income	9,834	5,497	82.5	55.9	2,604	26.5	1,733	17.6
Upper-income	687	376	5.6	54.7	187	27.2	124	18.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	12,011	6,665	100.0	55.5	3,130	26.1	2,216	18.4
	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	72	9.4	62	9.1	6	9.8	4	17.4
Middle-income	623	81.7	555	81.7	49	80.3	19	82.6
Upper-income	68	8.9	62	9.1	6	9.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	763	100.0	679	100.0	61	100.0	23	100.0
Percentage of Total Businesses:				89.0		8.0		3.0
	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	10	16.9	10	17.5	0	0.0	0	0.0
Middle-income	48	81.4	46	80.7	2	100.0	0	0.0
Upper-income	1	1.7	1	1.8	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	59	100.0	57	100.0	2	100.0	0	.0
Percentage of Total Farms:				96.6		3.4		.0

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Assessment Area: AL Florence

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	11.1	1,631	4.0	680	41.7	8,836	21.7
Moderate-income	5	13.9	3,650	9.0	984	27.0	7,280	17.9
Middle-income	22	61.1	27,852	68.4	3,089	11.1	7,490	18.4
Upper-income	5	13.9	7,589	18.6	438	5.8	17,116	42.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	36	100.0	40,722	100.0	5,191	12.7	40,722	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,632	1,374	3.1	37.8	1,652	45.5	606	16.7
Moderate-income	8,037	3,834	8.8	47.7	2,794	34.8	1,409	17.5
Middle-income	45,171	30,190	68.9	66.8	8,962	19.8	6,019	13.3
Upper-income	12,178	8,416	19.2	69.1	2,656	21.8	1,106	9.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	69,018	43,814	100.0	63.5	16,064	23.3	9,140	13.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	621	12.3	539	11.9	77	16.3	5	8.5
Moderate-income	542	10.7	489	10.8	47	10.0	6	10.2
Middle-income	2,639	52.1	2,419	53.3	177	37.5	43	72.9
Upper-income	1,267	25.0	1,091	24.0	171	36.2	5	8.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,069	100.0	4,538	100.0	472	100.0	59	100.0
Percentage of Total Businesses:				89.5		9.3		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.5	1	0.6	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	163	89.1	160	89.9	3	60.0	0	0.0
Upper-income	19	10.4	17	9.6	2	40.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	183	100.0	178	100.0	5	100.0	0	.0
Percentage of Total Farms:				97.3		2.7		.0

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Combined Demographics Report

Assessment Area: AL Gadsden

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.3	485	1.7	193	39.8	5,755	19.9
Moderate-income	11	36.7	7,370	25.5	1,710	23.2	5,275	18.3
Middle-income	12	40.0	11,432	39.6	1,541	13.5	5,675	19.7
Upper-income	6	20.0	9,581	33.2	346	3.6	12,163	42.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	30	100.0	28,868	100.0	3,790	13.1	28,868	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,403	421	1.4	30.0	621	44.3	361	25.7
Moderate-income	14,182	6,410	21.1	45.2	5,571	39.3	2,201	15.5
Middle-income	18,063	12,410	40.9	68.7	3,545	19.6	2,108	11.7
Upper-income	13,795	11,107	36.6	80.5	1,499	10.9	1,189	8.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	47,443	30,348	100.0	64.0	11,236	23.7	5,859	12.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	40	1.2	34	1.1	6	1.9	0	0.0
Moderate-income	973	28.6	840	27.5	127	41.0	6	13.3
Middle-income	1,311	38.5	1,189	39.0	96	31.0	26	57.8
Upper-income	1,083	31.8	989	32.4	81	26.1	13	28.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,407	100.0	3,052	100.0	310	100.0	45	100.0
Percentage of Total Businesses:				89.6		9.1		1.3
	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	3.8	3	3.8	0	0.0	0	0.0
Middle-income	55	69.6	55	69.6	0	0.0	0	0.0
Upper-income	21	26.6	21	26.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	79	100.0	79	100.0	0	.0	0	.0
Percentage of Total Farms:				100.0		.0		.0

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Combined Demographics Report

Assessment Area: AL Mobile

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	10.4	6,085	5.8	3,072	50.5	24,250	23.2
Moderate-income	34	29.6	23,905	22.9	5,968	25.0	17,428	16.7
Middle-income	41	35.7	40,554	38.9	4,982	12.3	20,338	19.5
Upper-income	26	22.6	33,780	32.4	2,317	6.9	42,308	40.6
Unknown-income	2	1.7	0	0.0	0	0.0	0	0.0
Total Assessment Area	115	100.0	104,324	100.0	16,339	15.7	104,324	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,220	4,212	4.0	34.5	5,310	43.5	2,698	22.1
Moderate-income	43,854	20,571	19.6	46.9	16,198	36.9	7,085	16.2
Middle-income	67,433	42,685	40.7	63.3	16,370	24.3	8,378	12.4
Upper-income	52,246	37,347	35.6	71.5	10,609	20.3	4,290	8.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	175,753	104,815	100.0	59.6	48,487	27.6	22,451	12.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	899	6.3	733	5.8	155	10.0	11	10.7
Moderate-income	2,792	19.6	2,399	19.0	381	24.6	12	11.7
Middle-income	4,881	34.2	4,388	34.8	448	28.9	45	43.7
Upper-income	5,668	39.8	5,076	40.3	557	36.0	35	34.0
Unknown-income	16	0.1	9	0.1	7	0.5	0	0.0
Total Assessment Area	14,256	100.0	12,605	100.0	1,548	100.0	103	100.0
Percentage of Total Businesses:				88.4		10.9		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	3.8	5	3.5	1	6.3	0	0.0
Moderate-income	16	10.1	13	9.1	3	18.8	0	0.0
Middle-income	78	49.1	72	50.3	6	37.5	0	0.0
Upper-income	59	37.1	53	37.1	6	37.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	159	100.0	143	100.0	16	100.0	0	.0
Percentage of Total Farms:				89.9		10.1		.0

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Combined Demographics Report

Assessment Area: AL Montgomery

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	14	21.5	7,984	13.9	3,735	46.8	15,154	26.4	
Moderate-income	13	20.0	13,606	23.7	2,778	20.4	9,271	16.1	
Middle-income	15	23.1	13,164	22.9	1,510	11.5	9,685	16.9	
Upper-income	23	35.4	22,670	39.5	931	4.1	23,314	40.6	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	65	100.0	57,424	100.0	8,954	15.6	57,424	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	16,723	5,408	9.6	32.3	7,892	47.2	3,423	20.5	
Moderate-income	23,192	12,010	21.4	51.8	8,363	36.1	2,819	12.2	
Middle-income	23,655	13,117	23.4	55.5	7,389	31.2	3,149	13.3	
Upper-income	37,682	25,548	45.6	67.8	9,045	24.0	3,089	8.2	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	101,252	56,083	100.0	55.4	32,689	32.3	12,480	12.3	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	1,991	21.8	1,564	19.8	326	30.0	101	60.8	
Moderate-income	1,466	16.0	1,266	16.0	190	17.5	10	6.0	
Middle-income	1,618	17.7	1,437	18.2	169	15.6	12	7.2	
Upper-income	4,066	44.5	3,623	45.9	400	36.9	43	25.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	9,141	100.0	7,890	100.0	1,085	100.0	166	100.0	
Percentage of Total Businesses:				86.3		11.9		1.8	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	6	5.9	5	5.2	1	20.0	0	0.0	
Moderate-income	11	10.9	10	10.4	1	20.0	0	0.0	
Middle-income	40	39.6	40	41.7	0	0.0	0	0.0	
Upper-income	44	43.6	41	42.7	3	60.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	101	100.0	96	100.0	5	100.0	0	.0	
Percentage of Total Farms:				95.0		5.0		.0	

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Combined Demographics Report

Assessment Area: AL Northeast AL

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	16,466	20.4	
Moderate-income	3	4.9	3,904	4.8	822	21.1	13,693	17.0	
Middle-income	45	73.8	59,218	73.4	9,022	15.2	16,065	19.9	
Upper-income	13	21.3	17,555	21.8	1,889	10.8	34,453	42.7	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	61	100.0	80,677	100.0	11,733	14.5	80,677	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	5,990	3,613	4.3	60.3	1,664	27.8	713	11.9	
Middle-income	97,897	61,033	72.1	62.3	21,850	22.3	15,014	15.3	
Upper-income	28,325	19,999	23.6	70.6	4,647	16.4	3,679	13.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	132,212	84,645	100.0	64.0	28,161	21.3	19,406	14.7	
	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	370	3.7	328	3.6	37	4.7	5	3.0	
Middle-income	6,956	69.4	6,281	69.3	535	67.6	140	83.8	
Upper-income	2,695	26.9	2,453	27.1	220	27.8	22	13.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	10,021	100.0	9,062	100.0	792	100.0	167	100.0	
Percentage of Total Businesses:				90.4		7.9		1.7	
	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	36	6.0	35	6.0	1	8.3	0	0.0	
Middle-income	470	78.3	465	79.1	5	41.7	0	0.0	
Upper-income	94	15.7	88	15.0	6	50.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	600	100.0	588	100.0	12	100.0	0	.0	
Percentage of Total Farms:				98.0		2.0		.0	

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Combined Demographics Report

Assessment Area: AL Tuscaloosa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	6	12.8	2,429	5.6	832	34.3	8,556	19.8	
Moderate-income	11	23.4	7,032	16.3	1,734	24.7	6,965	16.2	
Middle-income	17	36.2	17,000	39.4	1,655	9.7	8,526	19.8	
Upper-income	13	27.7	16,654	38.6	635	3.8	19,068	44.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	47	100.0	43,115	100.0	4,856	11.3	43,115	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	7,792	1,792	4.1	23.0	3,928	50.4	2,072	26.6	
Moderate-income	16,874	5,632	12.9	33.4	7,795	46.2	3,447	20.4	
Middle-income	33,011	18,231	41.6	55.2	9,385	28.4	5,395	16.3	
Upper-income	25,112	18,161	41.4	72.3	4,251	16.9	2,700	10.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	82,789	43,816	100.0	52.9	25,359	30.6	13,614	16.4	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	452	6.6	380	6.2	67	10.7	5	11.9	
Moderate-income	1,630	23.9	1,410	22.9	210	33.4	10	23.8	
Middle-income	2,438	35.7	2,205	35.8	215	34.2	18	42.9	
Upper-income	2,303	33.8	2,158	35.1	136	21.7	9	21.4	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	6,823	100.0	6,153	100.0	628	100.0	42	100.0	
Percentage of Total Businesses:				90.2		9.2		.6	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	1	0.8	1	0.9	0	0.0	0	0.0	
Moderate-income	15	12.2	13	11.2	2	33.3	0	0.0	
Middle-income	61	49.6	57	49.1	4	66.7	0	0.0	
Upper-income	46	37.4	45	38.8	0	0.0	1	100.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	123	100.0	116	100.0	6	100.0	1	100.0	
Percentage of Total Farms:				94.3		4.9		.8	

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Assessment Area: AZ Flagstaff

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	6,296	21.2	
Moderate-income	9	32.1	6,909	23.2	1,694	24.5	5,307	17.8	
Middle-income	11	39.3	13,270	44.6	1,132	8.5	5,956	20.0	
Upper-income	8	28.6	9,569	32.2	617	6.4	12,189	41.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	28	100.0	29,748	100.0	3,443	11.6	29,748	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	12,873	5,017	18.0	39.0	4,744	36.9	3,112	24.2	
Middle-income	31,400	13,477	48.4	42.9	7,276	23.2	10,647	33.9	
Upper-income	18,020	9,341	33.6	51.8	5,623	31.2	3,056	17.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	62,293	27,835	100.0	44.7	17,643	28.3	16,815	27.0	
	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	844	15.1	729	14.3	111	25.8	4	6.3	
Middle-income	2,464	44.1	2,239	44.0	191	44.3	34	54.0	
Upper-income	2,273	40.7	2,119	41.7	129	29.9	25	39.7	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	5,581	100.0	5,087	100.0	431	100.0	63	100.0	
Percentage of Total Businesses:				91.1		7.7		1.1	
	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	7	10.3	7	10.8	0	0.0	0	0.0	
Middle-income	35	51.5	34	52.3	1	33.3	0	0.0	
Upper-income	26	38.2	24	36.9	2	66.7	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	68	100.0	65	100.0	3	100.0	0	.0	
Percentage of Total Farms:				95.6		4.4		.0	

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Assessment Area: AZ Lake Havasu City

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	9,813	18.4	
Moderate-income	6	14.0	5,592	10.5	1,163	20.8	10,331	19.3	
Middle-income	34	79.1	44,616	83.5	4,823	10.8	12,493	23.4	
Upper-income	3	7.0	3,199	6.0	203	6.3	20,770	38.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	43	100.0	53,407	100.0	6,189	11.6	53,407	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	11,723	5,788	10.1	49.4	3,246	27.7	2,689	22.9	
Middle-income	89,387	47,730	83.1	53.4	18,832	21.1	22,825	25.5	
Upper-income	7,286	3,941	6.9	54.1	824	11.3	2,521	34.6	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	108,396	57,459	100.0	53.0	22,902	21.1	28,035	25.9	
	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	364	4.7	331	4.6	24	4.9	9	17.3	
Middle-income	6,775	88.0	6,303	88.1	431	88.7	41	78.8	
Upper-income	557	7.2	524	7.3	31	6.4	2	3.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	7,696	100.0	7,158	100.0	486	100.0	52	100.0	
Percentage of Total Businesses:				93.0		6.3		.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	4	6.9	4	7.3	0	0.0	0	0.0	
Middle-income	52	89.7	49	89.1	3	100.0	0	0.0	
Upper-income	2	3.4	2	3.6	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	58	100.0	55	100.0	3	100.0	0	.0	
Percentage of Total Farms:				94.8		5.2		.0	

