

# **PUBLIC DISCLOSURE**

**May 10, 2017**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**IBERIABANK  
RSSD ID NUMBER: 808176  
Lafayette, Louisiana 71501**

**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 Rating

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**INSTITUTION’S CRA RATING: SATISFACTORY**

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

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	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 HMDA<sup>1</sup>-reportable lending reflects adequate penetration in low- and moderate-income geographies.
- The overall geographic distribution of small business lending reflects good penetration in low- and moderate-income geographies.
- The overall distribution of HMDA-reportable lending among borrowers of different income levels is adequate.
- The overall distribution of small business lending among businesses of different sizes is good.
- The bank makes a relatively high level of community development loans.
- The bank makes a significant level of qualified community development investments in response to assessment area community development needs.
- Retail banking services are adequate in the bank’s assessment areas.
- The bank is a leader in providing community development services in the bank’s assessment areas.

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<sup>1</sup> 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.

## Institution

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### DESCRIPTION OF INSTITUTION

IBERIABANK is a multistate commercial bank headquartered in Lafayette, Louisiana, with \$21.6 billion in assets, 198 branch offices, and more than 200 ATMs as of December 31, 2016. The bank had total deposits of \$16.2 billion as of June 30, 2016, and retail branches located in seven states: Alabama, Arkansas, Florida, Georgia, Louisiana, Tennessee, and Texas. IBERIABANK received a “Satisfactory” rating at its previous Community Reinvestment Act (CRA) Performance Evaluation (PE) dated August 5, 2013. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment areas.

#### *Business Structure*

IBERIABANK is a subsidiary of IBERIABANK Corporation (IBKC), a financial holding company headquartered in Lafayette, Louisiana. IBERIABANK is a full-service provider of retail, mortgage, commercial banking, trust, and investment services to a broad range of retail, business, and institutional clients. IBERIABANK operates and wholly owns a mortgage affiliate, IBERIABANK Mortgage, which is headquartered in Little Rock, Arkansas, and does the majority of the bank’s HMDA lending.<sup>2</sup> IBERIABANK Corporation is also the parent of IBERIA CDE, LLC, which was created for the purchase of investing in tax credits.

In 2014, IBERIABANK completed the acquisitions of Teche Holding Company ("Teche") and its subsidiary bank, Teche Federal Bank; First Private Holdings, Inc. ("First Private") and its subsidiary bank, First Private Bank; and the Memphis operations of Trust One Bank, a division of Synovus Financial. As a result of these acquisitions, the bank expanded its presence in Louisiana, Texas, and Tennessee.

In 2015, IBERIABANK completed the acquisitions of Florida Bank Group, Inc. (“Florida Bank”); Old Florida Bancshares, Inc., and its subsidiary banks, Old Florida Bank and New Traditions Bank; and Georgia Commerce Bancshares, Inc. (“Georgia Commerce Bank”). As a result of these acquisitions, the bank expanded its presence in Florida and entered into the Atlanta, Georgia, market.

#### *Credit Products and Loan Portfolio*

IBERIABANK offers a wide variety of consumer, residential real estate, and commercial loan products to fulfill the credit needs of the residents and businesses in its assessment areas. Consumer loan products include auto loans, credit cards, personal lines of credit, installment loans, home equity loans, and mortgage loans. The bank also offers construction and commercial loan products including loans and lines of credit, business credit cards, and real estate loans. Through the bank’s wholly owned subsidiary, Mercantile Capital Corporation, IBERIABANK offers the Small Business Administration (SBA) 7(a) guaranteed loan program and the SBA 504 loan program.

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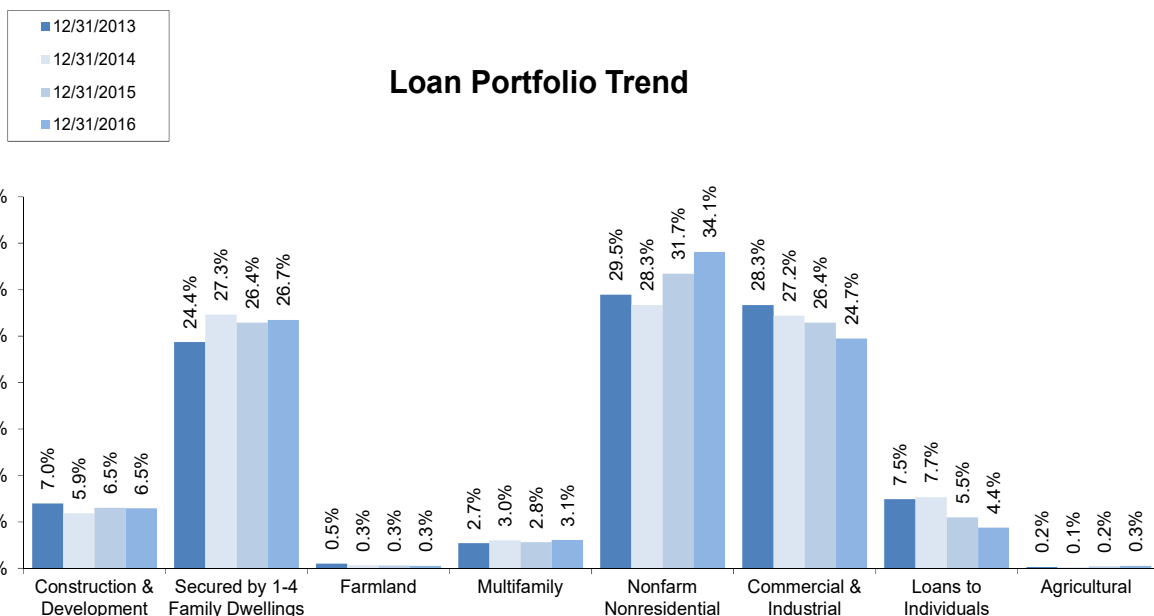
<sup>2</sup> IBERIABANK Mortgage ended operations as a stand-alone entity as of January 1, 2017. It is now a division of IBERIABANK.

## Institution

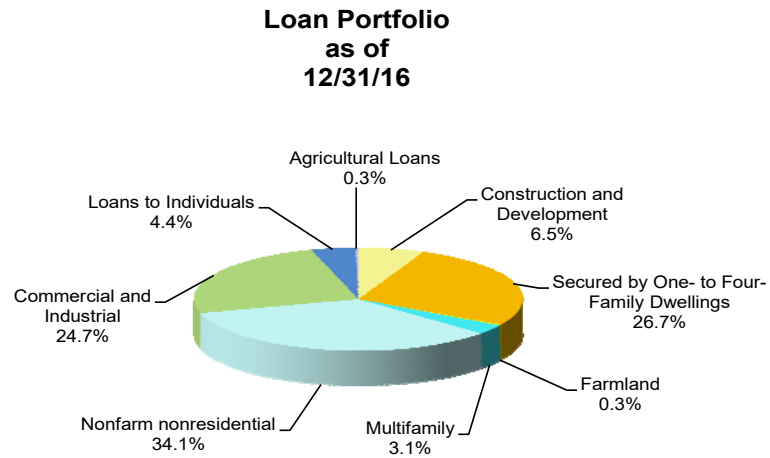
The following table shows the composition of IBERIABANK’s loan portfolio as of December 31, 2013, through December 31, 2016. Throughout the four-year period, loans secured by non-farm, nonresidential real estate represented the largest volume of loans by dollar volume of IBERIABANK’s loan portfolio. The next highest volume by dollar amount of IBERIABANK’s loan portfolio over the same period was loans secured by one- to four-family dwellings, followed by commercial and industrial loans. Agricultural loans and farmland lending accounted for less than 1.0 percent of the loan portfolio.

COMPOSITION OF LOAN PORTFOLIO								
Loan Type	12/31/2016		12/31/2015		12/31/2014		12/31/2013	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	950,974	6.5%	911,289	6.5%	663,544	5.9%	647,291	7.0%
Secured by One- to Four- Family Dwellings	3,928,790	26.7%	3,697,877	26.4%	3,049,085	27.3%	2,250,340	24.4%
Other Real Estate: Farmland	41,643	0.3%	43,159	0.3%	37,671	0.3%	45,952	0.5%
Multifamily	448,647	3.1%	394,691	2.8%	338,146	3.0%	250,579	2.7%
Nonfarm nonresidential	5,005,943	34.1%	4,436,871	31.7%	3,163,000	28.3%	2,723,352	29.5%
Commercial and Industrial	3,635,158	24.7%	3,698,297	26.4%	3,037,669	27.2%	2,619,868	28.3%
Loans to Individuals	642,114	4.4%	769,117	5.5%	857,412	7.7%	688,830	7.5%
Agricultural Loans	39,606	0.3%	31,953	0.2%	15,371	0.1%	15,225	0.2%
<b>Total</b>	<b>\$14,692,875</b>	<b>100.00%</b>	<b>\$13,983,254</b>	<b>100.00%</b>	<b>\$11,161,898</b>	<b>100.00%</b>	<b>\$9,241,437</b>	<b>100.00%</b>

\* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.



## Institution



IBERIABANK's loan portfolio includes products that provide flexible financing, such as lower down payments, lender paid mortgage insurance, and lower required credit scores, to help meet the credit needs of low- and moderate-income borrowers. IBERIABANK originates FHA, VA, and Rural Housing loans for home purchases and works with many state and local agencies that offer first-time homebuyer mortgages and/or down payment assistance for LMI borrowers. In addition, the bank offers grants of up to \$4,000 for down payment or closing cost assistance for home purchase or refinance loans to low- and moderate-income borrowers or in low- and moderate-income geographies. The bank has three other products worth mentioning: an unsecured home improvement installment loan product; a CD-secured installment loan product designed to assist customers in establishing or improving their credit history and credit score; and credit products targeted to first responders. Finally, the institution has developed a team of dedicated CRA mortgage lenders that specialize in lending to LMI borrowers and providing financial education in the bank's critical markets.

Another way that IBERIABANK is helping LMI borrowers is through its Loss Mitigation team. During the review period, IBERIABANK helped 239 families avoid foreclosure and stay in their homes. These transactions involved temporary forbearance agreements that were granted by the bank and helped families avoid foreclosure and/or provided more favorable loan terms. Also during the review period, IBERIABANK assisted six borrowers with funds from the Hardest Hit Fund (HHF) available in Alabama and Florida.



## Institution

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### SCOPE OF EXAMINATION

IBERIABANK is an interstate bank with 35 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. Ten 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. In most cases, the full-scope assessment areas 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:

- Alabama: Birmingham
- Arkansas: Little Rock
- Florida: Fort Myers and Orlando
- Georgia: Atlanta
- Louisiana: Lafayette, New Orleans and St. Mary
- Tennessee: Memphis
- Texas: Houston

The State of Louisiana had the highest number of branches, deposit activity, and the largest concentration of lending by number and dollar amount; as a result, performance in this state received the greatest weight in determining the overall rating for each test and the institution overall. Each state, and the full-scope assessment areas within each state, is presented in alphabetical order. 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 IBERIABANK and IBERIABANK Mortgage HMDA-reportable loans and CRA-reportable small business loans originated between January 1, 2014, and December 31, 2016. To determine the final lending test rating, equal weight was given to lending performance in 2014, 2015, and 2016. HMDA-reportable home purchase, refinance, and home improvement loans and CRA-reportable small business loans were the major lending products reviewed. CRA-reportable small farm loans and HMDA-reportable multifamily loans were not considered in the overall evaluation due to low activity levels. Retail banking services such as branch distribution and hours of operation were analyzed for the same review period.

The community development activity review period was April 1, 2013, to December 31, 2016. 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, 2016, 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 IBERIABANK'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 2016 FFIEC Census data and 2016 Dun & Bradstreet information. 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 are evaluated to determine the lending activity inside and outside the bank's assessment areas. In addition, loans inside the assessment area are evaluated based on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA-reportable loans is assessed by comparing the percentage of loans made in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses within each geographic income category.

The distribution of HMDA-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.

IBERIABANK's lending performance was also compared to the performance of aggregate lenders in 2014 and 2015. However, given that the 2016 aggregate data was not available, no comparison of the bank's 2016 data to aggregate data was performed. 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 IBERIABANK ranks within the respective areas.

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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.

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 of those activities, and their responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics 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 major markets, community contacts noted that affordable workforce housing was the biggest concern. Low- and moderate-income renters are paying a significantly higher share of their income for rent or living in substandard housing. In terms of single-family ownership, community contacts noted that homeownership is unattainable for many lower-wage workers due to significant housing price increases. Some community contacts commented on the negative home equity issue and its impact on LMI homeowners and communities. Community contacts also identified the need for more technical assistance and capital for small businesses, particularly small dollar loans and partnerships with community development financial institutions (CDFIs) and microlenders. Another common concern noted by the contacts was limited capacity of local governments and nonprofit organizations to address community development needs. Finally, almost all of the community contacts stated that low- and moderate-income families and communities are still struggling, and there is an ongoing need for programs to address financial stability and financial education.

Contacts in each market identified opportunities in these key areas for bank participation. More detailed information obtained from individual community contacts is included in the Credit and Community Development Needs section for each full-scope assessment area.

## Institution

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

#### Lending Test

Lending test performance is rated high satisfactory. The overall lending performance is good in all states excluding Georgia and Tennessee, where performance is adequate. The overall geographic distribution of loans throughout the assessment areas was good while the overall borrower distribution among borrowers of different income levels and businesses of different sizes was adequate. Additionally, the bank makes a relatively high level of community development loans. Community development lending was excellent in Alabama and Texas; good in Arkansas, Florida, and Louisiana; adequate in Georgia; and poor in Tennessee. As discussed earlier, the bank's performance in Louisiana had the greatest impact on the bank's overall lending test performance.

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 2014 through 2016. IBERIABANK originated more HMDA-reportable loans than small business loans by both number and dollar amount. Due to the higher percentage of loans by number, HMDA-reportable 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)	%
<b>Total Consumer related</b>	<b>0</b>	<b>0</b>	<b>\$0</b>	<b>0</b>
Home Improvement	4,036	--	\$210,622	--
Home Purchase	19,743	--	\$4,116,303	--
Multi-Family Housing	229	--	\$467,555	--
Refinancing	6,247	--	\$1,496,176	--
<b>Total HMDA related</b>	<b>30,255</b>	<b>58</b>	<b>\$6,290,656</b>	<b>67</b>
Small Business	21,148	--	\$3,053,576	--
<b>Total Small Business related</b>	<b>21,148</b>	<b>41</b>	<b>\$3,053,576</b>	<b>32</b>
Small Farm	651	--	\$75,902	--
<b>Total Small Farm related</b>	<b>651</b>	<b>1</b>	<b>\$75,902</b>	<b>1</b>
<b>TOTAL LOANS</b>	<b>52,054</b>	<b>100</b>	<b>\$9,420,134</b>	<b>100</b>

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

## Institution

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	3,378	87.2	\$150,420	86.5	495	12.8	\$23,466	13.5
Home Purchase - Conventional	2,692	87.4	\$766,324	83.9	387	12.6	\$146,731	16.1
Home Purchase - FHA	113	100	\$14,353	100	0	0	\$0	0
Home Purchase - VA	9	100	\$1,081	100	0	0	\$0	0
Multi-Family Housing	189	82.5	\$338,579	72.4	40	17.5	\$128,976	27.6
Refinancing	1,872	88.8	\$382,027	81.4	235	11.2	\$87,229	18.6
<b>Total HMDA related</b>	<b>8,253</b>	<b>87.7</b>	<b>\$1,652,784</b>	<b>81.1</b>	<b>1,157</b>	<b>12.3</b>	<b>\$386,402</b>	<b>18.9</b>
Small Business	19,193	90.8	\$2,656,689	87	1,955	9.2	\$396,887	13
<b>Total Small Bus. related</b>	<b>19,193</b>	<b>90.8</b>	<b>\$2,656,689</b>	<b>87</b>	<b>1,955</b>	<b>9.2</b>	<b>\$396,887</b>	<b>13</b>
Small Farm	457	70.2	\$41,544	54.7	194	29.8	\$34,358	45.3
<b>Total Small Farm related</b>	<b>457</b>	<b>70.2</b>	<b>\$41,544</b>	<b>54.7</b>	<b>194</b>	<b>29.8</b>	<b>\$34,358</b>	<b>45.3</b>
<b>TOTAL LOANS</b>	<b>27,903</b>	<b>89.4</b>	<b>\$4,351,017</b>	<b>84.2</b>	<b>3,306</b>	<b>10.6</b>	<b>\$817,647</b>	<b>15.8</b>

Note: Affiliate loans not included

The bank originated 87.7 percent of HMDA-related loans and 90.8 percent of small business loans, by number, to borrowers and businesses located inside the bank's assessment areas. This indicates IBERIABANK's willingness to originate loans that meet the credit needs of its assessment areas.

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

The overall geographic distribution of HMDA-reportable and small business lending reflects good penetration in low- and moderate-income geographies. Of the 10 full-scope assessment areas, 4 are considered good and 6 are considered adequate. While the overall geographic distribution of HMDA-reportable loans is adequate, the distribution of small business loans by geography is good.

The overall distribution of loans among borrowers of different income levels and businesses of different sizes is adequate. HMDA-reportable lending to borrowers of different income levels is adequate while small business lending to businesses of different revenue sizes is good. By assessment area, three full-scope assessment areas are considered good for overall borrower distribution, five are adequate, and two are poor.

The analyses of HMDA-reportable and small business lending within each assessment area are discussed in detail later in this report.

## Institution

### *Community Development Lending*

IBERIABANK made a relatively high level of community development loans during the review period. Since the previous examination, the bank originated or renewed 258 community development loans for approximately \$602.4 million. This volume of community development lending is considered good given the size and presence of the institution in its assessment areas; the bank's community development lending exhibited good responsiveness to community development needs at the assessment area level.

<b>Loan Purpose</b>	<b>#</b>	<b>\$ ('000s)</b>
Affordable Housing	59	\$99,770
Community Services	60	\$67,453
Economic Development	106	\$272,766
Revitalization or Stabilization	33	\$162,404
<b>Total</b>	<b>258</b>	<b>\$602,393</b>

Community development lending in Louisiana had the greatest impact on the performance assessment followed by Florida and Texas. In Louisiana, the bank made a relatively high level of loans, providing \$168.3 million in loans, which represented 28.4 percent of total community development lending. Community development lending in Florida represented about 14.3 percent of total community development lending while lending in Texas accounted for 11.7 percent of total community development lending. The bank made a relatively high level of loans in Florida and was a leader in community development lending in Texas, when considering the bank's presence in the state. The remaining four states accounted for 18.8 percent of total community development lending, with \$113.1 million in community development loans.

The bank made two community development loans for \$11.5 million during the review period that benefitted multiple states within the bank's footprint; these loans were considered in evaluating the bank's performance in the impacted states. The bank provided a \$6.5 million line of credit to a tax credit syndicator to increase the availability of capital for LIHTC projects across the bank's footprint. Additionally, the bank provided a \$5.0 million loan to a fund that will support the acquisition, renovation, and the lease and/or sale of affordable single-family housing in the bank's assessment areas in the states of Florida, Georgia, Louisiana, and Alabama.

The bank was responsive to the credit and community development needs across its footprint. Therefore, loans outside the bank's assessment areas without a purpose, mandate or function of serving the assessment areas were considered. Specifically, the bank had 55 loans for \$153.2 million outside of the bank's assessment areas. The majority of these loans (\$136.6 million) were SBA 504 loans originated by the bank's subsidiary, Mercantile Capital Corporation; the bank acquired Mercantile Capital Corporation during the current review period. SBA 504 lending outside the bank's assessment areas represented about 22.5 percent of the bank's total community development lending.

The community development loans originated or renewed during the review period had a variety of purposes. The most significant volume of loans supported economic development activities, primarily driven by the SBA 504 loans noted above. The second largest concentration of loans financed revitalization or stabilization

## Institution

of low- and moderate-income and other targeted geographies; the bank demonstrated leadership with these activities in several full-scope assessment areas, including Birmingham and New Orleans. The remaining loans financed affordable housing for low- and moderate-income individuals and community services targeted to low- and moderate-income individuals. 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.

### Investment Test

IBERIABANK's investment test performance is rated high satisfactory based on the overall level of qualified community development investments and contributions provided directly in the bank's assessment areas and across the institution's footprint. Specifically, the bank had excellent performance in one state while performance was good in six states. By assessment area, the bank had excellent performance in two full-scope assessment areas while performance was good in six full-scope assessment areas, adequate in one full-scope assessment area, and poor in one full-scope assessment area. Performance in Louisiana had the greatest impact on the investment test rating due to its relatively high concentration of branches, deposits, and lending among the states in IBERIABANK's retail service area, followed by Florida, Texas, and Alabama. The bank had the highest volume of qualified community development investments in Louisiana, followed by Florida and Alabama.

Qualified investments totaled approximately \$239.3 million, including \$183.7 million in investments that were obtained during the current review period and directly benefitted the bank's assessment areas. Of the total investments, \$1.0 million benefitted a broader statewide or regional area that included one or more of the bank's assessment areas or the bank's entire footprint. Finally, the bank had \$2.5 million in investments within the states it serves, but without a purpose, mandate, or function of serving any of the bank's assessment areas.

Investment Purpose	#	\$ ('000s)
Affordable Housing	1,132	\$223,651
Community Services	8	\$3,888
Economic Development	6	\$11,750
<b>Total</b>	<b>1,146</b>	<b>\$239,289</b>

Most of the bank's investments (by dollar and number) supported affordable housing through the purchase of securities backed by government-guaranteed mortgages to qualified low- and moderate-income borrowers, investments in LIHTC projects and equity funds, and investments in Ginnie Mae Project Loans. More specifically, the bank invested 59.3 percent of total investments, or \$142.1 million, in government-guaranteed

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mortgage-backed securities. An additional \$81.5 million of affordable housing investments were in LIHTC projects, LIHTC and housing equity funds, and Ginnie Mae Project Loans. The bank also had several investments to promote economic development and commercial revitalization, including investments in a Small Business Investment Company (SBIC), equity funds specializing in economic development, and community development entities (CDEs). Finally, the bank had investments for community services targeted to LMI individuals or communities. The community services investments were several municipal investments and a significant investment in a minority-owned financial institution.

IBERIABANK made 1,143 qualified contributions totaling \$9.9 million to organizations with a purpose of community development. Of the total contributions, \$9.4 million directly benefitted one of the bank’s assessment areas and \$103,300 benefitted a broader statewide or regional area that included one or more of the bank’s assessment areas. The bank also had \$202,500 in contributions that benefitted the bank’s entire footprint and \$153,400 in contributions within the states it serves, but without a purpose, mandate, or function of serving any of the bank’s assessment areas; these contributions were primarily in the Miami market in which the bank has expansion plans. The largest volume of contributions (by dollar) was in Florida, followed by Louisiana. Altogether, nearly 76.0 percent of all contributions during the review period were made to organizations in these two states.

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, youth and family programs, education and charter schools, emergency assistance including food and housing, job training, and health services. The bank was a significant supporter in markets across its footprint of an organization that partners with local nonprofits to provide community services to LMI individuals, with a primary focus on programs that promote financial stability, health, and education. It is also worth noting that during this review period IBERIABANK supported a national advocacy organization that provides training, technical assistance, and other resources to community-based member organizations engaged in expanding banking access, affordable housing, business development and workforce development for low- and moderate-income communities.

Contribution Purpose	#	\$
Affordable Housing	246	\$939,492
Community Services	836	\$7,802,892
Economic Development	42	\$695,593
Revitalization or Stabilization	19	\$417,279
<b>Total</b>	1,143	\$9,855,256

Contributions also exhibited responsiveness to a number of other community development needs. For example, the bank provided support for economic development, primarily through contributions and event sponsorships to nonprofit organizations that provide small business capacity building programs and access to capital. Contributions for affordable housing included support to nonprofits developing affordable housing, offering homebuyer education, as well as organizations providing training for affordable housing providers. Other



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affordable housing related contributions included almost \$410,000 in mortgage grants to help 144 low- and moderate-income borrowers with down payment and closing cost assistance. The grants were provided in partnership with nonprofit organizations in local communities across the bank's footprint.

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

IBERIABANK's service test performance is rated high satisfactory. Performance was good in the states of Alabama, Florida, Louisiana, Tennessee, and Texas, and adequate in the remaining states of Arkansas and Georgia.

#### *Retail Banking Services*

Retail banking services are good in the states of Florida and Louisiana, and adequate in the remaining states.

Delivery systems are considered reasonably accessible to IBERIABANK's geographies and individuals of different income levels. The distribution of 198 branch offices and 226 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 less than the percentage of households and businesses in the same geography; 3.5 percent of total branches were in low-income tracts compared to 7.5 percent of households and 5.1 percent of businesses. The distribution of the bank's branches in moderate-income tracts was slightly greater than the percentage of households and businesses in the same geography; 23.2 percent of total branches were in moderate-income tracts compared to 23.1 percent of households and 19.0 percent of businesses.

During the review period, the bank opened 60 branches and closed 34. Four branches were opened in low-income tracts and 17 were opened in moderate-income tracts, with a majority of the openings occurring in Florida and Louisiana. In terms of LMI branch closures, only one branch was closed in a moderate-income tract, and it was in the New Orleans assessment area. Overall, IBERIABANK'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, including in low- and moderate-income geographies. Half of all IBERIABANK's branches offer extended hours and 21.7 percent offer weekend hours, compared to 58.5 percent of branches in low- and moderate-income tracts that offer extended hours, and 18.9 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 a

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customer call center, full-service ATMs, telephone banking, online banking, mobile banking, and text banking. IBERIABANK, in partnership with Presto! ATMs (located in Publix Supermarkets), offers access to cash, surcharge-free, at all Presto! ATMs; this is in addition to all IBERIABANK ATMs.

Beyond traditional retail branches and alternative retail delivery, the bank also participates in a variety of retail programs designed to benefit lower-income customers and small businesses, including Individual Development Accounts (IDAs), free and second chance checking accounts, and HUD HAP accounts (accounts to facilitate paying mortgage loans for clients eligible for Section 8 housing vouchers).

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		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	7	3.5%	4	0	3	1	0	Total	9	4.0%	8	4.0%	3	0	1	3.7%	0	0	638	10.1%	7.5%	5.4%
DTO	0		0	0				SA	4		3		0	0	1		0	0				
Moderate	46	23.2%	17	1	37	30	10	Total	49	21.7%	46	23.1%	17	1	3	11.1%	1	0	1535	24.4%	23.1%	19.0%
DTO	0		0	0				SA	3		0		0	0	3		1	0				
Middle	56	28.3%	16	23	55	32	16	Total	69	30.5%	57	28.6%	19	23	12	44.4%	1	1	2059	32.7%	35.5%	32.5%
DTO	1		1	1				SA	14		2		0	0	12		1	1				
Upper	89	45.0%	23	10	80	35	17	Total	99	43.8%	88	44.2%	21	10	11	40.7%	0	0	1986	31.5%	33.9%	43.0%
DTO	3		1	1				SA	14		3		0	0	11		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	78	1.2%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	198	100.0%	60	34	175	98	43	Total	226	100.0%	199	100.0%	60	34	27	100.0%	2	1	6296	100.0%	100.0%	100.0%
DTO	4		2	2				SA	35		8		0	0	27		2	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

IBERIABANK is a leader in providing community development services throughout its assessment areas. During the review period, bank officers and staff engaged in 818 community development service activities totaling 35,680 hours. Community development services were considered excellent in the states of Alabama, Louisiana, Tennessee and Texas, and good in the states of Arkansas, Florida, and Georgia.

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The table to the right provides a breakdown of qualified community development services by purpose, number, and hours. IBERIABANK employees had extensive involvement 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, economic development by financing small businesses or small farms, and revitalization/stabilization of LMI and distressed/underserved areas. Most notably, the majority of service hours reported were board and committee leadership activities throughout the bank’s footprint, accounting for approximately 53.5 percent of all service hours.

Community Development Purpose	#	Hours
Affordable Housing	103	3,170
Community Services	651	30,513
Economic Development	51	1,334
Revitalization or Stabilization	13	663
<b>Total</b>	<b>818</b>	<b>35,680</b>

In addition to board and committee leadership, financial education for low- and moderate-income individuals has clearly become a common theme of the bank’s community outreach efforts across its assessment areas and states. Working with local schools, recreation departments and organizations such as Junior Achievement, the bank facilitated over 10,000 hours of youth financial education. Also, through a variety of initiatives hosted by workforce development programs, employers, entities serving persons with disabilities, and substance abuse recovery programs, the bank supported 200 adult financial literacy workshops for over 5,200 service hours.

While the majority of the bank’s service activities are mostly reflected in the community development purpose of community services in the table above, it is worth noting that bank leaders engaged in board service leadership with affordable housing providers such as Habitat for Humanity affiliates, community development financial institutions, community development corporations, and affordable housing trade associations throughout its assessment areas. Employees also taught homebuyer education, financial literacy, and served on loan review committees in an effort to support first-time homeownership and multifamily affordable housing. Collectively, bank employees engaged in over 100 service activities in excess of 3,000 hours to support affordable housing for low- and moderate-income individuals and communities.

### 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.

Further, section 1025 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203) assigns to the Consumer Financial Protection Bureau (CFPB) exclusive examination authority, and primary enforcement authority, to ensure compliance by banks with Federal consumer financial laws, if the bank has

## Institution

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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.

## ALABAMA

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**CRA RATING FOR ALABAMA:**            **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 adequate penetration throughout the assessment areas, and the distribution of loans by borrower income also reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank is a leader in making community development loans in its Alabama 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 Alabama assessment areas.
- Retail banking services are adequate in the bank's assessment areas.
- The bank is a leader in providing community development services throughout the Alabama assessment areas.

## ALABAMA

### SCOPE OF EXAMINATION

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

- Birmingham

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

- Daphne-Fairhope-Foley
- Huntsville
- Mobile
- Montgomery

The time period, products, and affiliates evaluated for these assessment areas 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, IBERIABANK had \$ 1.2 billion in deposits in Alabama accounting for 7.3 percent of the bank's total deposits. IBERIABANK operated 15 branch offices in Alabama as of December 31, 2016, representing 7.6 percent of the bank's total branches. HMDA-reportable lending in Alabama accounted for 8.7 percent of total institutional HMDA-reportable lending by number of loans, and CRA small business lending in Alabama accounted for 7.8 percent of the bank's total CRA small business lending. Overall, HMDA-reportable and CRA lending in Alabama accounted for 8.4 percent of the bank's total lending activity.

The following table shows lending activity from January 1, 2014 through December 31, 2016.

#### Statewide Summary of Lending Activity

Assessment Areas Located in  
AL STATE

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	1,853	45.6%	\$384,940	45.9%
HMDA Refinance	432	10.6%	\$124,394	14.8%
HMDA Home Improvement	242	6.0%	\$15,575	1.9%
HMDA Multi-Family	7	0.2%	\$51,447	6.1%
<b>Total HMDA</b>	<b>2,534</b>	<b>62.4%</b>	<b>\$576,356</b>	<b>68.8%</b>
<b>Total Small Business</b>	<b>1,499</b>	<b>36.9%</b>	<b>\$258,052</b>	<b>30.8%</b>
<b>Total Farm</b>	<b>27</b>	<b>0.7%</b>	<b>\$3,640</b>	<b>0.4%</b>
<b>TOTAL LOANS</b>	<b>4,060</b>	<b>100.0%</b>	<b>\$838,048</b>	<b>100.0%</b>

Originations and Purchases

## ALABAMA

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### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

#### **Lending Test**

The lending test rating in the State of Alabama is high satisfactory. Overall, performance in Alabama with regard to the geographic distribution of loans reflects adequate penetration throughout the assessment areas. The distribution of loans by borrower income also reflects adequate penetration among customers of different income levels and businesses of different sizes. Additionally, IBERIABANK is a leader in making community development loans in Alabama.

During the review period, IBERIABANK reported 2,534 HMDA-reportable loans and 1,499 small business loans in Alabama. As such, HMDA-reportable lending was given greater weight when determining the lending test rating for Alabama. The rating for Alabama is based on performance in the Birmingham full-scope assessment area, which accounts for 51.3 percent of the bank's HMDA-reportable and small business lending by number of loans and 45.3 percent by dollar volume in Alabama during the review period.

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 IBERIABANK's HMDA-reportable and small business loans is adequate, and the distribution of loans by borrower income and revenue size of businesses is also adequate. As noted above, the rating for the State of Alabama is derived from the Birmingham full-scope assessment area. A detailed discussion of the borrower and geographic distribution of lending for the Birmingham assessment area is included in the next section of this report.

#### ***Community Development Lending***

IBERIABANK is a leader in making community development loans in Alabama. The bank originated 16 community development loans totaling \$56.8 million in the Alabama assessment areas during the review period; in Birmingham, the only full-scope assessment area, the bank had 12 loans for \$38.8 million. Performance was excellent in Birmingham. The bank was considered responsive to the community credit needs in the state. Therefore, positive consideration was given to two loans totaling \$1.7 million to borrowers located in a broader statewide area, without a purpose, mandate or function of serving one of the Alabama assessment areas. The loans outside the bank's assessment areas provided financing for affordable housing for LMI individuals. Overall, this level of statewide community development lending is considered excellent relative to the bank's presence in the state. 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 Alabama is high satisfactory.

## ALABAMA

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IBERIABANK makes a significant level of qualified community development investments and grants in Alabama, occasionally in a leadership position. During the review period, IBERIABANK had qualified investments of \$23.6 million in the Alabama assessment areas, with 66.3 percent acquired during the current review period. In addition, the bank made 148 qualified contributions in the assessment areas for approximately \$652,700. The state investment rating also reflects 6 contributions totaling \$12,000 that benefit a broader statewide or regional area that includes the Alabama assessment areas.

Approximately 80.5 percent of combined investment and contribution activity occurred inside Birmingham, the bank's only full-scope assessment area in the state, compared to 57.7 percent of deposits in this market. In the bank's four limited-scope assessment areas, IBERIABANK demonstrated adequate performance. Overall, the bank exhibited good responsiveness to credit and community development needs in Alabama. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section.

A summary of the bank's investments and contributions for full-scope and limited-scope assessment areas can be found in Appendix F.

### **Service Test**

The service test rating for Alabama is high satisfactory.

### ***Retail Services***

Retail banking services are adequate in Alabama. The retail banking services rating consists of an evaluation of the bank's accessibility of delivery systems, changes in branch locations, and reasonableness of business hours and services in meeting assessment area needs. Additional detail on the bank's retail services can be found in the full-scope assessment area section.

### ***Community Development Services***

The bank is a leader in providing community development services that benefit residents and small businesses in the State of Alabama.

The bank provided a total of 3,347 qualified service hours during the examination period, including 1,559 hours in the Birmingham full-scope assessment area. Performance in Birmingham, the largest and only full-scope assessment area, was excellent. Additionally, employees engaged in 1,788 service hours in limited-scope assessment areas. The bank exhibited adequate performance in all limited-scope assessment areas, with the exception of Huntsville, which demonstrated good performance. As noted previously, the bank exited the Montgomery limited-scope assessment area during the review period. The community development service performance is considered excellent given IBERIABANK's size and presence in the State of Alabama.

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



## Birmingham, Alabama

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### METROPOLITAN AREA

*(Full Scope Review)*

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

##### Overview

The Birmingham assessment area includes two of the seven counties in the Birmingham MSA: Jefferson and Shelby. As of December 31, 2016, IBERIABANK operated nine branches inside the assessment area, which represent 60.0 percent of the branches statewide. In addition, 57.7 percent of the bank's statewide deposits are in this market. The assessment area represents the largest concentration of combined HMDA-reportable and CRA small business lending by dollar volume in the state at 45.3 percent.

The Birmingham assessment area is a highly competitive banking market. According to the June 30, 2016 FDIC Summary of Deposits Report, there were 37 financial institutions operating 263 branch offices inside the assessment area with a total of \$34.7 billion in deposits. Regions Bank, Compass Bank, and Wells Fargo Bank hold the largest share of deposits collectively at 65.2 percent. IBERIABANK ranks 10<sup>th</sup>, with \$685.0 million in deposits and nearly 2.0 percent of total deposits.