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Assessment Area: AZ Northern AZ

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.3	1,329	3.4	612	46.0	7,793	20.1
Moderate-income	10	21.3	5,632	14.5	1,931	34.3	6,520	16.8
Middle-income	22	46.8	18,430	47.4	2,744	14.9	7,351	18.9
Upper-income	13	27.7	13,455	34.6	1,184	8.8	17,182	44.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	47	100.0	38,846	100.0	6,471	16.7	38,846	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,496	1,157	2.8	46.4	571	22.9	768	30.8
Moderate-income	12,451	5,468	13.3	43.9	2,196	17.6	4,787	38.4
Middle-income	41,600	20,108	49.0	48.3	6,378	15.3	15,114	36.3
Upper-income	31,484	14,344	34.9	45.6	4,848	15.4	12,292	39.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	88,031	41,077	100.0	46.7	13,993	15.9	32,961	37.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	25	0.5	20	0.4	4	1.3	1	1.3
Moderate-income	141	2.8	115	2.5	20	6.6	6	7.9
Middle-income	2,502	49.9	2,301	49.6	156	51.5	45	59.2
Upper-income	2,351	46.8	2,204	47.5	123	40.6	24	31.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,019	100.0	4,640	100.0	303	100.0	76	100.0
Percentage of Total Businesses:				92.4		6.0		1.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.9	1	1.0	0	0.0	0	0.0
Moderate-income	3	2.8	3	3.0	0	0.0	0	0.0
Middle-income	62	57.9	59	59.0	3	42.9	0	0.0
Upper-income	41	38.3	37	37.0	4	57.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	107	100.0	100	100.0	7	100.0	0	.0
Percentage of Total Farms:				93.5		6.5		.0

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Assessment Area: AZ Prescott

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	10,430	18.5
Moderate-income	7	16.7	8,149	14.5	1,140	14.0	11,440	20.3
Middle-income	27	64.3	37,336	66.3	3,328	8.9	11,753	20.9
Upper-income	8	19.0	10,836	19.2	488	4.5	22,698	40.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	42	100.0	56,321	100.0	4,956	8.8	56,321	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	15,825	7,473	11.6	47.2	5,982	37.8	2,370	15.0
Middle-income	71,248	44,022	68.2	61.8	14,541	20.4	12,685	17.8
Upper-income	21,171	13,067	20.2	61.7	4,024	19.0	4,080	19.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	108,244	64,562	100.0	59.6	24,547	22.7	19,135	17.7
	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	2,096	18.1	1,911	17.5	163	26.6	22	22.9
Middle-income	6,520	56.2	6,145	56.4	323	52.8	52	54.2
Upper-income	2,995	25.8	2,847	26.1	126	20.6	22	22.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	11,611	100.0	10,903	100.0	612	100.0	96	100.0
Percentage of Total Businesses:				93.9		5.3		.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	18	8.3	17	8.0	1	33.3	0	0.0
Middle-income	150	69.1	148	69.5	1	33.3	1	100.0
Upper-income	49	22.6	48	22.5	1	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	217	100.0	213	100.0	3	100.0	1	100.0
Percentage of Total Farms:				98.2		1.4		.5

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Assessment Area: AZ Sierra Vista-Douglas

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	6,934	20.7
Moderate-income	11	34.4	10,124	30.2	1,956	19.3	6,012	17.9
Middle-income	16	50.0	15,645	46.6	1,749	11.2	6,697	20.0
Upper-income	5	15.6	7,776	23.2	240	3.1	13,902	41.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	32	100.0	33,545	100.0	3,945	11.8	33,545	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	18,285	9,925	29.4	54.3	5,478	30.0	2,882	15.8
Middle-income	29,113	15,922	47.1	54.7	8,075	27.7	5,116	17.6
Upper-income	10,854	7,929	23.5	73.1	1,606	14.8	1,319	12.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	58,252	33,776	100.0	58.0	15,159	26.0	9,317	16.0
	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	1,326	30.1	1,207	29.5	91	36.4	28	42.4
Middle-income	2,266	51.4	2,102	51.4	132	52.8	32	48.5
Upper-income	816	18.5	783	19.1	27	10.8	6	9.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	4,408	100.0	4,092	100.0	250	100.0	66	100.0
Percentage of Total Businesses:				92.8		5.7		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	71	31.0	68	30.4	3	60.0	0	0.0
Middle-income	111	48.5	110	49.1	1	20.0	0	0.0
Upper-income	47	20.5	46	20.5	1	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	229	100.0	224	100.0	5	100.0	0	.0
Percentage of Total Farms:				97.8		2.2		.0

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Combined Demographics Report

Assessment Area: AZ Tucson

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	18	7.5	12,424	5.2	4,648	37.4	51,336	21.6	
Moderate-income	65	27.0	62,294	26.2	12,865	20.7	42,353	17.8	
Middle-income	81	33.6	82,076	34.6	6,322	7.7	46,565	19.6	
Upper-income	76	31.5	80,586	33.9	2,695	3.3	97,126	40.9	
Unknown-income	1	0.4	0	0.0	0	0.0	0	0.0	
Total Assessment Area	241	100.0	237,380	100.0	26,530	11.2	237,380	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	27,756	8,530	3.5	30.7	14,983	54.0	4,243	15.3	
Moderate-income	125,774	54,287	22.0	43.2	55,391	44.0	16,096	12.8	
Middle-income	149,041	92,155	37.4	61.8	38,974	26.1	17,912	12.0	
Upper-income	132,821	91,612	37.2	69.0	25,948	19.5	15,261	11.5	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	435,392	246,584	100.0	56.6	135,296	31.1	53,512	12.3	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	2,290	5.7	1,966	5.3	310	11.0	14	5.7	
Moderate-income	9,872	24.7	8,722	23.6	1,105	39.2	45	18.2	
Middle-income	12,331	30.8	11,504	31.1	753	26.7	74	30.0	
Upper-income	15,528	38.8	14,766	40.0	648	23.0	114	46.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	40,021	100.0	36,958	100.0	2,816	100.0	247	100.0	
Percentage of Total Businesses:				92.3		7.0		.6	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	7	2.0	7	2.1	0	0.0	0	0.0	
Moderate-income	62	17.9	61	18.2	1	9.1	0	0.0	
Middle-income	130	37.5	122	36.3	8	72.7	0	0.0	
Upper-income	148	42.7	146	43.5	2	18.2	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	347	100.0	336	100.0	11	100.0	0	.0	
Percentage of Total Farms:				96.8		3.2		.0	

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Assessment Area: CA Amador-Calaveras-Tuolumne

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	6,111	16.2	
Moderate-income	1	3.3	260	0.7	56	21.5	6,225	16.5	
Middle-income	16	53.3	21,653	57.6	1,607	7.4	7,211	19.2	
Upper-income	12	40.0	15,703	41.7	721	4.6	18,069	48.0	
Unknown-income	1	3.3	0	0.0	0	0.0	0	0.0	
Total Assessment Area	30	100.0	37,616	100.0	2,384	6.3	37,616	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	2,127	378	0.9	17.8	68	3.2	1,681	79.0	
Middle-income	39,900	23,811	57.0	59.7	9,417	23.6	6,672	16.7	
Upper-income	34,442	17,579	42.1	51.0	4,448	12.9	12,415	36.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	76,469	41,768	100.0	54.6	13,933	18.2	20,768	27.2	
	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	60	0.9	57	1.0	2	0.5	1	1.8	
Middle-income	3,980	62.5	3,697	62.2	242	65.9	41	73.2	
Upper-income	2,322	36.5	2,185	36.8	123	33.5	14	25.0	
Unknown-income	1	0.0	1	0.0	0	0.0	0	0.0	
Total Assessment Area	6,363	100.0	5,940	100.0	367	100.0	56	100.0	
Percentage of Total Businesses:				93.4		5.8		.9	
	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	133	58.6	127	58.5	6	60.0	0	0.0	
Upper-income	94	41.4	90	41.5	4	40.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	227	100.0	217	100.0	10	100.0	0	.0	
Percentage of Total Farms:				95.6		4.4		.0	

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Assessment Area: CA Bakersfield

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	6	4.0	5,961	3.2	2,552	42.8	42,733	23.0	
Moderate-income	47	31.1	56,813	30.6	16,316	28.7	31,885	17.2	
Middle-income	47	31.1	54,668	29.5	8,056	14.7	33,329	18.0	
Upper-income	47	31.1	68,117	36.7	4,258	6.3	77,612	41.8	
Unknown-income	4	2.6	0	0.0	0	0.0	0	0.0	
Total Assessment Area	151	100.0	185,559	100.0	31,182	16.8	185,559	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	10,084	3,044	2.0	30.2	5,904	58.5	1,136	11.3	
Moderate-income	83,700	35,270	23.2	42.1	38,978	46.6	9,452	11.3	
Middle-income	84,954	46,879	30.8	55.2	27,310	32.1	10,765	12.7	
Upper-income	99,501	67,091	44.1	67.4	23,581	23.7	8,829	8.9	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	278,239	152,284	100.0	54.7	95,773	34.4	30,182	10.8	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	985	3.8	849	3.6	130	6.8	6	5.7	
Moderate-income	5,194	20.3	4,829	20.4	347	18.1	18	17.0	
Middle-income	7,608	29.7	7,015	29.7	547	28.5	46	43.4	
Upper-income	11,851	46.2	10,923	46.3	892	46.6	36	34.0	
Unknown-income	1	0.0	1	0.0	0	0.0	0	0.0	
Total Assessment Area	25,639	100.0	23,617	100.0	1,916	100.0	106	100.0	
Percentage of Total Businesses:				92.1		7.5		.4	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.3	0	0.0	0	0.0	
Moderate-income	258	30.2	208	28.7	50	38.5	0	0.0	
Middle-income	263	30.8	217	29.9	46	35.4	0	0.0	
Upper-income	332	38.8	298	41.1	34	26.2	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	855	100.0	725	100.0	130	100.0	0	.0	
Percentage of Total Farms:				84.8		15.2		.0	

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Assessment Area: CA Fresno

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	22	11.1	19,227	9.3	8,363	43.5	50,839	24.7
Moderate-income	56	28.1	56,736	27.6	15,970	28.1	33,021	16.0
Middle-income	51	25.6	56,403	27.4	8,780	15.6	35,245	17.1
Upper-income	68	34.2	73,442	35.7	3,359	4.6	86,716	42.1
Unknown-income	2	1.0	13	0.0	0	0.0	0	0.0
Total Assessment Area	199	100.0	205,821	100.0	36,472	17.7	205,821	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	30,054	7,729	5.0	25.7	19,408	64.6	2,917	9.7
Moderate-income	84,071	32,485	20.8	38.6	44,587	53.0	6,999	8.3
Middle-income	87,136	43,326	27.7	49.7	37,253	42.8	6,557	7.5
Upper-income	108,945	72,592	46.5	66.6	26,443	24.3	9,910	9.1
Unknown-income	13	0	0.0	0.0	13	100.0	0	0.0
Total Assessment Area	310,219	156,132	100.0	50.3	127,704	41.2	26,383	8.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,832	9.4	2,510	9.2	294	11.6	28	17.7
Moderate-income	6,933	23.0	6,110	22.3	790	31.3	33	20.9
Middle-income	7,820	26.0	7,159	26.1	622	24.6	39	24.7
Upper-income	12,486	41.5	11,609	42.4	819	32.4	58	36.7
Unknown-income	22	0.1	19	0.1	3	0.1	0	0.0
Total Assessment Area	30,093	100.0	27,407	100.0	2,528	100.0	158	100.0
Percentage of Total Businesses:				91.1		8.4		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	94	4.9	62	3.6	32	15.0	0	0.0
Moderate-income	605	31.5	531	31.1	74	34.6	0	0.0
Middle-income	682	35.5	614	36.0	67	31.3	1	100.0
Upper-income	539	28.1	498	29.2	41	19.2	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,920	100.0	1,705	100.0	214	100.0	1	100.0
Percentage of Total Farms:				88.8		11.1		.1

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Assessment Area: CA Los Angeles