Wells Fargo, Regions Bank, and Quicken Loans are the three largest HMDA lenders in the Birmingham assessment area, with a combined 21.1 percent of total HMDA-reportable loans in 2015. IBERIABANK Mortgage ranked 17<sup>th</sup> and IBERIABANK ranked 50<sup>th</sup> in 2015, and combined reported 1.8 percent of HMDA loans. In 2014 and 2015, the bank's percentage of total loans was similar; however, the volume of the bank's HMDA-reportable loans increased by 16.1 percent in 2015. Overall, there were 419 lenders in the market in 2015.

CRA small business lending is also highly competitive. In 2014 and 2015, IBERIABANK ranked 17<sup>th</sup> and had 1.5 percent of total CRA loans. The assessment area lending was dominated by American Express, Wells Fargo Bank and Regions Bank. There were 101 CRA reporters in the market in 2015.

##### Population and Income Characteristics

The assessment area population increased by 1.9 percent from 2010 to 2016, reaching an estimated 870,143 residents as of July 2016.<sup>3</sup> The majority of the growth, however, occurred in suburban locations such as Shelby County, which grew by more than 7.9 percent. The state's population also grew by 1.7 percent. Jefferson County, home to the city of Birmingham, is the most populous county in the state. It is important to note, though, that the city of Birmingham has experienced population loss for decades.

The assessment area is made up of 211 census tracts: 25 tracts are low-income (11.8 percent), 47 tracts are moderate-income (22.3 percent), 67 tracts are middle-income (31.8 percent), 71 tracts are upper-income (33.6 percent), and 1 tract has an unknown income level (0.5 percent).

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<sup>3</sup> QuickFacts. US Census Bureau, n.d. Web. 20 July 2017. <http://quickfacts.census.gov>

## Birmingham, Alabama

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Birmingham-Hoover MSA. As shown, the median family income increased from \$61,000 in 2014 to \$62,500 in 2016. Data shows that the median family income was considerably higher in Shelby County (\$84,311) than in Jefferson County (\$60,367) in 2015.<sup>4</sup> In addition, 37.3 percent of families in the assessment area are considered low- to moderate-income (LMI).<sup>5</sup>

### Borrower Income Levels Birmingham-Hoover, AL MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2014</b>	<b>\$61,000</b>	0 - \$30,499	\$30,500 - \$48,799	\$48,800 - \$73,199	\$73,200 - & above
<b>2015</b>	<b>\$62,500</b>	0 - \$31,249	\$31,250 - \$49,999	\$50,000 - \$74,999	\$75,000 - & above
<b>2016</b>	<b>\$62,500</b>	0 - \$31,249	\$31,250 - \$49,999	\$50,000 - \$74,999	\$75,000 - & above

Poverty is a significant problem in the assessment area, particularly in Jefferson County. The percentage of people living below the federal poverty line in Jefferson County was 18.1 percent between 2012 and 2016, while 8.3 percent of residents in Shelby County lived in poverty.<sup>6</sup> The statewide rate is 18.4 percent. In addition, a significant percentage of families in LMI areas live below the poverty level. Specifically, 33.1 percent of families living in low-income census tracts live below the poverty level, and 18.3 percent of families living in moderate-income census tracts live below the poverty level.<sup>7</sup>

### Economic Conditions

Birmingham was historically a manufacturing-based economy driven primarily by the iron and steel industry. Today, the economy has transitioned to a diversified service-based economy with only 7.0 percent of total employment in manufacturing. The top private employment sectors include wholesale and retail trade, education and health services, and professional and business services.<sup>8</sup> Government agencies also account for a significant share of employment in the region. The University of Alabama at Birmingham is the major economic driver and the largest employer in the region with 23,000 employees. Other major employers include Regions Financial Corp., St. Vincent's Health System, Baptist Health System, Inc., AT&T and Children's of

<sup>4</sup> "Birmingham, AL (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017.

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

<sup>5</sup> FRB Atlanta Calculations of 2015 Census Data

<sup>6</sup> "Birmingham, AL (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017.

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

<sup>7</sup> FRB Atlanta Calculations of 2015 Census Data

<sup>8</sup> "Comprehensive Housing Market Analysis: Birmingham, Alabama." Office of Policy Development and Research. U.S. Department of Housing and Urban Development, 1 May 2016. Web. 24 Jul.2017. [https://www.huduser.gov/portal/ushmc/chma\\_archive.html](https://www.huduser.gov/portal/ushmc/chma_archive.html)

## Birmingham, Alabama

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Alabama.<sup>9</sup> The Birmingham region is also experiencing new investment and economic development. According to the Birmingham Business Alliance, Birmingham received nearly \$1.1 billion in new capital investments in 2015, and over 3,500 new jobs were announced. The new jobs provide a range of opportunities for employees at different wage levels.<sup>10</sup>

In terms of economic conditions for small businesses, the entrepreneurial community is also growing. Innovation Depot, a nationally recognized business and technology incubator, serves over 100 companies that provided over 800 jobs in 2015.<sup>11</sup> Innovation Depot continues to generate new businesses and partnerships that are helping position the city as an entrepreneurial center. There were 36,775 businesses within the Birmingham assessment area, 88.5 percent of which had total annual revenues less than or equal to \$1 million.<sup>12</sup> Additionally, 15.7 percent of small businesses in the assessment area were located in moderate-income tracts, while there were far fewer in low-income tracts at 9.2 percent. Lending opportunities to this segment have remained stable between 2012 and 2015 in the assessment area, with nearly 15,200 loans made in 2015.<sup>13</sup> During this same period, loans made to firms with revenues of \$1.0 million or less represented nearly 55.0 percent of total small business loans, which is higher than previous years. This may be an indication that there may be fewer obstacles for smaller firms to access credit in the market.

Economic conditions have improved in the Birmingham-Hoover MSA, with new jobs and declining unemployment over the review period. Job growth has been driven primarily by professional and business services and education and health services sectors. As shown in the following table, the unemployment rate in the Birmingham MSA fell from 6.0 percent in 2014 to 5.5 percent in 2016, which is still above the national rate at 5.0 percent for this period but below the statewide unemployment rate of 6.0 percent.<sup>14</sup> While the unemployment rate in Shelby County is lower than the region and the state, the legacy steel industry continues to place a drag on Jefferson County and its economic condition. In 2015, for example, US Steel announced that it was permanently closing a blast furnace in Fairfield, Alabama, a suburb of Birmingham. In total, about 1,100 people were laid off as a result of this decision.<sup>15</sup>

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<sup>9</sup> Ibid

<sup>10</sup> Poe, Kelly. "Birmingham Got \$1.1 Billion in Capital Investment in 2015, Report Says." AL.com. Alabama Media Group, 17 Aug. 2015. Web. 25 July 2017. [http://www.al.com/business/index.ssf/2016/04/birmingham\\_got\\_11\\_billion\\_in\\_c.html](http://www.al.com/business/index.ssf/2016/04/birmingham_got_11_billion_in_c.html)

<sup>11</sup> 2015 Annual Report. Rep. Innovation Depot, n.d. Web. 25 July 2017. [https://issuu.com/innovationdepot/docs/id\\_annualreport\\_issuu/1](https://issuu.com/innovationdepot/docs/id_annualreport_issuu/1)

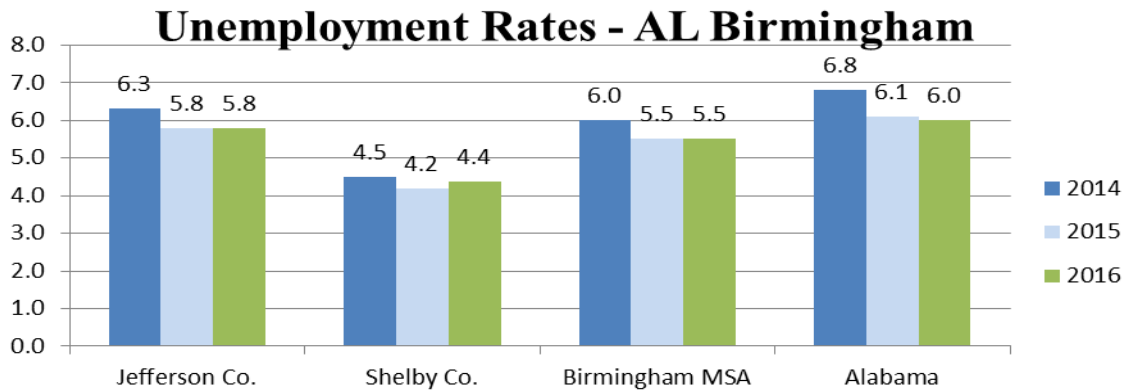
<sup>12</sup> FRB Atlanta Calculations of 2015 Dun & Bradstreet, 2010 American Community Survey data.

<sup>13</sup> "Birmingham, AL (CRA Loan Data)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 24 Jul. 2017. <http://www.policymap.com/>

<sup>14</sup> "At a Glance Tables." U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 24 July 2017. <http://www.bls.gov/eag/home.htm>

<sup>15</sup> Poe, Kelly. "US Steel Closing Blast Furnace at Fairfield Permanently." AL.com. Alabama Media Group, 17 Aug. 2015. Web. 25 July 2017. [http://www.al.com/business/index.ssf/2015/08/us\\_steel\\_closing\\_blast\\_furnace.html](http://www.al.com/business/index.ssf/2015/08/us_steel_closing_blast_furnace.html)

## Birmingham, Alabama



Census data indicates there were 378,943 housing units located in the assessment area, of which 61.2 percent were owner-occupied, 26.5 percent were rental units, and 12.3 percent were vacant. Rental and vacant units were more concentrated in low- and moderate-income tracts. The median age of the housing stock was 34 years, though housing was much older in the low- and moderate-income census tracts (53 years and 40 years, respectively) compared to the assessment area overall. In low-income census tracts, approximately 67.0 percent of all housing units were rentals or vacant; in moderate-income census tracts, nearly 55.0 percent of the units were rental or vacant. These factors suggest that HMDA-reportable lending opportunities in the low- and moderate-income tracts may be limited.

The Birmingham housing market has been generally improving since 2011. According to the Alabama Center for Real Estate, home sales in the Birmingham metro area (Jefferson, Shelby, St. Clair and Blount counties) increased by 23.8 percent between 2013 and 2016 while the median home price increased by 11.8 percent to \$183,396, a record-high for the area.<sup>16</sup> In terms of affordability, the Birmingham assessment area had a Housing Affordability Index (HAI) of 161.0 as of December 2016.<sup>17 18</sup> However, for lower-wage workers, housing costs are a challenge. For example, only 11.0 percent and 23.9 percent of all homes in Shelby County and Jefferson County, respectively, are likely affordable for a four-person family earning 50.0 percent of the area median income in 2015.<sup>19</sup> Finally, the percentage of seriously delinquent mortgages, (defined as more than 90 days past due or in foreclosure) continued to decline across the assessment area during the review period; however, delinquency rates were 4.0 percent in Jefferson County and 2.0 percent in Shelby County as of December 2016.<sup>20</sup>

<sup>16</sup> Birmingham Metro Residential Real Estate: Annual Trends Report. Rep. Alabama Center for Real Estate, UAB, n.d. Web. 25 July 2017. <acre.culverhouse.ua.edu>

<sup>17</sup> Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic

<sup>18</sup> The affordability index measures how affordable the median home price is to households earning the median income, assuming current mortgage rates. A baseline of 100 indicates that median home prices are in line with median household income; an index greater than 100 indicates the housing is more affordable. Jefferson has an HAI of 136 and Shelby has an HAI of 186. Source: Federal Reserve Bank of Atlanta calculations of data provided by Moody's Analytics.

<sup>19</sup> "Birmingham, AL (HUD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>20</sup> Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic.

## Birmingham, Alabama

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The improving housing market is further evidenced in the increase in home purchase lending volume. An analysis of HMDA-reportable lending indicates that the number of home purchase loans increased by 18.6 percent between 2013 and 2015; however, loan originations to borrowers earning 50.0 to 80.0 percent of the area median income declined by 4.9 percent over the same time period, which indicates housing affordability and financing for low- and moderate-income borrowers may be a growing concern.<sup>21</sup>

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 as a result of decades of population loss and the more recent foreclosure crisis. Birmingham city officials have identified nearly 16,000 abandoned properties and vacant lots that need to be demolished or cleared in order to spur redevelopment.<sup>22</sup> These properties are concentrated in the city's low- and moderate-income neighborhoods and have a destabilizing effect on the surrounding communities. To help address this issue, the city created a new land bank authority in 2014, which will bundle vacant and blighted properties and offer the land to entities for redevelopment.<sup>23</sup>

### 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.

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<sup>21</sup> "Birmingham, AL (HMDA Data)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>22</sup> 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](http://www.al.com/news/birmingham/index.ssf/2015/07/birmingham_has_a_45_million_pr.html)

<sup>23</sup> 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](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	11.8	17,911	8.1	5,928	33.1	46,278	21
Moderate-income	47	22.3	38,153	17.3	6,968	18.3	35,992	16.3
Middle-income	67	31.8	71,561	32.5	6,432	9	41,212	18.7
Upper-income	71	33.6	92,690	42.1	2,648	2.9	96,833	44
Unknown-income	1	0.5	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>211</b>	<b>100.0</b>	<b>220,315</b>	<b>100.0</b>	<b>21,976</b>	<b>10.0</b>	<b>220,315</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	39,955	13,121	5.7	32.8	17,881	44.8	8,953	22.4
Moderate-income	76,732	34,336	14.8	44.7	28,346	36.9	14,050	18.3
Middle-income	122,026	78,838	34	64.6	29,804	24.4	13,384	11
Upper-income	140,230	105,486	45.5	75.2	24,388	17.4	10,356	7.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>378,943</b>	<b>231,781</b>	<b>100.0</b>	<b>61.2</b>	<b>100,419</b>	<b>26.5</b>	<b>46,743</b>	<b>12.3</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	3,377	9.2	2,808	8.6	545	13.8	24	7.9
Moderate-income	5,784	15.7	4,981	15.3	751	19.1	52	17
Middle-income	10,149	27.6	9,086	27.9	967	24.6	96	31.5
Upper-income	17,458	47.5	15,651	48.1	1,674	42.5	133	43.6
Unknown-income	7	0	7	0	0	0	0	0
<b>Total Assessment Area</b>	<b>36,775</b>	<b>100.0</b>	<b>32,533</b>	<b>100.0</b>	<b>3,937</b>	<b>100.0</b>	<b>305</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.5</b>		<b>10.7</b>		<b>.8</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	18	8.3	17	8.3	1	8.3	0	0
Middle-income	67	31	61	29.9	6	50	0	0
Upper-income	130	60.2	125	61.3	5	41.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>216</b>	<b>100.0</b>	<b>204</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>94.4</b>		<b>5.6</b>		<b>.0</b>

## Birmingham, Alabama

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### Credit and Community Development Needs

Access to quality, affordable rental housing and 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 Neighborhood 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 a down payment assistance program to help them transition out of rental housing to homeownership.<sup>24</sup> Another opportunity identified is increasing the supply of rental housing that is affordable to a large segment of the Birmingham workforce. Only 28.1 percent of all rental units in Shelby County and 43.5 percent of rental units in Jefferson County are affordable to low-income families.<sup>25</sup> The City's public housing authority is the primary provider of housing for those having the lowest income. Yet as of July 2014, nearly 5,200 families were on the waiting list for public housing units or Section 8 tenant-based assistance.<sup>26</sup> Therefore, increasing housing for the very-low and low-income households is a significant need.

Community revitalization and stabilization is one of the biggest 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, as noted earlier, created a land bank to try to move blighted properties back into productive use. Birmingham has also targeted federal funds to address the high concentration of blighted and vacant housing in LMI communities and to increase the supply of quality affordable housing units in these areas.<sup>27</sup> A significant challenge for the city, however, is determining how best to use limited resources. Because the volume of vacant properties far exceeds the city's resources for blight remediation, the city continues to work on a strategy to equitably distribute resources while still aiming to have an impact on neighborhoods with opportunity.<sup>28</sup> Financial institutions can determine their level of involvement while working in leadership or technical assistance capacities with organizations, committees, and work groups that are undertaking these issues.

Community contacts and bank management familiar with the economic conditions of the Birmingham assessment area were also utilized for this evaluation to help examiners gain insight regarding the credit needs and economic conditions of the area. Community contacts specializing in small business development perceive credit access to be still limited. Specifically, small dollar loans are very challenging to obtain, and there is a perception in the community that the large banks have very little appetite for this type of lending. In addition, another community contact noted that small business owners need more technical assistance to help position them for traditional bank financing, and that banks should invest more time in building direct relationships with traditionally disadvantaged businesses.

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<sup>24</sup> *City of Birmingham Housing and Neighborhood Study*. Rep. City of Birmingham, Dec. 2014. Web. 26 July 2017.  
[http://www.imaginebham.com/uploads/1/4/4/7/14479416/2014\\_birmingham\\_housing\\_and\\_neighborhood\\_study.pdf](http://www.imaginebham.com/uploads/1/4/4/7/14479416/2014_birmingham_housing_and_neighborhood_study.pdf)

<sup>25</sup> Birmingham, AL assessment area (U.S. Census Bureau). US Department of Housing and Urban Development, n.d. Web. 03 Jan. 2018.  
<http://www.policymap.com/>

<sup>26</sup> *City of Birmingham Housing and Neighborhood Study*. Rep. City of Birmingham, Dec. 2014. pp. 67. Web. 26 July 2017.  
[http://www.imaginebham.com/uploads/1/4/4/7/14479416/2014\\_birmingham\\_housing\\_and\\_neighborhood\\_study.pdf](http://www.imaginebham.com/uploads/1/4/4/7/14479416/2014_birmingham_housing_and_neighborhood_study.pdf)

<sup>27</sup> *City of Birmingham Consolidated Plan 2010-2015*. Rep. City of Birmingham, n.d. Web 26 July 2017.  
<https://www.birminghamal.gov/work/birmingham-comprehensive-plan/>

<sup>28</sup> *City of Birmingham Housing and Neighborhood Study*. Rep. City of Birmingham, Dec. 2014. Web. 26 July 2017.  
[http://www.imaginebham.com/uploads/1/4/4/7/14479416/2014\\_birmingham\\_housing\\_and\\_neighborhood\\_study.pdf](http://www.imaginebham.com/uploads/1/4/4/7/14479416/2014_birmingham_housing_and_neighborhood_study.pdf)

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In addition, there are opportunities for banks to provide more support for small businesses by investing and partnering in organizations that provide financing assistance, such as community development financial institutions (CDFIs). A community contact stated that the best opportunity for banks to partner with CDFIs was by referring denied loan applicants to a local CDFI. The contact felt CDFIs were underutilized largely because they do not have access to a pipeline of customers. Beyond CDFIs, a community contact stated there were real opportunities for banks to partner with micro-lenders and to help expand access to this type of lending that is largely absent in the market.

Another community contact noted a concern with workforce development. In particular, the contact expressed some concern that certain segments of the population would not be able to transition into jobs with many of the region's burgeoning technology start-ups or into different work segments effectively without additional sources of training. This creates an additional opportunity for bank participation through lending, investment, and service opportunities with workforce development providers.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BIRMINGHAM, ALABAMA ASSESSMENT AREA**

#### **LENDING TEST**

IBERIABANK's lending performance in the Birmingham assessment area is good. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of loans also reflects adequate 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.

A majority of the bank's Alabama branches, deposits, and lending are located inside the Birmingham full-scope assessment area. IBERIABANK reported 1,367 (66.1 percent) HMDA-reportable loans and 701 (33.9 percent) CRA small business loans in the Birmingham assessment area during the review period. As such, HMDA-reportable lending received greater weight in determining the bank's lending test rating in the assessment area. The Birmingham assessment area accounted for 45.3 percent of IBERIABANK's total HMDA-reportable and small business lending by dollar volume in Alabama during the review period. In comparison, 57.7 percent of IBERIABANK's statewide 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.



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### *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, IBERIABANK's geographic distribution of loans reflects adequate penetration throughout the assessment area.

### Home Purchase Loans

IBERIABANK originated only six home purchase loans in low-income census tracts during the review period. Aggregate lenders also exhibited low lending levels for home purchase loans compared to the percentage of owner-occupied units in low-income census tracts. There are 25 low-income tracts in this assessment area, with only 5.7 percent of owner-occupied units. In addition, the demographic table for the Birmingham assessment area shows that 33.1 percent of the families in low-income census tracts live below the poverty level and that 44.8 percent of housing units in low-income tracts are rental and 22.4 percent are vacant. The opportunity for lending in low-income census tracts appears to be limited given the relatively small percentage of owner-occupied housing units, the high level of poverty in the low-income tracts, and the lack of lending by the aggregate lenders. As such, an evaluation of home purchase lending in low-income tracts was not considered in the lending test rating for this assessment area.

Home purchase lending in moderate-income census tracts is adequate. During the review period, 7.2 percent of the bank's loans were originated in moderate-income census tracts. This level of lending was considerably less than the 14.8 percent of owner-occupied units in moderate-income census tracts. However, the bank's performance exceeded aggregate lenders in 2014 and was similar to aggregate lending performance in 2015.

### Home Refinance Loans

Home refinance lending in low-income census tracts is poor. IBERIABANK originated only two home refinance loans in low-income census tracts in 2014 and no loans in 2015 and 2016. This level of lending represented 1.0 percent of the bank's home refinance loans in the assessment area, which was considerably less than the 5.7 percent level of owner-occupied units in low-income census tracts. Although the bank's performance exceeded aggregate lenders in low-income tracts in 2014, performance was less than aggregate lenders in 2015 with no loans.

Home refinance lending in moderate-income census tracts is adequate. The percentage of home refinance loans originated in moderate-income census tracts was less than the percentage of owner-occupied units in these tracts; however, performance exceeded aggregate lending in 2014 and was similar to aggregate lending in 2015.

### Home Improvement Loans

Home improvement lending in low-income census tracts is poor based on limited production of six loans in the assessment area during the review period. The percentage of home improvement loans in low-income census

## Birmingham, Alabama

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tracts at 3.1 percent was less than the percentage of owner-occupied units at 5.7 percent in these tracts. The bank's performance was also less than the aggregate lending performance in years 2014 and 2015.

Home improvement lending in moderate-income census tracts is adequate. The percentage of home improvement loans originated in moderate-income census tracts at 11.8 percent was less than the percentage of owner-occupied units at 14.8 percent in these tracts. Performance exceeded aggregate in 2014 and was less than aggregate lending in 2015. The assessment area has a high concentration of blighted and vacant housing in LMI communities. The Birmingham demographic table shows that 55.2 percent of all housing units in moderate-income tracts were rental or vacant. These factors suggest home improvement lending opportunities may be limited.

### Small Business Loans

Small business lending in low-income census tracts is excellent. IBERIABANK originated 11.0 percent of its small business loans in low-income tracts, which was greater than the percentage of small businesses located in these tracts at 8.6 percent. IBERIABANK also outperformed aggregate lenders in years 2014 and 2015.

Small business lending in moderate-income census tracts is good. The percentage of small business loans in moderate-income tracts was slightly above the percentage of small businesses located in these tracts. Additionally, the bank's performance was greater than aggregate lending performance in years 2014 and 2015.

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

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

### Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. While the percentage of home purchase loans to low-income borrowers was less than the percentage of low-income families located in the assessment area, IBERIABANK's lending performance was comparable to aggregate lending performance in 2014 and only slightly less than aggregate in 2015.

Home purchase lending to moderate-income borrowers is good. The bank's percentage of home purchase loans was greater than the percentage of moderate-income families located in the assessment area. The bank's home purchase lending was also greater than the aggregate lending performance in years 2014 and 2015.

### Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. The bank's percentage of home refinance loans to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. However, IBERIABANK's lending exceeded the aggregate lenders in years 2014 and 2015.

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Home refinance lending to moderate-income borrowers is also adequate. The bank's home refinance lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area. However, lending to moderate-income borrowers was greater than the aggregate lenders in 2014, and slightly less than aggregate in 2015.

### Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. The bank's home improvement lending to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. The bank's lending performance was comparable to aggregate lenders in 2014 and slightly less than aggregate in 2015.

### Small Business Loans

The distribution of small business loans to businesses of different sizes is good. The bank's lending to small businesses exceeded the aggregate in both 2014 and 2015, but was below the percentage of small businesses in the assessment area during the review period. Furthermore, of the 701 small business loans originated during the review period, 581 (82.8 percent) were in amounts of \$250,000 or less, which typically represent loan amounts requested by very small businesses.

### ***Community Development Lending***

IBERIABANK is a leader in making community development loans in the Birmingham assessment area. The bank originated 12 community development loans totaling \$38.8 million during the review period. Loans were responsive to multiple community development needs in the assessment area, including providing affordable housing or community services targeted to LMI individuals, promoting economic development by financing small business, and revitalizing or stabilizing LMI geographies.

Revitalization of the Central Business District in Birmingham is a high priority for the city of Birmingham and a number of local nonprofit organizations. To support this community need, the bank provided \$28.8 million to help revitalize and stabilize LMI geographies, particularly in downtown Birmingham. In addition, the bank provided \$5.5 million supporting community services to LMI individuals, including essential services such as affordable health care and early childhood education; \$4.0 million to support affordable housing; and \$500,000 towards economic development activities.

IBERIABANK's community development lending exhibits excellent responsiveness to the community development and credit needs relative to the bank's presence in the assessment area.

Examples of community development lending include but are not limited to:

- Three loans totaling nearly \$10.0 million to support the redevelopment of a historic department store located in an area targeted for revitalization in downtown Birmingham. The project leverages both New Market Tax Credits and Historic Tax Credits and is consistent with the goals of the revitalization plan for the downtown area, including eliminating blight through the productive re-use of a vacant property;

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promoting economic development by creating or retaining full-time jobs; and retaining and expanding businesses in the downtown area. The completed project will include a food market, office space, and 143 multifamily rental units with a 20 percent set-aside for low- to moderate- income tenants.

- A \$7.4 million loan to fund pre-development costs for a redevelopment project located in a low-income tract in downtown Birmingham. The project includes space for a supermarket, which will be the first supermarket opened in downtown Birmingham in decades. This area is considered a USDA designated food desert, and revitalization plans for the downtown area focus on developing or attracting services to support new residents, including a supermarket. Therefore, this loan is considered highly responsive to an identified community need.
- Two loans totaling \$11.4 million loan to support the revitalization of a vacant property located in a moderate-income tract and within the 19th Street North Commercial Revitalization District in downtown Birmingham. The redeveloped building will be a mixed use facility, with retail and office space, which will help attract new and retain existing businesses to the area.
- A \$4.0 million loan to finance the construction of a 42-unit LIHTC apartment complex for senior citizens in Birmingham and provide permanent mortgage financing upon completion of the improvements. This project is meeting a need for affordable housing for seniors in Birmingham. In addition, the bank will invest in this project by purchasing the tax credits.
- A \$500,000 loan to a national CDFI that promotes economic development by assisting entrepreneurs who are underserved by conventional banks with small business and micro loans, as well as by providing technical support. The bank's loan provides funding for the CDFI to make loans in the Birmingham assessment area and responds to a need identified by community contacts for small dollar loans for small businesses.
- A \$350,000 line of credit to a nonprofit Federally Qualified Health Center located in a low-income community. The health center provides affordable primary medical and dental services to underserved, uninsured residents in Jefferson County.

### **INVESTMENT TEST**

IBERIABANK makes a significant level of qualified investments and grants relative to the bank's presence in the Birmingham assessment area; investments and contributions demonstrate responsiveness to certain identified assessment area needs, namely affordable housing and small business assistance. Combined investment and contribution activity inside the assessment area totaled \$19.5 million, or 80.5 percent of total investment activity for the state.

The bank made investments (excluding contributions) totaling \$19.0 million in the assessment area; of that, \$12.2 million was invested during the review period. The bank was responsive to the need across the region for affordable rental housing, including \$7.5 million in two LIHTC projects that provided 98 new affordable units for senior citizens. Also, the bank invested \$1.0 million in a Ginnie Mae Project Loan for two multifamily housing projects, representing 200 income-restricted units. The other current period investments were mortgage-backed securities. All prior period investments provided financing for affordable multifamily housing through investments in a LIHTC project and mortgage-backed securities.

## Birmingham, Alabama

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IBERIABANK also contributed \$470,900 to nonprofit organizations during the review period. The majority of the contributions supported community services, including \$190,000 to United Way for programs targeting LMI individuals and \$30,000 to an LMI preschool readiness program. Other community services contributions supported organizations focused on youth services, homelessness, and family wellness and stability initiatives. IBERIABANK was responsive to affordable housing needs in the assessment area with 28 mortgage grants totaling \$56,000 for down payment assistance and closing costs. In addition, the bank was particularly responsive to small business needs, including a significant donation to an organization that provides financing and technical assistance to small businesses. As noted earlier, the bank also made \$12,000 in contributions that served a broader regional area that includes Birmingham, in response to community development needs such as financial stability efforts.

### **SERVICE TEST**

IBERIABANK's service test performance in the Birmingham assessment area is good based on the bank's retail banking services and the relatively high level of community development services.

#### ***Retail Services***

Retail banking services are adequate in the Birmingham full-scope assessment area.

The distribution of 9 branch offices and 11 ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. The percentage of branches in low-income tracts slightly exceeded the percentage of households and businesses in the same geography; 9.3 percent of households and 9.2 percent of businesses were located in low-income census tracts compared to 11.1 percent of the bank's branches. The distribution of the bank's branches in moderate-income tracts, however, was lower than the percentage of households and businesses in the same geography; 11.1 percent of total branches were in moderate-income tracts compared to 18.9 percent of households and 15.7 percent of businesses. Due to the limited number of branches in LMI geographies, delivery systems are considered inaccessible to portions of IBERIABANK's geographies and individuals of different income levels.

During the examination period, the bank opened a branch and a full-service ATM in a low-income tract. The bank did not close any branches or full-service ATMs. 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.

Bank products, services and business hours are consistent throughout the assessment area. The bank does not offer extended hours or weekend hours at any of its branches. In general, 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: AL Birmingham

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	
	#	%						#	%	#	%	#	%	#	%	#	%	#	%			#
Low	1	11.1%	1	0	0	0	0	Total	2	18.2%	2	18.2%	1	0	0	0.0%	0	0	25	11.8%	9.3%	9.2%
DTO	0		0	0				SA	1		1		0	0	0		0	0				
Moderate	1	11.1%	0	0	0	0	0	Total	1	9.1%	1	9.1%	0	0	0	0.0%	0	0	47	22.3%	18.9%	15.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	2	22.2%	0	0	2	0	0	Total	2	18.2%	2	18.2%	0	0	0	0.0%	0	0	67	31.8%	32.7%	27.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	5	55.6%	0	0	5	0	0	Total	6	54.5%	6	54.5%	0	0	0	0.0%	0	0	71	33.6%	39.1%	47.5%
DTO	0		0	0				SA	1		1		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	0.5%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	9	100.0%	1	0	7	0	0	Total	11	100.0%	11	100.0%	1	0	0	0.0%	0	0	211	100.0%	100.0%	100.0%
DTO	0		0	0				SA	2		2		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

IBERIABANK is considered a leader in providing community development services in the Birmingham assessment area. Employees provided 1,559 service hours to qualified organizations by participating in 43 different community development services.

IBERIABANK's community development service activities benefitted organizations that provide affordable housing, community services, economic development, and revitalization and stabilization activities for low- and moderate-income individuals, geographies and small businesses in the Birmingham assessment area. Of the bank's total 1,559 service hours, 179 hours were committed to youth financial education, 221 hours supported adult financial education, and 1,085 hours consisted of board or committee service to various qualified nonprofit organizations.

Highlighted below are examples of community development services considered responsive during the review period:

- Bank employees engaged in United Way service leadership, such as grant allocation committees and financial education to United Way's individual development account (IDA) participants.
- Bank employees provided financial education and expertise in support of a small business resource center.
- A bank leader served as a Steering Committee member for the City of Birmingham, assisting with neighborhood and community development planning priorities for the city's Comprehensive Plan.

Overall, the bank's activities demonstrated excellent responsiveness to identified community development needs in the Birmingham assessment area, particularly in light of the bank's low market share and limited branch network in the assessment area.

## Metropolitan Areas (Limited Review)

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

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

- **Daphne-Fairhope-Foley Assessment Area (Baldwin County)**
  - As of December 31, 2016, IBERIABANK operated one branch in the assessment area, representing 6.7 percent of its branches in Alabama.
  - As of June 30, 2016, the bank had \$55.7 million in deposits in this assessment area, representing a market share of 1.4 percent and 4.7 percent of IBERIABANK's total deposits in Alabama.
- **Huntsville Assessment Area (Madison County)**
  - As of December 31, 2016, IBERIABANK operated three branches in the assessment area, representing 20.0 percent of its branches in Alabama.
  - As of June 30, 2016, the bank had \$167.4 million in deposits in this assessment area, representing a market share of 2.5 percent and 14.1 percent of IBERIABANK's total deposits in Alabama.
- **Mobile Assessment Area (Mobile County)**
  - As of December 31, 2016, IBERIABANK operated two branches in the assessment area, representing 13.3 percent of its branches in Alabama.
  - As of June 30, 2016, the bank had \$178.0 million in deposits in this assessment area, representing a market share of 2.7 percent and 15.0 percent of IBERIABANK's total deposits in Alabama.
- **Montgomery Assessment Area (Autauga, Elmore, Lowndes, and Montgomery counties)**
  - As of December 31, 2016, IBERIABANK operated no branch offices in the assessment area. The bank exited this market in November 2015.
  - As of June 30, 2016, the bank had \$100.1 million in deposits in this assessment area, representing a market share of 1.3 percent and 8.4 percent of IBERIABANK's total deposits in Alabama.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

## Metropolitan Areas (Limited Review)

<b>Metropolitan Assessment Areas</b>			
<b>Assessment Areas</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Daphne-Fairhope-Foley	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Huntsville	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Mobile	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Montgomery	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)

For the lending test, IBERIABANK received a high satisfactory rating for the State of Alabama. Although performance in all of the metropolitan limited-scope assessment areas was weaker than the statewide lending test performance, each of these assessment areas, with the exception of Daphne-Fairhope-Foley and Montgomery, was considered adequate. Weaker performance was primarily attributable to the poor geographic distribution of HMDA-reportable loans and the overall poor borrower distribution of both small business and HMDA-reportable loans in all four assessment areas. The absence of community development lending in the Daphne-Fairhope-Foley and Montgomery assessment areas was also a factor in the weaker performance for these two assessment areas.

For the investment test, IBERIABANK received a high satisfactory rating for the State of Alabama. Performance in all metropolitan assessment areas was weaker than the statewide performance due to lower levels of investment activity relative to the bank’s operational presence, primarily in the Huntsville, Mobile, and Montgomery assessment areas. The Daphne-Fairhope-Foley assessment area exhibited limited responsiveness and was therefore considered to have performance below the state.

For the service test, IBERIABANK received a rating of high satisfactory for the State of Alabama. Service test performance in all metropolitan assessment areas was below the state performance, primarily due to weaker retail delivery and community development services. The bank exited the Montgomery market during the examination period.

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



## ARKANSAS

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**CRA RATING FOR ARKANSAS: SATISFACTORY**

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

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

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

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects adequate 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 Arkansas 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 Arkansas assessment areas.
- Retail banking services are adequate in the bank's assessment areas.
- The bank provides a relatively high level of community development services throughout the Arkansas assessment areas.

## ARKANSAS

### SCOPE OF EXAMINATION

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

- Little Rock

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

- Fayetteville
- Jonesboro
- Northeast Arkansas (non-MSA)

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

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN ARKANSAS

As of June 30, 2016, IBERIABANK had \$1.2 billion in deposits in Arkansas accounting for 7.2 percent of the bank's total deposits. IBERIABANK operated 23 branch offices in Arkansas as of December 31, 2016, representing 11.6 percent of the bank's total branches. HMDA-reportable lending in Arkansas accounted for 23.3 percent of total institutional HMDA-reportable lending by number of loans, and CRA small business lending in Arkansas accounted for 11.8 percent of the bank's total CRA small business lending. Overall, HMDA-reportable and CRA lending in Arkansas accounted for 18.7 percent of the bank's total lending activity.

The following table shows lending activity from January 1, 2014, through December 31, 2016.

#### Statewide Summary of Lending Activity Assessment Areas Located in AR STATE

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	4,611	50.1%	\$789,038	59.3%
HMDA Refinance	1,190	12.9%	\$230,657	17.3%
HMDA Home Improvement	960	10.4%	\$26,726	2.0%
HMDA Multi-Family	9	0.1%	\$3,340	0.3%
<b>Total HMDA</b>	<b>6,770</b>	<b>73.6%</b>	<b>\$1,049,761</b>	<b>78.9%</b>
<b>Total Small Business</b>	<b>2,263</b>	<b>24.6%</b>	<b>\$260,810</b>	<b>19.6%</b>
<b>Total Farm</b>	<b>170</b>	<b>1.8%</b>	<b>\$20,164</b>	<b>1.5%</b>
<b>TOTAL LOANS</b>	<b>9,203</b>	<b>100.0%</b>	<b>\$1,330,735</b>	<b>100.0%</b>

Originations and Purchases

## ARKANSAS

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### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

#### Lending Test

The lending test rating in the State of Arkansas is high satisfactory. Overall, performance in Arkansas with regard to the geographic distribution of loans reflects adequate 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, IBERIABANK makes a relatively high level of community development loans in Arkansas.

During the review period, IBERIABANK reported 6,770 HMDA-reportable loans and 2,263 small business loans in Arkansas. As such, HMDA-reportable lending was given greater weight when determining the lending test rating for Arkansas. The rating for Arkansas is based on performance in the Little Rock full-scope assessment area, which represents 40.9 percent of the bank's HMDA-reportable and small business lending by number of loans and 39.2 percent by dollar volume in Arkansas during the review period.

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 IBERIABANK's HMDA-reportable and small business loans is adequate, and the distribution of loans by borrower income and revenue size of businesses is good. As noted above, the rating for the State of Arkansas is derived from the Little Rock assessment area. A detailed discussion of the borrower and geographic distribution of lending for the Little Rock assessment area is included in the next section of this report.

#### *Community Development Lending*

IBERIABANK makes a relatively high level of community development loans in Arkansas. The bank originated 22 community development loans totaling \$36.7 million across the state during the review period; in Little Rock, the only full-scope assessment area, the bank had 14 loans for \$17.1 million. Additionally, the bank made a \$5.0 million line of credit (that was renewed twice during the review period) to a statewide CDFI that provides an alternative source of financing for small businesses across the state, including all of the bank's assessment areas. Overall, this level of statewide community development lending is considered good relative to the bank's presence in the state.

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 Arkansas is high satisfactory.

IBERIABANK makes a significant level of qualified community development investments and grants in Arkansas. During the review period, IBERIABANK had qualified investments of \$19.5 million in the Arkansas assessment areas, with nearly 60.0 percent acquired during the current review period. In addition, the bank

## ARKANSAS

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made 117 qualified contributions in the assessment areas for approximately \$400,190. The state investment rating also reflects a \$1.0 million investment and 12 contributions totaling \$18,500 that benefit a broader statewide or regional area that includes the Arkansas assessment areas.

Approximately 57.9 percent of combined investment and contribution activity occurred inside the Little Rock full-scope assessment area compared to 45.2 percent of deposits in this market. Performance was good in the Little Rock assessment area and adequate in the three limited-scope assessment areas. Overall, the bank exhibited good responsiveness to credit and community development needs in Arkansas. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section.

A summary of the bank's investments and contributions for full-scope and limited-scope assessment areas can be found in Appendix F.

### **Service Test**

The service test rating for Arkansas is low satisfactory.

#### ***Retail Services***

Retail banking services are adequate in Arkansas. The retail banking services rating consists of an evaluation of the bank's accessibility of delivery systems, changes in branch locations, and reasonableness of business hours and services in meeting assessment area needs. Additional detail on the bank's retail services can be found in the full-scope assessment area section.

#### ***Community Development Services***

IBERIABANK provides a relatively high level of community development services that benefits low- and moderate-income residents and small businesses in the State of Arkansas.

The bank provided a total of 4,755 qualified service hours during the examination period, including 2,683 hours in the Little Rock full-scope assessment area. Performance in Little Rock, the largest and only full-scope assessment area, was good. Additionally, employees engaged in 2,072 service hours in limited-scope assessment areas; two of three limited-scope assessment areas exhibited good performance, and one had adequate performance. Finally, bank employees engaged in six service hours at a statewide organization that benefitted the broader statewide or regional area, including the bank's assessment areas. The community development service performance is considered good given IBERIABANK'S size and presence in the State of Arkansas.

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

## Little Rock, Arkansas

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### **METROPOLITAN AREA** *(Full Scope Review)*

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LITTLE ROCK, ARKANSAS ASSESSMENT AREA**

##### Overview

The Little Rock assessment area includes Pulaski and Saline counties, which are located in the Little Rock-North Little Rock-Conway, Arkansas MSA. As of December 31, 2016, IBERIABANK operated nine branches inside the assessment area, which represent 39.1 percent of the branches statewide. In addition, 45.2 percent of the bank's statewide deposits are in this market. The assessment area represents the second largest concentration of combined HMDA-reportable and CRA small business lending by dollar volume in the state at 39.2 percent.

Little Rock is an active banking market. According to the June 30, 2016 FDIC Summary of Deposits Report, there were 29 financial institutions operating 215 branch offices inside the assessment area with a total of \$15.9 billion in deposits. Bank of the Ozarks, Bank of America, and Regions Bank hold the largest share of deposits at nearly 56.0 percent collectively. IBERIABANK ranks 8<sup>th</sup>, with \$525.1 million in deposits and 3.3 percent of total deposits.

Wells Fargo, US Bank, and Simmons First National Bank are the three largest HMDA lenders in the Little Rock market, with a combined 22.0 percent of total HMDA-reportable loans in 2015. IBERIABANK Mortgage ranked 5<sup>th</sup> and IBERIABANK ranked 19<sup>th</sup> in 2015, and combined reported 5.6 percent of HMDA-reportable loans. In 2014 and 2015, the bank's percentage of total loans was similar; however, the volume of the bank's HMDA-reportable loans increased by 8.7 percent in 2015. Overall, the assessment area posted a 9.7 percent increase from 2014 to 2015 with 296 lenders.

IBERIABANK ranked 8<sup>th</sup> and 10<sup>th</sup> in CRA lending in 2014 and 2015, respectively. In both years, the bank had 4.3 percent of total CRA loans, and assessment area lending was dominated by American Express Bank and US Bank. There were 71 CRA reporters in 2015.

##### Population and Income Characteristics

The assessment area population increased from 2010 to 2016 by 4.5 percent, reaching an estimated 511,953 residents in 2016. The majority of people reside in Pulaski County, home to Little Rock, but Saline County was one of the fastest growing counties in the state between 2010 and 2016, growing by more than 10.8 percent. During this same period, the state's population grew by 2.5 percent.<sup>29</sup>

The assessment area is made up of 116 census tracts: 10 tracts are low-income (8.6 percent), 30 tracts are moderate-income (25.9 percent), 46 tracts are middle-income (39.7 percent), 29 tracts are upper-income (25.0 percent), and 1 tract has an unknown income level (0.9 percent).

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<sup>29</sup> QuickFacts. US Census Bureau, n.d. Web. 20 July 2017. <http://quickfacts.census.gov>

## Little Rock, Arkansas

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Little Rock-North Little Rock-Conway, AR MSA. As shown, the median family income increased from \$60,100 in 2014 to \$62,400 in 2016. Data shows that the median family income was quite higher in Saline County (\$65,438) than Pulaski County (\$59,305) in 2015.<sup>30</sup> In addition, 39.6 percent of families are considered low- to moderate-income (LMI) in the assessment area.<sup>31</sup>

### Borrower Income Levels Little Rock-North Little Rock-Conway, AR MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2014</b>	<b>\$60,100</b>	0 - \$30,049	\$30,050 - \$48,079	\$48,080 - \$72,119	\$72,120 - & above
<b>2015</b>	<b>\$63,400</b>	0 - \$31,699	\$31,700 - \$50,719	\$50,720 - \$76,079	\$76,080 - & above
<b>2016</b>	<b>\$62,400</b>	0 - \$31,199	\$31,200 - \$49,919	\$49,920 - \$74,879	\$74,880 - & above

Rising poverty rates are a concern in the assessment area, particularly in Pulaski County. The percentage of people living below the federal poverty line in Saline County was 9.1 percent between 2011 and 2015, while 17.6 percent of residents in Pulaski County lived in poverty. The statewide rate is 19.3 percent.<sup>32</sup> In addition, a significant percentage of families living in LMI areas live below the poverty level. Specifically, 36.5 percent of families living in low-income census tracts live below the poverty level, and 18.9 percent of families living in moderate-income census tracts live below the poverty level.<sup>33</sup>

### Economic Conditions

The assessment area is home to the city of Little Rock, which is the state capital of Arkansas and the state's most populous city. Little Rock is an economic engine and fuels much of the state's economic activity. Leading private, nonfarm employment sectors include health care and social assistance, retail trade, and administrative and waste management services; however, these sectors typically have lower wage jobs.<sup>34</sup> Besides government, major employers in the area include Baptist Health, Arkansas Children's Hospital, Entergy, AT&T, Verizon, Dillard's Department Stores, and Windstream Communications.<sup>35</sup>

<sup>30</sup> "Little Rock, AR (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>31</sup> FRB Atlanta Calculations of 2015 Census Data

<sup>32</sup> "Little Rock, AR (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>33</sup> FRB Atlanta Calculations of 2015 Census Data

<sup>34</sup> "Comprehensive Housing Market Analysis: Little Rock-North Little Rock-Conway, Arkansas." Office of Policy Development and Research. U.S. Department of Housing and Urban Development, 1 Sept. 2015. Web. 24 Jul.2017. <https://www.huduser.gov/portal/publications/pdf/LittleRockAR-comp-16.pdf>.

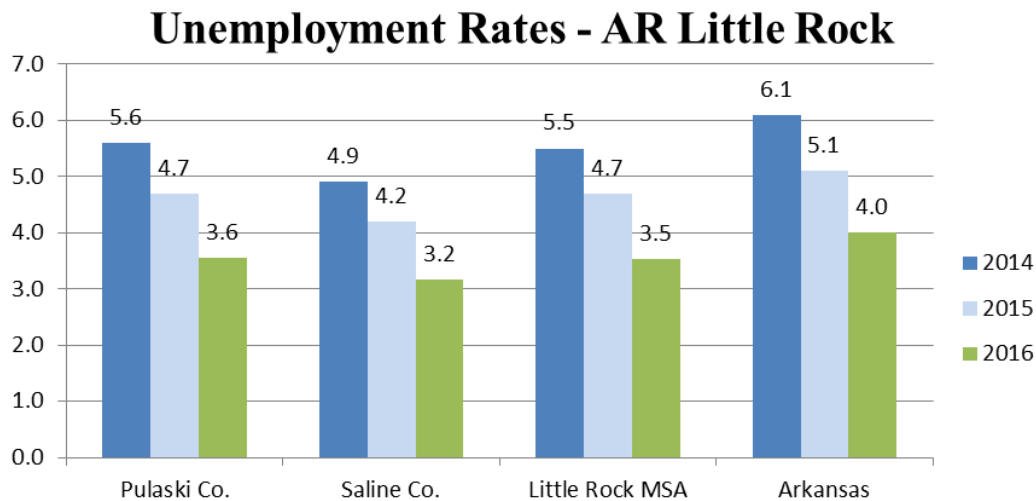
<sup>35</sup> "Major Employers." Little Rock Regional Chamber. N.p., n.d. Web. 24 July 2017. <http://www.littlerockchamber.com/major-employers.html>

## Little Rock, Arkansas

As home to the state capital and Little Rock Air Force Base (LRAFB), the government sector is the largest payroll sector in the region, employing over 71,000 as of August 2015. The State of Arkansas represents the largest employer in the region with nearly 24,000 employees, and LRAFB has 8,200 active duty personnel and 1,500 civilian employees.<sup>36</sup>

In terms of economic conditions for small businesses, there were 24,249 businesses within the Little Rock assessment area in 2016, of which 89.1 percent had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses. Additionally, 25.2 percent of small businesses in the assessment area were located in moderate-income tracts, while there were far fewer in low-income tracts at 4.4 percent. Lending opportunities to this segment remained stable between 2012 and 2015 in the assessment area, with nearly 8,370 loans made in 2015.<sup>37</sup> During this same period, loans made to firms with revenues of \$1.0 million or less represented nearly 55.0 percent of total small business loans, which is higher than previous years. This may be an indication that there may be fewer obstacles for smaller firms to access credit in the market.

Unemployment in Little Rock has declined significantly since its peak of 8.1 percent in January 2011.<sup>38</sup> The chart below shows a significant drop in the unemployment rates across the assessment area between 2014 and 2016. The unemployment rate for the MSA in 2016 was 3.5 percent, compared to 4.0 percent and 5.0 percent for the state and the nation, respectively.



Census data indicates there were 217,430 housing units located in the assessment area, of which 57.0 percent were owner-occupied, 32.3 percent were rental units, and 10.7 percent were vacant. Rental and vacant units were more concentrated in low- and moderate-income tracts. The median age of the housing stock across the assessment area was 34 years, though housing was much older in low- and moderate-income census tracts.

<sup>36</sup> "Comprehensive Housing Market Analysis: Little Rock-North Little Rock-Conway, Arkansas." Office of Policy Development and Research. U.S. Department of Housing and Urban Development, 1 Sept. 2015. Web. 24 Jul.2017. <https://www.huduser.gov/portal/publications/pdf/LittleRockAR-comp-16.pdf>.

<sup>37</sup> "Little Rock, AR (CRA Loan Data)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 24 Jul. 2017. <http://www.policymap.com/>

<sup>38</sup> "At a Glance Tables." U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 24 July 2017. <http://www.bls.gov/eag/home.htm>.

## Little Rock, Arkansas

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Census data also shows that 24.0 percent of the housing stock in the assessment area is located in moderate-income tracts and 6.8 percent is in low-income census tracts. In moderate-income census tracts, 46.3 percent of the housing was owner-occupied units while 38.9 percent of housing was rental units. In low-income tracts, 31.1 percent of the housing was owner-occupied units and 52.0 percent was rental units. These factors suggest that residential lending opportunities, both home purchase and home improvement, exist but to a greater extent in moderate-income geographies than in low-income geographies.

The assessment area housing market remained stable during the review period. CoreLogic reports that the median home price in Pulaski County was approximately \$180,300 as of December 2016, while Saline County had a median home price of nearly \$158,800.<sup>39</sup> Although Pulaski County is a much larger housing market than Saline, both counties fall within the state's top five housing markets in terms of units sold for the year.<sup>40</sup> The percentage of homes affordable for a four-person family earning 80.0 percent of the area median income in 2015 is over 50.0 percent in both counties, while the percentage of homes affordable to those earning 50.0 percent of the area median income averages 21.0 percent.<sup>41</sup> Therefore, efforts to assist home ownership for LMI buyers should continue to focus on down payment assistance programs, affordable lending products, and homebuyer counseling and education programs.

### 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.

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<sup>39</sup> Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic.

<sup>40</sup> Housing Market Reports. Arkansas Realtors Association, n.d. Web. 24 July 2017. <https://www.arkansasrealtors.com/ara-publications-2/housing-market-reports/>

<sup>41</sup> "Little Rock, AR (HUD)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 24 Jul. 2017. <<http://www.policymap.com/>>.



## Little Rock, Arkansas

### Combined Demographics Report

#### Assessment Area: AR Little Rock

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	8.6	6,828	5.4	2,495	36.5	27,240	21.7
Moderate-income	30	25.9	28,122	22.4	5,301	18.9	22,497	17.9
Middle-income	46	39.7	50,965	40.5	4,432	8.7	25,081	19.9
Upper-income	29	25	39,850	31.7	1,794	4.5	50,947	40.5
Unknown-income	1	0.9	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>116</b>	<b>100.0</b>	<b>125,765</b>	<b>100.0</b>	<b>14,022</b>	<b>11.1</b>	<b>125,765</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	14,877	4,631	3.7	31.1	7,732	52	2,514	16.9
Moderate-income	52,110	24,152	19.5	46.3	20,253	38.9	7,705	14.8
Middle-income	86,925	52,508	42.3	60.4	25,935	29.8	8,482	9.8
Upper-income	63,518	42,748	34.5	67.3	16,304	25.7	4,466	7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>217,430</b>	<b>124,039</b>	<b>100.0</b>	<b>57.0</b>	<b>70,224</b>	<b>32.3</b>	<b>23,167</b>	<b>10.7</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	1,158	4.8	941	4.4	203	8.6	14	4.8
Moderate-income	6,446	26.6	5,453	25.2	868	36.9	125	42.8
Middle-income	8,464	34.9	7,724	35.7	654	27.8	86	29.5
Upper-income	8,178	33.7	7,486	34.6	625	26.6	67	22.9
Unknown-income	3	0	3	0	0	0	0	0
<b>Total Assessment Area</b>	<b>24,249</b>	<b>100.0</b>	<b>21,607</b>	<b>100.0</b>	<b>2,350</b>	<b>100.0</b>	<b>292</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>89.1</b>		<b>9.7</b>		<b>1.2</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	9	3.2	8	2.9	1	14.3	0	0
Moderate-income	42	15.1	38	14	4	57.1	0	0
Middle-income	108	38.7	107	39.3	1	14.3	0	0
Upper-income	120	43	119	43.8	1	14.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>279</b>	<b>100.0</b>	<b>272</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>97.5</b>		<b>2.5</b>		<b>.0</b>	

## Little Rock, Arkansas

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### Credit and Community Development Needs

To better understand the community development and economic landscapes, community development experts were contacted. These individuals discussed the various opportunities and challenges across the region as well as how financial institutions can be responsive to local community development needs through lending, investment and/or service activities. Bank management also provided input on the performance context issues impacting the assessment area.

The highest priority development need for the area is quality affordable housing and rehabilitation of existing housing stock, according to community contacts. Other needs include the availability of mortgage programs with flexibility relative to appraisal assessments; housing rehabilitation financing; and lastly, support for first-time home buyer mortgage programs and down payment assistance programs. Additionally, bank management and community contacts stated that barriers to homeownership for LMI individuals include poor credit history and secondary mortgage market underwriting standards, particularly as they pertain to collateral condition.

Several community contacts that specialize in economic development and small business assistance noted that small businesses play an important role in the overall Little Rock economy and that there is a need for more commercial credit from financial institutions to help businesses start up or expand. Greater access to working capital loans and small dollar loan products for local small businesses would also have a trickle-down effect and positively impact the community. Community contacts also noted that there is a growing need for financial institutions to provide technical assistance to small businesses seeking financing. In addition, there are opportunities for banks to provide more support for small businesses by investing and partnering in organizations that provide financing assistance, such as community development financial institutions (CDFIs). A community contact stated that the best opportunity for banks to partner with CDFIs was by referring applicants denied for a loan to a local CDFI. Another opportunity mentioned was for local financial institutions to provide guidance and technical resources related to the New Markets Tax Credits program.

Overall, several community contacts commented that they would like to see more leadership and engagement by financial institutions as it relates to affordable housing. Contacts provided numerous examples of responsive leadership: collaborating with local partners in affordable housing advocacy at the state government level to lobby for subsidies and reduced bureaucracy for packaging affordable loans that apply city or state grant monies; providing low-interest loans and increasing access to capital by partnering with other organizations to provide loan guarantee programs; sponsoring Federal Home Loan Bank Affordable Housing Program applications; and serving on boards and providing leadership on committees, boards, and work groups on affordable housing. In major metropolitan cities, housing authorities typically serve as a catalyst for redevelopment activities. There are opportunities for banks to serve in a technical assistance capacity with the Metropolitan Housing Alliance in Little Rock to offer assistance in assessing feasibility of proposed community development projects, partnering on major redevelopment projects, deal structuring, and assisting with predevelopment funding.

Finally, one community contact noted that there are numerous opportunities for bank partnerships with organizations that offer financial education classes. In addition, there are several other asset-building programs, including homeownership counseling, Volunteer Income Tax Assistance (VITA) sites and an IDA

## Little Rock, Arkansas

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program operated by the Central Arkansas Development Council, which provides matching funds for savings that can be used to open or expand a small business, help pay for college expenses, purchase a home for a first-time homebuyer, or make home repairs.<sup>42</sup> Also, there are always opportunities for financial institutions to provide low-cost banking services and small dollar loan products. According to the FDIC's 2015 National Survey of Unbanked and Underbanked Households, 11.2 percent of households in the Little Rock MSA are unbanked and 25.5 percent of households are considered underbanked.<sup>43</sup>

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LITTLE ROCK, ARKANSAS ASSESSMENT AREA**

#### **LENDING TEST**

IBERIABANK's lending performance in the Little Rock assessment area is good. The geographic distribution of loans reflects adequate penetration throughout the assessment area while the distribution of loans 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.

IBERIABANK reported 2,561 (69.4 percent) HMDA-reportable loans and 1,130 (30.6 percent) CRA small business loans in the Little Rock assessment area during the review period. Therefore, HMDA-reportable lending received greater weight in determining the bank's lending test rating in the assessment area. The Little Rock assessment area accounted for 39.2 percent of IBERIABANK's total HMDA-reportable and small business lending by dollar volume in Arkansas during the review period. In comparison, 45.2 percent of IBERIABANK's Arkansas 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, IBERIABANK's geographic distribution of loans reflects adequate penetration throughout the assessment area.

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<sup>42</sup> Central Arkansas Development Council. N.p., n.d. Web. 27 July 2017. <http://www.cadc.com/>

<sup>43</sup> 2015 Household Survey Results. Rep. FDIC, n.d. Web. 26 July 2017. <https://www.economicinclusion.gov/surveys/2015household/index.html>

## Little Rock, Arkansas

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### Home Purchase Loans

Home purchase lending in low-income census tracts is adequate. During the review period, the bank originated 1.7 percent of its loans in low-income census tracts. This level of lending was less than the 3.7 percent of owner-occupied units in low-income tracts. However, the bank's performance was slightly greater than the aggregate lenders in 2014 and 2015.

Home purchase lending in moderate-income census tracts is also adequate. During the review period, 8.8 percent of the bank's loans were originated in moderate-income census tracts. This level of lending was less than the 19.5 percent of owner-occupied units in moderate-income census tracts. However, the bank's performance was on par with aggregate lenders in 2014 and 2015.

### Home Refinance Loans

Home refinance lending in low-income census tracts is poor. IBERIABANK originated five home refinance loans in low-income census tracts during the review period. As a result, the bank's home refinance lending was less than the level of owner-occupied units in these tracts. While the bank's performance was slightly greater than aggregate in 2014, it underperformed aggregate lenders in 2015.

Home refinance lending in moderate-income census tracts is also poor. The percentage of home refinance loans originated in moderate-income census tracts was less than the percentage of owner-occupied units in these tracts. While the bank's performance was greater than aggregate lending performance in 2014, it underperformed aggregate lenders in 2015.

### Home Improvement Loans

Home improvement lending in low-income census tracts is adequate. IBERIABANK originated 3.6 percent of its home improvement loans in these tracts during the review period. This performance was comparable to the percentage of owner-occupied units in these tracts. The bank's performance was less than the aggregate lending performance in 2014 but greater than the aggregate in 2015.

Home improvement lending in moderate-income census tracts is also adequate. IBERIABANK originated 20.1 percent of its home improvement loans in these tracts during the review period. This performance was comparable to the percentage of owner-occupied units in these tracts. However, the bank's performance exceeded aggregate lending performance in both 2014 and 2015.

### Small Business Loans

Small business lending in low-income census tracts is excellent. IBERIABANK originated 5.6 percent of its small business loans in low-income census tracts, where 4.4 percent of small businesses in the assessment area are located. Additionally, IBERIABANK's performance exceeded aggregate lending performance in years 2014 and 2015.

## Little Rock, Arkansas

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Small business lending in moderate-income census tracts is also excellent. IBERIABANK originated 28.8 percent of its small business loans in moderate-income census tracts, where 25.2 percent of small businesses in the assessment area are located. Additionally, IBERIABANK's performance exceeded aggregate lending performance in years 2014 and 2015.

### *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 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.

#### Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. The bank's percentage of home purchase loans to low-income borrowers was less than the percentage of low-income families in the assessment area during the review period. However, the bank's home purchase lending to low-income borrowers exceeded aggregate lending performance in 2014 and was comparable to aggregate lending performance in 2015.

Home purchase lending to moderate-income borrowers is excellent. IBERIABANK's home purchase lending to moderate-income borrowers exceeded the percentage of moderate-income families located in the assessment area. Additionally, the bank's home purchase lending exceeded aggregate lending in both 2014 and 2015.

#### Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. The bank's percentage of home refinance loans to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. However, IBERIABANK's lending in 2014 almost doubled aggregate lending performance and was slightly less than the aggregate lenders in 2015.

Home refinance lending to moderate-income borrowers is good. The percentage of home refinance loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area throughout the review period. However, the bank's performance exceeded the aggregate lending performance in 2014 and 2015.

#### Home Improvement Loans

Home improvement lending to low-income borrowers is poor. The bank's home improvement lending to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. Additionally, the bank underperformed aggregate lending in both 2014 and 2015.

Home improvement lending to moderate-income borrowers is good. The percentage of home improvement loans to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area throughout the review period. Additionally, the bank's performance was greater than the aggregate lending performance in 2014 and 2015.

## Little Rock, Arkansas

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### Small Business Loans

The distribution of small business loans to businesses of different sizes is good. The bank's lending to small businesses exceeded the aggregate in both 2014 and 2015, but was below the percentage of small businesses in the assessment area during the review period. In addition, of the 1,130 small business loans originated during the review period, 994 (87.9 percent) were in amounts of \$250,000 or less, which typically represent loan amounts requested by very small businesses.

### ***Community Development Lending***

IBERIABANK makes a relatively high level of community development loans in the Little Rock assessment area. The bank originated 14 community development loans totaling \$17.1 million during the review period. Loans were responsive to several community development needs in the assessment area, including promoting economic development by financing small business, revitalizing and stabilizing LMI geographies, and providing community services targeted to LMI individuals.

Access to credit and technical assistance for small businesses was noted by community contacts as a need in the assessment area. In response to this need, IBERIABANK provided \$880,000 towards economic development activities. In addition, the bank provided \$16.0 million supporting a range of community services to LMI individuals and \$270,300 towards revitalization and stabilization. The assessment area also benefited from a \$10 million dollar loan to a CDFI that provides small business loans across the entire state.

IBERIABANK's community development lending exhibits good responsiveness to some community development and credit needs relative to the bank's presence in the assessment area.

Examples of notable community development loans include but are not limited to:

- One loan for \$100,000 to a regional small business incubator that serves Little Rock and a broader regional area. The loan was renewed once during the review period for the same amount. This loan is responsive to the identified need in the assessment area for small business financing and technical assistance.
- Two loans totaling \$100,000 to a local community development organization to assist with real estate acquisition and working capital needs. The organization focuses on improving the quality of life of low-income, underserved, and disadvantaged children, youth, and families who are residents of the 12th Street corridor in Little Rock. This loan is an example of the bank's responsiveness to the credit needs of smaller nonprofits serving LMI communities in the assessment area.
- One loan for \$270,300 to a small business to support the renovation of a commercial building located in a low-income tract in Little Rock. The loan is considered an economic development loan since the borrower is considered a small business and the loan proceeds will allow the borrower to hire new employees. However, the project is also consistent with the revitalization plans for the 6th Street corridor and will help create and retain businesses in the low-income tract.

## Little Rock, Arkansas

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### INVESTMENT TEST

IBERIABANK makes a significant level of qualified investments and grants relative to the bank's presence in the Little Rock assessment area. Combined investment and contribution activity inside the assessment area totaled \$11.5 million, or 57.9 percent of total investment activity for the state.

The bank made investments (excluding contributions) totaling \$11.3 million in the assessment area; of that, \$5.0 million was invested during the review period. The bank was responsive to affordable rental housing needs with a \$1.5 million Ginnie Mae Project Loan for a 203-unit development that provides affordable Section 8 assisted living housing units for senior citizens. The remaining current period investments were mortgage-backed securities. Prior period investments supported the revitalization and stabilization of an LMI area with a \$5.5 million New Market Tax Credits investment near downtown Little Rock. Other prior period investments provided financing for affordable housing through investments in a CRA Qualified Investment Fund and mortgage-backed securities. As noted earlier, the assessment area also benefits from a \$1.0 million investment in a small business fund which provides seed capital to start-up businesses based out of Arkansas colleges and universities; this activity covers a broader regional area, including the assessment area.

IBERIABANK also contributed \$208,900 to nonprofit organizations during the review period. The majority of the contributions supported community services to LMI individuals, with sizeable contributions supporting an organization serving children and adults with disabilities, organizations that provide affordable housing for families of patients receiving medical treatment, and an economic education provider. While financial education was provided for LMI youth in the assessment area, the bank exhibited a low level of responsiveness to financial education and stability initiatives for LMI adults and families as noted earlier as a particular need.

The bank was responsive to affordable homeownership with 12 mortgage grants totaling \$37,600 to assist qualified LMI homebuyers with down payments and closing costs to purchase a home. The bank's other contributions addressed a wide variety of community needs, such as assistance for children's health, ancillary services for cancer patients, domestic abuse services, and other community services that assist low- and moderate-income individuals and communities. Lastly, the bank provided \$18,500 in contributions that benefitted a broader regional area that includes the bank's assessment area; included in this amount was \$10,000, the first payment of a five-year commitment to a statewide organization dedicated to increasing entrepreneurial activity in Arkansas.

### SERVICE TEST

Service test performance in the Little Rock assessment area is adequate based on the bank's retail banking services and the relatively high level of community development services.

#### ***Retail Services***

Retail banking services are adequate in the Little Rock full-scope assessment area.

## Little Rock, Arkansas

The bank's retail delivery systems are reasonably accessible to IBERIABANK's geographies and individuals of different income levels. The distribution of 9 branch offices and 12 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. There were no branches in low-income tracts compared to 6.4 percent of households and 4.8 percent of businesses. The distribution of the bank's branches in moderate-income tracts, however, exceeded the percentage of households and businesses in the same geography; 33.3 percent of total branches were in moderate-income tracts compared to 22.9 percent of households and 26.6 percent of businesses.

During the examination period, there were no branch openings, but the bank did close one branch in an upper-income tract. The bank did not open any full-service ATMs in the assessment area. 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.

IBERIABANK offers extended and weekend hours at its branch offices, including those located in moderate-income census tracts. Additionally, bank products, services and standard business hours are consistent throughout the 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: AR Little Rock

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	Open	Closed				#	%	%	%
Low	0	0.0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	8.6%	6.4%	4.8%
DTO	0		0	0			SA	0		0	0	0	0	0	0	0	0	0				
Moderate	3	33.3%	0	0	2	2	2	Total	3	25.0%	3	30.0%	0	0	0	0.0%	0	0	30	25.9%	22.9%	26.6%
DTO	0		0	0			SA	0		0		0	0	0	0	0	0	0				
Middle	3	33.3%	0	0	3	3	1	Total	5	41.7%	3	30.0%	0	0	2	100.0%	0	0	46	39.7%	40.4%	34.9%
DTO	0		0	0			SA	2		0		0	0	2		0	0	0				
Upper	3	33.3%	0	1	3	3	3	Total	4	33.3%	4	40.0%	0	1	0	0.0%	0	0	29	25.0%	30.4%	33.7%
DTO	0		0	0			SA	1		1		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	0.9%	0.0%	0.0%
DTO	0		0	0			SA	0		0		0	0	0	0	0	0	0				
Total	9	100.0%	0	1	8	8	6	Total	12	100.0%	10	100.0%	0	1	2	100.0%	0	0	116	100.0%	100.0%	100.0%
DTO	0		0	0				SA	3		1		0	0	2		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

IBERIABANK provides a relatively high level of community development services in the Little Rock assessment area. Employees provided 2,683 service hours to qualified organizations by participating in 21 different community development services.



## Little Rock, Arkansas

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IBERIABANK's community development service activities benefitted organizations that provide affordable housing, community services, and economic development support to low- and moderate-income individuals, communities and small businesses in the Little Rock assessment area. Of the bank's total service hours, 515 hours were committed to youth financial education and 57 hours supported adult financial education in Little Rock. Additionally, bank staff engaged in 2,112 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 employees engaged in small business education for a statewide innovation fund and provided technical assistance and board leadership to CDFIs in the assessment area to support small business lending.
- Bank lending officers facilitated homebuyer education in partnership with affordable housing counseling agencies.
- In support of youth financial education, bank employees served in a leadership capacity on a Junior Achievement board and finance committee.

While there was a limited level of bank services benefitting affordable housing during the review period, the bank demonstrated a high level of engagement in community services as well as responsiveness to identified economic development needs in the Little Rock 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 ARKANSAS METROPOLITAN ASSESSMENT AREAS

- **Fayetteville Assessment Area (Benton and Washington counties)**
  - As of December 31, 2016, IBERIABANK operated five branches in the assessment area, representing 21.7 percent of its branches in Arkansas.
  - As of June 30, 2016, the bank had \$222.0 million in deposits in this assessment area, representing a market share of 2.4 percent and 19.1 percent of IBERIABANK’s total deposits in Arkansas.
- **Jonesboro Assessment Area (Craighead and Poinsett counties)**
  - As of December 31, 2016, IBERIABANK operated five branches in the assessment area, representing 21.7 percent of its branches in Arkansas.
  - As of June 30, 2016, the bank had \$219.6 million in deposits in this assessment area, representing a market share of 8.3 percent and 18.9 percent of IBERIABANK’s total deposits in Arkansas.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

<b>Metropolitan Assessment Areas</b>			
<b>Assessment Areas</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Fayetteville	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Above)
Jonesboro	Not Consistent (Below)	Not Consistent (Below)	Consistent

For the lending test, IBERIABANK received a high satisfactory rating for the State of Arkansas. Although performance in both metropolitan limited-scope assessment areas was weaker than the institution’s performance for the state, lending in the Fayetteville assessment area was considered adequate. Performance in the limited-scope assessment areas was weaker than performance for the state primarily because the bank made few, if any, community development loans in these areas.

For the investment test, IBERIABANK received a high satisfactory rating for the State of Arkansas. Performance in the Fayetteville and Jonesboro metropolitan assessment areas was weaker than the statewide performance due to lower levels of investment activity relative to the bank’s operational presence in the assessment areas.

## Metropolitan Areas (Limited Review)

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For the service test, IBERIABANK received a rating of low satisfactory for the State of Arkansas. Service test performance in the Jonesboro metropolitan assessment area was consistent with the bank's state performance while performance in the Fayetteville assessment area was above the bank's state performance due to stronger retail banking services.

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

## Nonmetropolitan Area (Limited Review)

The following nonmetropolitan assessment area was reviewed using limited-scope examination procedures.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ARKANSAS NONMETROPOLITAN ASSESSMENT AREA

- **Northeast Arkansas Assessment Area (Clay, Greene, Jackson, Lawrence, Randolph, and Sharp counties)**
  - As of December 31, 2016, IBERIABANK operated four branches in the assessment area, representing 17.4 percent of its branches in Arkansas.
  - As of June 30, 2016, the bank had \$195.4 million in deposits in this assessment area, representing a market share of 8.5 percent and 16.8 percent of IBERIABANK’s total deposits in Arkansas.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Nonmetropolitan Assessment Area			
Assessment Area	Lending Test	Investment Test	Service Test
Northeast Arkansas	Consistent	Not Consistent (Below)	Consistent

For the lending test, IBERIABANK received a high satisfactory rating for the State of Arkansas. The bank’s performance in the nonmetropolitan limited-scope assessment area was consistent with the bank’s performance for the State of Arkansas, which was rated high satisfactory.