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	211	9.0	154,899	7.1	56,456	36.4	522,024	24.1
Moderate-income	672	28.6	603,256	27.8	124,935	20.7	356,500	16.4
Middle-income	628	26.8	607,359	28.0	59,835	9.9	382,899	17.6
Upper-income	798	34.0	804,630	37.1	32,395	4.0	908,804	41.9
Unknown-income	37	1.6	83	0.0	0	0.0	0	0.0
Total Assessment Area	2,346	100.0	2,170,227	100.0	273,621	12.6	2,170,227	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	256,638	33,122	2.1	12.9	202,783	79.0	20,733	8.1
Moderate-income	904,984	257,733	16.6	28.5	588,864	65.1	58,387	6.5
Middle-income	932,499	444,580	28.6	47.7	436,403	46.8	51,516	5.5
Upper-income	1,329,338	816,521	52.6	61.4	435,913	32.8	76,904	5.8
Unknown-income	2,277	135	0.0	5.9	1,835	80.6	307	13.5
Total Assessment Area	3,425,736	1,552,091	100.0	45.3	1,665,798	48.6	207,847	6.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	28,683	6.3	25,405	6.1	3,177	7.9	101	5.2
Moderate-income	84,721	18.5	76,199	18.3	8,252	20.5	270	13.8
Middle-income	117,542	25.7	105,739	25.4	11,346	28.2	457	23.4
Upper-income	221,667	48.4	204,473	49.2	16,126	40.1	1,068	54.8
Unknown-income	5,125	1.1	3,740	0.9	1,331	3.3	54	2.8
Total Assessment Area	457,738	100.0	415,556	100.0	40,232	100.0	1,950	100.0
Percentage of Total Businesses:				90.8		8.8		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	52	4.0	48	3.9	4	6.2	0	0.0
Moderate-income	164	12.5	152	12.2	12	18.5	0	0.0
Middle-income	275	21.0	258	20.7	17	26.2	0	0.0
Upper-income	806	61.5	774	62.2	31	47.7	1	100.0
Unknown-income	13	1.0	12	1.0	1	1.5	0	0.0
Total Assessment Area	1,310	100.0	1,244	100.0	65	100.0	1	100.0
Percentage of Total Farms:				95.0		5.0		.1

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Assessment Area: CA Merced

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.1	1,464	2.5	599	40.9	14,301	24.8
Moderate-income	17	34.7	17,842	31.0	4,642	26.0	9,512	16.5
Middle-income	18	36.7	21,152	36.7	3,173	15.0	9,882	17.2
Upper-income	12	24.5	17,155	29.8	1,931	11.3	23,918	41.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	49	100.0	57,613	100.0	10,345	18.0	57,613	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,064	482	1.2	23.4	1,437	69.6	145	7.0
Moderate-income	26,851	9,775	23.8	36.4	14,118	52.6	2,958	11.0
Middle-income	29,339	16,629	40.4	56.7	9,541	32.5	3,169	10.8
Upper-income	24,835	14,249	34.6	57.4	7,355	29.6	3,231	13.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	83,089	41,135	100.0	49.5	32,451	39.1	9,503	11.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	127	2.2	113	2.1	12	3.0	2	5.0
Moderate-income	2,251	38.7	2,050	38.2	183	45.1	18	45.0
Middle-income	1,719	29.6	1,597	29.8	107	26.4	15	37.5
Upper-income	1,717	29.5	1,608	30.0	104	25.6	5	12.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,814	100.0	5,368	100.0	406	100.0	40	100.0
Percentage of Total Businesses:				92.3		7.0		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.3	2	0.3	1	0.9	0	0.0
Moderate-income	140	15.9	122	16.0	18	15.8	0	0.0
Middle-income	476	54.2	410	53.7	66	57.9	0	0.0
Upper-income	259	29.5	230	30.1	29	25.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	878	100.0	764	100.0	114	100.0	0	.0
Percentage of Total Farms:				87.0		13.0		.0

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Combined Demographics Report

Assessment Area: CA Oakland

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	78	13.7	62,819	10.5	14,859	23.7	139,801	23.3
Moderate-income	121	21.3	111,581	18.6	13,150	11.8	98,456	16.4
Middle-income	189	33.2	209,834	35.0	11,259	5.4	114,844	19.2
Upper-income	178	31.3	215,458	35.9	4,581	2.1	246,591	41.1
Unknown-income	3	0.5	0	0.0	0	0.0	0	0.0
Total Assessment Area	569	100.0	599,692	100.0	43,849	7.3	599,692	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	119,330	31,486	5.7	26.4	71,565	60.0	16,279	13.6
Moderate-income	211,886	85,895	15.6	40.5	107,998	51.0	17,993	8.5
Middle-income	339,188	199,822	36.4	58.9	114,501	33.8	24,865	7.3
Upper-income	303,878	231,881	42.2	76.3	56,927	18.7	15,070	5.0
Unknown-income	38	0	0.0	0.0	38	100.0	0	0.0
Total Assessment Area	974,320	549,084	100.0	56.4	351,029	36.0	74,207	7.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	12,111	10.2	10,775	9.9	1,274	12.6	62	12.3
Moderate-income	20,773	17.5	18,920	17.5	1,770	17.5	83	16.5
Middle-income	38,350	32.2	35,172	32.5	3,007	29.8	171	33.9
Upper-income	47,719	40.1	43,487	40.1	4,044	40.0	188	37.3
Unknown-income	31	0.0	25	0.0	6	0.1	0	0.0
Total Assessment Area	118,984	100.0	108,379	100.0	10,101	100.0	504	100.0
Percentage of Total Businesses:				91.1		8.5		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	29	4.5	25	4.0	4	16.0	0	0.0
Moderate-income	72	11.1	71	11.5	1	4.0	0	0.0
Middle-income	209	32.4	203	32.7	6	24.0	0	0.0
Upper-income	336	52.0	321	51.8	14	56.0	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	646	100.0	620	100.0	25	100.0	1	100.0
Percentage of Total Farms:				96.0		3.9		.2

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Assessment Area: CA Sacramento

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	35	8.7	29,497	6.9	7,954	27.0	96,798	22.8
Moderate-income	102	25.4	102,180	24.0	15,447	15.1	73,098	17.2
Middle-income	146	36.3	157,395	37.0	10,043	6.4	85,509	20.1
Upper-income	117	29.1	136,191	32.0	4,249	3.1	169,868	39.9
Unknown-income	2	0.5	10	0.0	0	0.0	0	0.0
Total Assessment Area	402	100.0	425,273	100.0	37,693	8.9	425,273	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	56,119	17,400	4.4	31.0	32,265	57.5	6,454	11.5
Moderate-income	179,023	78,672	19.8	43.9	82,784	46.2	17,567	9.8
Middle-income	266,630	156,060	39.3	58.5	85,211	32.0	25,359	9.5
Upper-income	199,380	144,503	36.4	72.5	40,736	20.4	14,141	7.1
Unknown-income	21	0	0.0	0.0	21	100.0	0	0.0
Total Assessment Area	701,173	396,635	100.0	56.6	241,017	34.4	63,521	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,759	7.1	5,164	6.9	553	10.1	42	8.5
Moderate-income	17,453	21.6	15,898	21.3	1,447	26.4	108	21.9
Middle-income	31,125	38.6	28,833	38.6	2,063	37.6	229	46.4
Upper-income	26,349	32.7	24,811	33.2	1,424	26.0	114	23.1
Unknown-income	4	0.0	3	0.0	0	0.0	1	0.2
Total Assessment Area	80,690	100.0	74,709	100.0	5,487	100.0	494	100.0
Percentage of Total Businesses:				92.6		6.8		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	16	2.2	16	2.2	0	0.0	0	0.0
Moderate-income	98	13.2	96	13.3	2	11.1	0	0.0
Middle-income	355	48.0	341	47.2	14	77.8	0	0.0
Upper-income	271	36.6	269	37.3	2	11.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	740	100.0	722	100.0	18	100.0	0	.0
Percentage of Total Farms:				97.6		2.4		.0

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Assessment Area: CA San Diego

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	63	10.0	58,550	8.3	16,591	28.3	157,382	22.4
Moderate-income	134	21.3	139,895	19.9	19,253	13.8	123,504	17.5
Middle-income	227	36.1	250,700	35.6	15,660	6.2	131,950	18.7
Upper-income	198	31.5	254,602	36.2	8,872	3.5	290,911	41.3
Unknown-income	6	1.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	628	100.0	703,747	100.0	60,376	8.6	703,747	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	97,355	19,643	3.3	20.2	70,286	72.2	7,426	7.6
Moderate-income	234,923	85,043	14.3	36.2	128,923	54.9	20,957	8.9
Middle-income	423,992	230,360	38.8	54.3	158,603	37.4	35,029	8.3
Upper-income	398,595	258,899	43.6	65.0	110,023	27.6	29,673	7.4
Unknown-income	9	0	0.0	0.0	9	100.0	0	0.0
Total Assessment Area	1,154,874	593,945	100.0	51.4	467,844	40.5	93,085	8.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	9,721	5.8	8,975	5.8	703	5.6	43	5.9
Moderate-income	26,148	15.6	24,071	15.6	1,977	15.8	100	13.6
Middle-income	59,916	35.7	55,093	35.6	4,585	36.6	238	32.4
Upper-income	71,865	42.8	66,286	42.9	5,226	41.8	353	48.0
Unknown-income	141	0.1	118	0.1	22	0.2	1	0.1
Total Assessment Area	167,791	100.0	154,543	100.0	12,513	100.0	735	100.0
Percentage of Total Businesses:				92.1		7.5		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	22	1.7	22	1.8	0	0.0	0	0.0
Moderate-income	136	10.5	126	10.3	10	13.3	0	0.0
Middle-income	488	37.7	463	38.0	25	33.3	0	0.0
Upper-income	647	50.0	607	49.8	40	53.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,293	100.0	1,218	100.0	75	100.0	0	.0
Percentage of Total Farms:				94.2		5.8		.0

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Combined Demographics Report

Assessment Area: CA San Francisco

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.5	4,111	2.4	582	14.2	32,527	18.9
Moderate-income	22	13.9	25,779	14.9	2,844	11.0	29,403	17.0
Middle-income	69	43.7	76,402	44.3	3,287	4.3	33,148	19.2
Upper-income	61	38.6	66,225	38.4	1,333	2.0	77,439	44.9
Unknown-income	2	1.3	0	0.0	0	0.0	0	0.0
Total Assessment Area	158	100.0	172,517	100.0	8,046	4.7	172,517	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,429	1,558	1.0	21.0	4,983	67.1	888	12.0
Moderate-income	39,832	13,668	8.8	34.3	24,005	60.3	2,159	5.4
Middle-income	122,119	71,142	45.6	58.3	44,774	36.7	6,203	5.1
Upper-income	100,659	69,781	44.7	69.3	25,847	25.7	5,031	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	270,039	156,149	100.0	57.8	99,609	36.9	14,281	5.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,582	3.9	1,375	3.8	194	5.1	13	6.8
Moderate-income	4,281	10.5	3,863	10.5	407	10.7	11	5.8
Middle-income	18,477	45.5	16,465	44.9	1,934	50.9	78	40.8
Upper-income	16,262	40.0	14,919	40.7	1,254	33.0	89	46.6
Unknown-income	36	0.1	27	0.1	9	0.2	0	0.0
Total Assessment Area	40,638	100.0	36,649	100.0	3,798	100.0	191	100.0
Percentage of Total Businesses:				90.2		9.3		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.4	1	0.5	0	0.0	0	0.0
Moderate-income	14	6.0	14	6.5	0	0.0	0	0.0
Middle-income	76	32.6	68	31.3	8	50.0	0	0.0
Upper-income	142	60.9	134	61.8	8	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	233	100.0	217	100.0	16	100.0	0	.0
Percentage of Total Farms:				93.1		6.9		.0

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Assessment Area: CA San Jose

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	9.7	31,709	7.5	6,489	20.5	98,655	23.4
Moderate-income	84	22.6	91,939	21.8	8,162	8.9	68,111	16.2
Middle-income	138	37.1	159,464	37.8	7,531	4.7	81,518	19.3
Upper-income	113	30.4	138,221	32.8	3,593	2.6	173,059	41.1
Unknown-income	1	0.3	10	0.0	0	0.0	0	0.0
Total Assessment Area	372	100.0	421,343	100.0	25,775	6.1	421,343	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,950	15,850	4.5	33.1	29,203	60.9	2,897	6.0
Moderate-income	144,779	63,373	17.9	43.8	73,849	51.0	7,557	5.2
Middle-income	240,947	137,780	39.0	57.2	92,184	38.3	10,983	4.6
Upper-income	192,410	136,396	38.6	70.9	47,873	24.9	8,141	4.2
Unknown-income	239	0	0.0	0.0	239	100.0	0	0.0
Total Assessment Area	626,325	353,399	100.0	56.4	243,348	38.9	29,578	4.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,588	6.1	5,077	6.1	495	5.8	16	5.1
Moderate-income	19,758	21.5	17,150	20.6	2,531	29.9	77	24.4
Middle-income	32,207	35.0	29,240	35.2	2,878	34.0	89	28.2
Upper-income	34,332	37.3	31,643	38.0	2,555	30.2	134	42.4
Unknown-income	71	0.1	65	0.1	6	0.1	0	0.0
Total Assessment Area	91,956	100.0	83,175	100.0	8,465	100.0	316	100.0
Percentage of Total Businesses:				90.5		9.2		.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	11	2.4	11	2.5	0	0.0	0	0.0
Moderate-income	82	17.6	72	16.5	10	35.7	0	0.0
Middle-income	143	30.8	136	31.1	7	25.0	0	0.0
Upper-income	229	49.2	218	49.9	11	39.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	465	100.0	437	100.0	28	100.0	0	.0
Percentage of Total Farms:				94.0		6.0		.0

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Assessment Area: CA Stockton

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	8.6	7,870	4.9	3,119	39.6	35,056	22.0
Moderate-income	41	29.5	39,175	24.6	8,148	20.8	28,190	17.7
Middle-income	48	34.5	52,134	32.8	5,073	9.7	30,422	19.1
Upper-income	38	27.3	59,818	37.6	3,029	5.1	65,329	41.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	139	100.0	158,997	100.0	19,369	12.2	158,997	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	14,706	2,903	2.2	19.7	9,564	65.0	2,239	15.2
Moderate-income	60,227	27,336	20.8	45.4	27,685	46.0	5,206	8.6
Middle-income	75,960	43,321	33.0	57.0	27,102	35.7	5,537	7.3
Upper-income	80,221	57,797	44.0	72.0	17,197	21.4	5,227	6.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	231,114	131,357	100.0	56.8	81,548	35.3	18,209	7.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,585	7.6	1,386	7.3	184	11.3	15	14.0
Moderate-income	4,715	22.7	4,221	22.2	478	29.3	16	15.0
Middle-income	6,418	30.9	5,934	31.2	450	27.6	34	31.8
Upper-income	8,043	38.7	7,481	39.3	520	31.9	42	39.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	20,761	100.0	19,022	100.0	1,632	100.0	107	100.0
Percentage of Total Businesses:				91.6		7.9		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	56	4.5	50	4.5	6	4.5	0	0.0
Moderate-income	116	9.3	103	9.2	13	9.8	0	0.0
Middle-income	395	31.5	353	31.5	42	31.6	0	0.0
Upper-income	685	54.7	613	54.8	72	54.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,252	100.0	1,119	100.0	133	100.0	0	.0
Percentage of Total Farms:				89.4		10.6		.0

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Combined Demographics Report

Assessment Area: CO Boulder

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	7.4	3,429	5.0	885	25.8	15,233	22.1
Moderate-income	11	16.2	11,539	16.7	1,463	12.7	11,438	16.6
Middle-income	32	47.1	30,804	44.7	1,578	5.1	13,831	20.1
Upper-income	20	29.4	23,181	33.6	541	2.3	28,451	41.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	68	100.0	68,953	100.0	4,467	6.5	68,953	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,572	2,128	2.8	32.4	4,060	61.8	384	5.8
Moderate-income	25,140	11,244	15.0	44.7	12,571	50.0	1,325	5.3
Middle-income	58,363	34,407	45.8	59.0	19,198	32.9	4,758	8.2
Upper-income	35,693	27,410	36.5	76.8	6,611	18.5	1,672	4.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	125,768	75,189	100.0	59.8	42,440	33.7	8,139	6.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	903	3.6	836	3.6	62	3.7	5	2.5
Moderate-income	5,549	22.1	4,938	21.3	579	34.7	32	15.8
Middle-income	10,479	41.8	9,745	42.0	644	38.6	90	44.3
Upper-income	8,146	32.5	7,687	33.1	383	23.0	76	37.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	25,077	100.0	23,206	100.0	1,668	100.0	203	100.0
Percentage of Total Businesses:				92.5		6.7		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	7	2.1	7	2.2	0	0.0	0	0.0
Moderate-income	34	10.4	33	10.2	1	33.3	0	0.0
Middle-income	157	48.2	155	48.0	2	66.7	0	0.0
Upper-income	128	39.3	128	39.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	326	100.0	323	100.0	3	100.0	0	.0
Percentage of Total Farms:				99.1		.9		.0

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Combined Demographics Report

Assessment Area: CO Colorado Springs

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	5.4	5,437	3.5	1,446	26.6	30,825	20.1
Moderate-income	40	30.8	37,558	24.4	6,086	16.2	28,028	18.2
Middle-income	51	39.2	64,199	41.8	3,881	6.0	33,195	21.6
Upper-income	31	23.8	46,431	30.2	995	2.1	61,577	40.1
Unknown-income	1	0.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	130	100.0	153,625	100.0	12,408	8.1	153,625	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	13,074	3,804	2.5	29.1	7,112	54.4	2,158	16.5
Moderate-income	71,380	33,152	21.9	46.4	29,780	41.7	8,448	11.8
Middle-income	101,839	65,079	43.0	63.9	29,224	28.7	7,536	7.4
Upper-income	62,549	49,334	32.6	78.9	9,666	15.5	3,549	5.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	248,842	151,369	100.0	60.8	75,782	30.5	21,691	8.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,213	6.6	1,958	6.3	237	12.4	18	8.7
Moderate-income	7,774	23.4	7,064	22.7	667	34.8	43	20.7
Middle-income	11,848	35.6	11,321	36.3	465	24.3	62	29.8
Upper-income	11,439	34.4	10,813	34.7	541	28.3	85	40.9
Unknown-income	18	0.1	13	0.0	5	0.3	0	0.0
Total Assessment Area	33,292	100.0	31,169	100.0	1,915	100.0	208	100.0
Percentage of Total Businesses:				93.6		5.8		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	9	2.7	9	2.7	0	0.0	0	0.0
Moderate-income	91	27.3	89	27.1	2	50.0	0	0.0
Middle-income	117	35.1	116	35.3	1	25.0	0	0.0
Upper-income	116	34.8	115	35.0	1	25.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	333	100.0	329	100.0	4	100.0	0	.0
Percentage of Total Farms:				98.8		1.2		.0

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Assessment Area: CO Ft. Collins

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	2.7	1,020	1.4	282	27.6	14,995	20.2
Moderate-income	18	24.7	14,167	19.1	1,797	12.7	13,102	17.6
Middle-income	36	49.3	37,482	50.4	2,295	6.1	16,539	22.3
Upper-income	16	21.9	21,642	29.1	730	3.4	29,688	39.9
Unknown-income	1	1.4	13	0.0	0	0.0	0	0.0
Total Assessment Area	73	100.0	74,324	100.0	5,104	6.9	74,324	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,412	799	1.0	23.4	2,416	70.8	197	5.8
Moderate-income	30,761	14,387	18.2	46.8	12,335	40.1	4,039	13.1
Middle-income	65,522	39,631	50.0	60.5	18,848	28.8	7,043	10.7
Upper-income	30,789	24,388	30.8	79.2	4,598	14.9	1,803	5.9
Unknown-income	135	13	0.0	9.6	0	0.0	122	90.4
Total Assessment Area	130,619	79,218	100.0	60.6	38,197	29.2	13,204	10.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	212	1.0	197	1.0	13	1.1	2	1.3
Moderate-income	4,342	21.0	3,969	20.6	340	28.4	33	20.8
Middle-income	10,215	49.5	9,614	49.9	527	44.0	74	46.5
Upper-income	5,862	28.4	5,496	28.5	318	26.5	48	30.2
Unknown-income	6	0.0	4	0.0	0	0.0	2	1.3
Total Assessment Area	20,637	100.0	19,280	100.0	1,198	100.0	159	100.0
Percentage of Total Businesses:				93.4		5.8		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.7	3	0.7	0	0.0	0	0.0
Moderate-income	45	10.5	44	10.5	1	11.1	0	0.0
Middle-income	233	54.3	228	54.3	5	55.6	0	0.0
Upper-income	147	34.3	144	34.3	3	33.3	0	0.0
Unknown-income	1	0.2	1	0.2	0	0.0	0	0.0
Total Assessment Area	429	100.0	420	100.0	9	100.0	0	.0
Percentage of Total Farms:				97.9		2.1		.0

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Combined Demographics Report

Assessment Area: CO Greeley

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	9.1	4,487	7.2	1,504	33.5	13,029	21.0
Moderate-income	13	16.9	11,853	19.1	2,369	20.0	10,620	17.1
Middle-income	29	37.7	28,521	46.0	1,530	5.4	13,380	21.6
Upper-income	27	35.1	17,143	27.6	643	3.8	24,975	40.3
Unknown-income	1	1.3	0	0.0	0	0.0	0	0.0
Total Assessment Area	77	100.0	62,004	100.0	6,046	9.8	62,004	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	8,453	3,336	5.4	39.5	4,108	48.6	1,009	11.9
Moderate-income	20,872	10,020	16.1	48.0	8,804	42.2	2,048	9.8
Middle-income	41,931	29,769	47.8	71.0	9,114	21.7	3,048	7.3
Upper-income	23,178	19,099	30.7	82.4	2,526	10.9	1,553	6.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	94,434	62,224	100.0	65.9	24,552	26.0	7,658	8.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	566	4.7	469	4.2	89	10.9	8	6.6
Moderate-income	2,107	17.3	1,945	17.3	145	17.7	17	13.9
Middle-income	5,225	43.0	4,891	43.6	275	33.6	59	48.4
Upper-income	4,265	35.1	3,919	34.9	308	37.7	38	31.1
Unknown-income	2	0.0	1	0.0	1	0.1	0	0.0
Total Assessment Area	12,165	100.0	11,225	100.0	818	100.0	122	100.0
Percentage of Total Businesses:				92.3		6.7		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	9	1.2	9	1.2	0	0.0	0	0.0
Moderate-income	75	9.8	72	10.0	3	7.1	0	0.0
Middle-income	528	69.0	495	68.5	33	78.6	0	0.0
Upper-income	153	20.0	147	20.3	6	14.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	765	100.0	723	100.0	42	100.0	0	.0
Percentage of Total Farms:				94.5		5.5		.0

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Assessment Area: FL Ft. Walton

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	8,651	17.7
Moderate-income	6	14.0	5,997	12.3	1,016	16.9	8,822	18.1
Middle-income	24	55.8	30,216	61.9	2,167	7.2	11,385	23.3
Upper-income	11	25.6	12,613	25.8	439	3.5	19,968	40.9
Unknown-income	2	4.7	0	0.0	0	0.0	0	0.0
Total Assessment Area	43	100.0	48,826	100.0	3,622	7.4	48,826	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	10,683	3,685	7.6	34.5	5,010	46.9	1,988	18.6
Middle-income	55,010	31,591	64.8	57.4	14,933	27.1	8,486	15.4
Upper-income	25,931	13,496	27.7	52.0	3,727	14.4	8,708	33.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	91,624	48,772	100.0	53.2	23,670	25.8	19,182	20.9
	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	1,601	12.9	1,452	12.5	131	19.8	18	16.2
Middle-income	7,418	59.8	6,994	60.1	366	55.4	58	52.3
Upper-income	3,394	27.3	3,195	27.4	164	24.8	35	31.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	12,413	100.0	11,641	100.0	661	100.0	111	100.0
Percentage of Total Businesses:				93.8		5.3		.9
	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	15	18.5	14	17.7	1	50.0	0	0.0
Middle-income	49	60.5	48	60.8	1	50.0	0	0.0
Upper-income	17	21.0	17	21.5	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	81	100.0	79	100.0	2	100.0	0	.0
Percentage of Total Farms:				97.5		2.5		.0

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Assessment Area: FL Gainesville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	21.4	6,016	11.5	1,930	32.1	11,910	22.8
Moderate-income	12	21.4	9,062	17.4	1,670	18.4	8,922	17.1
Middle-income	14	25.0	14,113	27.1	1,386	9.8	9,413	18.0
Upper-income	18	32.1	22,971	44.0	1,074	4.7	21,917	42.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	56	100.0	52,162	100.0	6,060	11.6	52,162	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	20,631	2,746	5.1	13.3	15,241	73.9	2,644	12.8
Moderate-income	21,075	8,028	15.0	38.1	9,927	47.1	3,120	14.8
Middle-income	30,233	16,465	30.8	54.5	9,553	31.6	4,215	13.9
Upper-income	39,063	26,287	49.1	67.3	9,293	23.8	3,483	8.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	111,002	53,526	100.0	48.2	44,014	39.7	13,462	12.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,226	9.3	1,120	9.2	101	11.4	5	4.5
Moderate-income	2,265	17.2	2,020	16.6	223	25.2	22	20.0
Middle-income	3,951	30.0	3,683	30.2	233	26.3	35	31.8
Upper-income	5,732	43.5	5,355	44.0	329	37.1	48	43.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	13,174	100.0	12,178	100.0	886	100.0	110	100.0
Percentage of Total Businesses:				92.4		6.7		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.7	2	0.7	0	0.0	0	0.0
Moderate-income	17	6.1	17	6.3	0	0.0	0	0.0
Middle-income	149	53.6	142	52.4	7	100.0	0	0.0
Upper-income	110	39.6	110	40.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	278	100.0	271	100.0	7	100.0	0	.0
Percentage of Total Farms:				97.5		2.5		.0

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Combined Demographics Report

Assessment Area: FL Homosassa Springs

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	6,967	17.5
Moderate-income	3	10.7	3,326	8.4	371	11.2	8,149	20.5
Middle-income	20	71.4	29,578	74.3	3,039	10.3	8,535	21.4
Upper-income	4	14.3	6,895	17.3	409	5.9	16,148	40.6
Unknown-income	1	3.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	28	100.0	39,799	100.0	3,819	9.6	39,799	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	6,541	4,120	8.1	63.0	1,139	17.4	1,282	19.6
Middle-income	59,552	38,288	75.5	64.3	7,452	12.5	13,812	23.2
Upper-income	10,720	8,312	16.4	77.5	663	6.2	1,745	16.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	76,813	50,720	100.0	66.0	9,254	12.0	16,839	21.9
	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	736	9.5	694	9.4	37	12.1	5	13.9
Middle-income	5,792	74.8	5,545	74.9	225	73.8	22	61.1
Upper-income	1,220	15.7	1,168	15.8	43	14.1	9	25.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,748	100.0	7,407	100.0	305	100.0	36	100.0
Percentage of Total Businesses:				95.6		3.9		.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	13	12.0	13	12.0	0	0.0	0	0.0
Middle-income	72	66.7	72	66.7	0	0.0	0	0.0
Upper-income	23	21.3	23	21.3	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	108	100.0	108	100.0	0	.0	0	.0
Percentage of Total Farms:				100.0		.0		.0