For the investment test, IBERIABANK received a high satisfactory rating for the State of Arkansas. Performance in the Northeast Arkansas nonmetropolitan assessment area was weaker than the statewide performance due to lower levels of investment activity relative to the bank’s operational presence in the assessment area.

For the service test, IBERIABANK received a rating of low satisfactory for the State of Arkansas. Service test performance in the Northeast Arkansas nonmetropolitan assessment area was consistent with state performance. Community development service performance in Northeast Arkansas was consistent with the statewide performance while retail banking services were significantly weaker compared to the bank’s state performance.

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

## FLORIDA

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**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 good penetration throughout the assessment areas, and the distribution of loans by borrower income reflects adequate 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 good in the bank's assessment areas.
- The bank provides a relatively high level of community development services throughout the assessment areas.

## FLORIDA

### SCOPE OF EXAMINATION

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

- Fort Myers
- Orlando

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

- Homosassa Springs
- Jacksonville
- Keys (non-MSA)
- Naples
- Palm Beach-Broward
- Sarasota
- Tallahassee
- Tampa

The time period, products, and affiliates evaluated for these assessment areas 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, IBERIABANK had \$4.2 billion in deposits in Florida accounting for 25.7 percent of the bank's total deposits. IBERIABANK operated 58 branch offices in Florida as of December 31, 2016, representing 29.3 percent of the bank's total branches. HMDA-reportable lending in Florida accounted for 15.5 percent of total institutional HMDA-reportable lending by number of loans, and CRA small business lending in Florida accounted for 17.9 percent of the bank's total CRA small business lending. Overall, HMDA-reportable and CRA lending in Florida accounted for 16.4 percent of the bank's total lending activity.

The following table shows lending activity from January 1, 2014, through December 31, 2016.

### Statewide Summary of Lending Activity Assessment Areas Located in FL STATE

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	3,313	41.6%	\$667,214	48.8%
HMDA Refinance	797	10.0%	\$189,560	13.9%
HMDA Home Improvement	326	4.1%	\$22,512	1.6%
HMDA Multi-Family	66	0.8%	\$36,600	2.7%
<b>Total HMDA</b>	<b>4,502</b>	<b>56.6%</b>	<b>\$915,886</b>	<b>67.0%</b>
<b>Total Small Business</b>	<b>3,439</b>	<b>43.2%</b>	<b>\$449,406</b>	<b>32.9%</b>
<b>Total Farm</b>	<b>17</b>	<b>0.2%</b>	<b>\$2,670</b>	<b>0.2%</b>
<b>TOTAL LOANS</b>	<b>7,958</b>	<b>100.0%</b>	<b>\$1,367,962</b>	<b>100.0%</b>

Originations and Purchases

## FLORIDA

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### 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 good penetration throughout the assessment areas. The distribution of loans by borrower income reflects adequate penetration among customers of different income levels and businesses of different sizes. Additionally, IBERIABANK makes a relatively high level of community development loans in Florida.

During the review period, IBERIABANK reported 4,502 HMDA-reportable loans and 3,439 small business loans in Florida. As such, HMDA-reportable lending was given greater weight when determining the lending test rating for Florida. The rating for Florida is based on performance in the Fort Myers and Orlando full-scope assessment areas, which represent 37.9 percent of the bank's HMDA-reportable and small business lending by number of loans and 40.8 percent by dollar volume in Florida during the review period.

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 IBERIABANK's HMDA-reportable and small business loans is good, and the distribution of loans by borrower income and revenue size of businesses is adequate. As noted above, the rating for the State of Florida is derived from the Fort Myers and Orlando assessment areas. A detailed discussion of the borrower and geographic distribution of lending for both assessment areas is included in the next section of this report.

#### *Community Development Lending*

IBERIABANK makes a relatively high level of community development loans in Florida. The bank originated 49 community development loans totaling \$70.7 million in the assessment areas across the state during the review period. The bank makes a relatively high level of community development loans in the 2 full-scope assessment areas, with 10 loans for \$14.5 million in Fort Meyers and 19 loans for \$37.5 million in Orlando.

The bank was considered responsive to the community credit needs in the state. Therefore, nine loans for \$15.4 million to borrowers located in a broader statewide area, without a purpose, mandate or function of serving one the Florida assessment areas, were also considered in evaluating statewide performance. Notably, the bank originated five SBA 504 loans in the state through its subsidiary Mercantile Capital Corporation for \$10.4 million. Additionally, the bank provided nearly \$4.0 million for an NMTC project in a moderate-income community in Fellsmere, Florida; the loan will help fund a new organic waste processing plant, which is consistent with the community's revitalization and sustainability plans and will create new job opportunities for LMI individuals.

Statewide community development lending performance was driven by performance in the full-scope assessment areas and enhanced by the lending outside the bank's assessment areas. More information on community development loans can be found in the full-scope assessment area sections of this report.

## FLORIDA

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### Investment Test

The investment test rating for Florida is high satisfactory.

IBERIABANK makes a significant level of qualified community development investments and grants in Florida, occasionally in a leadership position. During the review period, IBERIABANK had qualified investments of \$52.6 million in the Florida assessment areas, with nearly 73.4 percent acquired during the current review period. In addition, the bank made 273 qualified contributions in the assessment areas for approximately \$4.3 million. The state investment rating also reflects nine contributions totaling \$62,150 that benefit a broader statewide or regional area that includes the Florida assessment areas.

Approximately 31.4 percent of combined investment and contribution activity occurred inside the Fort Myers and Orlando full-scope assessment areas compared to 40.6 percent of deposits in these markets. Performance is good in the Orlando assessment area and adequate in the Fort Myers assessment area. In the bank's limited-scope assessment areas, IBERIABANK demonstrated excellent performance in Sarasota; good performance in the Jacksonville, Keys, Palm Beach-Broward, and Tampa assessment areas; and adequate performance in the Homosassa Springs, Naples and Tallahassee assessment areas. Overall, the bank exhibited good responsiveness to credit and community development needs in Florida. Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections.

A summary of the bank's investments and contributions for full-scope and limited-scope assessment areas can be found in Appendix F.

### Service Test

The service test rating for Florida is high satisfactory.

#### *Retail Services*

Retail banking services are good in Florida. The retail banking services rating consists of an evaluation of the bank's accessibility of delivery systems, changes in branch locations, and reasonableness of business hours and services in meeting assessment area needs. Additional detail on the bank's retail services can be found in the full-scope assessment area sections.

#### *Community Development Services*

IBERIABANK provides a relatively high level of community development services that benefit low- and moderate-income residents and small businesses in the State of Florida.

The bank contributed a total of 10,980 qualified service hours in the state during the examination period, including 2,909 hours in the Fort Myers and Orlando full-scope assessment areas. Performance in both full-scope assessment areas was good. Additionally, employees engaged in 8,065 service hours in limited-scope assessment areas. Five of eight limited-scope assessment areas exhibited good performance. The Palm Beach-Broward assessment area had excellent performance, while the Keys had adequate performance. In the Tallahassee assessment area, the bank had very poor performance, but it should be noted that the bank exited



## FLORIDA

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this market during the review period. In addition, bank employees engaged in 26 service hours that benefitted the broader statewide or regional area, including the bank's assessment areas. The community development service performance is considered good given IBERIABANK's size and presence in the State of Florida.

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

## Fort Myers, Florida

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### **METROPOLITAN AREA** *(Full Scope Review)*

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FORT MYERS, FLORIDA ASSESSMENT AREA**

##### Overview

The Fort Myers assessment area is made up of the Cape Coral-Fort Myers, Florida MSA, which consists of Lee County. As of December 31, 2016, IBERIABANK had eight branches in the Fort Myers assessment area representing 13.8 percent of the branches statewide. In addition, 11.8 percent of the bank's statewide deposits are in this market. The assessment area represents the largest concentration of combined HMDA-reportable and CRA small business lending by number of loans at 23.1 percent in the state.

The assessment area is an active banking market that includes various sizes of financial institutions ranging from community banks to large, national financial institutions. According to the June 30, 2016 FDIC Summary of Deposits Report, SunTrust Bank holds the highest deposit market share with nearly 15.7 percent of the deposits and has 22 branches in the market area. IBERIABANK is ranked 8<sup>th</sup> in the market with nearly 3.2 percent of deposits. Overall, there are 34 banks active in the market operating 214 branches and having a total of \$15.2 billion in deposits.

IBERIABANK ranked 14<sup>th</sup> and 13<sup>th</sup> in CRA lending in 2014 and 2015, respectively. In 2015, the bank had 1.5 percent of total CRA loans, which was down slightly from 1.9 percent in 2014. There were 128 CRA reporters in the assessment area in 2015. American Express Bank dominated the market in both years.

Wells Fargo, Quicken Loans, and SunCoast Credit Union are the three largest HMDA lenders in the Fort Myers market, with a combined 20.9 percent of total HMDA-reportable loans in 2015. IBERIABANK Mortgage ranked 17<sup>th</sup> and IBERIABANK ranked 76<sup>th</sup> in 2015, and combined reported 1.6 percent of HMDA-reportable loans. In 2014, the bank's percentage of total loans was slightly higher at 1.7 percent, although the bank reported fewer loans than in 2015.

##### Population and Income Characteristics

The county seat of Lee County is Fort Myers, and Cape Coral is the largest city in the assessment area. Between 2010 and 2016, the assessment area population increased by 16.7 percent, reaching an estimated 722,336 residents in 2016. Over this same period, the state population grew by 9.6 percent.<sup>44</sup> The city of Cape Coral had an estimated population of 179,804 in 2016, while the estimated population in Fort Myers was 77,146. Southwest Florida is one of the fastest-growing areas in the country, with Lee County ranking in the top 10 of the fastest-growing metro areas in the country. The area benefits from baby boomers seeking a

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<sup>44</sup> QuickFacts. US Census Bureau, n.d. Web. 20 July 2017. <http://quickfacts.census.gov>

## Fort Myers, Florida

retirement location as well as a younger population interested in remaining in the area. County officials also state they see growth coming up the I-75 corridor, which still has a lot of undeveloped land along its inland side, as well as the coast, thereby making its location attractive.<sup>45</sup>

The assessment area is made up of 167 census tracts: 5 tracts are low-income (3.0 percent), 32 tracts are moderate-income (19.2 percent), 80 tracts are middle-income (47.9 percent), 48 tracts are upper-income (28.7 percent) and 2 tracts have unknown income levels (1.2 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Cape Coral-Fort Myers MSA. As shown, the median family income declined from \$58,000 in 2014 to \$56,400 in 2016. In addition, 38.0 percent of families in the assessment area are considered low- to moderate-income (LMI).<sup>46</sup>

**Borrower Income Levels  
Cape Coral-Fort Myers, FL MSA**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2014</b>	<b>\$58,000</b>	0	- \$28,999	\$29,000	- \$46,399	\$46,400	- \$69,599	\$69,600	- & above
<b>2015</b>	<b>\$57,600</b>	0	- \$28,799	\$28,800	- \$46,079	\$46,080	- \$69,119	\$69,120	- & above
<b>2016</b>	<b>\$56,400</b>	0	- \$28,199	\$28,200	- \$45,119	\$45,120	- \$67,679	\$67,680	- & above

The percentage of people living below the federal poverty line in Lee County was 16.1 percent between 2011 and 2015, which is similar to the statewide rate.<sup>47</sup> In addition, a significant percentage of families in LMI areas live below the poverty level. Specifically, 30.5 percent of families living in low-income census tracts live below the poverty level, and 15.3 percent of families living in moderate-income census tracts live below the poverty level.<sup>48</sup>

### Economic Conditions

As of December 2016, total employment in the assessment area was approximately 254,900 jobs with employment concentrations in the following sectors: leisure and hospitality services, government, professional and business services, retail trade, and education and health services.<sup>49</sup> Lee Memorial Health System is the largest employer in the region with 10,900 employees. Other major employers include Publix Super Markets Inc., Wal-Mart Stores Inc., and Florida Gulf Coast University. Bolstered by tourism and retirees making their way to Florida, the consumer services industry is the backbone of the local economy.

<sup>45</sup> Overton, Penelope. "Lee: 3rd Fastest-growing Metro Area in the Country." News-Press.Com. USA Today Network, 24 Mar. 2016. Web. 20 July 2017. <http://www.news-press.com/story/news/local/2016/03/24/lee-3rd-fastest-growing-metro-area-country/82176510/>

<sup>46</sup> FRB Atlanta Calculations of 2015 Census Data

<sup>47</sup> "Lee County, FL (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 18 July 2017. <http://www.policymap.com/>

<sup>48</sup> FRB Atlanta Calculations of 2015 Census Data

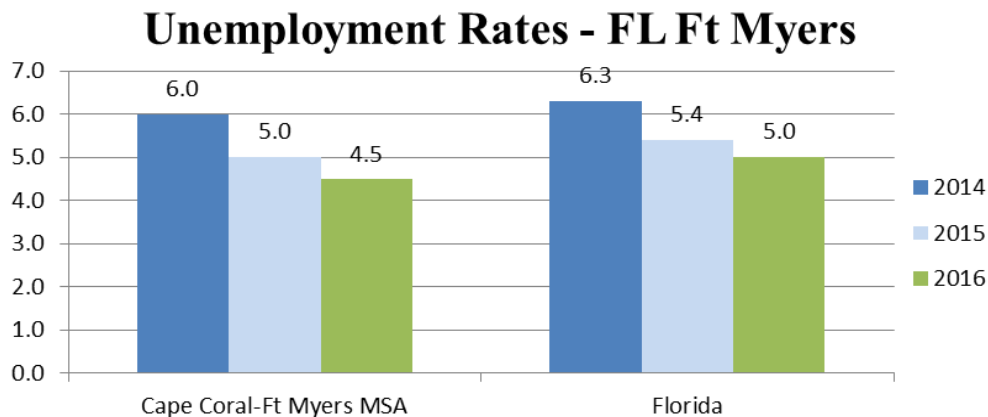
<sup>49</sup> Cramer, Kristopher. "Cape Coral-Fort Myers, Florida." Précis U.S. Metro. Moody's Analytics, November 2016. Web. 18 August 2017. <https://www.economy.com/precismetro>

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According to 2016 Dun &Bradstreet information, there were 45,062 businesses in the assessment area, of which 94.0 percent had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses. Additionally, 17.8 percent of businesses in the assessment area are located in low- and moderate-income tracts. Loan originations to businesses grew by 42.0 percent between 2013 and 2015 in the assessment area, with approximately 15,500 loans made in 2015. Loans made to firms with revenues of \$1.0 million or less represented a 56.5 percent share of total small business loans in Lee County, which is higher than previous years.<sup>50</sup> This may be an indication that there are fewer obstacles for smaller firms to access credit in the market.

According to bank management, Lee County and many coastal communities have a seasonal population surge that boosts business but is followed by a lull during the “off season.” This can be especially challenging for small businesses, many who may see about two-thirds of their annual business during a five-month period. This creates opportunities for financial institutions to tailor and offer financial products that help small businesses manage their cash flow and operations for seasonality.

Economic conditions have improved in the Cape Coral-Fort Myers MSA, with job growth and declining unemployment over the review period. The unemployment rate in the MSA fell from 6.0 percent in 2014 to 4.5 percent in 2016, which is below the state and national rate of 5.0 percent for this period.<sup>51</sup>



<sup>50</sup> “Lee County, FL (CRA Loan Data).” GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 18 August 2017. <<http://www.policymap.com/>>.

<sup>51</sup> “At a Glance Tables.” U.S. Bureau of Labor Statistics. U.S. Bureau of Labor Statistics, n.d. Web. 24 July 2017. <http://www.bls.gov/eag/home.htm>

## Fort Myers, Florida

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Census data indicates there were 363,892 housing units in the assessment area, of which 50.5 percent were owner-occupied, 17.0 percent were rental units and 32.5 percent were vacant. The 2010 census data shows that 3.0 percent of the housing stock in the assessment area was located in low-income tracts and 16.8 percent was in moderate-income tracts. Nearly 42.7 percent of the housing in moderate-income census tracts was owner-occupied units while 27.2 percent of housing was rental units. In low-income census tracts, 22.6 percent of the housing was owner-occupied and 50.6 percent was rental. The vacancy rate was spread somewhat evenly across all geographies. Several factors suggest that residential lending opportunities, home purchase and home improvement, exist but may be limited in low-income tracts.

The assessment area's real estate market has rebounded from the recession, and population growth in the metropolitan area is fueling the housing recovery. Annual home sales trended upward throughout most of the review period before slowing in the middle of 2016. As of December 2016, Lee County posted an 8.0 percent decline over the prior year.<sup>52</sup> The area, however, experienced strong annual price appreciation throughout the review period. Lee County real estate appreciated at a rate of 5.0 percent annually. From December 2013 to December 2016, median home prices in the assessment area saw a 22.9 percent increase. The median home price was approximately \$210,300 as of December 2016. Additionally, the percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) has drastically declined from a recessionary high of 23.0 percent in January 2010 to 2.0 percent as of December 2016, which is leading to faster housing price growth.

The improving housing market is further evidenced by the increase in mortgage originations. An analysis of HMDA-reportable lending indicates that the number of home purchase loans increased by 125.0 percent between 2012 and 2015; during the same period, refinance loans declined by 45.3 percent. In terms of loan originations to borrowers of different income categories, loan originations to borrowers earning 50.0 to 80.0 percent of the area median income increased by 23.8 percent between 2013 and 2015 and loan originations to borrowers earning 80.0 to 120.0 percent of the area median income increased by 19.8 percent. However, originations for low-income borrowers posted a 30.0 percent decline in the number of loans for the same period, which suggests that residential lending opportunities for this segment may be a growing concern.

Overall, the assessment area had a Housing Affordability Index (HAI) of 131.0 as of December 2016, which indicates that housing is more affordable in the area for households earning the median income.<sup>53</sup> However, for lower-wage workers, housing costs are still a challenge. Specifically, 22.7 percent of all homes in Lee County are likely affordable for a four-person family earning 50.0 percent of the area median income in 2015, and 31.1 percent of all homes are likely affordable for a four-person family earning 80.0 percent of the median

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<sup>52</sup> Federal Reserve Bank of Atlanta staff calculations based on data provided by LPS Applied Analytics.

<sup>53</sup> The affordability index measures how affordable the median home price is to households earning the median income, assuming current mortgage rates. A baseline of 100 indicates that median home prices are in line with median household income; an index greater than 100 indicates the housing is more affordable. Source: Federal Reserve Bank of Atlanta calculations of data provided by Moody's Analytics.

## Fort Myers, Florida

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income.<sup>54</sup> Therefore, programs and products that assist homeownership for LMI buyers should be of focus, including down payment assistance programs, affordable lending products, and homebuyer counseling and education programs.

### 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.

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<sup>54</sup> "Lee County, FL (HUD)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 18 Aug. 2017. <<http://www.policymap.com/>>.

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### Combined Demographics Report

Assessment Area: FL Ft. Myers

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	5	3	4,411	2.7	1,344	30.5	30,892	19	
Moderate-income	32	19.2	27,458	16.9	4,214	15.3	30,886	19	
Middle-income	80	47.9	86,515	53.1	5,796	6.7	34,898	21.4	
Upper-income	48	28.7	44,541	27.3	1,390	3.1	66,249	40.7	
Unknown-income	2	1.2	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>167</b>	<b>100.0</b>	<b>162,925</b>	<b>100.0</b>	<b>12,744</b>	<b>7.8</b>	<b>162,925</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	10,760	2,430	1.3	22.6	5,440	50.6	2,890	26.9	
Moderate-income	61,029	26,066	14.2	42.7	16,593	27.2	18,370	30.1	
Middle-income	185,990	102,292	55.6	55	29,224	15.7	54,474	29.3	
Upper-income	106,113	53,140	28.9	50.1	10,566	10	42,407	40	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>363,892</b>	<b>183,928</b>	<b>100.0</b>	<b>50.5</b>	<b>61,823</b>	<b>17.0</b>	<b>118,141</b>	<b>32.5</b>	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	1,473	3.3	1,293	3.1	166	7	14	4.3	
Moderate-income	6,540	14.5	6,127	14.5	381	16	32	9.9	
Middle-income	23,532	52.2	22,322	52.7	1,062	44.7	148	45.7	
Upper-income	13,470	29.9	12,580	29.7	761	32	129	39.8	
Unknown-income	47	0.1	40	0.1	6	0.3	1	0.3	
<b>Total Assessment Area</b>	<b>45,062</b>	<b>100.0</b>	<b>42,362</b>	<b>100.0</b>	<b>2,376</b>	<b>100.0</b>	<b>324</b>	<b>100.0</b>	
Percentage of Total Businesses:				<b>94.0</b>		<b>5.3</b>		<b>.7</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	5	1.7	4	1.4	1	8.3	0	0	
Moderate-income	45	15.4	44	15.8	1	8.3	0	0	
Middle-income	121	41.4	117	41.9	4	33.3	0	0	
Upper-income	121	41.4	114	40.9	6	50	1	100	
Unknown-income	0	0	0	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>292</b>	<b>100.0</b>	<b>279</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	
Percentage of Total Farms:				<b>95.5</b>		<b>4.1</b>		<b>.3</b>	

2016 FFIEC Census Data and 2016 D&B Information

## Fort Myers, Florida

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### Credit and Community Development Needs

While preparing CRA evaluations, examiners contact community representatives to gain insight regarding the credit needs and economic conditions of a bank's assessment area. Community contacts and bank management familiar with the economic conditions of the Cape Coral-Fort Myers assessment area were utilized for this evaluation.

According to multiple contacts, the highest priority need in Cape Coral is affordable workforce housing, especially given the region's predominant service sector. There are not enough apartments to meet demand, and renters are being squeezed by rising prices. For example, 49.7 percent of all renters in Lee County spend more than 30.0 percent of household income on housing-related expenses and are therefore considered cost-burdened; the percentage of renters that spend more than 50.0 percent on housing represents nearly a quarter of all renters in Lee County.<sup>55</sup> In addition, the Out of Reach 2016 study by the National Low Income Housing Coalition finds that a worker earning a mean wage of \$13.08 would have to work 52 hours a week in order to afford the fair market rent for a two-bedroom apartment in the assessment area.<sup>56</sup>

Cape Coral has only 3.9 percent of apartments vacant and available for rent out of 3,696 multifamily rental apartments, and the city needs about 4,500 rental apartment units in the next three years to keep up with demand.<sup>57</sup> However, Cape Coral's original plan and layout is not conducive to assemblage of sufficient land area to allow new multifamily development, including affordable rental apartments. This lack of rental apartments puts pressure on the rents being charged on poorly maintained apartment properties, duplexes, and other sorts of housing, such as single-family homes. The business community, including financial institutions, has an opportunity to take a leadership role in advocating for more affordable housing, as well as financing affordable housing developments.

Because the region was severely impacted by the 2008 residential foreclosure crisis, one community contact noted that the main obstacle to home loans for LMI individuals is credit history. As such, the contact stated that several lending institutions have provided considerable outreach for helping clients with credit repair by providing materials and personnel. The contact encouraged financial institutions to continue this type of engagement but also provide residential loan modifications as necessary and develop innovative credit enhancements to offset prior charge-offs for prospective applicants. Lastly, financial institutions can assist with operational grants for nonprofit housing organizations.

As it relates to small business development in the region, contacts noted that conditions for businesses and microbusinesses in Southwest Florida are favorable, and community banks and some larger financial institutions have been supportive. Contacts encourage banks to continue to support local small business providers; sponsor vendor fairs or similar microbusiness expos, and assist with financial preparedness training.

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<sup>55</sup> "Lee County, FL (Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 17 August 2017. <<http://www.policymap.com/>>.

<sup>56</sup> "Out of Reach 2016". National Low Income Housing Coalition. Web. 17 Aug 2017. [http://nlihc.org/sites/default/files/oor/OOR\\_2016\\_0.pdf](http://nlihc.org/sites/default/files/oor/OOR_2016_0.pdf)

<sup>57</sup> Bumb, Frank. "Cape Coral Booms, but Apartment Complexes Are Scarce." *The News-Press*, USA Today, 9 Mar. 2017, [www.news-press.com/story/news/local/cape-coral/2016/11/28/cape-coral-booms-and-so-do-rent-prices/92512874/](http://www.news-press.com/story/news/local/cape-coral/2016/11/28/cape-coral-booms-and-so-do-rent-prices/92512874/).



## Fort Myers, Florida

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While contacts noted that depository institutions in the area do not have loan products specifically tailored to microbusiness needs, there are real opportunities for banks to partner with micro-lenders and to help expand access to this type of lending, which is largely absent in the market.

Financial institutions serving the Cape Coral-Fort Myers MSA are likely familiar with the Fort Myers Community Redevelopment Agency (FMCRA) and its redevelopment efforts. The agency oversees several redevelopment districts located within Fort Myers, such as East Fort Myers Redevelopment Area, Cleveland Redevelopment Area, and Dr. Martin Luther King, Jr. Redevelopment Area. The FMCRA works together with the City's Community Development Division to prepare plans for the revitalization of each district and coordinate the implementation of the plan's recommendations. Tax increment funds generated by each district, combined with other funding sources, are used to upgrade the public infrastructure and to stimulate redevelopment.<sup>58</sup> Most recently, the Southwest Florida Regional Technology Hub was completed in the Fort Myers CRA Downtown District, which will bring economic development to the Midtown and Dunbar neighborhoods and create a productive use for three acres of formerly nonperforming brownfield land.<sup>59</sup> Working in a leadership or technical assistance capacity with these organizations, financial institutions can determine their level of involvement.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FORT MYERS, FLORIDA ASSESSMENT AREA**

#### **LENDING TEST**

IBERIABANK's lending performance in the Fort Myers assessment area is good. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of loans reflects adequate 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.

IBERIABANK reported 1,059 (57.8 percent) HMDA-reportable loans and 774 (42.2 percent) CRA small business loans in the Fort Myers assessment area during the review period. Therefore, HMDA-reportable lending received greater weight in determining the bank's lending test rating in the assessment area. The Fort Myers assessment area accounted for 15.7 percent of IBERIABANK's total HMDA-reportable lending in Florida and 21.2 percent of its total statewide CRA small business lending by dollar volume during the review period. In comparison, 11.8 percent of IBERIABANK's Florida deposits are in the Fort Myers 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.

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<sup>58</sup> Fort Myers Community Redevelopment Agency, [www.swflenterprisecenter.com](http://www.swflenterprisecenter.com).

<sup>59</sup> Florida Community Loan Fund, <http://www.fclf.org/meet-our-borrowers-item/sw-florida-regional-technology-hub>.

## Fort Myers, Florida

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### ***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, IBERIABANK's geographic distribution of loans reflects good penetration throughout the assessment area.

### Home Purchase Loans

Home purchase lending in low-income census tracts is adequate. Lending performance in low-income census tracts was slightly less than the percentage of owner-occupied units located in these tracts throughout the review period. The bank's home purchase lending in these tracts exceeded aggregate lending in 2014 and was less than aggregate lending in 2015. As noted in the table above, 30.5 percent of families living in low-income tracts are living below the poverty level, which indicates that lending opportunities may be more limited in these tracts.

Home purchase lending in moderate-income census tracts is excellent. The bank's home purchase lending in moderate-income census tracts exceeded the percentage of owner-occupied units in these tracts during the review period. In addition, the bank's home purchase lending in these tracts exceeded aggregate lending in years 2014 and 2015.

### Home Refinance Loans

During the review period, IBERIABANK originated only two home refinance loans in low-income census tracts, where only 1.3 percent of owner-occupied units were 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 tracts is adequate. During the review period, the bank originated just 10 refinance loans in moderate-income tracts, representing 8.7 percent of its home refinance loans; 14.2 percent of owner-occupied units are located in moderate-income tracts. IBERIABANK's home refinance lending in these tracts was less than the aggregate lenders in 2014 but similar to aggregate in 2015. As noted earlier, Fort Myers was heavily impacted by the foreclosure crisis and while home values have recovered, homeowners in moderate-income tracts may not have had sufficient equity or credit quality to consider a refinance when interest rates were lowest at the beginning of the review period.

### Home Improvement Loans

Home improvement lending in low-income census tracts is adequate. During the review period, a total of three home improvement loans were made (two in 2014 and one in 2015) in low-income census tracts. This level of lending represented 5.4 percent of the bank's home improvement loans in the assessment area, which exceeded the 1.3 percent of owner-occupied units located in these tracts. Additionally, the bank's performance significantly exceeded aggregate lenders in 2014 and 2015.

## Fort Myers, Florida

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Home improvement lending in moderate-income census tracts is excellent. Lending performance in moderate-income tracts exceeded the percentage of owner-occupied units located in these tracts. IBERIABANK's home improvement lending was also greater than aggregate lending performance in 2014 and 2015.

### Small Business Loans

Small business lending in low-income census tracts is excellent. IBERIABANK originated 6.8 percent of its small business loans in low-income census tracts, which was greater than the percentage of small businesses located in these tracts at 3.1 percent. IBERIABANK's performance was also significantly greater than aggregate lenders in 2014 and 2015.

Small business lending in moderate-income census tracts is good. IBERIABANK originated 15.2 percent of its small business loans in moderate-income census tracts, which was slightly greater than the percentage of small businesses located in these tracts at 14.5 percent. IBERIABANK's performance was also greater than aggregate lenders in 2014 and 2015.

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

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

### Home Purchase Loans

Home purchase lending to low-income borrowers is good. The percentage of home purchase loans to low-income borrowers was less than the percentage of low-income families located in the assessment area; however, lending performance was significantly greater than aggregate lending performance in 2014 and 2015.

Home purchase lending to moderate-income borrowers is excellent. The bank's percentage of home purchase loans was significantly greater than the percentage of moderate-income families located in the assessment area. The bank's home purchase lending was also significantly greater than the aggregate lending performance in 2014 and 2015.

### Home Refinance Loans

Home refinance lending to low-income borrowers is good. The bank's percentage of home refinance loans to low-income borrowers was significantly less than the percentage of low-income families in the assessment area. However, IBERIABANK's lending significantly exceeded aggregate lending performance in 2014 and 2015.

Home refinance lending to moderate-income borrowers is excellent. The bank's home refinance lending to moderate-income borrowers was similar to the percentage of moderate-income families in the assessment area. Additionally, lending to moderate-income borrowers was significantly greater than the aggregate lenders in 2014 and 2015.

## Fort Myers, Florida

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### Home Improvement Loans

Home improvement lending to low-income borrowers is poor. The bank's home improvement lending to low-income borrowers was significantly less than the percentage of low-income families in the assessment area throughout the review period. Additionally, the bank's lending performance was also less than aggregate lenders in 2014 and 2015.

Home improvement lending to moderate-income borrowers is also poor. The percentage of home improvement loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area throughout the review period. In addition, the bank's performance was greater than the aggregate lending performance in 2014, but less than the aggregate lenders in 2015.

### Small Business Loans

The distribution of small business loans to businesses of different sizes is adequate. 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, IBERIABANK's performance was greater than the aggregate lending performance in 2014 and similar to aggregate lending in 2015. Additionally, 86.9 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.

### ***Community Development Lending***

IBERIABANK makes a relatively high level of community development loans in the Fort Myers assessment area. The bank originated or renewed 10 community development loans totaling \$14.5 million during the review period. Loans were responsive to the need for affordable housing and community services targeted to LMI individuals. Specifically, the bank provided \$11.5 million for community services to LMI individuals and \$3.0 million for affordable housing. This level of lending is considered good given the bank's presence and the availability of community development lending opportunities in the assessment area.

Examples of notable community development loans include:

- Two loans to a Federally Qualified Health Center that serves primarily LMI patients to support working capital needs and to finance the construction of a new medical office.
- A \$1.0 million line of credit (and several renewals) to a local Habitat for Humanity affiliate to provide working capital and bridge financing.

### **INVESTMENT TEST**

IBERIABANK makes an adequate level of qualified investments and grants relative to the bank's presence in the Fort Myers assessment area. Combined investment and contribution activity inside the assessment area totaled \$4.9 million, of which \$4.1 million was invested during the review period. All of the current and prior period investments were purchases of mortgage-backed securities.

## Fort Myers, Florida

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IBERIABANK also contributed \$68,500 to nonprofit organizations during the review period. The majority of the contributions supported community services, including \$11,000 to United Way for programs targeting LMI individuals. Another significant community services contribution included support to a Federally Qualified Health Center, which provides healthcare services to individuals regardless of their ability to pay or health insurance status. The bank was also responsive to affordable housing needs in the assessment area, with donations to three housing organizations to cover home buyer education and operating support, and a mortgage grant of \$3,000 to help a qualified LMI homebuyer with down payment and closing costs. Other contributions supported domestic violence counseling and shelter, food bank assistance, a microenterprise training program, and health prevention services. Furthermore, \$62,000 in contributions were provided to several organizations serving a broader statewide or regional area that includes Fort Myers, in response to community development needs such as access to affordable housing, community development lending and financial stability efforts.

### SERVICE TEST

IBERIABANK's service test performance in the Cape Coral-Fort Myers assessment area is adequate based on the bank's retail banking services and the relatively high level of community development services.

#### *Retail Services*

Retail banking services are adequate in the Fort Myers full-scope assessment area.

The distribution of eight branch offices and eight ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. There were no branches in low-income tracts compared to 3.2 percent of households and 3.3 percent of businesses. The distribution of the bank's branches in moderate-income tracts was also less than the percentage of households and businesses in the same geography; 12.5 percent of total branches were in moderate-income tracts compared to 17.4 percent of households and 14.5 percent of businesses. Due to the limited number of branches in LMI geographies, delivery systems are considered inaccessible to portions of IBERIABANK's geographies and individuals of different income levels.

During the examination period, there were no branch openings and two branch closures. The two closures were in upper-income tracts. The bank did not open or close any full-service ATMs in LMI geographies in the assessment area. 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.

Bank products, services and business hours are consistent throughout the assessment area. IBERIABANK does not offer extended or weekend hours at any its branch offices in the 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.

## Fort Myers, Florida

### Geographic Distribution of Branches & ATMS Assessment Area: FL Ft. Myers

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	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	5	3.0%	3.2%	3.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	12.5%	0	0	1	0	0	Total	1	12.5%	1	12.5%	0	0	0	0.0%	0	0	32	19.2%	17.4%	14.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	4	50.0%	0	0	3	0	0	Total	4	50.0%	4	50.0%	0	0	0	0.0%	0	0	80	47.9%	53.5%	52.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	3	37.5%	0	2	3	0	0	Total	3	37.5%	3	37.5%	0	2	0	0.0%	0	0	48	28.7%	25.9%	29.9%
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	2	1.2%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	8	100.0%	0	2	7	0	0	Total	8	100.0%	8	100.0%	0	2	0	0.0%	0	0	167	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

IBERIABANK provided a relatively high level of community development services in the Fort Myers assessment area. Employees participated in 29 activities, providing 1,758 service hours to qualified organizations.

IBERIABANK's community development service activities in the Fort Myers assessment area primarily benefitted organizations that provide affordable housing and community services to low- and moderate-income individuals, communities and small businesses. Of the bank's total service hours, 248 hours were provided to youth financial education, and 33 hours supported adult financial education in the Fort Myers assessment area. In addition, bank staff engaged in 1,477 hours of board or committee service to qualified nonprofit organizations.

Examples of responsive community development services include:

- The bank engaged in affordable housing board service leadership on a housing development corporation, a housing finance corporation, and a Habitat for Humanity chapter.
- Bank employees served on a United Way allocations committee to grant funds to community service organizations.
- Bank employees served in a leadership capacity for various organizations supporting child welfare, disabled individuals, and substance abuse counseling and treatment.

While there were limited bank service activities supporting economic development, the bank was responsive to affordable housing needs in the assessment area. Overall, the bank's performance is considered good given its low market share and limited branch network in the Fort Myers assessment area.