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Assessment Area: FL Ocala

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	16,559	18.1
Moderate-income	15	23.8	14,168	15.5	2,984	21.1	18,120	19.8
Middle-income	35	55.6	64,450	70.4	6,338	9.8	20,885	22.8
Upper-income	11	17.5	12,895	14.1	872	6.8	35,949	39.3
Unknown-income	2	3.2	0	0.0	0	0.0	0	0.0
Total Assessment Area	63	100.0	91,513	100.0	10,194	11.1	91,513	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	27,398	13,776	13.0	50.3	7,963	29.1	5,659	20.7
Middle-income	110,769	77,213	73.1	69.7	15,259	13.8	18,297	16.5
Upper-income	23,097	14,683	13.9	63.6	5,072	22.0	3,342	14.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	161,264	105,672	100.0	65.5	28,294	17.5	27,298	16.9
	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	3,234	18.1	2,970	17.7	248	26.0	16	13.4
Middle-income	9,872	55.2	9,454	56.3	362	38.0	56	47.1
Upper-income	4,771	26.7	4,381	26.1	343	36.0	47	39.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	17,877	100.0	16,805	100.0	953	100.0	119	100.0
Percentage of Total Businesses:				94.0		5.3		.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	89	15.7	83	15.1	6	33.3	0	0.0
Middle-income	306	53.9	300	54.5	6	33.3	0	0.0
Upper-income	173	30.5	167	30.4	6	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	568	100.0	550	100.0	18	100.0	0	.0
Percentage of Total Farms:				96.8		3.2		.0

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Combined Demographics Report

Assessment Area: FL Pensacola

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	3.1	1,783	1.6	799	44.8	24,210	21.1
Moderate-income	26	26.5	23,146	20.2	4,388	19.0	20,154	17.6
Middle-income	44	44.9	55,651	48.6	5,386	9.7	23,837	20.8
Upper-income	23	23.5	33,905	29.6	1,766	5.2	46,284	40.4
Unknown-income	2	2.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	98	100.0	114,485	100.0	12,339	10.8	114,485	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,733	1,161	1.0	31.1	1,891	50.7	681	18.2
Moderate-income	47,374	21,324	17.9	45.0	17,567	37.1	8,483	17.9
Middle-income	93,582	59,255	49.8	63.3	21,753	23.2	12,574	13.4
Upper-income	54,521	37,171	31.3	68.2	8,051	14.8	9,299	17.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	199,210	118,911	100.0	59.7	49,262	24.7	31,037	15.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	518	2.1	439	1.9	79	5.4	0	0.0
Moderate-income	6,118	24.3	5,502	23.4	567	39.0	49	28.5
Middle-income	11,060	44.0	10,442	44.4	552	38.0	66	38.4
Upper-income	7,459	29.7	7,147	30.4	255	17.5	57	33.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	25,155	100.0	23,530	100.0	1,453	100.0	172	100.0
Percentage of Total Businesses:				93.5		5.8		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.3	1	0.3	0	0.0	0	0.0
Moderate-income	28	9.4	27	9.3	1	16.7	0	0.0
Middle-income	206	69.4	204	70.1	2	33.3	0	0.0
Upper-income	62	20.9	59	20.3	3	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	297	100.0	291	100.0	6	100.0	0	.0
Percentage of Total Farms:				98.0		2.0		.0

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Assessment Area: FL Tampa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	11,225	22.9	
Moderate-income	14	31.1	15,817	32.2	1,844	11.7	11,260	22.9	
Middle-income	28	62.2	31,512	64.2	2,243	7.1	10,584	21.6	
Upper-income	2	4.4	1,762	3.6	177	10.0	16,022	32.6	
Unknown-income	1	2.2	0	0.0	0	0.0	0	0.0	
Total Assessment Area	45	100.0	49,091	100.0	4,264	8.7	49,091	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	28,947	19,092	32.6	66.0	5,516	19.1	4,339	15.0	
Middle-income	51,161	37,419	63.9	73.1	5,860	11.5	7,882	15.4	
Upper-income	2,850	2,059	3.5	72.2	308	10.8	483	16.9	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	82,958	58,570	100.0	70.6	11,684	14.1	12,704	15.3	
	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	3,094	35.1	2,923	34.7	149	43.6	22	50.0	
Middle-income	5,263	59.7	5,067	60.1	176	51.5	20	45.5	
Upper-income	455	5.2	436	5.2	17	5.0	2	4.5	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	8,812	100.0	8,426	100.0	342	100.0	44	100.0	
Percentage of Total Businesses:				95.6		3.9		.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	29	18.0	28	17.8	1	25.0	0	0.0	
Middle-income	91	56.5	88	56.1	3	75.0	0	0.0	
Upper-income	41	25.5	41	26.1	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	161	100.0	157	100.0	4	100.0	0	.0	
Percentage of Total Farms:				97.5		2.5		.0	

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Combined Demographics Report

Assessment Area: NM Las Cruces

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	9.8	3,783	7.6	1,517	40.1	12,552	25.1
Moderate-income	16	39.0	16,631	33.2	5,177	31.1	8,281	16.6
Middle-income	7	17.1	8,665	17.3	1,393	16.1	8,139	16.3
Upper-income	14	34.1	20,941	41.9	1,953	9.3	21,048	42.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	41	100.0	50,020	100.0	10,040	20.1	50,020	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,328	2,155	4.6	29.4	4,362	59.5	811	11.1
Moderate-income	25,288	14,879	31.6	58.8	7,547	29.8	2,862	11.3
Middle-income	13,743	8,495	18.1	61.8	3,796	27.6	1,452	10.6
Upper-income	33,071	21,486	45.7	65.0	9,028	27.3	2,557	7.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	79,430	47,015	100.0	59.2	24,733	31.1	7,682	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	518	9.6	469	9.6	45	9.7	4	8.9
Moderate-income	1,495	27.8	1,335	27.4	144	31.0	16	35.6
Middle-income	934	17.4	813	16.7	113	24.3	8	17.8
Upper-income	2,432	45.2	2,252	46.3	163	35.1	17	37.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,379	100.0	4,869	100.0	465	100.0	45	100.0
Percentage of Total Businesses:				90.5		8.6		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	2.5	5	2.9	0	0.0	0	0.0
Moderate-income	94	47.7	75	43.1	19	82.6	0	0.0
Middle-income	21	10.7	21	12.1	0	0.0	0	0.0
Upper-income	77	39.1	73	42.0	4	17.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	197	100.0	174	100.0	23	100.0	0	.0
Percentage of Total Farms:				88.3		11.7		.0

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Assessment Area: NM Southern NM

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	4.0	386	1.6	158	40.9	4,839	19.7
Moderate-income	4	16.0	4,084	16.6	1,370	33.5	4,276	17.4
Middle-income	15	60.0	14,106	57.3	1,604	11.4	5,531	22.5
Upper-income	5	20.0	6,045	24.6	247	4.1	9,975	40.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	25	100.0	24,621	100.0	3,379	13.7	24,621	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	926	366	1.4	39.5	290	31.3	270	29.2
Moderate-income	9,254	4,515	17.0	48.8	1,905	20.6	2,834	30.6
Middle-income	32,089	14,997	56.3	46.7	6,064	18.9	11,028	34.4
Upper-income	14,346	6,759	25.4	47.1	2,511	17.5	5,076	35.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	56,615	26,637	100.0	47.0	10,770	19.0	19,208	33.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	216	7.0	199	7.1	16	7.8	1	1.6
Moderate-income	405	13.2	366	13.0	24	11.8	15	24.6
Middle-income	1,545	50.3	1,411	50.3	95	46.6	39	63.9
Upper-income	904	29.4	829	29.6	69	33.8	6	9.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,070	100.0	2,805	100.0	204	100.0	61	100.0
Percentage of Total Businesses:				91.4		6.6		2.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.6	1	0.7	0	0.0	0	0.0
Moderate-income	15	9.6	14	9.3	1	16.7	0	0.0
Middle-income	122	78.2	117	78.0	5	83.3	0	0.0
Upper-income	18	11.5	18	12.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	156	100.0	150	100.0	6	100.0	0	.0
Percentage of Total Farms:				96.2		3.8		.0

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Assessment Area: TX Abilene

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.5	810	2.2	306	37.8	7,912	21.4
Moderate-income	11	25.0	9,486	25.6	2,071	21.8	6,370	17.2
Middle-income	20	45.5	16,252	43.9	1,647	10.1	7,839	21.2
Upper-income	7	15.9	10,479	28.3	349	3.3	14,906	40.3
Unknown-income	4	9.1	0	0.0	0	0.0	0	0.0
Total Assessment Area	44	100.0	37,027	100.0	4,373	11.8	37,027	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,630	669	1.9	41.0	670	41.1	291	17.9
Moderate-income	17,397	7,270	20.4	41.8	8,139	46.8	1,988	11.4
Middle-income	29,150	16,183	45.5	55.5	9,608	33.0	3,359	11.5
Upper-income	14,500	11,436	32.2	78.9	1,804	12.4	1,260	8.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	62,677	35,558	100.0	56.7	20,221	32.3	6,898	11.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	126	1.9	111	1.9	14	2.5	1	1.3
Moderate-income	1,554	23.9	1,373	23.4	175	31.5	6	7.9
Middle-income	2,955	45.5	2,651	45.2	267	48.0	37	48.7
Upper-income	1,837	28.3	1,716	29.2	98	17.6	23	30.3
Unknown-income	28	0.4	17	0.3	2	0.4	9	11.8
Total Assessment Area	6,500	100.0	5,868	100.0	556	100.0	76	100.0
Percentage of Total Businesses:				90.3		8.6		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.6	2	0.6	0	0.0	0	0.0
Moderate-income	47	14.2	45	14.0	2	25.0	0	0.0
Middle-income	163	49.4	158	49.1	5	62.5	0	0.0
Upper-income	118	35.8	117	36.3	1	12.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	330	100.0	322	100.0	8	100.0	0	.0
Percentage of Total Farms:				97.6		2.4		.0

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Assessment Area: TX Beaumont

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	6	5.7	3,877	4.0	1,425	36.8	22,993	23.5	
Moderate-income	30	28.6	20,680	21.1	5,129	24.8	15,864	16.2	
Middle-income	39	37.1	42,207	43.1	4,783	11.3	17,809	18.2	
Upper-income	25	23.8	31,164	31.8	1,897	6.1	41,274	42.1	
Unknown-income	5	4.8	12	0.0	0	0.0	0	0.0	
Total Assessment Area	105	100.0	97,940	100.0	13,234	13.5	97,940	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	7,154	2,381	2.4	33.3	3,566	49.8	1,207	16.9	
Moderate-income	38,456	18,616	18.9	48.4	13,643	35.5	6,197	16.1	
Middle-income	66,927	44,673	45.3	66.7	15,323	22.9	6,931	10.4	
Upper-income	47,275	32,993	33.4	69.8	10,440	22.1	3,842	8.1	
Unknown-income	18	18	0.0	100.0	0	0.0	0	0.0	
Total Assessment Area	159,830	98,681	100.0	61.7	42,972	26.9	18,177	11.4	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	338	2.2	315	2.2	22	1.9	1	0.7	
Moderate-income	3,704	24.2	3,251	23.2	420	35.8	33	22.8	
Middle-income	5,903	38.5	5,484	39.1	367	31.3	52	35.9	
Upper-income	5,376	35.1	4,958	35.4	359	30.6	59	40.7	
Unknown-income	15	0.1	9	0.1	6	0.5	0	0.0	
Total Assessment Area	15,336	100.0	14,017	100.0	1,174	100.0	145	100.0	
Percentage of Total Businesses:				91.4		7.7		.9	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	3	1.3	3	1.3	0	0.0	0	0.0	
Moderate-income	17	7.1	17	7.2	0	0.0	0	0.0	
Middle-income	110	46.2	108	45.8	2	100.0	0	0.0	
Upper-income	108	45.4	108	45.8	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	238	100.0	236	100.0	2	100.0	0	.0	
Percentage of Total Farms:				99.2		.8		.0	

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Assessment Area: TX Brownsville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	3.4	1,779	1.9	1,078	60.6	22,275	24.3
Moderate-income	28	32.2	24,607	26.9	10,397	42.3	14,610	16.0
Middle-income	35	40.2	43,639	47.7	12,543	28.7	16,052	17.5
Upper-income	18	20.7	21,468	23.5	3,458	16.1	38,556	42.1
Unknown-income	3	3.4	0	0.0	0	0.0	0	0.0
Total Assessment Area	87	100.0	91,493	100.0	27,476	30.0	91,493	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,828	768	1.0	27.2	1,632	57.7	428	15.1
Moderate-income	35,395	18,569	23.6	52.5	11,876	33.6	4,950	14.0
Middle-income	62,527	37,371	47.5	59.8	15,766	25.2	9,390	15.0
Upper-income	39,711	21,875	27.8	55.1	5,667	14.3	12,169	30.6
Unknown-income	23	23	0.0	100.0	0	0.0	0	0.0
Total Assessment Area	140,484	78,606	100.0	56.0	34,941	24.9	26,937	19.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	436	4.1	391	4.0	41	4.9	4	4.1
Moderate-income	2,944	27.5	2,692	27.5	227	27.4	25	25.5
Middle-income	4,197	39.2	3,825	39.1	335	40.4	37	37.8
Upper-income	3,131	29.2	2,875	29.4	224	27.0	32	32.7
Unknown-income	10	0.1	8	0.1	2	0.2	0	0.0
Total Assessment Area	10,718	100.0	9,791	100.0	829	100.0	98	100.0
Percentage of Total Businesses:				91.4		7.7		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.9	2	0.9	0	0.0	0	0.0
Moderate-income	31	14.2	31	14.6	0	0.0	0	0.0
Middle-income	112	51.1	109	51.4	3	42.9	0	0.0
Upper-income	74	33.8	70	33.0	4	57.1	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	219	100.0	212	100.0	7	100.0	0	.0
Percentage of Total Farms:				96.8		3.2		.0

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Assessment Area: TX Bryan-College Station

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	6	14.3	3,841	10.3	1,506	39.2	9,417	25.2	
Moderate-income	9	21.4	8,101	21.7	2,166	26.7	5,098	13.7	
Middle-income	11	26.2	11,359	30.5	1,604	14.1	6,700	18.0	
Upper-income	14	33.3	13,987	37.5	626	4.5	16,082	43.1	
Unknown-income	2	4.8	9	0.0	0	0.0	0	0.0	
Total Assessment Area	42	100.0	37,297	100.0	5,902	15.8	37,297	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	12,057	1,875	6.0	15.6	8,480	70.3	1,702	14.1	
Moderate-income	17,464	4,913	15.8	28.1	10,049	57.5	2,502	14.3	
Middle-income	22,532	9,692	31.1	43.0	10,270	45.6	2,570	11.4	
Upper-income	22,333	14,688	47.1	65.8	6,109	27.4	1,536	6.9	
Unknown-income	29	0	0.0	0.0	29	100.0	0	0.0	
Total Assessment Area	74,415	31,168	100.0	41.9	34,937	46.9	8,310	11.2	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	653	9.4	601	9.5	47	8.4	5	6.0	
Moderate-income	1,133	16.3	1,021	16.1	97	17.3	15	17.9	
Middle-income	2,360	33.8	2,115	33.4	229	40.8	16	19.0	
Upper-income	2,809	40.3	2,578	40.7	183	32.6	48	57.1	
Unknown-income	17	0.2	12	0.2	5	0.9	0	0.0	
Total Assessment Area	6,972	100.0	6,327	100.0	561	100.0	84	100.0	
Percentage of Total Businesses:				90.7		8.0		1.2	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	5	3.1	3	1.9	2	66.7	0	0.0	
Moderate-income	9	5.5	9	5.6	0	0.0	0	0.0	
Middle-income	56	34.4	56	35.0	0	0.0	0	0.0	
Upper-income	93	57.1	92	57.5	1	33.3	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	163	100.0	160	100.0	3	100.0	0	.0	
Percentage of Total Farms:				98.2		1.8		.0	

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Assessment Area: TX Burnet-Gillespie-Kerr

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	5,173	15.4
Moderate-income	1	4.3	592	1.8	95	16.0	5,389	16.1
Middle-income	11	47.8	17,150	51.2	1,940	11.3	6,437	19.2
Upper-income	11	47.8	15,763	47.0	909	5.8	16,506	49.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	23	100.0	33,505	100.0	2,944	8.8	33,505	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	855	392	1.1	45.8	367	42.9	96	11.2
Middle-income	28,918	17,629	50.3	61.0	6,687	23.1	4,602	15.9
Upper-income	26,113	17,008	48.6	65.1	4,930	18.9	4,175	16.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	55,886	35,029	100.0	62.7	11,984	21.4	8,873	15.9
	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	52	0.7	49	0.7	3	0.7	0	0.0
Middle-income	3,842	51.2	3,573	51.0	228	54.4	41	48.2
Upper-income	3,612	48.1	3,380	48.3	188	44.9	44	51.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	7,506	100.0	7,002	100.0	419	100.0	85	100.0
Percentage of Total Businesses:				93.3		5.6		1.1
	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	162	46.8	162	47.1	0	0.0	0	0.0
Upper-income	184	53.2	182	52.9	2	100.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	346	100.0	344	100.0	2	100.0	0	.0
Percentage of Total Farms:				99.4		.6		.0

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Assessment Area: TX Corpus Christi

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	11.0	8,758	10.6	3,434	39.2	20,433	24.7
Moderate-income	20	24.4	17,630	21.3	3,810	21.6	13,423	16.2
Middle-income	26	31.7	29,199	35.3	3,953	13.5	14,369	17.4
Upper-income	24	29.3	27,054	32.7	1,271	4.7	34,445	41.7
Unknown-income	3	3.7	29	0.0	29	100.0	0	0.0
Total Assessment Area	82	100.0	82,670	100.0	12,497	15.1	82,670	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	16,190	6,162	8.3	38.1	7,657	47.3	2,371	14.6
Moderate-income	28,712	14,880	20.0	51.8	10,112	35.2	3,720	13.0
Middle-income	48,567	26,231	35.2	54.0	16,495	34.0	5,841	12.0
Upper-income	44,617	27,283	36.6	61.1	12,063	27.0	5,271	11.8
Unknown-income	203	0	0.0	0.0	173	85.2	30	14.8
Total Assessment Area	138,289	74,556	100.0	53.9	46,500	33.6	17,233	12.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,306	17.0	1,975	16.0	301	26.4	30	23.6
Moderate-income	2,334	17.2	2,015	16.4	307	26.9	12	9.4
Middle-income	4,511	33.2	4,156	33.7	322	28.2	33	26.0
Upper-income	4,412	32.5	4,157	33.7	204	17.9	51	40.2
Unknown-income	26	0.2	17	0.1	8	0.7	1	0.8
Total Assessment Area	13,589	100.0	12,320	100.0	1,142	100.0	127	100.0
Percentage of Total Businesses:				90.7		8.4		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	29	11.0	28	10.9	1	20.0	0	0.0
Moderate-income	26	9.9	24	9.3	2	40.0	0	0.0
Middle-income	102	38.8	101	39.1	1	20.0	0	0.0
Upper-income	106	40.3	105	40.7	1	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	263	100.0	258	100.0	5	100.0	0	.0
Percentage of Total Farms:				98.1		1.9		.0

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Assessment Area: TX East TX

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	7,705	26.3	
Moderate-income	7	26.9	6,043	20.6	1,581	26.2	5,870	20.0	
Middle-income	19	73.1	23,286	79.4	3,214	13.8	5,682	19.4	
Upper-income	0	0.0	0	0.0	0	0.0	10,072	34.3	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	26	100.0	29,329	100.0	4,795	16.3	29,329	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	11,919	6,528	19.5	54.8	2,788	23.4	2,603	21.8	
Middle-income	43,095	26,946	80.5	62.5	5,797	13.5	10,352	24.0	
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	55,014	33,474	100.0	60.8	8,585	15.6	12,955	23.5	
	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	1,001	28.6	918	28.4	66	34.4	17	23.6	
Middle-income	2,496	71.4	2,315	71.6	126	65.6	55	76.4	
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	3,497	100.0	3,233	100.0	192	100.0	72	100.0	
Percentage of Total Businesses:				92.5		5.5		2.1	
	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	21	15.4	20	15.9	1	10.0	0	0.0	
Middle-income	115	84.6	106	84.1	9	90.0	0	0.0	
Upper-income	0	0.0	0	0.0	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	126	100.0	10	100.0	0	.0	
Percentage of Total Farms:				92.6		7.4		.0	

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Assessment Area: TX El Paso

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	5.6	6,846	3.7	4,127	60.3	43,893	23.5
Moderate-income	57	35.4	58,376	31.3	19,610	33.6	31,779	17.0
Middle-income	47	29.2	58,467	31.3	11,693	20.0	33,141	17.8
Upper-income	47	29.2	62,998	33.7	6,539	10.4	77,874	41.7
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	161	100.0	186,687	100.0	41,969	22.5	186,687	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	11,007	2,643	1.7	24.0	7,045	64.0	1,319	12.0
Moderate-income	83,194	44,150	28.4	53.1	32,392	38.9	6,652	8.0
Middle-income	81,280	49,031	31.6	60.3	26,024	32.0	6,225	7.7
Upper-income	87,378	59,456	38.3	68.0	22,202	25.4	5,720	6.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	262,859	155,280	100.0	59.1	87,663	33.3	19,916	7.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,631	6.8	1,395	6.3	219	11.2	17	12.6
Moderate-income	6,972	28.9	6,211	28.2	721	36.9	40	29.6
Middle-income	6,546	27.2	6,060	27.5	455	23.3	31	23.0
Upper-income	8,808	36.6	8,239	37.5	522	26.7	47	34.8
Unknown-income	130	0.5	95	0.4	35	1.8	0	0.0
Total Assessment Area	24,087	100.0	22,000	100.0	1,952	100.0	135	100.0
Percentage of Total Businesses:				91.3		8.1		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	3.1	4	3.3	0	0.0	0	0.0
Moderate-income	43	33.9	39	32.2	4	66.7	0	0.0
Middle-income	34	26.8	34	28.1	0	0.0	0	0.0
Upper-income	45	35.4	44	36.4	1	16.7	0	0.0
Unknown-income	1	0.8	0	0.0	1	16.7	0	0.0
Total Assessment Area	127	100.0	121	100.0	6	100.0	0	.0
Percentage of Total Farms:				95.3		4.7		.0

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Combined Demographics Report

Assessment Area: TX Grimes-Walker-Washington

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	4.5	1,149	4.4	437	38.0	5,661	21.7
Moderate-income	4	18.2	3,443	13.2	577	16.8	4,410	16.9
Middle-income	9	40.9	10,892	41.8	1,495	13.7	4,494	17.2
Upper-income	7	31.8	10,575	40.5	933	8.8	11,515	44.2
Unknown-income	1	4.5	21	0.1	0	0.0	0	0.0
Total Assessment Area	22	100.0	26,080	100.0	3,442	13.2	26,080	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,334	645	2.4	19.3	2,400	72.0	289	8.7
Moderate-income	7,636	2,946	11.0	38.6	3,359	44.0	1,331	17.4
Middle-income	19,285	11,054	41.4	57.3	4,769	24.7	3,462	18.0
Upper-income	19,089	12,034	45.0	63.0	3,819	20.0	3,236	17.0
Unknown-income	97	41	0.2	42.3	56	57.7	0	0.0
Total Assessment Area	49,441	26,720	100.0	54.0	14,403	29.1	8,318	16.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	140	3.0	126	2.9	14	4.2	0	0.0
Moderate-income	616	13.0	552	12.7	55	16.5	9	12.9
Middle-income	1,916	40.4	1,734	39.9	153	45.9	29	41.4
Upper-income	2,069	43.6	1,926	44.4	111	33.3	32	45.7
Unknown-income	3	0.1	3	0.1	0	0.0	0	0.0
Total Assessment Area	4,744	100.0	4,341	100.0	333	100.0	70	100.0
Percentage of Total Businesses:				91.5		7.0		1.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	1.2	3	1.2	0	0.0	0	0.0
Moderate-income	30	11.8	30	12.0	0	0.0	0	0.0
Middle-income	83	32.7	80	32.1	3	60.0	0	0.0
Upper-income	138	54.3	136	54.6	2	40.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	254	100.0	249	100.0	5	100.0	0	.0
Percentage of Total Farms:				98.0		2.0		.0

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Assessment Area: TX Hale

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	1,927	22.7	
Moderate-income	4	44.4	3,679	43.4	912	24.8	1,747	20.6	
Middle-income	2	22.2	1,545	18.2	247	16.0	1,701	20.1	
Upper-income	3	33.3	3,247	38.3	106	3.3	3,096	36.5	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	9	100.0	8,471	100.0	1,265	14.9	8,471	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	6,076	2,850	38.2	46.9	2,039	33.6	1,187	19.5	
Middle-income	2,622	1,221	16.3	46.6	963	36.7	438	16.7	
Upper-income	4,908	3,399	45.5	69.3	972	19.8	537	10.9	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	13,606	7,470	100.0	54.9	3,974	29.2	2,162	15.9	
	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	361	30.7	324	30.2	30	37.0	7	35.0	
Middle-income	241	20.5	221	20.6	16	19.8	4	20.0	
Upper-income	572	48.7	528	49.2	35	43.2	9	45.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	1,174	100.0	1,073	100.0	81	100.0	20	100.0	
Percentage of Total Businesses:				91.4		6.9		1.7	
	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	52	21.0	48	20.5	4	28.6	0	0.0	
Middle-income	50	20.2	49	20.9	1	7.1	0	0.0	
Upper-income	146	58.9	137	58.5	9	64.3	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	248	100.0	234	100.0	14	100.0	0	.0	
Percentage of Total Farms:				94.4		5.6		.0	

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Assessment Area: TX Harrison