## Orlando, Florida

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### **METROPOLITAN AREA** *(Full Scope Review)*

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ORLANDO, FLORIDA ASSESSMENT AREA**

##### Overview

IBERIABANK entered the Orlando market in 2015 as a result of the acquisition of Old Florida Bancshares, Inc. The Orlando assessment area comprises two of four counties within the Orlando-Kissimmee-Sanford, Florida MSA: Orange County and Seminole County. As of December 31, 2016, IBERIABANK had 11 branches in the Orlando assessment area, which represent 19.0 percent of the branches statewide. In addition, 28.8 percent of the bank's statewide deposits are in this market. The assessment area represents the largest concentration of combined HMDA-reportable and CRA small business lending by dollar volume in the state at 23.3 percent.

The assessment area is an active banking market that includes various sizes of financial institutions ranging from community banks to large national financial institutions. According to the June 30, 2016 FDIC Summary of Deposits Report, IBERIABANK holds the 7<sup>th</sup> highest deposit market share with 3.2 percent of the deposits in the market area. Overall, there are 41 banks active in the market operating 420 branches and holding a total of \$37.1 billion in deposits.

IBERIABANK ranked 17<sup>th</sup> out of 123 CRA reporters in the assessment area in CRA lending in 2015. The bank had 0.8 percent of total CRA loans. American Express Bank dominated the market.

Wells Fargo, FBC Mortgage, and Quicken Loans are the three largest HMDA lenders in the Orlando market, with a combined 19.7 percent of total HMDA-reportable loans in 2015. IBERIABANK Mortgage ranked 63<sup>rd</sup> and IBERIABANK ranked 78<sup>th</sup> out of 674 lenders in 2015, with a combined 0.5 percent of reported HMDA loans.

##### Population and Income Characteristics

Orlando is projected to be the second fastest growing city in the country in 2017, with a diverse range of residents from international to young professionals and retirees.<sup>60</sup> As of July 2016, Orange County had a total population of 1.3 million, and Seminole County had a population of 455,479.<sup>61</sup> This represents a 14.7 percent

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<sup>60</sup> Sharf, Samantha. "Full List: America's Fastest-Growing Cities 2017." Forbes. Web 14 Aug 2017.

<https://www.forbes.com/sites/samanthasharf/2017/02/10/full-list-americas-fastest-growing-cities-2017/#43dae7473a36>

<sup>61</sup> QuickFacts. US Census Bureau, n.d. Web. 9 Nov 2017. <http://quickfacts.census.gov>

## Orlando, Florida

increase in Orange County and a 7.8 percent increase in Seminole County from the 2010 Census. The city of Orlando is the largest city in the assessment area with a population of 277,173, a 15.9 percent increase over the same period.<sup>62</sup>

The assessment area is made up of 293 census tracts: 6 tracts are low-income (2.1 percent), 76 tracts are moderate-income (25.9 percent), 99 tracts are middle-income (33.8 percent), 111 tracts are upper-income (37.9 percent), and one tract has an unknown income level (0.3 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Orlando-Kissimmee-Sanford, Florida MSA. As shown, the median family income declined from \$58,300 in 2015 to \$57,800 in 2016. In addition, 36.8 percent of families living in the assessment area are considered low- to moderate-income (LMI).<sup>63</sup>

**Borrower Income Levels**  
**Orlando-Kissimmee-Sanford, FL MSA**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2015</b>	<b>\$58,300</b>	0	- \$29,149	\$29,150	- \$46,639	\$46,640	- \$69,959	\$69,960	- & above
<b>2016</b>	<b>\$57,800</b>	0	- \$28,899	\$28,900	- \$46,239	\$46,240	- \$69,359	\$69,360	- & above

The percentage of people living below the federal poverty line was 17.3 percent in Orange County and 12.1 percent in Seminole between 2012 and 2016, while the statewide rate was 16.1 percent.<sup>64</sup> In addition, a significant percentage of families in LMI areas live below the poverty level. Specifically, 37.9 percent of families living in low-income census tracts live below the poverty level and 16.7 percent of families living in moderate-income census tracts live below the poverty level.<sup>65</sup>

### Economic Conditions

As a leading domestic and international tourist destination, the Orlando MSA is home to major theme and water parks, including Walt Disney World Resort, Universal Orlando Resort, and SeaWorld Orlando. Appropriately, the leisure and hospitality sector tops the area's industry sectors, followed by professional and business services, wholesale and retail trade, and education and health services.<sup>66</sup> Walt Disney World is the largest employer in the MSA with 74,000 employees; other large employers include Orange County Public Schools at

<sup>62</sup> "Orlando, FL (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 22 Jan. 2018. <<http://www.policymap.com/>>.

<sup>63</sup> FRB Atlanta Calculations of 2015 Census Data

<sup>64</sup> "Orlando, FL (US Census)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>65</sup> FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

<sup>66</sup> Bowen, Robyn E. "HUD USER." USHMC - Market Profiles, Office of Policy Development and Research (PD&R), 1 Mar. 2017, [www.huduser.gov/portal/ushmc/profile\\_archive.html](http://www.huduser.gov/portal/ushmc/profile_archive.html).



## Orlando, Florida

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53,500, Adventist Health System/Florida Hospital at 17,059, Universal Orlando (Comcast) at 12,000, and Publix Supermarkets at 9,927.<sup>67</sup> The area is home to the University of Central Florida (UCF) as well as, the largest university in the nation, with more than 64,300 students. UCF employs nearly 12,400 faculty and staff.<sup>68</sup>

Over the review period, the area experienced significant job growth and economic investment. In the Orlando MSA, the number of people employed reached 1.2 million for 2016, a 13.4 percent increase from 2013 annual employment figures.<sup>69</sup> However, as previously noted, leisure and hospitality is the leading employment sector, representing approximately 20.0 percent of total employment; many of the jobs in this sector are low paying with annual earnings of \$33,400.<sup>70</sup>

In terms of economic investment, one of the region's largest economic engines has been the new Dr. Phillips Center for the Performing Arts, which supported 3,000 jobs in the City of Orlando during construction.<sup>71</sup> Other regional investments included the start of a seven-year \$2.3 billion, I-4 interstate project designed to overhaul 21 miles of the region's key transportation corridor; a \$1.1 billion expansion at Orlando International Airport; and the construction of a new major league soccer stadium.

According to 2016 Dun & Bradstreet information, there were 110,956 businesses in the assessment area, of which 92.9 percent had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses. Additionally, 19.9 percent of small businesses in the assessment area are located in low- or moderate-income tracts. Lending to small businesses has been improving in the assessment area. According to an analysis of CRA loan data, the number of small business loans increased by 39.3 percent between 2012 and 2015, with nearly 40,000 loans originated in 2015. During this same period, loans made to firms with revenues of \$1.0 million or less increased to a 55.0 percent share of total small business loans in the assessment area, which is higher than previous years. This may be an indication that fewer obstacles exist for smaller firms to access credit in the market. For those financial institutions that are challenged with reaching small businesses with revenue sizes under a \$1 million, they may consider partnering with community development financial institutions (CDFIs) to assist small and emerging businesses with flexible financing and technical assistance.

The declining unemployment rate reflects the level of economic growth in the region in the last few years. As shown in the following table, the unemployment rate for the MSA in 2016 was 4.4 percent, while the two counties composing the assessment area were slightly lower. The area compares favorably to the statewide unemployment rate of 4.9 percent.

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<sup>67</sup> "Orlando's Top 10". Web 18 Aug 2017. <http://www.orlandostop10.com/employers.aspx>

<sup>68</sup> Bowen, Robyn E. "HUD USER." USHMC - Market Profiles, Office of Policy Development and Research (PD&R), 1 Mar. 2017, [www.huduser.gov/portal/ushmc/profile\\_archive.html](http://www.huduser.gov/portal/ushmc/profile_archive.html).

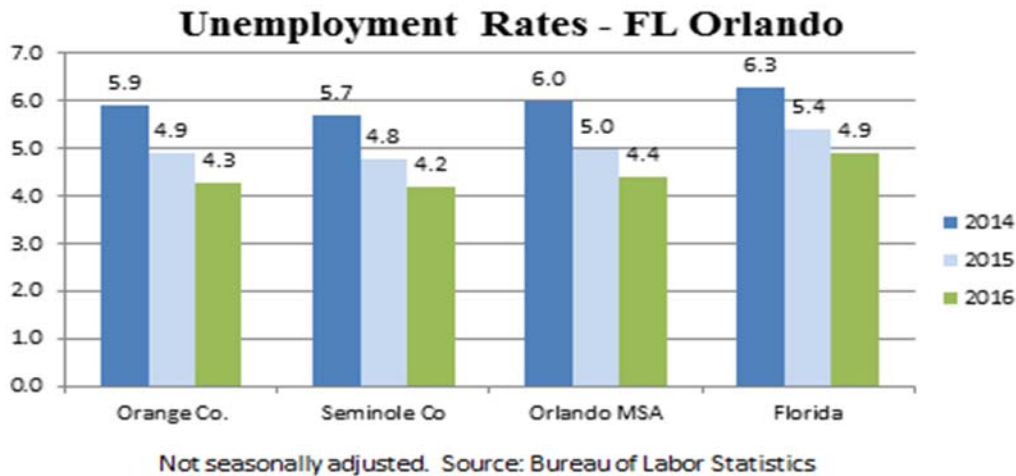
<sup>69</sup> Donaldson, Kwame. "Orlando-Kissimmee-Sanford, FL" Précis U.S. Metro. Moody's Analytics, November 2016. Web. 9 Nov 2017, <https://www.economy.com/precismetro>

<sup>70</sup> Ibid

<sup>71</sup> Orlando Economic Development Commission. "Orlando Insight: First Quarter 2015". Web 18 Aug 2017.

<http://www.orlandoedc.com/Orlando/media/Orlando/Data-Center/economy/Orlando-Insight-First-Quarter-2015.pdf?ext=.pdf>

## Orlando, Florida



There were 653,083 housing units in the assessment area in 2016, of which 53.9 percent were owner-occupied, 31.6 percent were rental units, and 14.5 percent were vacant. Of the housing stock in low-income tracts, only 17.7 percent are owner-occupied units, which represents less than 1 percent of all owner-occupied units in the assessment area. As for the housing units in moderate-income tracts, 35.2 percent are owner-occupied, and this represents 16.8 percent of all owner-occupied units in the assessment area. Rental units represent 66.5 percent of housing units in low-income tracts and 47.9 percent in moderate-income tracts. Additionally, the median age of the housing stock is 24 years for the assessment area, 28 years in moderate-income tracts, and 37 years in low-income tracts. All of these factors underscore that residential lending opportunities in low- and moderate-income tracts may be limited.

The real estate market has rebounded after the recession, with median sale prices continuing to rise from \$180,500 in January 2014 to \$220,000 in December 2016, an increase of 21.9 percent.<sup>72</sup> The two counties also experienced an increase in the number of new single-family building permits between 2014 and 2016, 37.3 percent in Orange County and 29.8 percent in Seminole County.<sup>73</sup> Yet, the number of home sales in Orange and Seminole counties declined from 2013 to 2015 by 16.5 percent and 13.7 percent, respectively.<sup>74</sup>

For lower-wage workers, however, housing costs are a challenge. For example, only 13.5 percent and 17.9 percent of all homes in Seminole and Orange counties, respectively, are likely affordable for a four-person family earning 50.0 percent of the area median income in 2015.<sup>75</sup> This figures increases to nearly one-quarter for a four-person family earning 80.0 percent of the median income. Therefore, efforts to assist home ownership for LMI buyers should continue to focus on down payment assistance programs, affordable lending products, and homebuyer counseling and education programs.

<sup>72</sup> "Monday Morning Quarterback Weekly Report", Orlando Regional Realtor Association. Web. 17 Aug 2017.

<http://www.orlandorealtors.org/?page=MondayMorningQtrbk>

<sup>73</sup> "Orange, FL and Seminole, FL (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>74</sup> Ibid.

<sup>75</sup> "Orlando, FL MSA (Census, HUD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 10 Nov. 2017. <http://www.policymap.com/>

## Orlando, Florida

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Similar to home ownership affordability, rental housing costs are a significant issue in the Orlando MSA, particularly for the lowest income residents. Within the MSA, 55.9 percent of renters in Orange County and 51.0 percent of renters in Seminole County are 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 75.0 percent were cost burdened.<sup>76</sup> The *2016 Out of Reach* study by the National Low Income Housing Coalition confirms that housing affordability is a problem, finding an individual would need to earn an hourly wage of \$19.29, or \$40,120 annually, to afford the fair market rent for a two-bedroom apartment in the Orlando MSA.<sup>77</sup> As previously noted, the annual earnings of an individual in the leisure and hospitality sector are \$33,400.

The market is also experiencing lower delinquency levels. The percentage of home loans in the Orlando assessment area that were seriously delinquent (90 or more days delinquent or in foreclosure) or had transitioned into Real Estate Owned status declined to 3.0 percent in December 2016, which is significantly below the area's high of 21.0 percent in December 2009.<sup>78</sup> This rate is favorable to the state's 3.7 percent for the same period.<sup>79</sup> Although the market is experiencing lower levels of delinquency, the high percentage of underwater homeowners is still of concern. According to RealtyTrac, Orlando had 15.7 percent of properties seriously underwater at the end of 2016, compared to a national average of 9.6 percent.<sup>80</sup> A property is considered seriously underwater when the combined loan amount secured by the property is at least 25.0 percent higher than the property's estimated market value.

### 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.

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<sup>76</sup> "Orlando, FL MSA (US Census Bureau)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 10 Nov. 2017. <http://www.policymap.com/>

<sup>77</sup> "Out of Reach 2016". National Low Income Housing Coalition. Web. 17 Aug 2017. [http://nlihc.org/sites/default/files/oor/OOR\\_2016\\_0.pdf](http://nlihc.org/sites/default/files/oor/OOR_2016_0.pdf)

<sup>78</sup> *National Foreclosure Report*. CoreLogic, 2016, *National Foreclosure Report*, [www.corelogic.com/about-us/news/corelogic-reports-21,000-completed-foreclosures-in-december-2016.aspx](http://www.corelogic.com/about-us/news/corelogic-reports-21,000-completed-foreclosures-in-december-2016.aspx).

<sup>79</sup> Federal Reserve Bank of Atlanta calculations of data provided by LPS.

<sup>80</sup> *Number of Seriously Underwater Properties Down 1 Million From Year Ago, Down 7.1 Million From Market Bottom in Q1 2012*. ATTOM Data Solutions, 21 Aug. 2017, [www.attomdata.com/news/heat-maps/2016-home-equity-and-underwater-report/](http://www.attomdata.com/news/heat-maps/2016-home-equity-and-underwater-report/).

## Orlando, Florida

### Combined Demographics Report

Assessment Area: FL Orlando

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	2	3,481	0.9	1,320	37.9	71,291	19.3
Moderate-income	76	25.9	85,515	23.2	14,273	16.7	64,762	17.5
Middle-income	99	33.8	131,398	35.6	10,826	8.2	73,773	20
Upper-income	111	37.9	148,831	40.3	6,894	4.6	159,399	43.2
Unknown-income	1	0.3	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>293</b>	<b>100.0</b>	<b>369,225</b>	<b>100.0</b>	<b>33,313</b>	<b>9.0</b>	<b>369,225</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	7,782	1,380	0.4	17.7	5,172	66.5	1,230	15.8
Moderate-income	167,576	58,992	16.8	35.2	80,301	47.9	28,283	16.9
Middle-income	240,416	128,303	36.5	53.4	77,279	32.1	34,834	14.5
Upper-income	237,309	163,314	46.4	68.8	43,943	18.5	30,052	12.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>653,083</b>	<b>351,989</b>	<b>100.0</b>	<b>53.9</b>	<b>206,695</b>	<b>31.6</b>	<b>94,399</b>	<b>14.5</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	725	0.7	655	0.6	61	0.9	9	1.1
Moderate-income	22,127	19.9	19,887	19.3	2,112	29.7	128	15.4
Middle-income	36,927	33.3	34,231	33.2	2,501	35.2	195	23.5
Upper-income	51,177	46.1	48,251	46.8	2,429	34.2	497	60
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>110,956</b>	<b>100.0</b>	<b>103,024</b>	<b>100.0</b>	<b>7,103</b>	<b>100.0</b>	<b>829</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.9</b>		<b>6.4</b>		<b>.7</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2	0.4	2	0.4	0	0	0	0
Moderate-income	66	12.2	62	12.4	4	9.8	0	0
Middle-income	184	34	165	33	19	46.3	0	0
Upper-income	289	53.4	271	54.2	18	43.9	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>541</b>	<b>100.0</b>	<b>500</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>92.4</b>		<b>7.6</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Orlando, Florida

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### Credit and Community Development Needs

While preparing CRA evaluations, examiners often contact community representatives to gain insight regarding the credit needs and economic conditions of a bank's assessment area. Community contacts and bank management familiar with the economic conditions of the Orlando MSA assessment area were utilized for this evaluation.

Community contacts maintain that affordable rental housing and single-family homeownership are critical needs in the market. One contact specializing in affordable housing pointed out that long waiting lists for government-subsidized housing leave some families resorting to weekly hotel rentals, thereby diminishing their ability to save money for a down payment or rental deposit. The contact noted that there are also additional barriers for renters with bad credit, evictions or criminal histories. In addition, the Florida Housing Corporation's 2016 Rental Market Study found that there were not enough affordable and available units to meet the needs of renters earning less than 60.0 percent of the area median income in the Orlando MSA.<sup>81</sup> The report also indicates that the Orlando area has 21.0 percent of LIHTC units at risk (4,249 units) due to LIHTC developments reaching 30-year expirations for rent and income restrictions. Also related to housing, local bank management, working with community contacts, maintains that homelessness is a major issue in Orlando, noting that concerted efforts are being made to provide both temporary and permanent housing for the homeless. There are several nonprofit organizations in the assessment area working on housing that banks can partner with to provide services, loans and investments.

An indicator related to financial stability that has been mentioned by community contacts and reported by United Way of Florida is ALICE (Asset Limited, Income Constrained, Employed). These are households earning more than the US poverty level but less than the ALICE Threshold, a newly defined basic survival income level. United Way of Florida proposes that the ALICE Threshold captures a more realistic basic cost of living than the poverty level because it estimates the minimal cost of the five basic household necessities – housing, child care, food, transportation, and health care – for each county in Florida. For Seminole and Orange counties, United Way estimates that nearly 37.0 and 43.0 percent of households, respectively, (the percentage of poverty and ALICE households) in the area do not earn enough to consistently cover their basic living expenses, driven primarily by the lack of affordable housing.<sup>82</sup>

In light of increasing economic challenges facing ALICE households and other low- and moderate-income individuals and families, there is an opportunity for banks to support activities that improve financial capability and household financial stability. Providing adult-level financial education so that people are empowered to make better financial decisions and have better financial outcomes is one approach, along with expanding access to mainstream financial services. According to the FDIC's 2015 National Survey of Unbanked and Underbanked Households for the Orlando MSA, 4.3 percent of households are unbanked, meaning they have no type of deposit account with a mainstream financial institution. Also, 22.8 percent of households are considered

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<sup>81</sup> 2016 Rental Market Study, Shimberg Center for Housing Studies, July 2016, <http://flhousingdata.shimberg.ufl.edu/datasets.html>

<sup>82</sup> "United Way ALICE Project, United Way, Winter 2017, [www.unitedwayalice.org/reports.php](http://www.unitedwayalice.org/reports.php).

## Orlando, Florida

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underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis.<sup>83</sup> In addition to providing education and expanding banking access, there are also opportunities for financial institutions to support financial stability and asset accumulation efforts, such as sponsorships and volunteer involvement with the Volunteer Income Tax Assistance (VITA) program and the Florida Prosperity Partnership. Coordinated by the local United Way, the VITA program is a free tax preparation service operated by volunteers offered to families throughout the Orlando MSA. The Florida Prosperity Partnership works to increase the financial capacity and stability of residents by partnering with financial institutions to promote the benefits of mainstream banking and introducing the “Bank On” program throughout Florida.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ORLANDO, FLORIDA ASSESSMENT AREA**

#### **LENDING TEST**

IBERIABANK’s lending performance in the Orlando assessment area is adequate. The geographic distribution of loans reflects good penetration throughout the assessment area, while the distribution of loans reflects poor 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.

IBERIABANK reported 763 (64.8 percent) CRA small business loans and 415 (35.2 percent) HMDA-reportable loans in the Orlando assessment area during the review period. Therefore, CRA small business lending received greater weight in determining the bank’s lending test rating in the assessment area. The Orlando assessment area accounted for 23.3 percent of IBERIABANK’s total HMDA-reportable and CRA small business lending by dollar volume in Florida during the review period. In comparison, 28.8 percent of IBERIABANK’s statewide 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, IBERIABANK’s geographic distribution of loans reflects good penetration throughout the

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<sup>83</sup> “2015 FDIC National Survey of Unbanked and Underbanked Households”. FDIC. 18 Aug 2017. <https://www.fdic.gov/householdsurvey/>

## Orlando, Florida

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assessment area. As previously noted, IBERIABANK entered the Orlando market in 2015 as a result of an acquisition. Therefore, the review period for this assessment area only included a two-year period from 2015 through 2016. Only 6 of 293 census tracts in this assessment area are low-income. The demographic table for the Orlando assessment area indicates that housing units in low-income tracts are 17.7 percent owner-occupied, 66.5 percent rental, and 15.8 percent vacant. Aggregate lenders also exhibited low lending levels for both HMDA-reportable and small business lending. The demographic table for the Orlando assessment area also shows that 37.9 percent of the families in low-income census tracts live below the poverty level. Additionally, only 0.6 percent of small businesses in the assessment area are located in low-income census tracts. Opportunities for lending in low-income census tracts appears to be limited given the relatively small percentage of owner-occupied housing units and small businesses located in low-income census tracts, the high level of poverty in the low-income tracts, and the lack of lending by the aggregate lenders. As such, with regards to geographic distribution, an assessment of both HMDA-reportable and small business lending in low-income tracts is not included in the evaluation of this assessment area, and more weight was given to lending performance in moderate-income tracts.

### Small Business Loans

Small business lending in moderate-income census tracts is excellent. IBERIABANK originated 31.1 percent of its small business loans in moderate-income census tracts, where 19.3 percent of small businesses in the assessment area are located. Additionally, IBERIABANK's performance was significantly greater than aggregate lenders in 2015. Furthermore, the bank's lending volume increased from 100 loans in 2015 to 137 loans in 2016.

### Home Purchase Loans

Home purchase lending in moderate-income census tracts is adequate. Lending performance in moderate-income census tracts was less than the percentage of owner-occupied units located in these tracts throughout the review period. However, the bank's home purchase lending in these tracts was similar to aggregate lending in 2015. The bank's lending volume increased from 18 loans in 2015 to 20 loans in 2016.

### Home Refinance Loans

Home refinance lending in moderate-income census tracts is poor. IBERIABANK originated five home refinance loans in moderate-income census tracts in 2015 and three in 2016. This level of lending represented 7.3 percent of the bank's home refinance loans in the assessment area, which was considerably less than the 16.8 percent level of owner-occupied units in moderate-income census tracts. Additionally, the bank's performance was less than the aggregate lending performance in 2015.

### Home Improvement Loans

Home improvement lending in moderate-income census tracts is poor based on only one loan made each year in 2015 and 2016. The percentage of home improvement loans in moderate-income census tracts at 13.3 percent was less than the percentage of owner-occupied units at 16.8 percent in these tracts. The bank's performance was also less than the aggregate lending performance in 2015.

## Orlando, Florida

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

The distribution of loans by borrower income or revenue size of businesses is poor. For this analysis, the distribution of small business lending across business revenue sizes and HMDA lending across borrower income levels was compared to available demographic information. Performance relative to other financial institutions was also considered. There are several performance context factors discussed earlier that are important to note in evaluating the bank's HMDA lending to LMI borrowers. First, the Orlando assessment area has a shortage of housing units that are affordable to LMI borrowers. In 2015, only 13.5 percent and 17.9 percent of all homes in Seminole and Orange counties, respectively, were likely affordable for a four-person family earning 50.0 percent of the area median income and approximately 25.0 percent of homes were affordable for a four-person family earning 80.0 percent of the median income.<sup>84</sup> This suggests that the supply of homes available for LMI borrowers to purchase is very limited. Second, the HMDA lending market in the Orlando assessment area is dominated by national banks and national mortgage lenders. This may initially affect HMDA lending for new entrants into the market. As noted previously, IBERIABANK entered the Orlando market in 2015. These factors were taken in to consideration when reviewing the bank's lending to LMI borrowers across all HMDA product types.

### Small Business Loans

The distribution of small business loans to businesses of different sizes is poor. IBERIABANK's originations of small business loans to businesses with revenues of \$1 million or less at 36.4 percent was significantly less than the percentage of small businesses in the assessment area at 92.9 percent. IBERIABANK's performance was also less than aggregate lending performance in 2015. Additionally, 73.2 percent of small business loans were originated by the bank in amounts of \$250,000 or less, indicating the bank exhibited a marginal record of serving the credit needs of very small businesses with small dollar loan amounts that are typically requested by small businesses.

### Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. During the review period, low-income families represented 19.3 percent of total families and received only 3.5 percent of the bank's home purchase loans. However, the bank performed well relative to aggregate in 2015, with 5.9 percent of its home purchase loans to low-income borrowers, compared to the aggregate at 3.6 percent.

Home purchase lending to moderate-income borrowers is poor. During the review period, moderate-income families represented 17.5 percent of total families and received 11.0 percent of the bank's home purchase loans; the bank's lending underperformed the aggregate in 2015.

### Home Refinance Loans

Home refinance lending to low-income borrowers is poor. IBERIABANK originated five home refinance loans to low-income borrowers over the entire review period. This level of lending represented 4.6 percent of the

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<sup>84</sup> "Orlando, FL MSA (Census, HUD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 10 Nov. 2017.  
<http://www.policymap.com/>



## Orlando, Florida

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bank's home refinance loans in the assessment area, which was significantly less than the percentage of low-income families (19.3 percent) located in the assessment area. In 2015, the bank's performance exceeded aggregate; however, this performance was driven by three loan originations.

Home refinance lending to moderate-income borrowers is adequate. During the review period, moderate-income families represented 17.5 percent of total families and received 14.7 percent of the bank's home refinance loans. Additionally, in 2015 the bank originated 7.7 percent of its home refinance loans to moderate-income borrowers, compared to the aggregate at 9.6 percent. The bank's lending volume increased from 4 loans in 2015 to 12 loans in 2016.

### Home Improvement Loans

Home improvement lending to low-income borrowers is very poor. During the review period, the bank originated no home improvement loans to low-income borrowers, although 19.3 percent of the families in the assessment area were low-income. As such, the bank's lending performance was also less than aggregate lenders in 2015.

Home improvement lending to moderate-income borrowers is also very poor. During the review period, the bank originated no home improvement loans to moderate-income borrowers although 17.5 percent of the families in the assessment area were moderate-income. As such, the bank's performance was also less than aggregate lenders in 2015.

### ***Community Development Lending***

IBERIABANK makes a relatively high level of community development loans in the Orlando assessment area. The bank originated or renewed 19 community development loans totaling \$37.5 million during the review period. This level of lending is considered good given the level of competition along with the bank's tenure and presence in the assessment area.

The bank's loans were responsive to several community development needs in the assessment area, including small business financing, affordable housing, and community services for LMI individuals. Specifically, the bank provided financing to support economic development through 10 SBA 504 loans totaling \$29.7 million. Additionally, the bank had five loans for \$7.3 million to support affordable housing; these loans financed multifamily housing located in moderate-income tracts, with rents that are below the fair market rent and affordable to households earning less than 80.0 percent of the area median income. Finally, the bank provided loans totaling \$525,000 for working capital for two local nonprofit organizations that offer community services for LMI individuals.

### **INVESTMENT TEST**

IBERIABANK makes a significant level of qualified investments and grants relative to the bank's presence in the Orlando assessment area. Combined investment and contribution activity inside the assessment area totaled nearly \$13.0 million, or 22.8 percent of total investment activity for the state.

## Orlando, Florida

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The bank made investments (excluding contributions) totaling \$11.8 million in the assessment area, all of which was invested during the review period. The bank was responsive to affordable rental housing needs with a \$5.8 million investment in a 108-unit Section 8 Project Based multifamily development in Sanford, Seminole County. The remaining current period investments were mortgage-backed securities.

IBERIABANK also contributed \$1.1 million to nonprofit organizations during the review period. The majority of the contributions supported community services to LMI individuals, including a total of \$1.0 million to a scholarship program that allows Florida's low-income families to select a school that best meets their child's individual needs regardless of income level; this contribution was directed towards LMI students in the Orlando assessment area. The bank also provided a contribution to Habitat for Humanity of Seminole County & Greater Apopka to support a new 10-unit affordable townhome development. This contribution was particularly impactful in addressing affordable housing needs in Seminole County. Other contributions supported organizations focused on small business technical assistance, foster-care transitional programs, job training assistance, food banks, health care programs, and other emergency support services. Furthermore, \$62,000 in contributions were provided to several organizations serving a broader statewide or regional area that includes Orlando, in response to community development needs such as access to affordable housing, community development lending and financial stability efforts.

### **SERVICE TEST**

IBERIABANK's service test performance in the Orlando assessment area is good based on the bank's retail services and the relatively high level of community development services.

#### ***Retail Services***

Retail banking services are good in the Orlando full-scope assessment area.

The bank's retail delivery systems are accessible to IBERIABANK's geographies and individuals of different income levels. The distribution of 11 branch offices and 11 ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. There were no branches in low-income tracts compared to 1.2 percent of households and 0.7 percent of businesses. The distribution of the bank's branches in moderate-income tracts exceeded the percentage of households and businesses in the same geography; 36.4 percent of total branches were in moderate-income tracts compared to 24.9 percent of households and 19.9 percent of businesses.

The bank acquired 12 branches with 11 full-service ATMs in the assessment area during the examination period, including 4 in moderate-income tracts. The bank did not open or close any branches associated with the acquisition; however, one branch was relocated into an existing location. Overall, the bank's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals in the assessment area.

## Orlando, Florida

Bank products, services, and business hours are consistent throughout the assessment area. IBERIABANK offers extended hours at its branch offices, including those located in moderate-income tracts. The bank, however, does not offer weekend hours in any of its branches. 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: FL Orlando

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	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	6	2.0%	1.2%	0.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	4	36.4%	4	0	3	3	0	Total	4	36.4%	4	36.4%	4	0	0	0.0%	0	0	76	25.9%	24.9%	19.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	2	18.2%	2	0	2	2	0	Total	2	18.2%	2	18.2%	2	0	0	0.0%	0	0	99	33.8%	36.8%	33.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	5	45.5%	5	0	5	5	0	Total	5	45.5%	5	45.5%	5	0	0	0.0%	0	0	111	37.9%	37.1%	46.1%
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	0.3%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	11	100.0%	11	0	10	10	0	Total	11	100.0%	11	100.0%	11	0	0	0.0%	0	0	293	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**

IBERIABANK provides a relatively high level of community development services in the Orlando assessment area. Employees provided 1,152 service hours to qualified organizations, by participating in 26 community development services.

IBERIABANK’s community development service activities benefitted organizations that provide affordable housing, community services, and economic development support to low- and moderate-income individuals, communities and small businesses in the Orlando assessment area. Of the total service hours in the assessment area, 912 hours, or nearly 80.0 percent, involved board or committee service to qualified nonprofit organizations.

Examples of responsive community development services include:

- Bank employees engaged in a high level of board service leadership with the local Habitat for Humanity chapter in support of low- and moderate-income single-family homeownership.
- Bank employees supported workforce development through board and finance committee leadership with a nonprofit organization that helps refugee, immigrant, and homeless populations attain proper identification.

## Orlando, Florida

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- A bank employee served on the community development committee of a nonprofit organization that supports minority small business development through financing, education, and technical assistance.

The bank was responsive to identified community development needs. Overall, the bank's performance is considered good given its low market share and limited branch network in the Orlando assessment area.

## Metropolitan Areas (Limited Review)

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

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FLORIDA METROPOLITAN ASSESSMENT AREAS

- **Homosassa Springs Assessment Area (Citrus County)**
  - As of December 31, 2016, IBERIABANK operated one branch in the assessment area, representing 1.7 percent of its branches in Florida.
  - As of June 30, 2016, the bank had \$64.9 million in deposits in this assessment area, representing a market share of 3.0 percent and 1.6 percent of IBERIABANK's total deposits in Florida.
- **Jacksonville Assessment Area (Duval and St. Johns counties)**
  - As of December 31, 2016, IBERIABANK operated three branches in the assessment area, representing 5.2 percent of its branches in Florida.
  - As of June 30, 2016, the bank had \$101.9 million in deposits in this assessment area, representing a market share of 0.2 percent and 2.4 percent of IBERIABANK's total deposits in Florida.
- **Naples Assessment Area (Collier County)**
  - As of December 31, 2016, IBERIABANK operated eight branches in the assessment area, representing 13.8 percent of its branches in Florida.
  - As of June 30, 2016, the bank had \$863.6 million in deposits in this assessment area, representing a market share of 5.6 percent and 20.8 percent of IBERIABANK's total deposits in Florida.
- **Palm Beach-Broward Assessment Area (Palm Beach and Broward counties)**
  - As of December 31, 2016, IBERIABANK operated seven branches in the assessment area, representing 12.1 percent of its branches in Florida.
  - As of June 30, 2016, the bank had \$392.1 million in deposits in this assessment area, representing a market share of 0.4 percent and 9.4 percent of IBERIABANK's total deposits in Florida.
- **Sarasota Assessment Area (Manatee and Sarasota counties)**
  - As of December 31, 2016, IBERIABANK operated eight branches in the assessment area, representing 13.8 percent of its branches in Florida.
  - As of June 30, 2016, the bank had \$404.2 million in deposits in this assessment area, representing a market share of 2.1 percent and 9.7 percent of IBERIABANK's total deposits in Florida.
- **Tallahassee Assessment Area (Leon County)**
  - As of December 31, 2016, IBERIABANK operated no branch offices in this assessment area. The bank exited the market in March 2015.
  - As of June 30, 2016, the bank had \$29.8 million in deposits in this assessment area, representing a market share of 0.5 percent and 0.7 percent of IBERIABANK's total deposits in Florida.

## Metropolitan Areas (Limited Review)

- **Tampa Assessment Area (Hillsborough and Pinellas counties)**
  - As of December 31, 2016, IBERIABANK operated eight branches in the assessment area, representing 13.8 percent of its branches in Florida.
  - As of June 30, 2016, the bank had \$374.0 million in deposits in this assessment area, representing a market share of 0.6 percent and 9.0 percent of IBERIABANK’s total deposits in Florida.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

<b>Metropolitan Assessment Areas</b>			
<b>Assessment Areas</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Homosassa Springs	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Above)
Jacksonville	Not Consistent (Below)	Consistent	Not Consistent (Below)
Naples	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Palm Beach-Broward	Not Consistent (Below)	Consistent	Consistent
Sarasota	Consistent	Not Consistent (Above)	Consistent
Tallahassee	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Tampa	Not Consistent (Below)	Consistent	Consistent

For the lending test, IBERIABANK received a high satisfactory rating for the State of Florida. Performance in the Sarasota metropolitan limited-scope assessment area was consistent with the bank’s performance for the state. Although lending test performance in the remaining six metropolitan limited-scope assessment areas was weaker than the state, each of these assessment areas, with the exception of the Homosassa Springs and Jacksonville assessment areas, was still considered adequate. Performance in the limited-scope assessment areas was weaker than performance for the state primarily because the bank made few, if any, community development loans in the Homosassa Springs, Jacksonville, Naples, and Tampa assessment areas. Additionally, the geographic distribution of loans was also a factor in the Jacksonville and Tallahassee assessment areas rating. The distribution of loans by borrower income also contributed to the weaker performance in Homosassa Springs and Tallahassee assessment areas.

For the investment test, IBERIABANK received a high satisfactory rating for the State of Florida. Performance in the Sarasota metropolitan assessment area was stronger than the performance for the state while the bank’s performance in the Jacksonville, Palm Beach-Broward, and Tampa metropolitan assessment areas was consistent with the state. Performance in the Homosassa Springs, Naples, and Tallahassee assessment areas was weaker than the state’s performance.