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	3,150	19.0
Moderate-income	3	21.4	2,462	14.8	633	25.7	2,473	14.9
Middle-income	4	28.6	5,096	30.7	673	13.2	3,001	18.1
Upper-income	7	50.0	9,025	54.4	742	8.2	7,959	48.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	14	100.0	16,583	100.0	2,048	12.3	16,583	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	4,273	2,130	12.4	49.8	1,255	29.4	888	20.8
Middle-income	9,478	5,707	33.2	60.2	1,927	20.3	1,844	19.5
Upper-income	13,809	9,349	54.4	67.7	2,629	19.0	1,831	13.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	27,560	17,186	100.0	62.4	5,811	21.1	4,563	16.6
	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	554	21.5	508	21.4	41	22.9	5	23.8
Middle-income	759	29.5	686	28.9	65	36.3	8	38.1
Upper-income	1,258	48.9	1,177	49.6	73	40.8	8	38.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,571	100.0	2,371	100.0	179	100.0	21	100.0
Percentage of Total Businesses:				92.2		7.0		.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	1	1.6	1	1.6	0	0.0	0	0.0
Middle-income	27	43.5	27	44.3	0	0.0	0	0.0
Upper-income	34	54.8	33	54.1	1	100.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	62	100.0	61	100.0	1	100.0	0	.0
Percentage of Total Farms:				98.4		1.6		.0

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Assessment Area: TX Howard-Runnels

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	2,373	22.9	
Moderate-income	3	21.4	1,790	17.2	422	23.6	1,758	16.9	
Middle-income	8	57.1	6,360	61.3	951	15.0	1,707	16.4	
Upper-income	3	21.4	2,229	21.5	147	6.6	4,541	43.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	14	100.0	10,379	100.0	1,520	14.6	10,379	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	3,386	1,689	16.1	49.9	993	29.3	704	20.8	
Middle-income	11,412	6,307	60.2	55.3	3,168	27.8	1,937	17.0	
Upper-income	3,777	2,481	23.7	65.7	395	10.5	901	23.9	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	18,575	10,477	100.0	56.4	4,556	24.5	3,542	19.1	
	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	326	22.9	288	22.3	32	28.6	6	27.3	
Middle-income	816	57.3	743	57.6	62	55.4	11	50.0	
Upper-income	282	19.8	259	20.1	18	16.1	5	22.7	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	1,424	100.0	1,290	100.0	112	100.0	22	100.0	
Percentage of Total Businesses:				90.6		7.9		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	6	3.0	6	3.0	0	0.0	0	0.0	
Middle-income	97	47.8	96	48.0	1	33.3	0	0.0	
Upper-income	100	49.3	98	49.0	2	66.7	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	203	100.0	200	100.0	3	100.0	0	.0	
Percentage of Total Farms:				98.5		1.5		.0	

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Assessment Area: TX Killeen-Temple

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	4.6	1,602	2.2	591	36.9	14,277	19.6
Moderate-income	16	24.6	13,034	17.9	2,298	17.6	13,471	18.5
Middle-income	30	46.2	39,429	54.3	4,262	10.8	15,528	21.4
Upper-income	14	21.5	18,611	25.6	969	5.2	29,400	40.5
Unknown-income	2	3.1	0	0.0	0	0.0	0	0.0
Total Assessment Area	65	100.0	72,676	100.0	8,120	11.2	72,676	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,823	918	1.6	24.0	1,824	47.7	1,081	28.3
Moderate-income	24,032	5,522	9.3	23.0	13,915	57.9	4,595	19.1
Middle-income	64,833	34,123	57.8	52.6	21,090	32.5	9,620	14.8
Upper-income	27,481	18,509	31.3	67.4	5,532	20.1	3,440	12.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	120,169	59,072	100.0	49.2	42,361	35.3	18,736	15.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	201	2.0	190	2.0	11	1.9	0	0.0
Moderate-income	1,852	18.5	1,690	18.1	139	24.5	23	26.7
Middle-income	4,966	49.7	4,648	49.8	278	48.9	40	46.5
Upper-income	2,963	29.7	2,800	30.0	140	24.6	23	26.7
Unknown-income	2	0.0	2	0.0	0	0.0	0	0.0
Total Assessment Area	9,984	100.0	9,330	100.0	568	100.0	86	100.0
Percentage of Total Businesses:				93.4		5.7		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	1.1	3	1.2	0	0.0	0	0.0
Moderate-income	19	7.3	15	5.9	4	80.0	0	0.0
Middle-income	156	59.8	155	60.5	1	20.0	0	0.0
Upper-income	83	31.8	83	32.4	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	261	100.0	256	100.0	5	100.0	0	.0
Percentage of Total Farms:				98.1		1.9		.0

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Assessment Area: TX Kleberg

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	1,977	26.8	
Moderate-income	2	33.3	2,764	37.4	660	23.9	1,194	16.2	
Middle-income	2	33.3	3,181	43.1	538	16.9	1,343	18.2	
Upper-income	1	16.7	1,441	19.5	137	9.5	2,872	38.9	
Unknown-income	1	16.7	0	0.0	0	0.0	0	0.0	
Total Assessment Area	6	100.0	7,386	100.0	1,335	18.1	7,386	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	5,201	2,283	35.0	43.9	2,130	41.0	788	15.2	
Middle-income	5,363	2,548	39.1	47.5	2,154	40.2	661	12.3	
Upper-income	2,235	1,693	26.0	75.7	116	5.2	426	19.1	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	12,799	6,524	100.0	51.0	4,400	34.4	1,875	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	309	34.1	285	34.1	16	29.6	8	47.1	
Middle-income	416	45.9	386	46.2	25	46.3	5	29.4	
Upper-income	182	20.1	165	19.7	13	24.1	4	23.5	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	907	100.0	836	100.0	54	100.0	17	100.0	
Percentage of Total Businesses:				92.2		6.0		1.9	
	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	18.2	6	18.2	0	0.0	0	0.0	
Middle-income	4	12.1	4	12.1	0	0.0	0	0.0	
Upper-income	23	69.7	23	69.7	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	33	100.0	33	100.0	0	.0	0	.0	
Percentage of Total Farms:				100.0		.0		.0	

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Assessment Area: TX Limestone

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	1,070	19.1
Moderate-income	1	12.5	732	13.1	194	26.5	947	16.9
Middle-income	5	62.5	3,469	62.0	319	9.2	1,060	18.9
Upper-income	2	25.0	1,397	25.0	139	9.9	2,521	45.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8	100.0	5,598	100.0	652	11.6	5,598	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	1,100	733	11.8	66.6	241	21.9	126	11.5
Middle-income	6,336	3,802	61.4	60.0	1,166	18.4	1,368	21.6
Upper-income	3,006	1,659	26.8	55.2	255	8.5	1,092	36.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	10,442	6,194	100.0	59.3	1,662	15.9	2,586	24.8
	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	111	14.5	97	13.9	10	19.6	4	22.2
Middle-income	529	69.2	479	68.8	39	76.5	11	61.1
Upper-income	125	16.3	120	17.2	2	3.9	3	16.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	765	100.0	696	100.0	51	100.0	18	100.0
Percentage of Total Businesses:				91.0		6.7		2.4
	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	42	65.6	40	64.5	2	100.0	0	0.0
Upper-income	22	34.4	22	35.5	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	64	100.0	62	100.0	2	100.0	0	.0
Percentage of Total Farms:				96.9		3.1		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX Longview

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	4.0	592	1.9	287	48.5	6,778	22.2
Moderate-income	8	32.0	7,568	24.7	1,422	18.8	5,447	17.8
Middle-income	9	36.0	12,307	40.2	1,542	12.5	5,840	19.1
Upper-income	6	24.0	10,119	33.1	437	4.3	12,521	40.9
Unknown-income	1	4.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	25	100.0	30,586	100.0	3,688	12.1	30,586	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,116	497	1.8	44.5	503	45.1	116	10.4
Moderate-income	12,556	5,779	20.4	46.0	5,520	44.0	1,257	10.0
Middle-income	21,090	12,544	44.3	59.5	6,466	30.7	2,080	9.9
Upper-income	14,309	9,485	33.5	66.3	4,079	28.5	745	5.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	49,071	28,305	100.0	57.7	16,568	33.8	4,198	8.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	52	0.8	47	0.8	5	0.8	0	0.0
Moderate-income	2,024	32.0	1,749	31.1	265	41.0	10	21.7
Middle-income	2,487	39.4	2,209	39.3	256	39.6	22	47.8
Upper-income	1,743	27.6	1,612	28.6	117	18.1	14	30.4
Unknown-income	14	0.2	10	0.2	4	0.6	0	0.0
Total Assessment Area	6,320	100.0	5,627	100.0	647	100.0	46	100.0
Percentage of Total Businesses:				89.0		10.2		.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	8	11.8	8	12.1	0	0.0	0	0.0
Middle-income	38	55.9	38	57.6	0	0.0	0	0.0
Upper-income	22	32.4	20	30.3	2	100.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	68	100.0	66	100.0	2	100.0	0	.0
Percentage of Total Farms:				97.1		2.9		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX Lubbock

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	11.8	3,680	5.7	1,331	36.2	13,655	21.0
Moderate-income	13	19.1	13,700	21.1	2,968	21.7	11,548	17.8
Middle-income	25	36.8	24,591	37.9	2,853	11.6	12,384	19.1
Upper-income	21	30.9	22,970	35.4	858	3.7	27,354	42.1
Unknown-income	1	1.5	0	0.0	0	0.0	0	0.0
Total Assessment Area	68	100.0	64,941	100.0	8,010	12.3	64,941	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	8,601	2,597	4.3	30.2	4,734	55.0	1,270	14.8
Moderate-income	24,821	10,815	17.7	43.6	11,107	44.7	2,899	11.7
Middle-income	42,353	22,380	36.7	52.8	15,707	37.1	4,266	10.1
Upper-income	37,884	25,208	41.3	66.5	9,622	25.4	3,054	8.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	113,659	61,000	100.0	53.7	41,170	36.2	11,489	10.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	652	4.7	586	4.6	64	6.2	2	2.1
Moderate-income	2,058	14.9	1,878	14.8	171	16.7	9	9.4
Middle-income	5,289	38.3	4,764	37.6	490	47.8	35	36.5
Upper-income	5,797	42.0	5,449	43.0	298	29.1	50	52.1
Unknown-income	8	0.1	6	0.0	2	0.2	0	0.0
Total Assessment Area	13,804	100.0	12,683	100.0	1,025	100.0	96	100.0
Percentage of Total Businesses:				91.9		7.4		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	1.1	6	1.1	0	0.0	0	0.0
Moderate-income	47	8.3	47	8.5	0	0.0	0	0.0
Middle-income	235	41.4	228	41.3	7	46.7	0	0.0
Upper-income	279	49.2	271	49.1	8	53.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	567	100.0	552	100.0	15	100.0	0	.0
Percentage of Total Farms:				97.4		2.6		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX McAllen

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	0.9	1,162	0.7	607	52.2	43,087	25.3
Moderate-income	35	31.0	51,742	30.3	22,775	44.0	26,468	15.5
Middle-income	48	42.5	72,290	42.4	22,052	30.5	28,589	16.8
Upper-income	27	23.9	45,309	26.6	6,603	14.6	72,359	42.4
Unknown-income	2	1.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	113	100.0	170,503	100.0	52,037	30.5	170,503	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,493	854	0.6	57.2	469	31.4	170	11.4
Moderate-income	68,971	41,580	28.5	60.3	17,611	25.5	9,780	14.2
Middle-income	103,836	61,599	42.2	59.3	25,625	24.7	16,612	16.0
Upper-income	68,891	41,863	28.7	60.8	16,370	23.8	10,658	15.5
Unknown-income	19	0	0.0	0.0	0	0.0	19	100.0
Total Assessment Area	243,210	145,896	100.0	60.0	60,075	24.7	37,239	15.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	55	0.2	52	0.2	3	0.2	0	0.0
Moderate-income	5,122	22.8	4,686	22.5	402	26.2	34	23.8
Middle-income	7,794	34.7	7,203	34.6	537	34.9	54	37.8
Upper-income	9,513	42.3	8,866	42.6	592	38.5	55	38.5
Unknown-income	6	0.0	3	0.0	3	0.2	0	0.0
Total Assessment Area	22,490	100.0	20,810	100.0	1,537	100.0	143	100.0
Percentage of Total Businesses:				92.5		6.8		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	0.6	2	0.7	0	0.0	0	0.0
Moderate-income	97	29.9	88	30.0	9	29.0	0	0.0
Middle-income	103	31.8	88	30.0	15	48.4	0	0.0
Upper-income	122	37.7	115	39.2	7	22.6	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	324	100.0	293	100.0	31	100.0	0	.0
Percentage of Total Farms:				90.4		9.6		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX Odessa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	8,159	24.4
Moderate-income	8	28.6	7,604	22.8	1,805	23.7	5,235	15.7
Middle-income	12	42.9	16,010	47.9	2,066	12.9	6,398	19.2
Upper-income	8	28.6	9,775	29.3	786	8.0	13,597	40.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	28	100.0	33,389	100.0	4,657	13.9	33,389	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	12,216	7,040	21.9	57.6	3,919	32.1	1,257	10.3
Middle-income	23,907	15,438	48.0	64.6	6,442	26.9	2,027	8.5
Upper-income	16,149	9,676	30.1	59.9	5,138	31.8	1,335	8.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	52,272	32,154	100.0	61.5	15,499	29.7	4,619	8.8
	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	986	17.6	869	17.6	112	17.8	5	23.8
Middle-income	2,513	44.9	2,173	43.9	330	52.4	10	47.6
Upper-income	2,099	37.5	1,905	38.5	188	29.8	6	28.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	5,598	100.0	4,947	100.0	630	100.0	21	100.0
Percentage of Total Businesses:				88.4		11.3		.4
	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	9.3	5	9.3	0	0.0	0	0.0
Middle-income	21	38.9	21	38.9	0	0.0	0	0.0
Upper-income	28	51.9	28	51.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	54	100.0	54	100.0	0	.0	0	.0
Percentage of Total Farms:				100.0		.0		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX San Angelo

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	4.0	494	1.8	195	39.5	6,116	22.0
Moderate-income	7	28.0	7,713	27.8	1,793	23.2	5,095	18.3
Middle-income	10	40.0	12,057	43.4	1,139	9.4	5,391	19.4
Upper-income	6	24.0	7,505	27.0	271	3.6	11,167	40.2
Unknown-income	1	4.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	25	100.0	27,769	100.0	3,398	12.2	27,769	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	934	375	1.3	40.1	394	42.2	165	17.7
Moderate-income	13,245	7,372	26.2	55.7	4,619	34.9	1,254	9.5
Middle-income	19,821	12,742	45.3	64.3	4,825	24.3	2,254	11.4
Upper-income	12,027	7,645	27.2	63.6	3,492	29.0	890	7.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	46,027	28,134	100.0	61.1	13,330	29.0	4,563	9.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	536	11.7	457	10.9	71	20.6	8	24.2
Moderate-income	706	15.4	637	15.1	66	19.2	3	9.1
Middle-income	2,082	45.4	1,924	45.7	149	43.3	9	27.3
Upper-income	1,248	27.2	1,180	28.0	56	16.3	12	36.4
Unknown-income	13	0.3	10	0.2	2	0.6	1	3.0
Total Assessment Area	4,585	100.0	4,208	100.0	344	100.0	33	100.0
Percentage of Total Businesses:				91.8		7.5		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	16	6.2	16	6.4	0	0.0	0	0.0
Moderate-income	11	4.3	11	4.4	0	0.0	0	0.0
Middle-income	87	33.7	87	34.9	0	0.0	0	0.0
Upper-income	144	55.8	135	54.2	9	100.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	258	100.0	249	100.0	9	100.0	0	.0
Percentage of Total Farms:				96.5		3.5		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX San Antonio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	9.7	28,260	7.0	10,543	37.3	95,848	23.7
Moderate-income	115	30.9	118,686	29.4	24,922	21.0	69,486	17.2
Middle-income	108	29.0	125,902	31.2	11,997	9.5	77,302	19.2
Upper-income	109	29.3	130,769	32.4	5,113	3.9	160,981	39.9
Unknown-income	4	1.1	0	0.0	0	0.0	0	0.0
Total Assessment Area	372	100.0	403,617	100.0	52,575	13.0	403,617	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,868	19,272	5.2	40.3	22,448	46.9	6,148	12.8
Moderate-income	201,352	96,350	25.9	47.9	81,313	40.4	23,689	11.8
Middle-income	209,277	120,029	32.3	57.4	69,399	33.2	19,849	9.5
Upper-income	197,865	136,120	36.6	68.8	47,348	23.9	14,397	7.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	656,362	371,771	100.0	56.6	220,508	33.6	64,083	9.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4,436	5.5	3,951	5.2	471	8.9	14	6.6
Moderate-income	18,026	22.2	16,641	21.9	1,349	25.6	36	17.0
Middle-income	24,757	30.4	22,955	30.2	1,707	32.4	95	44.8
Upper-income	33,962	41.7	32,191	42.4	1,705	32.4	66	31.1
Unknown-income	187	0.2	155	0.2	31	0.6	1	0.5
Total Assessment Area	81,368	100.0	75,893	100.0	5,263	100.0	212	100.0
Percentage of Total Businesses:				93.3		6.5		.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	24	2.6	22	2.4	2	20.0	0	0.0
Moderate-income	116	12.3	116	12.5	0	0.0	0	0.0
Middle-income	294	31.2	292	31.4	2	20.0	0	0.0
Upper-income	507	53.9	501	53.8	6	60.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	941	100.0	931	100.0	10	100.0	0	.0
Percentage of Total Farms:				98.9		1.1		.0

2015 FFIEC Census Data and 2015 D&B Information

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Combined Demographics Report

Assessment Area: TX San Antonio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	37	8.7	29,350	6.3	10,895	37.1	105,275	22.6
Moderate-income	122	28.7	126,009	27.0	26,036	20.7	78,754	16.9
Middle-income	129	30.4	149,205	32.0	14,001	9.4	88,988	19.1
Upper-income	133	31.3	161,858	34.7	6,014	3.7	193,405	41.5
Unknown-income	4	0.9	0	0.0	0	0.0	0	0.0
Total Assessment Area	425	100.0	466,422	100.0	56,946	12.2	466,422	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	49,604	19,988	4.6	40.3	23,127	46.6	6,489	13.1
Moderate-income	213,111	102,950	23.7	48.3	85,388	40.1	24,773	11.6
Middle-income	245,266	143,303	32.9	58.4	77,276	31.5	24,687	10.1
Upper-income	240,543	168,726	38.8	70.1	53,243	22.1	18,574	7.7
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	748,524	434,967	100.0	58.1	239,034	31.9	74,523	10.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4,121	4.8	3,580	4.6	515	8.1	26	4.0
Moderate-income	17,229	20.2	15,645	20.0	1,495	23.6	89	13.7
Middle-income	26,333	30.9	24,063	30.8	2,069	32.7	201	30.9
Upper-income	37,362	43.8	34,815	44.5	2,216	35.0	331	50.9
Unknown-income	176	0.2	137	0.2	36	0.6	3	0.5
Total Assessment Area	85,221	100.0	78,240	100.0	6,331	100.0	650	100.0
Percentage of Total Businesses:				91.8		7.4		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	24	2.1	22	2.0	2	15.4	0	0.0
Moderate-income	131	11.7	129	11.7	2	15.4	0	0.0
Middle-income	394	35.2	390	35.2	4	30.8	0	0.0
Upper-income	571	51.0	566	51.1	5	38.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,120	100.0	1,107	100.0	13	100.0	0	.0
Percentage of Total Farms:				98.8		1.2		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX Starr-Willacy

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	28.6	5,551	31.6	2,683	48.3	7,782	44.3
Moderate-income	11	52.4	10,063	57.3	3,233	32.1	2,982	17.0
Middle-income	3	14.3	1,942	11.1	437	22.5	2,811	16.0
Upper-income	0	0.0	0	0.0	0	0.0	3,981	22.7
Unknown-income	1	4.8	0	0.0	0	0.0	0	0.0
Total Assessment Area	21	100.0	17,556	100.0	6,353	36.2	17,556	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,813	4,999	30.8	64.0	1,524	19.5	1,290	16.5
Moderate-income	15,568	9,247	56.9	59.4	2,913	18.7	3,408	21.9
Middle-income	2,910	2,009	12.4	69.0	362	12.4	539	18.5
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	26,291	16,255	100.0	61.8	4,799	18.3	5,237	19.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	339	24.1	322	24.6	13	18.6	4	14.8
Moderate-income	931	66.2	862	65.8	48	68.6	21	77.8
Middle-income	137	9.7	126	9.6	9	12.9	2	7.4
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,407	100.0	1,310	100.0	70	100.0	27	100.0
Percentage of Total Businesses:				93.1		5.0		1.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	17	24.6	16	25.0	1	20.0	0	0.0
Moderate-income	43	62.3	41	64.1	2	40.0	0	0.0
Middle-income	9	13.0	7	10.9	2	40.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	69	100.0	64	100.0	5	100.0	0	.0
Percentage of Total Farms:				92.8		7.2		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX Tyler

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.9	1,324	2.5	559	42.2	11,454	21.6
Moderate-income	12	29.3	13,241	24.9	2,933	22.2	9,146	17.2
Middle-income	14	34.1	21,340	40.2	1,670	7.8	10,377	19.5
Upper-income	12	29.3	17,208	32.4	857	5.0	22,136	41.7
Unknown-income	1	2.4	0	0.0	0	0.0	0	0.0
Total Assessment Area	41	100.0	53,113	100.0	6,019	11.3	53,113	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,833	636	1.2	22.4	1,713	60.5	484	17.1
Moderate-income	20,924	11,534	21.7	55.1	6,967	33.3	2,423	11.6
Middle-income	35,116	22,378	42.2	63.7	8,724	24.8	4,014	11.4
Upper-income	26,150	18,484	34.9	70.7	5,991	22.9	1,675	6.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	85,023	53,032	100.0	62.4	23,395	27.5	8,596	10.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	729	7.1	631	6.7	89	10.7	9	9.7
Moderate-income	2,068	20.0	1,817	19.3	239	28.8	12	12.9
Middle-income	3,638	35.3	3,381	36.0	219	26.4	38	40.9
Upper-income	3,863	37.5	3,551	37.8	279	33.6	33	35.5
Unknown-income	17	0.2	12	0.1	4	0.5	1	1.1
Total Assessment Area	10,315	100.0	9,392	100.0	830	100.0	93	100.0
Percentage of Total Businesses:				91.1		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	4	1.9	4	2.0	0	0.0	0	0.0
Moderate-income	33	15.6	27	13.5	6	50.0	0	0.0
Middle-income	109	51.4	104	52.0	5	41.7	0	0.0
Upper-income	66	31.1	65	32.5	1	8.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	212	100.0	200	100.0	12	100.0	0	.0
Percentage of Total Farms:				94.3		5.7		.0

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Combined Demographics Report

Assessment Area: TX Val Verde-Maverick

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	5.3	889	3.8	425	47.8	7,640	32.3
Moderate-income	11	57.9	13,034	55.1	3,867	29.7	5,025	21.3
Middle-income	4	21.1	6,121	25.9	1,256	20.5	4,114	17.4
Upper-income	2	10.5	3,591	15.2	388	10.8	6,856	29.0
Unknown-income	1	5.3	0	0.0	0	0.0	0	0.0
Total Assessment Area	19	100.0	23,635	100.0	5,936	25.1	23,635	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,288	947	4.7	73.5	205	15.9	136	10.6
Moderate-income	18,586	10,798	53.9	58.1	5,196	28.0	2,592	13.9
Middle-income	9,335	4,741	23.7	50.8	3,020	32.4	1,574	16.9
Upper-income	6,216	3,554	17.7	57.2	1,133	18.2	1,529	24.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	35,425	20,040	100.0	56.6	9,554	27.0	5,831	16.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	30	1.2	27	1.2	3	1.9	0	0.0
Moderate-income	1,153	47.2	1,058	46.9	79	50.6	16	50.0
Middle-income	799	32.7	739	32.7	48	30.8	12	37.5
Upper-income	461	18.9	431	19.1	26	16.7	4	12.5
Unknown-income	2	0.1	2	0.1	0	0.0	0	0.0
Total Assessment Area	2,445	100.0	2,257	100.0	156	100.0	32	100.0
Percentage of Total Businesses:				92.3		6.4		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	2.1	1	2.2	0	0.0	0	0.0
Moderate-income	17	36.2	15	33.3	2	100.0	0	0.0
Middle-income	13	27.7	13	28.9	0	0.0	0	0.0
Upper-income	16	34.0	16	35.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	47	100.0	45	100.0	2	100.0	0	.0
Percentage of Total Farms:				95.7		4.3		.0

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: TX Waco

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	14.0	5,105	8.6	2,307	45.2	13,362	22.5
Moderate-income	11	19.3	11,226	18.9	2,690	24.0	10,383	17.5
Middle-income	20	35.1	19,416	32.7	2,156	11.1	11,539	19.4
Upper-income	16	28.1	23,681	39.8	1,296	5.5	24,144	40.6
Unknown-income	2	3.5	0	0.0	0	0.0	0	0.0
Total Assessment Area	57	100.0	59,428	100.0	8,449	14.2	59,428	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	14,271	2,918	5.4	20.4	8,307	58.2	3,046	21.3
Moderate-income	20,078	8,302	15.4	41.3	9,062	45.1	2,714	13.5
Middle-income	33,412	18,106	33.5	54.2	10,764	32.2	4,542	13.6
Upper-income	33,611	24,676	45.7	73.4	6,541	19.5	2,394	7.1
Unknown-income	22	11	0.0	50.0	11	50.0	0	0.0
Total Assessment Area	101,394	54,013	100.0	53.3	34,685	34.2	12,696	12.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	538	5.3	474	5.2	56	6.5	8	6.7
Moderate-income	2,075	20.4	1,788	19.5	257	30.0	30	25.2
Middle-income	3,318	32.7	2,947	32.1	324	37.9	47	39.5
Upper-income	4,185	41.2	3,940	42.9	211	24.6	34	28.6
Unknown-income	33	0.3	25	0.3	8	0.9	0	0.0
Total Assessment Area	10,149	100.0	9,174	100.0	856	100.0	119	100.0
Percentage of Total Businesses:				90.4		8.4		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.7	3	0.7	0	0.0	0	0.0
Moderate-income	9	2.2	9	2.2	0	0.0	0	0.0
Middle-income	221	52.9	220	53.0	1	33.3	0	0.0
Upper-income	184	44.0	182	43.9	2	66.7	0	0.0
Unknown-income	1	0.2	1	0.2	0	0.0	0	0.0
Total Assessment Area	418	100.0	415	100.0	3	100.0	0	.0
Percentage of Total Farms:				99.3		.7		.0

2016 FFIEC Census Data and 2016 D&B Information