## Metropolitan Areas (Limited Review)

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For the service test, IBERIABANK received a rating of high satisfactory for the State of Florida. Performance in the Homosassa Springs metropolitan assessment area was stronger than the performance for the state, primarily driven by solid retail delivery services. Service test performance in the Palm Beach-Broward, Sarasota, and Tampa metropolitan assessment areas was consistent with the bank's state performance. Performance in the Jacksonville, Naples, and Tallahassee metropolitan assessment areas was below the bank's statewide performance due to weaker retail delivery services.

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

## Nonmetropolitan Area (Limited Review)

The following nonmetropolitan assessment area was reviewed using limited-scope examination procedures.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE FLORIDA NONMETROPOLITAN ASSESSMENT AREA

- **Keys Assessment Area (Monroe County)**
  - As of December 31, 2016, IBERIABANK operated four branches in the assessment area, representing 6.9 percent of its branches in Florida.
  - As of June 30, 2016, the bank had \$240.0 million in deposits in this assessment area, representing a market share of 8.3 percent and 5.8 percent of IBERIABANK’s total deposits in Florida.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

<b>Nonmetropolitan Assessment Area</b>			
<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Keys	Not Consistent (Below)	Consistent	Not Consistent (Below)

For the lending test, IBERIABANK received a high satisfactory rating for the State of Florida. The bank’s performance in the Keys nonmetropolitan assessment area was below performance for the State of Florida. The geographic distribution of HMDA-reportable loans and the distribution of HMDA-reportable loans by borrower income contributed to the weaker performance in this area.

For the investment test, IBERIABANK received a high satisfactory rating for the State of Florida. Investment test performance in the Keys nonmetropolitan assessment area was consistent with the state.

For the service test, IBERIABANK received a rating of high satisfactory for the State of Florida. Service test performance in the Keys nonmetropolitan assessment area was below the bank’s state performance, driven principally by weaker retail banking services.

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



## GEORGIA

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**CRA RATING FOR GEORGIA: SATISFACTORY**

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

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

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

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects adequate penetration throughout the assessment area, and the distribution of loans by borrower income reflects poor penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans in its Georgia assessment area.
- The bank makes a significant level of qualified community development investments and grants in Georgia. However, investments and contributions demonstrate limited responsiveness to identified community development needs in the bank's full-scope assessment area.
- 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.

## GEORGIA

### SCOPE OF EXAMINATION

A full-scope review was conducted for the only assessment area in the State of Georgia:

- Atlanta

The Atlanta assessment area is the only assessment area in the state; therefore, no limited-scope review was conducted in the State of Georgia. 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 GEORGIA

As of June 30, 2016, IBERIABANK had \$850.9 million in deposits in Georgia accounting for 5.3 percent of the bank's total deposits. IBERIABANK operated eight branch offices in Georgia as of December 31, 2016, representing 4.0 percent of the bank's total branches. HMDA-reportable lending in Georgia accounted for 1.3 percent of total institutional HMDA-reportable lending by number of loans, and CRA small business lending in Georgia accounted for 3.2 percent of the bank's total CRA small business lending. Overall, HMDA-reportable and CRA lending in Georgia accounted for 2.0 percent of the bank's total lending activity. As noted previously, IBERIABANK acquired a bank in Georgia in 2015 and added the Atlanta assessment area during the review period.

The following table shows lending activity from January 1, 2014 through December 31, 2016.

### Statewide Summary of Lending Activity Assessment Areas Located in GA STATE

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	200	20.5%	\$60,753	19.2%
HMDA Refinance	139	14.3%	\$63,492	20.0%
HMDA Home Improvement	21	2.2%	\$22,027	7.0%
HMDA Multi-Family	5	0.5%	\$1,684	0.5%
<b>Total HMDA</b>	<b>365</b>	<b>37.4%</b>	<b>\$147,956</b>	<b>46.7%</b>
<b>Total Small Business</b>	<b>607</b>	<b>62.3%</b>	<b>\$168,638</b>	<b>53.2%</b>
<b>Total Farm</b>	<b>3</b>	<b>0.3%</b>	<b>\$321</b>	<b>0.1%</b>
<b>TOTAL LOANS</b>	<b>975</b>	<b>100.0%</b>	<b>\$316,915</b>	<b>100.0%</b>

Originations and Purchases

## GEORGIA

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### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

#### **Lending Test**

The lending test rating in the State of Georgia is low satisfactory. Overall, performance in Georgia with regard to the geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of loans by borrower income reflects poor penetration among customers of different income levels and businesses of different sizes. Additionally, IBERIABANK makes an adequate level of community development loans in Georgia.

During the review period, IBERIABANK reported 365 HMDA-reportable loans and 607 small business loans in Georgia. As such, small business lending was given greater weight when determining the lending test rating for Georgia. The rating for Georgia is based on performance in the Atlanta full-scope 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 IBERIABANK's HMDA-reportable and small business loans is adequate, and the distribution of loans by borrower income and revenue size of businesses is poor. As noted above, the rating for the State of Georgia is derived from the Atlanta full-scope assessment area. A detailed discussion of the borrower and geographic distribution of lending for the assessment area is included in the next section of this report.

#### ***Community Development Lending***

IBERIABANK makes an adequate level of community development loans in the State of Georgia. The bank originated eight community development loans totaling \$8.4 million in Georgia during the review period; all loans were in Atlanta, which was the only full-scope assessment area. The bank was considered responsive to the credit needs in its assessment area. Therefore, positive consideration was given for three loans totaling \$5.3 million that financed affordable housing projects in Georgia, but outside the bank's assessment area. Overall, this level of statewide community development lending is considered adequate based on the bank's presence and time in the market, as well as the competitiveness in its Georgia 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 Georgia is high satisfactory.

IBERIABANK makes a significant level of qualified community development investments and grants in Georgia. However, investments and contributions demonstrate limited responsiveness to identified community development needs in the bank's full-scope assessment area. During the review period, the bank had qualified investments of \$10.9 million in the Georgia assessment area, with 52.5 percent acquired during the current

## GEORGIA

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review period. In addition, the bank made 30 qualified contributions in the assessment area for approximately \$189,300. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section.

A summary of the bank's investments and contributions for full-scope and limited-scope assessment areas can be found in Appendix F.

### **Service Test**

The service test rating for Georgia is Low Satisfactory.

#### ***Retail Services***

Retail banking services are adequate in Georgia. The retail banking services rating consists of an evaluation of the bank's accessibility of delivery systems, changes in branch locations, and reasonableness of business hours and services in meeting assessment area needs. Additional detail on the bank's retail services can be found in the full-scope assessment area section.

#### ***Community Development Services***

IBERIABANK provides a relatively high level of community development services that benefit low- and moderate-income residents and small businesses in the State of Georgia.

The bank provided a total of 672 qualified service hours during the review period. In addition, bank employees engaged in nine service hours that benefitted the broader statewide or regional area, including the bank's assessment area. The community development service performance is considered good given IBERIABANK's size and presence in the State of Georgia.

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

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### METROPOLITAN AREA (Full Scope Review)

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ATLANTA, GEORGIA ASSESSMENT AREA

##### Overview

IBERIABANK entered the Georgia market in 2015 as a result of the acquisition of Georgia Commerce Bancshares, Inc. ("Georgia Commerce Bank"), expanding its presence into the Atlanta assessment area. As noted earlier, Atlanta is the bank's only assessment area in the state. The Atlanta assessment area consists of 6 counties that are part of the 29-county Atlanta-Sandy Springs-Roswell, Georgia MSA, including Cherokee, Cobb, DeKalb, Forsyth, Fulton and Gwinnett counties. As of December 31, 2016, IBERIABANK had eight branches in the Atlanta assessment area, which represent 5.3 percent of the institution's branches overall.

The assessment area's banking market is competitive with a significant presence of national and multi-regional banks. According to the June 30, 2016 FDIC Summary of Deposits Report, there are 68 financial institutions operating 913 branch locations in the Atlanta assessment area. IBERIABANK holds 0.6 percent deposit market share with approximately \$850.9 million in total deposits. Leaders in the Atlanta assessment area are SunTrust Bank (30.7 percent), followed by Bank of America (19.9 percent), Wells Fargo Bank (19.6 percent), and BB&T (4.7 percent).

HMDA-reportable and CRA lending is similarly competitive. IBERIABANK and IBERIABANK Mortgage combined had 0.1 percent of total HMDA-reportable lending in 2015. IBERIABANK ranked 165<sup>th</sup> while IBERIABANK Mortgage ranked 144<sup>th</sup> out of the 732 HMDA lenders in the market in 2015. Wells Fargo Bank was the dominant HMDA reporter in 2015, followed by Quicken Loans and SunTrust Mortgage. IBERIABANK's CRA lending volume in 2015 in the Atlanta assessment area ranked 26<sup>th</sup> out of 172 lenders with 0.2 percent of CRA loans. American Express is the dominant CRA reporter in the market, followed by Wells Fargo Bank, Bank of America, and Capital One.

##### Population and Income Characteristics

The Atlanta MSA is now the 9<sup>th</sup> largest region in the U.S with 5.8 million residents as of 2016. The region experienced population growth of 9.6 percent from 2010.<sup>85 86</sup> While Fulton County, home to the city of Atlanta, was the most populous county in the assessment area with over 983,900 people, Forsyth County added the most residents in the region between 2010 and 2016, followed by Cherokee County.<sup>87 88</sup> The other large population centers are in Cobb and DeKalb counties.

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<sup>85</sup> Select Georgia. Georgia Power. Web. 13 Mar. 2017. <https://www.selectgeorgia.com/resources/publications/metro-atlanta-overview/>.

<sup>86</sup> Hysa, Ilir. "Atlanta-Sandy Springs-Roswell, GA" Précis U.S. Metro. Moody's Analytics, November 2016. Web. 9 Nov 2017. <https://www.economy.com/precismetro>

<sup>87</sup> "Atlanta, GA MSA (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 13 Mar. 2017. <<http://www.policymap.com/>>.

<sup>88</sup> Atlanta Regional Commission. Atlanta Region Population Estimates. Web. 3 Oct. 2017. <https://atlantaregional.org/atlanta-region-population-estimates/>.

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IBERIABANK’s Atlanta assessment area contains 653 census tracts; 2010 census data indicates that there were 79 (12.1 percent) low-income census tracts, 139 (21.3 percent) moderate-income tracts, 178 (27.3 percent) middle-income tracts, 253 (38.7 percent) upper-income tracts, and 4 (0.6 percent) tracts with unknown income levels.

For purposes of classifying borrower income, this evaluation uses the FFIEC’s estimated median family income for each relevant area. The following table sets forth the estimated median family income for the Atlanta MSA and shows that the median family income decreased between 2015 and 2016.

**Borrower Income Levels**  
**Atlanta-Sandy Springs-Roswell, GA MSA**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2015</b>	<b>\$70,700</b>	0	- \$35,349	\$35,350	- \$56,559	\$56,560	- \$84,839	\$84,840	- & above
<b>2016</b>	<b>\$67,200</b>	0	- \$33,599	\$33,600	- \$53,759	\$53,760	- \$80,639	\$80,640	- & above

There is considerable variation in the median family income in the counties throughout the assessment area. Within the assessment area, DeKalb County had the lowest median family income between 2011 and 2015 at \$60,203. Forsyth County had the highest median family income at \$101,200.<sup>89</sup>

Poverty and financial instability are major concerns throughout the assessment area. The percentage of people living below the poverty level continues to increase each year. For the 29 county Atlanta assessment area the percentage of people in poverty was 14.9 percent between 2012 and 2016, while the poverty rate was 17.8 percent statewide.<sup>90</sup> For the assessment area, the poverty rate is highest in DeKalb County at 18.9 percent, followed by Fulton County at 16.9 percent.<sup>91</sup> Moreover, the Corporation for Enterprise Development’s (CFED) Asset & Opportunity Scorecard, which measures asset poverty, found that 39.8 percent of metro Atlanta households are liquid asset poor, meaning that they lack the savings to cover basic expenses or live at the poverty level for three months if a crisis led to a loss of stable income.<sup>92</sup> In addition, 36.5 percent of families within the assessment area are considered low- to moderate-income (LMI), and 49.9 percent of the families living in LMI tracts have incomes below the poverty level.

### Economic Conditions

The Atlanta MSA has experienced significant job growth since the recession and is now the 9<sup>th</sup> largest employment center in the country. The metropolitan area added an average of 61,850 jobs per year from the

<sup>89</sup> FRB Atlanta Calculations of 2016 FFIEC Census Data.

<sup>90</sup> "Atlanta, GA MSA (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 13 Mar. 2017. <<http://www.policymap.com/>>.

<sup>91</sup> Ibid

<sup>92</sup> Corporation for Enterprise Development (CFED). Asset and Opportunity Scorecard, n.d. Web. 8 Aug. 2017. <<http://assetsandopportunity.org/>>.

## Atlanta, Georgia

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end of 2010 through 2015, representing a 2.6 percent average annual increase.<sup>93</sup> Every industry sector added jobs except for the information sector, and the greatest growth occurred in the wholesale and retail trade, and professional and business services sectors.<sup>94</sup> Excluding government, the region's largest industry sectors are professional and business services, wholesale and retail trade, and education and health services. Delta Airlines, Emory Healthcare, Home Depot, AT&T, Wellstar Health System, UPS, Northside Hospital, and Piedmont Healthcare are among the top employers in the region.<sup>95</sup> Fulton, Gwinnett, DeKalb, and Cobb counties are the largest employment centers.<sup>96</sup>

According to 2016 Dun & Bradstreet information, there were 224,397 businesses within the Atlanta 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. Between 2012 and 2014, small business lending increased by 12.7 percent, with 103,400 loans made in 2014. During this same period, loans made to firms with revenues of \$1.0 million or less have steadily increased, representing a 52.8 percent share of total small business loans; this may indicate that there are fewer obstacles for smaller firms to access credit in the market.<sup>97</sup> This data also agrees with a Dun & Bradstreet and Pepperdine University study which shows that the small business sector ended 2015 with access to capital at its highest level since 2012 and a heightened level of optimism about their businesses' health and growth.<sup>98</sup>

According to the Federal Reserve System 2016 Small Business Credit Survey, the top financial challenges faced by surveyed businesses in the last 12 months were accessing necessary credit and meeting operating expenses.<sup>99</sup> The vast majority of firms addressed financial challenges by using personal finances (76.0 percent) before taking on additional debt (44.0 percent). Georgia firms also indicated an unwillingness to assume debt and relied primarily on retained business earnings (66.0 percent) as their primary funding source. Only 13.0 percent of Georgia respondents used external financing in the prior 12 months, with nearly 80.0 percent seeking amounts ranging from \$25,000 to \$250,000.

As shown in the following chart, the economy has improved across the assessment area, with the unemployment rate falling for all counties from 2014 to 2016. In the Atlanta MSA, the unemployment rate was 5.0 percent in 2016, compared to a high of 10.2 percent in 2010. The highest unemployment rates in the bank's Atlanta assessment area in 2016 were in Fulton and DeKalb counties; both were 5.3 percent. Forsyth and Cherokee had the lowest unemployment rates (4.1 percent and 4.2 percent, respectively) in 2016. Statewide, the unemployment rate was 5.4 percent.

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<sup>93</sup> US Housing Market Conditions. Office of Policy Development and Research (PD&R), n.d. Web. 12 Sept. 2016. <https://www.huduser.gov/portal/periodicals/USHMC/reg//AtlantaGA-HMP-June16.pdf>

<sup>94</sup> Ibid

<sup>95</sup> Select Georgia. Georgia Power. Web. 13 Sept. 2016. <<http://selectgeorgia.com/publications/atlanta-overview.pdf>>.

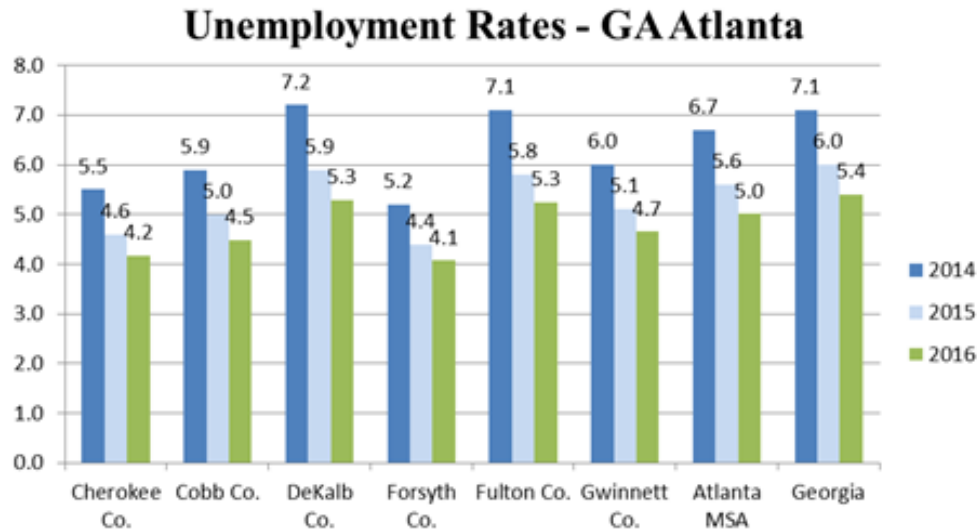
<sup>96</sup> Georgia Department of Labor. Web. 13 Sept. 2016. <<https://explorer.gdol.ga.gov/vosnet/mis/current/laborforce.pdf>>.

<sup>97</sup> "Atlanta, GA (CRA Loan Data)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 12 Sept. 2016. <<http://www.policymap.com/>>.

<sup>98</sup> "Access to Funding Up but Demand Is Down for the Small Business Sector." Dun & Bradstreet, 17 Dec. 2015. Web. 13 Mar. 2017. <<http://investor.dnb.com/releasedetail.cfm?releaseid=947339>>.

<sup>99</sup> "2016 Small Business Credit Survey of the Federal Reserve Banks: Report on Employer Firms." *Federal Reserve Bank of Atlanta*. Federal Reserve System, 2016. Web. 10 Aug. 2017.

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Not seasonally adjusted. Source: Bureau of Labor Statistics

The State of Georgia provides tax incentives to attract and retain businesses and jobs while significantly reducing the cost of doing business. Business incentives include the Job Tax Credit, Investment Tax Credit and Freeport Inventory Tax Exemption<sup>100</sup>. Additionally, designated geographies such as Empowerment Zones, Enterprise Zones, Foreign Trade Zones, Less Developed Census Tracts, and Opportunity Zones encourage economic development and revitalization in underserved and distressed communities.

The state is also vested in Workforce and Economic Development incentives to increase the pool of qualified workers for new companies expanding to and within the state. Employers can encourage worker access to jobs located in employment centers through increased public transportation utilization. Employers receive up to a \$125 tax write-off per employee through the MARTA Partnership when they underwrite the cost of MARTA transit passes.<sup>101</sup> Quick Start is an internationally recognized free training program offered onsite or through technical schools to ready current or potential employees for skills-based jobs. The state HOPE Postsecondary Scholarship and Grant Programs support Georgia students attending state universities, colleges and technical schools in pursuit of a degree or certificate to further job training and career preparation.

Census data indicates there were approximately 1.4 million housing units in the assessment area in 2010, of which 57.5 percent were owner-occupied, 30.5 percent were rental units, and 12.1 percent were vacant.<sup>102</sup> Cherokee and Forsyth counties have the highest homeownership rates (at or above 75.0 percent) and Fulton County, the most urban county, had the lowest rate at 46.5 percent.<sup>103</sup> Rental and vacant units are highly

<sup>100</sup> "County Reports." Georgia Power. N.p., n.d. Web. 09 Aug. 2017. <https://www.selectgeorgia.com/resources/publications/business-incentives-copy-needed/>

<sup>101</sup> "Metro Atlanta Overview - Atlanta: The Growth Engine in the Southeast." Georgia Power Community and Economic Development, n.d. Web. 9 Aug. 2017. <<http://selectgeorgia.com/publications/atlanta-overview.pdf>>.

<sup>102</sup> FRB Atlanta Calculations of Dun & Bradstreet, 2010 American Community Survey data.

<sup>103</sup> Ibid



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concentrated in low- and moderate-income tracts, and the housing is much older in these areas compared to the overall assessment area. These factors suggest that lending may be more challenging in LMI areas than in other areas.

The Atlanta metro housing market is strong, with annual increases in home sales and home values, and is now surpassing market highs experienced in the last decade. The shortage of housing inventory is placing upward pressure on new and existing home prices. During the 12 months ending March 2016, the average sales price for new homes was \$318,500, representing a 4.0 percent increase over the prior year, while the average sales price for existing homes was \$225,000, representing an increase of 7.0 percent since March 2015.<sup>104</sup> The number of new and existing homes sold totaled 117,400 units, an increase of 8.0 percent from home sales from the prior year.<sup>105</sup>

The improving sales market has led to more new home construction. For the 12-month period ending April 2016, new home permits increased 16.0 percent to approximately 21,150 homes.<sup>106</sup> Most of the recent home building activity has been occurring in Cherokee, Forsyth, and Henry counties, but most of the new home construction is at the upper end of the market, making it difficult for first-time homebuyers and LMI families to purchase in these communities.<sup>107</sup> Over the past four years, the number of entry-level homes for sale (defined as those priced in the lower third of a local market) has fallen by 34.0 percent on a national level, according to a Reuters analysis of data compiled by listings firm Trulia.<sup>108</sup> In terms of affordability, the Atlanta assessment area had a Housing Affordability Index (HAI) of 157.0 as of December 2016.<sup>109</sup> <sup>110</sup> The percentage of homes affordable for a four-person family earning 80.0 percent of the area median income in 2015 varies by county. Only 15.4 percent of all homes in Forsyth County are affordable to those earning 80.0 percent of the area median income. Home ownership affordability increases in counties farther away from the employment centers.<sup>111</sup>

The market is also experiencing lower delinquency levels. The percentage of home loans in the Atlanta metropolitan area that were seriously delinquent (90 or more days delinquent or in foreclosure) or had transitioned into Real Estate Owned status declined to 2.9 percent in March 2016, which is slightly below the 3.0 percent rate for both Georgia and the U.S.<sup>112</sup> Although the market is experiencing lower levels of

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<sup>104</sup> US Housing Market Conditions. Office of Policy Development and Research (PD&R), n.d. Web. 12 Sept. 2016. <https://www.huduser.gov/portal/periodicals/USHMC/reg//AtlantaGA-HMP-June16.pdf>

<sup>105</sup> Ibid

<sup>106</sup> Ibid

<sup>107</sup> Kanell, Michael. "HOUSING MARKET; Atlanta's housing market an oddity." *The Journal-Constitution*, 21 Aug. 2016. Print. 13 Sept. 2016.

<sup>108</sup> Randall, David and Groom, Nichola. "In recovering housing market, the starter home remains elusive" *Reuters*, 10 August 2016. Web. 4 January. 2017. <http://www.reuters.com/article/us-usa-housing-starterhomes-insight-idUSKCN10L0FG>.

<sup>109</sup> Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic.

<sup>110</sup> The affordability index measures how affordable the median home price is to households earning the median income, assuming current mortgage rates. A baseline of 100 indicates that median home prices are in line with median household income; an index greater than 100 indicates the housing is more affordable. As of December 2016, Cherokee County has an HAI of 186, DeKalb County has an HAI of 123, and Gwinnett County has an HAI of 170. Source: Federal Reserve Bank of Atlanta calculations of data provided by Moody's Analytics.

<sup>111</sup> "Atlanta, GA MSA (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 13 Mar. 2017. <<http://www.policymap.com/>>.

<sup>112</sup> Federal Reserve Bank of Atlanta calculations of data provided by LPS.

## Atlanta, Georgia

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delinquency, the high percentage of underwater homeowners is still of concern. Atlanta ranks 3<sup>rd</sup> in the percentage of homeowners owing more on their mortgages than their homes are worth. At the end of 2015, 17.6 percent of Atlanta homeowners were underwater, compared to a national average of 13.0 percent.<sup>113</sup>

The multifamily housing market is also thriving with increased construction, rising rents and declining vacancy rates. The estimated vacancy rate for all rental units (including renter-occupied, single-family homes, and apartments) was 6.2 percent as of May 1, 2016, down from 12.7 percent in 2010. The average monthly apartment rent was \$1,018 in the first quarter of 2016, representing an 8.1 percent increase from the first quarter of 2015 and a 32.0 percent increase from the first quarter of 2010. The vast majority of new rental housing in Atlanta is Class A luxury rentals, and the construction of new affordable rental housing is limited.

As rents continue to rise, it will be a challenge for LMI renters to find affordable housing options in counties closest to the urban core and job centers. Renters are currently struggling with high housing costs in several counties, with 52.0 percent in DeKalb and Gwinnett counties considered housing cost-burdened. Rental households are considered cost-burdened if their rental costs account for more than 30.0 percent of household income. In the Atlanta MSA, a renter would need an hourly wage of \$18.25 to afford a two-bedroom rental.

Due to the increasing rent and the high housing cost burdens on working families, Atlanta's economic development authority passed a new affordable housing policy, the Workforce Housing Policy, which would increase the availability of affordable housing throughout the city by requiring real estate developers receiving government subsidies to make units available to persons making lower incomes. In addition, the city of Atlanta passed an ordinance also effective July 1, 2016, that requires a set percentage of residential real estate units from any development receiving public funds to be leased to working households whose income falls below 80.0 percent of the area median income.

### 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.

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<sup>113</sup> Eloy, Michell. "Report: Atlanta Underwater Mortgage Rate Falls, Still High." WABE, 10 Mar. 2016. Web. 13 Sept. 2016. <<http://news.wabe.org/post/report-atlanta-underwater-mortgage-rate-falls-still-high>>.

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### Combined Demographics Report

Assessment Area: GA Atlanta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	79	12.1	56,116	6.8	18,397	32.8	172,177	20.8
Moderate-income	139	21.3	154,661	18.7	26,518	17.1	129,749	15.7
Middle-income	178	27.3	255,956	30.9	20,510	8	149,221	18
Upper-income	253	38.7	361,884	43.7	13,301	3.7	377,470	45.6
Unknown-income	4	0.6	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>653</b>	<b>100.0</b>	<b>828,617</b>	<b>100.0</b>	<b>78,726</b>	<b>9.5</b>	<b>828,617</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	132,737	29,310	3.5	22.1	72,746	54.8	30,681	23.1
Moderate-income	309,972	122,135	14.7	39.4	137,217	44.3	50,620	16.3
Middle-income	430,567	268,513	32.4	62.4	116,853	27.1	45,201	10.5
Upper-income	569,843	409,707	49.4	71.9	112,621	19.8	47,515	8.3
Unknown-income	33	0	0	0	33	100	0	0
<b>Total Assessment Area</b>	<b>1,443,152</b>	<b>829,665</b>	<b>100.0</b>	<b>57.5</b>	<b>439,470</b>	<b>30.5</b>	<b>174,017</b>	<b>12.1</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	11,418	5.1	10,155	4.9	1,166	6.8	97	6
Moderate-income	39,522	17.6	35,425	17.2	3,844	22.3	253	15.8
Middle-income	67,354	30	62,131	30.2	4,818	28	405	25.2
Upper-income	106,048	47.3	97,820	47.6	7,379	42.8	849	52.9
Unknown-income	55	0	40	0	15	0.1	0	0
<b>Total Assessment Area</b>	<b>224,397</b>	<b>100.0</b>	<b>205,571</b>	<b>100.0</b>	<b>17,222</b>	<b>100.0</b>	<b>1,604</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.6</b>		<b>7.7</b>		<b>.7</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	24	2.7	23	2.6	1	5.3	0	0
Moderate-income	92	10.4	90	10.4	2	10.5	0	0
Middle-income	297	33.4	286	32.9	11	57.9	0	0
Upper-income	475	53.5	470	54.1	5	26.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>888</b>	<b>100.0</b>	<b>869</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>97.9</b>		<b>2.1</b>		<b>.0</b>

## Atlanta, Georgia

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### Credit and Community Development Needs

The community development environment in the Atlanta region is sophisticated, with strong engagement from nonprofits, government agencies, foundations, and financial institutions. There are numerous opportunities for banks to partner with nonprofits, developers and community development financial institutions (CDFIs) 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.

According to a community contact engaged in affordable housing and foreclosure advocacy, the biggest housing challenge in Atlanta is the large number of homeowners with negative home equity. As a result, the contact stated that the majority of housing activity in underwater communities is left to investors. Moreover, the contact mentioned that home sales in affordable neighborhoods are not increasing, and the availability of mortgage credit is deficient. While federal and state housing tax credit programs are available for affordable multi-housing development, there is also a need for the construction and rehabilitation of single-family homes, and there is no tax credit program in place to encourage a shift in focus to this type of activity. Bank capital does not seem to be available for these single-family projects, according to the contact. Other challenges in the region, such as homeowner and rental affordability, were discussed above.

As it relates to neighborhood stabilization activities in metro Atlanta, there are opportunities for financial institutions to partner with local municipalities and developers focused on revitalizing distressed neighborhoods and communities. For instance, within the city limits of Atlanta there are currently 10 designated Tax Allocation Districts (TADs) that are used to incentivize a variety of developments, such as housing and commercial development in areas that have experienced years of disinvestment. Second, there are several designated "Opportunity Zones" to aid local governments with job creation and redevelopment efforts in several jurisdictions throughout Georgia. This designation is for any area which is within or adjacent to one or more contiguous census block groups with a poverty rate of 15.0 percent or greater, where the area is also included within a state Enterprise Zone, or where a redevelopment plan exists.

The prevalence of poverty and the need for social support services highlight the importance of community service organizations within the bank's communities. The ongoing demand for these services often results in needs for these organizations in terms of financial support and technical assistance as they attempt to serve significant low- and moderate-income populations within the bank's assessment areas. Ultimately, this has the potential to create community development service or investment opportunities for financial institutions. Other opportunities may include helping organizations provide homebuyer and financial education, asset building initiatives, and job training programs. In addition, financial institutions may have opportunities to work collaboratively with city and county officials to address affordable housing and community development issues and to provide leadership in this regard.

## Atlanta, Georgia

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### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ATLANTA, GEORGIA ASSESSMENT AREA

#### LENDING TEST

IBERIABANK's lending performance in the Atlanta assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area while the distribution of loans reflects poor 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.

IBERIABANK reported 607 (62.4 percent) CRA small business loans and 365 (37.6 percent) HMDA-reportable loans in the Atlanta assessment area during the review period. Therefore, CRA small business lending received greater weight in determining the bank's lending test rating in the 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, IBERIABANK's geographic distribution of loans reflects adequate penetration throughout the assessment area. As previously noted, IBERIABANK entered the Atlanta market in 2015 as a result of an acquisition. Therefore, the review period for this assessment area only included a two-year period from 2015 through 2016.

#### Small Business Loans

Small business lending in low-income census tracts is adequate. IBERIABANK originated 5.6 percent of its small business loans in low-income tracts. This was slightly greater than the percentage of small businesses located in these tracts at 4.9 percent. IBERIABANK's lending was slightly less than aggregate lenders in 2015. The bank's lending volume increased from 7 loans in 2015 to 27 loans in 2016.

Small business lending in moderate-income census tracts is good. While the percentage of small business loans in moderate-income tracts was similar to the percentage of small businesses located in these tracts, the bank's performance was greater than aggregate lending performance in 2015. The bank's lending volume increased from 45 loans in 2015 to 59 loans in 2016.

## Atlanta, Georgia

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### Home Purchase Loans

Home purchase lending in low-income census tracts is adequate. During the review period, 3.0 percent of the bank's home purchase loans were originated in low-income tracts. While the percentage of home purchase loans in low-income geographies was slightly less than the percentage of owner-occupied units located in low-income census tracts, IBERIABANK's lending performance was slightly greater than aggregate lending performance in 2015.

Home purchase lending in moderate-income census tracts is also adequate. During the review period, 16.0 percent of the bank's loans were originated in these tracts. The bank's percentage of home purchase loans was greater than the percentage of owner-occupied units in moderate-income census tracts. However, the bank's home purchase lending was less than the aggregate lending performance in 2015.

### Home Refinance Loans

Home refinance lending in low-income census tracts is poor. IBERIABANK originated two home refinance loans in low-income census tracts. This level of lending represented 1.4 percent of the bank's home refinance loans in the assessment area, which was significantly less than the 3.5 percent level of owner-occupied units in low-income census tracts. In 2015, the percentage of the bank's loans in low-income tracts was similar to aggregate lenders, although the bank made only one loan.

Home refinance lending in moderate-income census tracts is adequate. The bank originated 13 home refinance loans. While the percentage of home refinance loans originated in moderate-income census tracts was less than the percentage of owner-occupied units in these tracts, the bank's performance was similar to aggregate lending in 2015.

### Home Improvement Loans

Home improvement lending in low-income census tracts is very poor. During the review period, the bank produced no home improvement loans in low-income census tracts despite the bank's home improvement lending performance in middle- and upper-income tracts. Although only 3.5 percent of owner-occupied units are in low-income census tracts in the assessment area, the aggregate lending performance at 2.7 percent exceeded the bank's lending performance in low-income census tracts in 2015.

Home improvement lending in moderate-income census tracts is also very poor. The bank originated no home improvement loans in moderate-income census tracts. The percentage of owner-occupied units in moderate-income census tracts was 14.7 percent. Although the aggregate performance at 11.2 percent in 2015 was slightly below the percentage of owner-occupied housing units, the aggregate performance still exceeded the bank's lending performance.

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

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

## Atlanta, Georgia

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### Small Business Loans

The distribution of small business loans to businesses of different sizes is poor. IBERIABANK's originations of small business loans to businesses with revenues of \$1 million or less at 29.3 percent was significantly less than the percentage of small businesses in the assessment area at 91.6 percent. IBERIABANK's performance was significantly less than aggregate lending performance in 2015. Additionally, only 63.6 percent of small business loans were originated by the bank in amounts of \$250,000 or less, indicating the bank exhibited a poor record of serving the credit needs of very small businesses with small dollar loan amounts that are typically requested by small businesses.

### Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. While the percentage of home purchase loans to low-income borrowers was significantly less than the percentage of low-income families located in the assessment area, IBERIABANK's lending performance was significantly greater than the aggregate lending performance in 2015. In addition, the bank's lending volume increased from 8 loans in 2015 to 11 loans in 2016.

Home purchase lending to moderate-income borrowers is excellent. The bank's percentage of home purchase loans exceeded the percentage of moderate-income families in the assessment area. IBERIABANK's home purchase lending also exceeded the aggregate lending performance in 2015. Additionally, the bank's lending volume increased from 19 loans in 2015 to 23 loans in 2016.

### Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. The bank's percentage of home refinance loans to low-income borrowers was significantly less than the percentage of low-income families in the assessment area throughout the review period. However, IBERIABANK's percentage of loans to low-income borrowers exceeded aggregate lenders in 2015, although the bank made only three loans.

Home refinance lending to moderate-income borrowers is also adequate. The bank's home refinance lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area. Additionally, lending to moderate-income borrowers was less than aggregate lenders in 2015. However, the bank's lending volume increased from 4 loans in 2015 to 12 loans in 2016.

### Home Improvement Loans

Home improvement lending to low-income borrowers is very poor. The bank made no home improvement loans to low-income borrowers, although the assessment area consisted of 20.8 percent low-income families. The bank's lending performance was also significantly below aggregate lending performance in 2015.

Home improvement lending to moderate-income borrowers is also very poor. The bank made no home improvement loans to moderate-income borrowers, who comprised 15.7 percent of the families in the assessment area. As such, the aggregate lending performance significantly exceeded the bank's lending performance in 2015.

## Atlanta, Georgia

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### ***Community Development Lending***

IBERIABANK makes an adequate level of community development loans in the Atlanta assessment area. The bank originated eight community development loans totaling \$8.4 million during the review period; three of the loans for \$3.3 million were originated or renewed by Georgia Commerce Bank, which IBERIABANK acquired during the review period. Specifically, the bank provided one SBA 504 loan for \$2.0 million to support economic development activities; two loans for \$2.6 million towards community revitalization and stabilization; two loans for \$2.1 million supporting community services to LMI individuals; and three loans totaling \$1.7 million towards affordable housing for LMI individuals. Notably, IBERIABANK provided support for a local CDFI through two different loans, including a \$250,000 loan to support a foreclosure redevelopment program and a \$250,000 loan to increase the CDFI's affordable housing lending capacity.

IBERIABANK's community development lending exhibits adequate responsiveness to some community development and credit needs relative to the bank's presence and time in the market, along with the level of competition in the assessment area.

### **INVESTMENT TEST**

IBERIABANK makes a significant level of qualified investments and grants relative to the bank's presence and time in the Atlanta assessment area. However, investments and contributions demonstrate limited responsiveness to a range of community needs, including affordable homeownership, small business development services, and financial stability initiatives. As noted earlier, opportunities for bank investments to address these needs do exist in the assessment area. Combined investment and contribution activity inside the assessment area totaled \$11.1 million.

The bank made investments (excluding contributions) totaling \$10.9 million in the assessment area; of that, \$5.7 million was invested during the review period. The current period investments included a \$1.0 million LIHTC project involving the redevelopment of a former public housing site into 106 units for families. In addition, the bank was responsive to promoting economic development by financing small businesses with a \$250,000 commitment into a Small Business Investment Company (SBIC) Fund. As of the end of the assessment period, \$220,460 of its commitment has been funded. The remaining current period investments were mortgage-backed securities. All prior period investments provided financing for affordable multifamily housing through investment funds.

IBERIABANK also contributed \$189,300 to nonprofit organizations during the review period. Nearly all of the contributions supported organizations that provide community services to low- or moderate-income individuals, primarily LMI youth mentoring and athletic development programs. IBERIABANK was responsive in its support of homelessness and job training needs in the Atlanta assessment area. The bank provided \$10,000 for a three-year initiative aimed at providing housing and supportive services to homeless individuals and families, and \$37,200 to another organization which provides job training for persons with disabilities. Other contributions provided support for emergency assistance needs, affordable housing, youth educational scholarships, and health-related services for LMI individuals.



## Atlanta, Georgia

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### SERVICE TEST

IBERIABANK's service test performance in the Atlanta assessment area is adequate based on the bank's retail banking services and the relatively high level of community development services.

#### *Retail Services*

Retail banking services are adequate in the Atlanta full-scope assessment area.

The distribution of eight branch offices and eight ATMs as of December 31, 2016, was compared to the distribution of households and businesses among the tract categories within the assessment area. There were no branches in low-income tracts compared to 8.0 percent of households and 5.1 percent of businesses. The distribution of the bank's branches in moderate-income tracts was also less than the percentage of households and businesses in the same geography; 12.5 percent of total branches were in moderate-income tracts compared to 20.4 percent of households and 17.6 percent of businesses. Due to the limited number of branches in LMI geographies, delivery systems are considered inaccessible to portions of IBERIABANK's geographies and individuals of different income levels.

Through its acquisition of Georgia Commerce Bancshares, the bank acquired nine branches with nine full-service ATMs in the assessment area during the examination period, including one in a moderate-income tract. The bank did not open any additional branches or full-service ATMs in the assessment area; however, the bank did close one branch 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.

Bank products, services, and business hours are consistent throughout the assessment area. The bank does not offer extended hours or weekend hours at any of its branches. 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.

## Atlanta, Georgia

### Geographic Distribution of Branches & ATMS

Assessment Area: GA Atlanta

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	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	79	12.1%	8.0%	5.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	12.5%	1	0	0	0	0	Total	1	12.5%	1	12.5%	1	0	0	0.0%	0	0	139	21.3%	20.4%	17.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	2	25.0%	2	0	2	0	0	Total	2	25.0%	2	25.0%	2	0	0	0.0%	0	0	178	27.3%	30.4%	30.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	5	62.5%	5	1	5	0	0	Total	5	62.5%	5	62.5%	6	1	0	0.0%	0	0	253	38.7%	41.2%	47.3%
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	4	0.6%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	8	100.0%	8	1	7	0	0	Total	8	100.0%	8	100.0%	9	1	0	0.0%	0	0	653	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**

IBERIABANK provided a relatively high level of community development services in the Atlanta assessment area. Employees provided 672 service hours to qualified organizations by participating in 18 activities.

IBERIABANK's community development service activities in the Atlanta assessment area benefitted organizations that provide affordable housing, community services, and economic development support to low- and moderate-income individuals, communities, and small businesses. Of the total service hours, nearly 79.0 percent, or 530 hours, involved board or committee service to qualified nonprofit organizations. For the remaining service hours, bank staff provided both youth and adult financial education in the assessment area.

The following were considered responsive community development activities during the review period:

- The bank engaged in service leadership at an affordable housing CDFI that promotes single-family housing development and first-time homeownership.
- A bank employee served in a board leadership role in a university workforce program for disabled individuals.

The bank's performance is considered good given its low market share and limited branch network in the assessment area. While the bank's community development services demonstrated good engagement in community services, the types of activities were less responsive to identified affordable housing needs in the assessment area.

## LOUISIANA

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**CRA RATING FOR LOUISIANA: 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 adequate 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 Louisiana 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 Louisiana assessment areas.
- Retail banking services are good in the bank's assessment areas.
- The bank is a leader in providing community development services throughout the assessment areas.

## LOUISIANA

### SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment areas in the State of Louisiana:

- Lafayette
- St. Mary (non-MSA)
- New Orleans

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

- Allen (non-MSA)
- Monroe
- Baton Rouge
- Morehouse (non-MSA)
- Houma
- St. Landry (non-MSA)
- Lake Charles
- Shreveport
- Lincoln (non-MSA)

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

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN LOUISIANA

As of June 30, 2016, IBERIABANK had \$6.9 billion in deposits in Louisiana accounting for 42.5 percent of the bank's total deposits. IBERIABANK operated 76 branch offices in Louisiana as of December 31, 2016, representing 38.4 percent of the bank's total branches. HMDA-reportable lending in Louisiana accounted for 36.5 percent of total institutional HMDA-reportable lending by number of loans, and CRA small business lending in Louisiana accounted for 49.6 percent of the bank's total CRA small business lending. Overall, HMDA-reportable and CRA lending in Louisiana accounted for 41.7 percent of the bank's total lending activity.

The following table shows lending activity from January 1, 2014, through December 31, 2016.

### Statewide Summary of Lending Activity

Assessment Areas Located in

LA STATE

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	6,099	29.9%	\$1,224,575	38.7%
HMDA Refinance	2,644	13.0%	\$584,924	18.5%
HMDA Home Improvement	1,813	8.9%	\$77,582	2.5%
HMDA Multi-Family	66	0.3%	\$112,754	3.6%
<b>Total HMDA</b>	<b>10,622</b>	<b>52.1%</b>	<b>\$1,999,835</b>	<b>63.3%</b>
<b>Total Small Business</b>	<b>9,519</b>	<b>46.7%</b>	<b>\$1,145,952</b>	<b>36.3%</b>
<b>Total Farm</b>	<b>238</b>	<b>1.2%</b>	<b>\$14,489</b>	<b>0.5%</b>
<b>TOTAL LOANS</b>	<b>20,379</b>	<b>100.0%</b>	<b>\$3,160,276</b>	<b>100.0%</b>

Originations and Purchases

## LOUISIANA

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### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

#### Lending Test

The lending test rating in the State of Louisiana is high satisfactory. Overall, performance in Louisiana with regard to the geographic distribution of loans reflects adequate 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, IBERIABANK makes a relatively high level of community development loans in Louisiana.

During the review period, IBERIABANK reported 10,622 HMDA-reportable loans and 9,519 small business loans in Louisiana. As such, HMDA-reportable lending was given greater weight when determining the lending test rating for Louisiana. The rating for Louisiana is based on performance in the Lafayette, New Orleans, and St. Mary full-scope assessment areas, which account for 57.2 percent of the bank's HMDA-reportable and small business lending by number of loans and 62.0 percent by dollar volume in Louisiana during the review period.

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 IBERIABANK's HMDA-reportable and small business loans is adequate, and the distribution of loans by borrower income and revenue size of businesses is good. As noted above, the rating for the State of Louisiana is derived from the Lafayette, New Orleans, and St. Mary assessment areas. A detailed discussion of the borrower and geographic distribution of lending for all three assessment areas is included in the next section of this report.

#### *Community Development Lending*

IBERIABANK makes a relatively high level of community development loans in Louisiana. The bank originated 49 community development loans totaling \$168.3 million in the assessment areas across the state during the review period. The bank is a leader in community development lending in the New Orleans full-scope assessment area, with 22 loans for \$59.0 million. The bank makes an adequate level of community development loans in Lafayette, with 9 loans for \$42.4 million, while the level of loans was low in the St. Mary assessment area, with one loan for \$10,000. The bank is also a leader in community development lending in the Baton Rouge limited-scope assessment area. Notably, the bank had nearly \$43.9 million in loans during the review period, including \$33.3 million to support revitalization and stabilization efforts in the city of Baton Rouge.

The bank also had \$11.5 million in two loans that covered several states in its footprint, including Louisiana. These loans are discussed in the Institution section; both loans supported affordable housing and positively impacted the bank's performance in all Louisiana assessment areas.

Statewide community development lending performance was driven by performance in the full-scope assessment areas, and the New Orleans 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.

## LOUISIANA

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### **Investment Test**

The investment test rating for Louisiana is high satisfactory.

IBERIABANK makes a significant level of qualified community development investments and grants in Louisiana, often in a leadership position. During the review period, IBERIABANK had qualified investments of \$95.4 million in the Louisiana assessment areas, with nearly 84.3 percent acquired during the current review period. In addition, the bank made 414 qualified contributions in the assessment areas for approximately \$3.1 million. The state investment rating also reflects four contributions totaling \$9,500 that benefit a broader statewide or regional area that includes the Louisiana assessment areas.

Approximately 76.3 percent of combined investment and contribution activity occurred inside the Lafayette, New Orleans, and St. Mary full-scope assessment areas compared to 69.6 percent of deposits in these markets. Performance is excellent in the New Orleans assessment area, good in the Lafayette assessment area, and poor in the St. Mary assessment area. In the bank's limited-scope assessment areas, IBERIABANK demonstrated good performance in the Allen, Baton Rouge, Lake Charles, and Monroe assessment areas; and adequate performance in the Houma, Lincoln, Morehouse, Shreveport, and St. Landry assessment areas. Overall, the bank exhibited good responsiveness to credit and community development needs in Louisiana. Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections.

A summary of the bank's investments and contributions for full-scope and limited-scope assessment areas can be found in Appendix F.

### **Service Test**

The service test rating for Louisiana is high satisfactory.

#### ***Retail Services***

Retail banking services are good in Louisiana. The retail banking services rating consists of an evaluation of the bank's accessibility of delivery systems, changes in branch locations, and reasonableness of business hours and services in meeting assessment area needs. Additional detail on the bank's retail services can be found in the full-scope assessment area sections.

#### ***Community Development Services***

IBERIABANK is a leader in providing community development services that benefit low- and moderate-income residents and small businesses in the State of Louisiana.

The bank contributed a total of 13,224 qualified service hours in the state during the examination period, including 8,404 hours in the New Orleans, Lafayette, and St. Mary full-scope assessment areas. Performance was excellent in two full-scope assessment areas and adequate in one assessment area. Additionally, employees engaged in 4,820 service hours in limited-scope assessment areas. Six limited-scope assessment areas exhibited

## LOUISIANA

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good performance, while the remaining three assessment areas had adequate performance. The community development service performance is considered excellent given IBERIABANK's size and presence in the State of Louisiana.

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

## Lafayette, Louisiana

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### **METROPOLITAN AREA** *(Full Scope Review)*

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAFAYETTE, LOUISIANA ASSESSMENT AREA**

##### Overview

The Lafayette assessment area consists of the five parishes that make up the Lafayette, Louisiana MSA: Acadia, Iberia, Lafayette, St. Martin, and Vermilion. As of December 31, 2016, IBERIABANK had 18 branches in this assessment area. The bank's branch presence in the assessment area represents 23.4 percent of the branches statewide and its largest concentration of statewide deposits.

IBERIABANK holds the largest share of deposits in the Lafayette assessment area. According to the June 30, 2016 FDIC Summary of Deposits Report, the bank ranked 1<sup>st</sup> out of 39 financial institutions operating in the assessment area with a 26.6 percent deposit market share and \$2.9 billion in deposits. IBERIABANK is followed by JPMorgan Chase Bank with 12.5 percent market share and Capital One with 6.8 percent market share.

HMDA-reportable and CRA small business lending are competitive in the Lafayette assessment area. In 2014, IBERIABANK ranked 3<sup>rd</sup> and IBERIABANK Mortgage ranked 9<sup>th</sup> in HMDA-reportable lending, and combined had 7.3 percent of total HMDA-reportable loans in the assessment area. In 2015, IBERIABANK ranked 6<sup>th</sup> and IBERIABANK Mortgage ranked 7<sup>th</sup> in HMDA-reportable lending and combined had 6.4 percent of total reportable loans. Wells Fargo is consistently the dominant HMDA lender in the market though in 2015, GMFS and Platinum Mortgage also originated a significant volume of HMDA-reportable loans in the market. For CRA small business lending, IBERIABANK ranked 3<sup>rd</sup> in 2014 with 12.3 percent of total reportable loans in the assessment area and 5<sup>th</sup> with 8.0 percent of total reportable loans in 2015. American Express and Capital One Bank were the primary CRA lenders in the market.

##### Population and Income Characteristics

The population of the assessment area in 2015 was approximately 480,148 people, representing a 2.9 percent increase since 2010. Lafayette Parish is the most populated and fastest growing parish in the assessment area. Between 2000 and 2010, the population in the parish increased by 21.7 percent; growth continued between 2010 and 2015 with an additional population gain of 7.5 percent. The other parishes in the assessment area are significantly smaller than Lafayette Parish, but also experienced population growth between 2010 and 2015, ranging from 0.7 percent in Iberia Parish to 3.2 percent in Vermillion Parish.<sup>114</sup>

There are 95 census tracts in the assessment area; 2010 census data indicates that there were 5 (5.3 percent) low-income census tracts, 23 (24.2 percent) moderate-income tracts, 43 (45.3 percent) middle-income tracts, 21 (22.1 percent) upper-income tracts, and 3 (3.2 percent) unknown-income tracts.

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<sup>114</sup> "Lafayette, LA assessment area (U.S. Census Bureau)." *Decennial Census and American Community Survey*. American Community Survey, n.d. Web. 7 Jul. 2017. <http://www.policymap.com/>



## Lafayette, Louisiana

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

### Borrower Income Levels Lafayette, LA MSA

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2014</b>	<b>\$58,300</b>	0	- \$29,149	\$29,150	- \$46,639	\$46,640	- \$69,959	\$69,960	- & above
<b>2015</b>	<b>\$59,600</b>	0	- \$29,799	\$29,800	- \$47,679	\$47,680	- \$71,519	\$71,520	- & above
<b>2016</b>	<b>\$63,100</b>	0	- \$31,549	\$31,550	- \$50,479	\$50,480	- \$75,719	\$75,720	- & above

There is considerable variation in the median family income throughout the assessment area. Acadia Parish had the lowest median family income between 2011 and 2015 at \$46,837, while Lafayette Parish had the highest at \$69,671. Of the families living in the assessment area, 40.1 percent are considered low- to moderate-income (LMI), and 24.9 percent of the families living in LMI tracts have incomes below the poverty level.

### Economic Conditions

Economic conditions in the Lafayette metro area have weakened since 2014 after a period of significant economic expansion driven by the strength of the oil and natural gas industries. The metropolitan area had 208,400 nonfarm payroll jobs in September 2016, which represented a decline of 4.4 percent from September 2015. The metropolitan area is heavily dependent on the oil and natural gas industry. The mining, logging, and construction sector accounts for approximately 14.0 percent of all nonfarm payroll jobs and contains 4 of the top 10 employers in the metropolitan area. Recent job loss has been greatest in this sector, and payrolls fell by 11.8 percent between September 2014 and September 2016. Notably, the reported wages in this sector for all parishes fell well below the average median income in this assessment area, indicating job losses in this sector may have had a negative effect on LMI individuals living in this assessment area.<sup>115</sup>

The education and health services sector has the highest number of employees in the metropolitan area and expanded more than any other sector since 2000. Lafayette General Health is the largest education and health services employer. Other major employers include Wal-Mart in the wholesale and retail trade sector along with Stuller, Inc., which is the largest employer in the manufacturing sector.<sup>116</sup>

According to 2016 Dun & Bradstreet data, there were 25,197 businesses operating in the Lafayette assessment area, of which 90.6 percent had total annual revenues less than or equal to \$1.0 million and were therefore considered small businesses. Additionally, 19.9 percent of small businesses in the assessment area are located

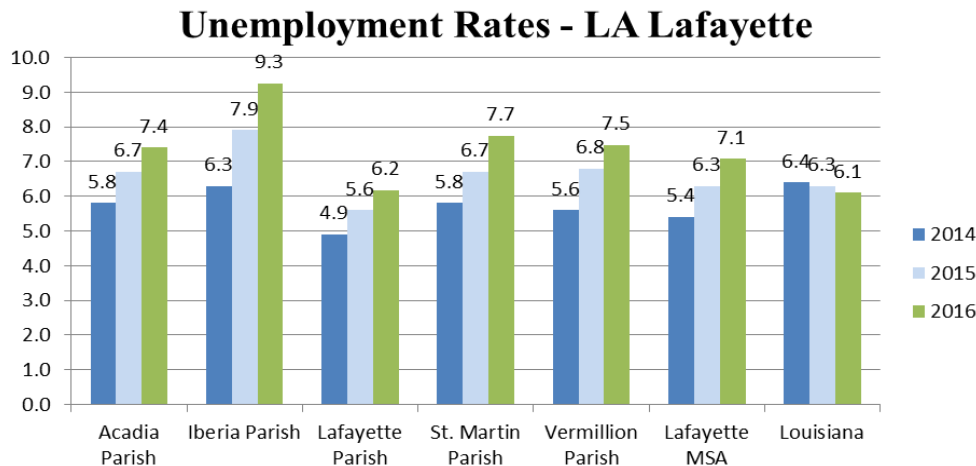
<sup>115</sup> "Lafayette, LA assessment area (U.S. Census Bureau)." *Bureau of Labor Statistics Quarterly Census of Employment and Wages*. n.d. Web. 7 Jul. 2017. <http://www.policymap.com/>

<sup>116</sup> Comprehensive Housing Market Analysis. *Office of Policy Development and Research, Oct. 2016*. n.d. Web. 7 Jul. 2017. <https://www.huduser.gov/portal/publications/pdf/LafayetteLA-comp-17.pdf>

## Lafayette, Louisiana

in LMI tracts. Loans to small businesses in the assessment area have been trending upwards in recent years. Small business lending in 2015 was up 26.2 percent from lending in 2012.<sup>117</sup> These findings confirm sentiments also expressed in the Federal Reserve’s 2015 Small Business Credit Survey, in which a majority of small businesses reported that their firms experienced improved financing success rates, profitable operations, revenue growth, and employee additions.<sup>118</sup>

The increasing unemployment rate is an indicator of the weakening economy in the assessment area. The unemployment rate in the Lafayette metro area rose to 7.1 percent in 2016 – equal to the previous peak reported in 2010 – and is up from 5.4 percent in 2014.<sup>119</sup> As shown in the following table, the unemployment rate statewide has been declining in the past few years; however, within the assessment area, the unemployment rate in all parishes increased between 2014 and 2016. The highest unemployment rate in 2016 was in Iberia Parish at 9.3 percent. Lafayette Parish had the lowest unemployment rate in 2016 at 6.2 percent, though it was still significantly higher than in 2014 at 4.9 percent.



The assessment area contained 192,199 housing units in 2010, of which 62.2 percent were owner-occupied, 27.6 percent were rental units, and 10.1 percent were vacant. St. Martin and Vermilion parishes have the highest homeownership rates (exceeding 66.0 percent in both parishes) and Lafayette Parish, the most populated parish, had the lowest rate at 59.5 percent. In low-income tracts, 41.8 percent of units were owner-occupied, and in moderate-income tracts 54.2 percent of units were owner-occupied.<sup>120</sup> Rental and vacant units are highly concentrated in LMI tracts, and the housing is much older in these areas compared to the assessment area overall. These factors suggest that lending may be more challenging in LMI areas.

<sup>117</sup> “Lafayette, LA assessment area (U.S. Census Bureau).” *FFIEC: CRA*. Community Reinvestment Act, n.d. Web. 7 Jul. 2017. <http://www.policymap.com/>

<sup>118</sup> *2015 Small Business Credit Survey*. Cleveland Federal Reserve, n.d. Web. 7 Jul. 2017. <https://www.clevelandfed.org/community-development/small-business/about-the-joint-small-business-credit-survey/2015-joint-small-business-credit-survey.aspx>

<sup>119</sup> Comprehensive Housing Market Analysis. *Office of Policy Development and Research*, Oct. 2016. n.d. Web. 7 Jul. 2017. <https://www.huduser.gov/portal/publications/pdf/LafayetteLA-comp-17.pdf>

<sup>120</sup> FRB Atlanta Calculations of Dun & Bradstreet, 2016 FFIEC Census data.

## Lafayette, Louisiana

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The recent economic downturn in the Lafayette metro area has caused the home sales market to slow. New home sales fell by 16.0 percent between 2015 and 2016 while existing home sales were down nearly 3.0 percent during this time period. Home prices are also declining with the average sales price of an existing home falling nearly 3.0 percent between 2015 and 2016 to \$181,300.<sup>121</sup> Homebuilding activity has remained below peak levels, but has improved significantly since recession lows from 2009 to 2011.<sup>122</sup>

The market is also experiencing a rise in volumes of distressed home sales (REO and short sales). In September 2016, 3.0 percent of all mortgage loans in the Lafayette metro area were seriously delinquent (90 or more days delinquent or in foreclosure) or had transitioned to REO status, up from 2.8 percent in September 2015. The percentage of home loans in the assessment area that were seriously delinquent or had transitioned into REO status was lower than the rate for Louisiana at 3.8 percent, but higher than the average of 2.7 percent nationwide.

Housing affordability varies throughout the assessment area. In 2015, 40.6 percent of all homes were affordable to those earning 80.0 percent of the area median income in Lafayette Parish; however, in St. Martin Parish, 65.8 percent were considered affordable to this income demographic.<sup>123</sup> High housing cost burdens for homeowners and renters are also a concern in some markets. Between 2011 and 2015, 18.5 percent of homeowner households were considered cost burdened in Lafayette Parish while 43.3 percent of renters were considered cost burdened. Homeowners and renters are considered cost burdened when monthly owner or renter costs are 30 percent or more of household income.<sup>124</sup> In the Lafayette metro area, a renter would need an hourly wage of \$14.17 and would need to work 46 hours per week to be able to afford a two-bedroom rental.<sup>125</sup>

### Demographic Characteristics

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.

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<sup>121</sup> Comprehensive Housing Market Analysis. *Office of Policy Development and Research, Oct. 2016.* n.d. Web. 7 Jul. 2017.

<https://www.huduser.gov/portal/publications/pdf/LafayetteLA-comp-17.pdf>

<sup>122</sup> Comprehensive Housing Market Analysis. *Office of Policy Development and Research, Oct. 2016.* n.d. Web. 7 Jul. 2017.

<https://www.huduser.gov/portal/publications/pdf/LafayetteLA-comp-17.pdf>

<sup>123</sup>“Lafayette, LA assessment area (U.S. Census Bureau).” *HUD Income Limits.* US Department of Housing and Urban Development Income Limits, n.d. Web. 7 Jul. 2017. <http://www.policymap.com/>

<sup>124</sup>“Lafayette, LA assessment area (U.S. Census Bureau).” *Decennial Census and American Community Survey.* . American Community Survey, n.d. Web. 7 Jul. 2017. <http://www.policymap.com/>

<sup>125</sup> National Low Income Housing Coalition. *Out of Reach 2017: Louisiana.* n.d. Web. 7 Jul. 2017. <http://nlihc.org/oor/louisiana>

# Lafayette, Louisiana

## Combined Demographics Report

Assessment Area: LA Lafayette

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	5.3	3,710	3.1	1,300	35	28,217	23.9
Moderate-income	23	24.2	26,691	22.6	6,267	23.5	19,124	16.2
Middle-income	43	45.3	54,396	46.1	6,761	12.4	21,131	17.9
Upper-income	21	22.1	33,262	28.2	2,087	6.3	49,587	42
Unknown-income	3	3.2	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>95</b>	<b>100.0</b>	<b>118,059</b>	<b>100.0</b>	<b>16,415</b>	<b>13.9</b>	<b>118,059</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%
Low-income	7,782	3,253	2.7	41.8	3,312	42.6	1,217	15.6
Moderate-income	44,110	23,927	20	54.2	15,105	34.2	5,078	11.5
Middle-income	89,812	56,542	47.3	63	24,111	26.8	9,159	10.2
Upper-income	50,495	35,877	30	71.1	10,578	20.9	4,040	8
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>192,199</b>	<b>119,599</b>	<b>100.0</b>	<b>62.2</b>	<b>53,106</b>	<b>27.6</b>	<b>19,494</b>	<b>10.1</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	490	1.9	454	2	30	1.4	6	2.3
Moderate-income	4,488	17.8	4,076	17.9	348	16.4	64	24.6
Middle-income	11,353	45.1	10,215	44.8	1,030	48.6	108	41.5
Upper-income	8,847	35.1	8,062	35.3	703	33.2	82	31.5
Unknown-income	19	0.1	12	0.1	7	0.3	0	0
<b>Total Assessment Area</b>	<b>25,197</b>	<b>100.0</b>	<b>22,819</b>	<b>100.0</b>	<b>2,118</b>	<b>100.0</b>	<b>260</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.6</b>		<b>8.4</b>		<b>1.0</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	4	0.7	4	0.7	0	0	0	0
Moderate-income	111	18	107	18	4	20	0	0
Middle-income	352	57.2	338	56.8	14	70	0	0
Upper-income	148	24.1	146	24.5	2	10	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>615</b>	<b>100.0</b>	<b>595</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>96.7</b>		<b>3.3</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Lafayette, Louisiana

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### Credit and Community Development Needs

Community contacts indicate that community development needs in this region are changing due to a number of recent events, including the aforementioned decline in the oil and natural gas industry, which has led to considerable job losses. Additionally, massive flooding in all five parishes in August 2016 has created a need for disaster recovery assistance throughout the assessment area. Finally, political obstacles, including the financial insolvency of Lafayette Parish, are impacting community development opportunities.

According to community contacts engaged in broad community development encompassing low-income family housing, public transportation, economic development, and workforce development, there is a lack of affordable housing for LMI individuals in Lafayette. Many of the multifamily units in LMI areas are substandard and in disrepair. Quality low-income housing is a necessity for this area. However, bank management notes that there is very limited capacity in the nonprofit or for-profit affordable housing developers, which is a barrier to addressing the need for affordable housing.

Community contacts also noted that revitalization efforts of Lafayette's northern "urban core" area are needed. Development is occurring on the southern side of the city, but the more urban, northern area needs revitalization and diverse housing options. The north side of the city has the highest rate of poverty and suffers from a lack of jobs as well. Community contacts state that increased lending to LMI borrowers in these areas is needed.

Poverty is a concern across the assessment area. In Lafayette Parish, the percentage of families living in poverty has been steadily increasing since 2010 though poverty rates for families have gradually declined in all other parishes in the assessment area.<sup>126</sup> While the unemployment rate in Lafayette Parish is lower than in other parts of the assessment area, deteriorating economic conditions in Lafayette's urban core may be a contributing factor to the increasing poverty in this area. There are opportunities for financial institutions to take a leadership role in developing strategies to reduce poverty and the associated challenges of financial instability for low- and moderate-income families.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAFAYETTE, LOUISIANA ASSESSMENT AREA**

### **LENDING TEST**

IBERIABANK's lending performance in the Lafayette assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of loans reflects good 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.

IBERIABANK reported 2,372 (50.3 percent) CRA small business loans and 2,343 (49.7 percent) HMDA-reportable loans in the Lafayette assessment area during the review period. Therefore, CRA small business and HMDA-reportable lending received equal weight in determining the bank's lending test rating in the assessment

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<sup>126</sup> "Lafayette, LA assessment area (U.S. Census Bureau)." *Decennial Census and American Community Survey*. American Community Survey, n.d. Web. 10 Jul. 2017. <http://www.policymap.com/>

## Lafayette, Louisiana

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area. The Lafayette assessment area accounted for 14.2 percent of IBERIABANK's total HMDA-reportable lending in Louisiana and 21.0 percent of its total statewide CRA small business lending by dollar volume during the review period. In comparison, 42.1 percent of IBERIABANK's Louisiana 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, IBERIABANK's geographic distribution of loans reflects adequate penetration throughout the assessment area.

### Small Business Loans

Small business lending in low-income census tracts is poor. IBERIABANK originated 0.5 percent of its small business loans in low-income tracts, which was less than the percentage of small businesses located in these tracts at 2.0 percent. IBERIABANK also underperformed aggregate lenders in years 2014 and 2015.

Small business lending in moderate-income census tracts is adequate. The bank made 13.8 percent of small business loans in moderate-income tracts, which was less than the percentage of small businesses located in moderate-income tracts at 17.9 percent. The bank's performance was slightly less than aggregate lending in 2014 but equal to aggregate lending in 2015. It should be noted that the percentage of aggregate loans in both 2014 and 2015 was also less than the demographic benchmark, which indicates there may be some challenges with lending to businesses located in moderate-income tracts.

### Home Purchase Loans

IBERIABANK originated 16 home purchase loans in low-income census tracts during the review period. Aggregate lenders also exhibited low lending levels for home purchase loans compared to the percentage of owner-occupied units in low-income census tracts. There are only five low-income census tracts in this assessment area, with only 2.7 percent of owner-occupied units. In addition, the demographic table for the Lafayette assessment area shows that 35.0 percent of the families in low-income census tracts live below the poverty level and that 42.6 percent of housing units in low-income tracts are rental and 15.6 percent are vacant. The opportunity for lending in low-income census tracts appears to be limited given the relatively small

## Lafayette, Louisiana

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percentage of owner-occupied housing units, the high level of poverty in the low-income tracts, and the lack of lending by the aggregate lenders. As such, an evaluation of home purchase lending in low-income tracts was not considered in the lending test rating for this assessment area.

Home purchase lending in moderate-income census tracts is adequate. The bank's home purchase lending in moderate-income census tracts was less than the percentage of owner-occupied units in these tracts during the review period and slightly less than aggregate performance in 2014. However, the bank's performance was greater than aggregate performance in 2015. As noted earlier, the housing market has slowed significantly in Lafayette in the past several years, which is likely impacting home purchase lending opportunities in moderate-income tracts.

### Home Refinance Loans

Home refinance lending in low-income census tracts is poor. The bank's lending performance in low-income census tracts was less than the percentage of owner-occupied units located in low-income census tracts and was less than the aggregate performance in 2014. The bank's performance was slightly greater than the aggregate performance in 2015. The bank's lending volume in 2016 remained the same as 2015 at 3 loans.

Home refinance lending in moderate-income census tracts is good. While the bank's home refinance lending in moderate-income tracts was less than the percentage of owner-occupied units, it was greater than aggregate lending performance during the review period.

### Home Improvement Loans

Home improvement lending in low-income census tracts is adequate. IBERIABANK originated 1.9 percent of its home improvement loans in low-income census tracts. The bank's performance was less than the percentage of owner-occupied units in these tracts at 2.7 percent. However, the bank's performance was comparable to aggregate lenders in 2014 and slightly less than aggregate lenders in 2015. Additionally, the bank increased its lending volume from 3 loans in 2015 to 5 loans in 2016.

Home improvement lending in moderate-income census tracts is good. IBERIABANK originated 23.1 percent of its home improvement loans in moderate-income census tracts. The bank's performance was slightly greater than the percentage of owner-occupied units at 20.0 percent and greater than the aggregate lenders during 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 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.

## Lafayette, Louisiana

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### Small Business Loans

The distribution of small business loans to businesses of different sizes is good. The bank's lending to small businesses exceeded the aggregate in both 2014 and 2015 and was below the percentage of small businesses in the assessment area during the review period. In addition, of the 2,372 small business loans originated during the review period, 2,113 (89.0 percent) 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. Although the bank's home purchase lending to low-income borrowers was considerably less than the percentage of low-income families in the assessment area, the bank's lending outperformed the aggregate lenders during the review period.

Home purchase lending to moderate-income borrowers is adequate. The bank's home purchase lending to moderate-income borrowers was equal to the percentage of moderate-income families in the assessment area throughout the review period. In addition, the bank's performance was comparable to the aggregate lenders in 2014 and equal to aggregate lenders in 2015.

### Home Refinance Loans

Home refinance lending to low-income borrowers is good. The bank's home refinance lending to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. However, the bank's lending performance exceeded aggregate lenders during the review period.

Home refinance lending to moderate-income borrowers is adequate. The bank's home refinance lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area throughout the review period. However, IBERIABANK's performance was greater than aggregate lenders in 2014 and comparable to aggregate lenders in 2015.

### Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. The bank's home improvement lending to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. The bank's lending performance was less than aggregate lenders in 2014 but greater than aggregate in 2015. In 2015, 16.7 percent of the bank home improvement loans were to low-income borrowers compared with aggregate lending at 13.7 percent.

Home improvement lending to moderate-income borrowers is good. The bank's home improvement lending to moderate-income borrowers was greater than the percentage of moderate-income families located in the assessment area. The bank also performed better than aggregate lenders during the review period.

### ***Community Development Lending***

IBERIABANK makes an adequate level of community development loans in the Lafayette assessment area. The bank originated nine community development loans totaling \$42.5 million during the review period. Loans



## Lafayette, Louisiana

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exhibited adequate responsiveness to several community development needs in the assessment area, including revitalizing and stabilizing LMI geographies and providing community services targeted to LMI individuals. Specifically, the bank provided \$14.6 million for community services and \$27.9 million for revitalization and stabilization activities in LMI geographies. The loans for revitalization and stabilization purposes were primarily for projects located in state-designated enterprise zones and were consistent with the plan for these areas to create or retain jobs for LMI individuals.

As noted earlier, the Lafayette economy has weakened due to the recent oil crisis. In addition, the region experienced widespread flooding in 2016. The impact of these events on community development lending opportunities was considered in assessing the bank's performance in this assessment area.

### **INVESTMENT TEST**

IBERIABANK makes a significant level of qualified investments and grants, often in a leadership position. Combined investment and contribution activity inside the assessment area totaled \$39.9 million, or 40.5 percent of total investment activity for the state.

The bank made investments (excluding contributions) totaling \$39.2 million in the assessment area; of that, \$34.7 million was invested during the review period. The bank was responsive to affordable rental housing needs for LMI families, including \$11.2 million in two Ginnie Mae Project Loan investments to support a 180-unit apartment complex in New Iberia and provide Section 8 tenant-based assistance for apartment units occupied by eligible families in Lafayette.

In addition, the bank invested in community services for LMI individuals with a \$2.0 million investment in municipal bonds issued by the Iberia Parish School District, which serves a majority of students qualifying for free or reduced price lunch. The bank supported economic development in the current period with a \$2.0 million investment in the Solomon Hess SBA Fund. The fund promotes community development by investing in loans to small businesses located in low- or moderate-income areas or that employ low- or moderate-income persons. All other current period investments were mortgage-backed securities. Prior period investments supported affordable rental housing and LMI borrowers through investments in qualified investment funds and mortgage-backed securities.

IBERIABANK also contributed \$629,500 to nonprofit organizations during the review period. The majority of the contributions supported community services to LMI individuals, including a significant contribution to an organization that assists other nonprofit organizations engaged in financial stability, health, education, and other basic needs. In addition, the bank provided a multi-year commitment to a local organization focused on improving conditions in rural communities for LMI families. The bank also supported affordable housing with a sizeable contribution to a local CDFI, which works to help low-wealth families become homeowners. Other housing contributions during the review period included two mortgage grants for \$8,000 to help qualified LMI homebuyers with down payment and closing costs and financial assistance to an affordable housing organization. The bank's other financial support addressed a variety of critical community needs, such as

## Lafayette, Louisiana

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assistance for basic shelter and food security, youth enrichment programs, health care services, housing rehabilitation, and youth economic education. Lastly, the bank provided \$9,500 in contributions that benefitted a broader regional area that includes the bank's assessment areas.

### **SERVICE TEST**

IBERIABANK's service test performance in the Lafayette assessment area is good based on the bank's retail banking services and its leadership in providing community development services.

## Lafayette, Louisiana

### Retail Services

Retail banking services are good in the Lafayette full-scope assessment area.

Delivery systems are accessible to geographies and individuals of different income levels in the assessment area. The distribution of 18 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 no branches in low-income tracts and six in moderate-income tracts representing 33.3 percent of branches. For comparison purposes, 3.8 percent of households and 1.9 percent of businesses were located in low-income census tracts and 22.6 percent of households and 17.8 percent of businesses were located in moderate-income tracts.

During the review period, no branches or full-service ATMs were opened in low-income census tracts in the assessment area. However, the bank did open one branch with a full-service ATM in a moderate-income tract. 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.

Bank products, services and standard business hours are consistent throughout the assessment area. IBERIABANK offers extended hours and weekend hours at its branch offices, including those located in moderate-income census tracts. Overall, banking services and hours of operations do not vary in a way that inconveniences the assessment area, including low- and moderate-income geographies and low- and moderate income individuals.

**Geographic Distribution of Branches & ATMS**

Assessment Area: LA Lafayette

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend ed Hours	Week- end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts	House holds	Total Businesses		
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed				#	%
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	5	5.3%	3.8%	1.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	6	33.3%	1	0	6	6	2	Total	6	26.1%	6	30.0%	1	0	0	0.0%	0	0	23	24.2%	22.6%	17.8%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	7	38.9%	2	6	7	7	2	Total	10	43.5%	8	40.0%	4	6	2	66.7%	0	0	43	45.3%	46.7%	45.1%
DTO	0		0	1				SA	3		1		0	0	2		0	0				
Upper	5	27.8%	1	2	5	5	4	Total	7	30.4%	6	30.0%	1	2	1	33.3%	0	0	21	22.1%	26.9%	35.1%
DTO	0		0	0				SA	2		1		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	3	3.2%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	18	100.0%	4	8	18	18	8	Total	23	100.0%	20	100.0%	6	8	3	100.0%	0	0	95	100.0%	100.0%	100.0%
DTO	0		0	1				SA	5		2		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.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

### Community Development Services

IBERIABANK is a leader in providing community development services in the Lafayette assessment area. Employees provided 4,371 qualified hours during the review period by participating in 56 service activities.

## Lafayette, Louisiana

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IBERIABANK's community development activities in the Lafayette assessment area benefitted organizations that provide affordable housing, community services, economic development, and revitalization and stabilization activities for low- and moderate-income individuals, communities and small businesses. Of the total 4,371 qualified service hours, 1,630 hours were committed to youth financial education, and 285 hours supported adult financial education in Lafayette. Bank employees also provided 2,289 hours of board or committee service to qualified nonprofit organizations.

Highlighted below are examples of community development services considered responsive during the review period:

- The bank supported affordable housing preservation and homeownership through board and committee service leadership and technical assistance. Service activities benefitted the local Habitat for Humanity chapter and a CDFI that deploys capital to support housing for low-wealth families.
- Bank employees facilitated financial literacy for a variety of youth-serving nonprofit organizations, including those providing juvenile detention support services.
- A bank leader served on the loan committee of a regional development authority to deploy capital to small businesses in the assessment area.
- IBERIABANK employees provided revitalization and stabilization leadership through service on the board and finance committee for a municipal development authority and facilitation of United Way federal disaster recovery efforts.

The bank has significant market share and an adequate branch network in the assessment area. Overall, the bank exhibits significant bank engagement and executes activities that are diverse and responsive to identified community development needs.

## New Orleans, Louisiana

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### **METROPOLITAN AREA**

*(Full Scope Review)*

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NEW ORLEANS, LOUISIANA ASSESSMENT AREA**

##### Overview

The New Orleans assessment area includes Jefferson, Orleans, and St. Tammany parishes and is part of the eight-parish New Orleans-Metairie-Kenner MSA. As of December 31, 2016, IBERIABANK operated 24 branches in the assessment area. The bank's branch presence in the assessment area represents 31.6 percent of branches and 25.7 percent of deposits in Louisiana. Additionally, the market represents the bank's largest concentration of both HMDA-reportable and CRA small business lending, with 43.6 percent of combined HMDA-reportable and CRA small business lending by dollar volume in the state.

Three financial institutions, Capital One, Whitney, and JPMorgan Chase, hold nearly 60.0 percent of deposits in the assessment area. According to the June 30, 2016 FDIC Summary of Deposits Report, IBERIABANK is ranked 6<sup>th</sup> in the market with 5.3 percent of deposits (\$1.8 billion). Overall, there are 31 banks active in the market operating 312 branches and holding a total of \$33.2 billion in deposits.

Wells Fargo, Fidelity Bank, and GMFS, LLC were the top three HMDA lenders in the New Orleans market in 2015. IBERIABANK Mortgage ranked 5<sup>th</sup> and IBERIABANK ranked 21<sup>st</sup> in 2015, and combined reported 5.2 percent of HMDA loans. In 2014, the bank's percentage share of total loans and volume of reportable loans were lower. Overall, there were 393 lenders in the market, and the assessment area posted a 13.9 percent increase in HMDA-reportable lending from 2014 to 2015.

IBERIABANK ranked 7<sup>th</sup> and 10<sup>th</sup> in CRA lending in 2014 and 2015, respectively. Out of 95 CRA reporters, the bank had 3.5 percent of total CRA loans in 2015. The assessment area lending was dominated by American Express Bank, Capital One, and Chase Bank in both years with over 50.0 percent of market share.

##### Population and Income Characteristics

Hurricane Katrina led to dramatic population loss across the entire MSA, but over the past ten years, the region has gradually recovered. According to the Data Center analysis of 2016 US Census data, the population of the assessment area was approximately 1.1 million, or nearly 96.0 percent of its 2000 population.<sup>127</sup> New Orleans, located in Orleans Parish, is the principal city within the assessment area, and it had a population of 391,495 as of July 2016, or 80.0 percent of its 2000 population.<sup>128</sup> It should also be noted that the assessment area population represents nearly 85.0 percent of the total population in the New Orleans MSA.<sup>129</sup>

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<sup>127</sup> "Total Population by Parish for the New Orleans Metro." The Data Center. Nonprofit Knowledge Works, 23 Mar. 2017. Web. 21 July 2017. <<http://www.datacenterresearch.org/data-resources/population-by-parish>>.

<sup>128</sup> QuickFacts. US Census Bureau, n.d. Web. 20 July 2017. <http://quickfacts.census.gov>

<sup>129</sup> "New Orleans, LA (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

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The assessment area is made up of 347 census tracts: 58 tracts are low-income (16.7 percent), 88 tracts are moderate-income (25.4 percent), 99 tracts are middle-income (28.5 percent), 92 tracts are upper-income (26.5 percent), and 10 tracts are unknown income (2.9 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the New Orleans 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 declined from \$61,900 in 2014 to \$60,000 in 2016. Data shows that the median family income is lowest in Orleans Parish (\$49,948) and highest in St. Tammany Parish (\$73,790).<sup>130</sup> In addition, 40.1 percent of families are considered low- to moderate-income (LMI).<sup>131</sup>

**Borrower Income Levels  
New Orleans-Metairie, LA MSA**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2014</b>	<b>\$61,900</b>	0	- \$30,949	\$30,950	- \$49,519	\$49,520	- \$74,279	\$74,280	- & above
<b>2015</b>	<b>\$63,000</b>	0	- \$31,499	\$31,500	- \$50,399	\$50,400	- \$75,599	\$75,600	- & above
<b>2016</b>	<b>\$60,000</b>	0	- \$29,999	\$30,000	- \$47,999	\$48,000	- \$71,999	\$72,000	- & above

New Orleans has been plagued by high rates of poverty for years. The percentage of people living below the federal poverty line in Orleans Parish was 27.0 percent between 2011 and 2015 compared to the national poverty rate of 15.0 percent.<sup>132</sup> Following a national pattern, poverty has been increasing at a faster rate in suburban areas in New Orleans; Hurricane Katrina and the recession accelerated this trend. The percentage of people living below the federal poverty line in Jefferson Parish was 16.8 percent between 2011 and 2015, while 11.4 percent of residents in St. Tammany Parish lived in poverty. In addition, a significant percentage of families in LMI areas live below the poverty level. Specifically, 37.9 percent of families living in low-income census tracts live below the poverty level and 18.2 percent of families living in moderate-income census tracts live below the poverty level.<sup>133</sup>

### Economic Conditions

The New Orleans economy has gone through upheaval since Hurricane Katrina, and though conditions have improved significantly in the last few years, the region is still considered in a recovery. Fortunately, the region's economy was fueled by \$120 billion in government investment to aid in post-Katrina rebuilding

<sup>130</sup> "New Orleans, LA MSA (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>131</sup> FRB Atlanta Calculations of 2015 Census Data

<sup>132</sup> "New Orleans, LA MSA (US Census)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>133</sup> FRB Atlanta Calculations of 2015 Census Data

## New Orleans, Louisiana

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efforts, and this buffered the region from the impact of the national recession.<sup>134</sup> As a result, the New Orleans MSA weathered the recession much better than the rest of the nation.<sup>135</sup> In the last few years, the economy has slowed slightly, with some job loss in the construction sector due to the completion of many hurricane recovery-related projects and layoffs at several energy related firms impacted by falling oil prices.<sup>136</sup>

Healthcare has been New Orleans' primary source of job growth over the last few years with several major projects, including the new Veterans Affairs Medical Center, an expansion of both the Children's Hospital and the Ochsner Health System hospital, and the completion of the University Medical Center. Not only job generators, these projects are important anchors for larger economic development initiatives near downtown New Orleans.<sup>137</sup> Ochsner Health System is the largest employer in the region with 14,500 employees. The other major employers include Naval Air Station Joint Reserve Base, Louisiana State University Health, Northrop Grumman, and Tulane University.<sup>138</sup> The top employment sectors include education and health services, wholesale and retail trade, leisure and hospitality services, and government.<sup>139</sup> Besides the health industry, job growth has been particularly strong in the leisure and hospitality and retail trade sectors; however, many of the jobs in these sectors have annual wages below \$32,000.<sup>140</sup>

Small businesses are an anchor to the New Orleans economy. According to 2016 Dun & Bradstreet information, there were 57,574 businesses within the New Orleans assessment area of which 91.6 percent had total annual revenues less than or equal to \$1 million.<sup>141</sup> Additionally, 17.8 percent of small businesses in the assessment area are located in moderate-income tracts and 6.6 percent are in low-income tracts. The region has experienced strong growth in start-up businesses. The rate of business startups in the MSA is 64.0 percent higher than the national average, with 471 startups per 100,000 adults during the three-year period ending in 2013.<sup>142</sup> Lending to small businesses is also increasing. According to an analysis of CRA loan data, the number of small business loans increased by 13.0 percent between 2012 and 2015, with nearly 22,200 loans made in 2015.<sup>143</sup> During this same period, loans made to firms with revenues of \$1.0 million or less averaged 50.0 percent share of total small business loans, which is higher than previous years.<sup>144</sup> This may be an indication that there may be fewer obstacles for smaller firms to access credit in the market.

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<sup>134</sup> Plyer, Allison, Nihal Shrinath, and Vicki Mack. "The New Orleans Index at Ten: Measuring Greater New Orleans' Progress toward Prosperity." The Data Center. Nonprofit Knowledge Works, 31 July 2015. Web. 28 July 2017. [http://www.datacenterresearch.org/reports\\_analysis/new-orleans-index-at-ten/](http://www.datacenterresearch.org/reports_analysis/new-orleans-index-at-ten/)

<sup>135</sup> From 2008 to 2010, the New Orleans metro lost only 1.0 percent of jobs compared to 5.0 percent of jobs lost nationwide. By 2014, New Orleans had recouped all its losses and reached 5.0 percent above its 2008 job level, while the nation remained more than 1.0 percent below 2008 job levels.

<sup>136</sup> *Comprehensive Housing Market Analysis, New Orleans, Louisiana*. Rep. Office of Policy Development and Research, HUD, Oct. 2015. Web. 27 July 2017. <https://www.huduser.gov/portal/publications/pdf/NewOrleansLA-comp-16.pdf>

<sup>137</sup> Ibid.

<sup>138</sup> Nichols, Thomas. "New Orleans-Metairie, LA" Précis U.S. Metro. Moody's Analytics, November 2016. Web. 28 July 2017. <https://www.economy.com/precismetro>

<sup>139</sup> *Comprehensive Housing Market Analysis, New Orleans, Louisiana*. Rep. Office of Policy Development and Research, HUD, Oct. 2015. Web. 27 July 2017. <https://www.huduser.gov/portal/publications/pdf/NewOrleansLA-comp-16.pdf>  
[https://www.huduser.gov/portal/ushmc/chma\\_archive.html](https://www.huduser.gov/portal/ushmc/chma_archive.html)

<sup>140</sup> Nichols, Thomas. "New Orleans-Metairie, LA" Précis U.S. Metro. Moody's Analytics, November 2016. Web. 28 July 2017. <https://www.economy.com/precismetro>

<sup>141</sup> FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

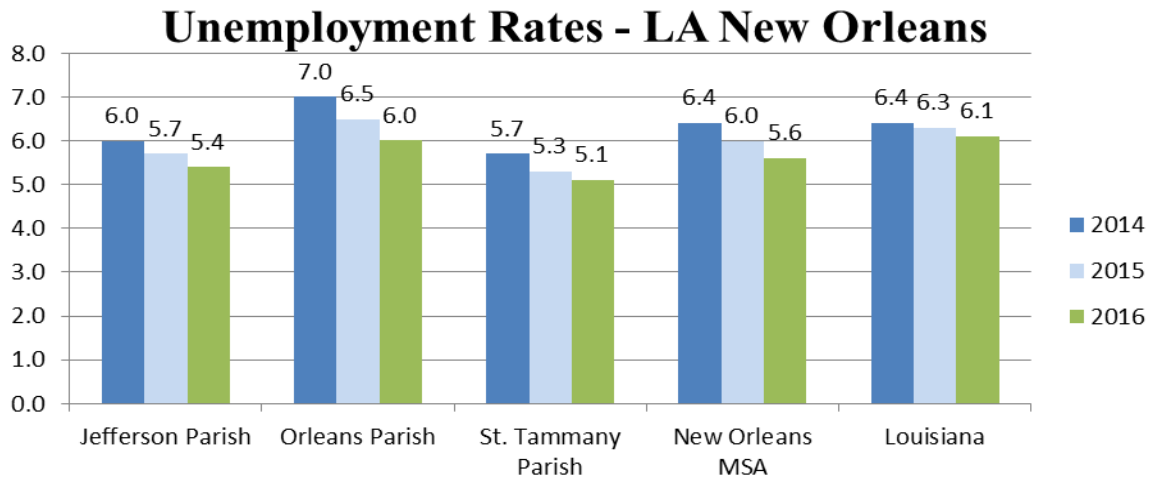
<sup>142</sup> Plyer, Allison, Nihal Shrinath, and Vicki Mack. "The New Orleans Index at Ten: Measuring Greater New Orleans' Progress toward Prosperity." The Data Center. Nonprofit Knowledge Works, 31 July 2015. Web. 28 July 2017. [http://www.datacenterresearch.org/reports\\_analysis/new-orleans-index-at-ten/](http://www.datacenterresearch.org/reports_analysis/new-orleans-index-at-ten/)

<sup>143</sup> "Jefferson Parish, Orleans Parish, and St. Tammany, LA (CRA Loan Data)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 24 Jul. 2017. <http://www.policymap.com/>

<sup>144</sup> Federal Reserve Bank of Atlanta calculations of data from PolicyMap CRA Loan Data.

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The declining unemployment rate reflects the level of economic growth in the region in the last few years. Unemployment in the MSA declined from 6.4 percent in 2014 to 5.6 percent in 2016. Within the assessment area, the unemployment rate was highest in Orleans Parish, while the other two parishes had rates below the MSA and state.<sup>145</sup> Jefferson Parish was the top job center in 2016 with 36.0 percent of MSA jobs, followed by Orleans Parish with 30.0 percent of MSA jobs; both have remained steady since 2013.<sup>146</sup>



The housing market in the assessment area is generally improving. There were 441,602 housing units in the assessment area according to the 2010 Census, of which 52.3 percent were owner-occupied, 30.1 percent were rental units, and 17.6 percent were vacant. More specifically, the 2010 Census data shows that 10.3 percent of the housing stock in the assessment area is located in low-income tracts and 23.9 percent is in moderate-income tracts. In LMI tracts, housing is disproportionately rental and vacant units, suggesting that residential lending opportunities may be limited in LMI areas.

Home prices have been steadily rising in the assessment area for the past several years. The median home price has increased from \$215,000 in December 2013 to \$229,000 in December 2016.<sup>147</sup> Home prices are highest in Orleans Parish with median home prices of \$280,000 as of December 2016, while Jefferson Parish has the lowest with median home prices of \$187,000 for the same period. With the exception of Orleans Parish, the housing market in the assessment area is generally in line with household incomes when the median home price is compared to median household income.<sup>148</sup> However, for lower-wage workers, housing costs are a challenge.

<sup>145</sup> Federal Reserve Bank of Atlanta calculations of data from the Bureau of Labor Statistics.

<sup>146</sup> "New Orleans, LA MSA (BLS)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 20 July 2017. <http://www.policymap.com/>

<sup>147</sup> Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic.

<sup>148</sup> The affordability index measures how affordable the median home price is to households earning the median income, assuming current mortgage rates. A baseline of 100 indicates that median home prices are in line with median household income; an index greater than 100 indicates the housing is more affordable. According to Federal Reserve Bank of Atlanta calculations, the affordability index for the assessment area was 126, though there was variation across the parishes, with Orleans Parish less affordable than elsewhere in the region. Source: Federal Reserve Bank of Atlanta calculations of data provided by Moody's Analytics.



## New Orleans, Louisiana

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For example, only between 8.0 percent and 11.0 percent of all homes in the three parishes are likely affordable for a four-person family earning 50.0 percent of the area median income in 2015.<sup>149</sup> This figure increases to a nearly one-third for a four-person family earning 80.0 percent of the median income.

Similar to home ownership affordability, rental housing costs are a significant issue in the New Orleans MSA, particularly for the lowest income residents. Within the MSA, 51.6 percent of renters are 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 69.0 percent were cost burdened.<sup>150</sup> The *2017 Out of Reach* study by the National Low Income Housing Coalition confirms housing affordability is a problem, finding an individual would need to earn an hourly wage of \$18.54 to afford the fair market rent for a two-bedroom apartment in the New Orleans MSA.<sup>151</sup> In addition, there are several thousand low-income residents on waiting lists for public housing units and housing vouchers.<sup>152</sup> Therefore, increasing the number of affordable rental units specifically in the city is a high priority for local leaders.<sup>153</sup>

### 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.

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<sup>149</sup> "New Orleans, LA (HUD)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 12 Aug. 2017. <http://www.policymap.com/>

<sup>150</sup> "New Orleans, LA MSA (US Census Bureau)." GIS Mapping and Geographic Information System Data. The Reinvestment Fund, n.d. Web. 12 Aug. 2017. <http://www.policymap.com/>

<sup>151</sup> *Out of Reach 2017*. National Low Income Housing Coalition, *Out of Reach 2017*, [nlihc.org/oor/louisiana](http://nlihc.org/oor/louisiana).

<sup>152</sup> Hasselle, Della. *In New Orleans, Public Housing Crunch Forces Thousands into Limbo*. Al Jazeera America, 30 June 2015, [america.aljazeera.com/articles/2015/7/30/new-orleans.html](http://america.aljazeera.com/articles/2015/7/30/new-orleans.html)

<sup>153</sup> Mallach, Alan. *Where Will People Live? New Orleans Growing Rental Housing Challenge*. Center for Community Progress/New Orleans Redevelopment Authority, March 2016, [www.noraworks.org/images/NORA-Rental-Housing-Report.pdf](http://www.noraworks.org/images/NORA-Rental-Housing-Report.pdf)

## New Orleans, Louisiana

### Combined Demographics Report

Assessment Area: LA New Orleans

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	58	16.7	18,212	7.8	6,894	37.9	54,441	23.4
Moderate-income	88	25.4	48,820	21	8,889	18.2	38,984	16.7
Middle-income	99	28.5	90,774	39	8,845	9.7	43,032	18.5
Upper-income	92	26.5	74,985	32.2	2,756	3.7	96,334	41.4
Unknown-income	10	2.9	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>347</b>	<b>100.0</b>	<b>232,791</b>	<b>100.0</b>	<b>27,384</b>	<b>11.8</b>	<b>232,791</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%
Low-income	45,408	11,258	4.9	24.8	21,153	46.6	12,997	28.6
Moderate-income	105,339	39,781	17.2	37.8	41,126	39	24,432	23.2
Middle-income	157,626	94,619	41	60	40,926	26	22,081	14
Upper-income	133,048	85,296	36.9	64.1	29,876	22.5	17,876	13.4
Unknown-income	181	11	0	6.1	9	5	161	89
<b>Total Assessment Area</b>	<b>441,602</b>	<b>230,965</b>	<b>100.0</b>	<b>52.3</b>	<b>133,090</b>	<b>30.1</b>	<b>77,547</b>	<b>17.6</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	3,891	6.8	3,491	6.6	374	8.5	26	6
Moderate-income	10,434	18.1	9,402	17.8	959	21.7	73	16.8
Middle-income	17,503	30.4	16,353	31	1,053	23.8	97	22.3
Upper-income	25,681	44.6	23,423	44.4	2,024	45.7	234	53.8
Unknown-income	65	0.1	44	0.1	16	0.4	5	1.1
<b>Total Assessment Area</b>	<b>57,574</b>	<b>100.0</b>	<b>52,713</b>	<b>100.0</b>	<b>4,426</b>	<b>100.0</b>	<b>435</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.6</b>		<b>7.7</b>		<b>.8</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	
Low-income	10	4.1	10	4.2	0	0	0	0
Moderate-income	18	7.4	17	7.1	1	20	0	0
Middle-income	97	39.9	95	39.9	2	40	0	0
Upper-income	117	48.1	115	48.3	2	40	0	0
Unknown-income	1	0.4	1	0.4	0	0	0	0
<b>Total Assessment Area</b>	<b>243</b>	<b>100.0</b>	<b>238</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.9</b>		<b>2.1</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## New Orleans, Louisiana

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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. According to these contacts, housing affordability is a significant concern for the area. Prior to Hurricane Katrina, the New Orleans area was already plagued with affordable housing issues. The significant destruction of rental housing caused by the storm, related increases in the cost of living, and demographic shifts only compounded the housing problem. According to HousingNOLA, a citywide cross-sector housing initiative, housing costs have risen by 50.0 percent since 2000. Simultaneously, demand for rental housing has increased, due to recent job growth in the region and because many existing renters are unable to consider homeownership due to rising home values. Finally, the loss of the “income-affordable” units (those that were affordable to low-income individuals but lost during Katrina) and the drop in federal and state funding resources have led to a reduction in the supply of affordable housing. As a result, over 50.0 percent of households in New Orleans pay more than 50.0 percent of their income on housing, and this disproportionately impacts the lowest income residents. The HousingNOLA report found that New Orleans has just 47 affordable rental units for every 100 extremely and very low-income residents.<sup>154</sup>

Multiple initiatives are underway to address the growing affordability crisis. In 2016, the City of New Orleans released a five-year strategy to build or preserve 7,500 affordable housing units by 2021.<sup>155</sup> Additionally, HousingNOLA has developed a ten-year plan and implementation process to improve housing affordability citywide. HousingNOLA estimates that there will still be demand for 11,580 rental and homeownership units by 2025. These plans are focused on both the development of new and the preservation of affordable rental and homeownership opportunities, and both plans recognize that public resources are not sufficient to address the affordable housing demand. It should also be noted that in the next 10 to 15 years the New Orleans subsidized housing market is likely to see many housing units flip to market rate and luxury apartments as the federal grant programs expire. Subsidies for 1,200 units are set to expire by 2021 and nearly 4,900 will expire by 2031. The loss of subsidized units will affect more than 100 housing developments.<sup>156</sup> Financial institutions have the opportunity to participate not just in financing new affordable housing projects, but in taking a leadership role in developing and funding some of the other creative public/private financing mechanisms needed to achieve these affordable housing goals.

One challenge with meeting the affordability housing goals is the lack of mortgage-ready homebuyers. Community contacts noted that potential homeowners struggle with credit related issues, predatory lending practices, lack of appropriate mortgage products and underwriting flexibility, and limited funds for down payments. Financial institutions can help address some of these barriers by participating with homeownership education or by offering flexible financing products that target low- and moderate-income homebuyers.

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<sup>154</sup> *10-Year Strategy and Implementation Plan for a More Equitable New Orleans*, Housing NOLA, December 2015, <http://housingnola.com/main/uploads/file/housingnolareport.pdf>

<sup>155</sup> *Housing for a Resilient New Orleans, A Five-Year Strategy*, City of New Orleans, June 2016, [www.nola.gov/home/buttons/resilient-housing/](http://www.nola.gov/home/buttons/resilient-housing/)

<sup>156</sup> Woodward, Alex. “American Can and the Future of Affordable Housing in New Orleans.” *Gambit*, Gambit Communications, Inc, 23 Dec. 2016, [www.bestofneworleans.com/thelatest/archives/2016/12/23/american-can-and-the-future-of-affordable-housing-in-new-orleans](http://www.bestofneworleans.com/thelatest/archives/2016/12/23/american-can-and-the-future-of-affordable-housing-in-new-orleans).

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Neighborhood revitalization continues to be a high priority for the city of New Orleans as well, with a primary emphasis on blight remediation. New Orleans ranks as one of the worst cities in the country in terms of blighted properties. There were nearly 44,000 blighted homes and vacant lots in 2010. The city launched a comprehensive blight strategy that included a pledge to reduce blight by 10,000 units by 2014. This goal has been met and the city has developed a national model for blight remediation. The city has made strategic use of the blighted properties to align with other city priorities, using them to catalyze commercial development, to create new affordable housing, or create new greenspace.<sup>157</sup>

Workforce development is another critical issue in the New Orleans area. There are a significant number of low-wage jobs and low-skilled workers, specifically in New Orleans. Almost 20.0 percent of 16 – 24 year olds in New Orleans are neither in school nor working.<sup>158</sup> That figure represents the third highest rate in the nation. In addition, an estimated 27.0 percent of New Orleans' working-age population was low-skilled and had low literacy skills in 2013.<sup>159</sup> At the same time, the New Orleans economy is shifting to knowledge-based industries, which will require a higher skilled workforce; strengthening and targeting workforce development efforts towards new job openings and growth industries is important to helping residents achieve new employment opportunities. There are several initiatives currently underway emphasizing basic literacy and soft skills training, as well as technical training aimed specifically at bringing underemployed, unemployed and youth into the workforce. Workforce development initiatives are another avenue for banks to focus CRA-related activities, including investments and services.

Finally, community contacts stated that small businesses often do not meet bank underwriting criteria and have to rely on CDFIs for their credit needs. CDFIs typically provide both technical assistance and access to credit and are strong partners for financial institutions because they provide a second option for borrowers that a bank is unable to serve. Banks can support CDFIs through community development investments or loans or by providing advisory services to the organizations or directly to small business owners they serve. Small business assistance and credit access are critical community development needs in the assessment area.

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<sup>157</sup> *City Surpasses Blight Reduction Milestone of 10,000 Units by 2014*, City of New Orleans, 9 Jan. 2014, [www.nola.gov/mayor/press-releases/2014/20140109-blight/](http://www.nola.gov/mayor/press-releases/2014/20140109-blight/)

<sup>158</sup> Dreilinger, Danielle. "Unemployed, Out-of-School Youth Cost Louisiana \$1.7 Billion, Report Says." *NOLA.com*, The Times-Picayune, 12 Mar. 2015, [www.nola.com/education/index.ssf/2015/03/unemployed\\_out-of-school\\_youth.html](http://www.nola.com/education/index.ssf/2015/03/unemployed_out-of-school_youth.html)

<sup>159</sup> Nelson, Marla, et al. *Persistent Low Wages in New Orleans*. Data Center Research, 2015, [www.datacenterresearch.org/reports\\_analysis/low-wages/](http://www.datacenterresearch.org/reports_analysis/low-wages/), 5 Aug. 2015.

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### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW ORLEANS, LOUISIANA ASSESSMENT AREA

#### LENDING TEST

IBERIABANK's lending performance in the New Orleans assessment area is good. The geographic distribution of loans reflects good penetration throughout the assessment area while the distribution of loans reflects adequate 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.

IBERIABANK reported 3,758 (59.6 percent) HMDA-reportable loans and 2,544 (40.4 percent) CRA small business loans in the New Orleans assessment area during the review period. Therefore, HMDA-reportable lending received greater weight in determining the bank's lending test rating in the assessment area. The New Orleans assessment area accounted for 50.1 percent of IBERIABANK's total HMDA-reportable lending in Louisiana and 32.3 percent of its total statewide CRA small business lending by dollar volume during the review period. In comparison, 25.7 percent of IBERIABANK's Louisiana 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, IBERIABANK's geographic distribution of loans reflects good penetration throughout the assessment area.

#### Home Purchase Loans

Home purchase lending in low-income census tracts is excellent. IBERIABANK's home purchase lending in low-income census tracts was greater than the percentage of owner-occupied units in these tracts. The bank's performance was also greater than aggregate lending performance in 2014 and 2015.

Home purchase lending in moderate-income census tracts is good. Lending performance in these tracts was comparable to the percentage of owner-occupied units during the review period. In addition, the bank's performance was similar to the aggregate in 2014 and slightly greater than aggregate in 2015.

## New Orleans, Louisiana

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### Home Refinance Loans

Home refinance lending in low-income census tracts is excellent. Lending performance in low-income census tracts exceeded the percentage of owner-occupied units in these tracts during the review period. In addition, the bank's performance also exceeded aggregate performance in 2014 and 2015.

Home refinance lending in moderate-income census tracts is adequate. The percentage of home refinance loans originated in moderate-income census tracts at 13.7 percent was less than the percentage of owner-occupied units at 17.2 percent in these tracts. Performance was slightly greater than aggregate in 2014 and was less than aggregate lending in 2015.

### Home Improvement Loans

Home improvement lending in low-income census tracts is adequate. Lending performance in low-income census tracts was slightly greater than the percentage of owner-occupied units located in low-income census tracts. IBERIABANK's home improvement lending in these tracts was similar to aggregate in 2014 and less than aggregate in 2015.

Home improvement lending in moderate-income census tracts is good. IBERIABANK's home improvement lending in moderate-income census tracts was greater than the percentage of owner-occupied units in those tracts during the review period. Additionally, IBERIABANK's performance was greater than the aggregate in 2014 and comparable to aggregate in 2015.

### Small Business Loans

Small business lending in low-income census tracts is good. IBERIABANK originated 8.1 percent of its small business loans in low-income census tracts, where 6.6 percent of small businesses in the assessment area are located. The bank's performance was comparable to aggregate in 2014 and greater than aggregate in 2015.

Small business lending in moderate-income census tracts is also good. The percentage of small business loans in moderate-income census tracts was greater than the percentage of small businesses operating in moderate-income census tracts. The bank's performance was comparable to aggregate in 2014 and greater than aggregate in 2015.

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

The distribution of loans by borrower income or revenue size of businesses is adequate. For this analysis, the distribution of small business lending across business revenue sizes and HMDA lending across borrower income levels was compared to available demographic information. Performance relative to other financial institutions was also considered. There are several performance context factors discussed earlier that are important to note in evaluating the bank's HMDA lending to LMI borrowers. First, approximately 27 percent of individuals in Orleans Parish were living below the federal poverty level in 2015 and poverty levels have been rising in the more suburban parishes; this indicates that there may be fewer qualified homebuyers and homeowners seeking HMDA loans. Second, New Orleans has a shortage of housing units that are affordable to LMI borrowers. In 2015, only between 8.0 percent and 11.0 percent of all homes in the assessment area were

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likely affordable for a four-person family earning 50.0 percent of the area median income and approximately 33.0 percent of homes were affordable for a four-person family earning 80.0 percent of the median income. These statistics along with the projected demand for affordable units in the area provide some perspective on the overall housing shortage facing LMI individuals and indicates that there are a number of external factors that may be impacting the HMDA lending to these borrowers.

### Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. IBERIABANK's home purchase lending to low-income borrowers was less than the percentage of low-income families living in the assessment area throughout the review period. However, the bank's home purchase lending to low-income borrowers doubled aggregate lending in 2014 and was comparable to aggregate in 2015.

Home purchase lending to moderate-income borrowers is also adequate. The bank's home purchase lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area during the review period. The bank's lending was similar to aggregate in 2014 but slightly below in 2015.

### Home Refinance Loans

Home refinance lending to low-income borrowers is poor. The bank's home purchase lending to low-income borrowers was significantly less than the percentage of low-income families, and the bank also underperformed aggregate lenders in both 2014 and 2015.

Home refinance lending to moderate-income borrowers is adequate. IBERIABANK's home refinance lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area throughout the review period. The bank's lending performance in this category was greater than aggregate lending in 2014 and less than aggregate in 2015.

### Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. The bank's home improvement lending to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. However, the bank's lending exceeded aggregate lending performance in 2014 and was similar to aggregate in 2015.

Home improvement lending to moderate-income borrowers is also adequate. The percentage of home improvement loans made to moderate-income borrowers was comparable to the percentage of moderate-income families in the assessment area throughout the review period. Additionally, the bank's performance was greater than aggregate lenders in 2014 and 2015.

### Small Business Loans

Lending to small businesses in this assessment area is considered good. Approximately 56.1 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

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percentage of small businesses in the assessment area, IBERIABANK's performance was greater than aggregate lending performance in 2014 and 2015. In addition, 82.7 percent of small business loans were originated in amounts of \$250,000 or less, indicating a willingness to lend in smaller dollar amounts typically requested by small businesses.

### *Community Development Lending*

IBERIABANK is a leader in making community development loans in the New Orleans assessment area. The bank originated 22 community development loans totaling \$59.0 million during the review period. Loans were responsive to multiple community development needs in the assessment area, including providing affordable housing and community services targeted to LMI individuals, promoting economic development by financing small businesses, and revitalizing and stabilizing LMI geographies.

The revitalization of New Orleans is a top priority, as recovery from Hurricane Katrina continues. One of the primary strategies to encourage revitalization is the reuse of abandoned and blighted properties as well as creating new housing and community services to help attract and retain residents and businesses. IBERIABANK made a number of community development loans to help support these community needs. Specifically, the bank provided 10 loans for \$37.6 million to help revitalize and stabilize LMI geographies, particularly in and around downtown New Orleans. The revitalization and stabilization loans financed several projects that leveraged New Markets Tax Credits and state and federal Historic Tax Credits. The bank also made six loans totaling \$17.4 million to support affordable housing, including financing for four Low Income Housing Tax Credit projects. In addition, the bank provided \$2.3 million towards economic development activities and \$1.7 million supporting community services to LMI individuals, with a particular emphasis on financing for charter schools.

IBERIABANK's community development lending exhibits excellent responsiveness to the community development and credit needs relative to the bank's presence in the assessment area.

Examples of notable community development loans include but are not limited to:

- IBERIABANK provided two loans totaling \$19.0 million to redevelop a large, vacant historic commercial building into a mixed-use, mixed-income facility. The project is located in a designated revitalization area in downtown New Orleans and will provide residential, office and retail space, including 25 units of workforce housing. Other key sources of capital for the project included New Markets Tax Credits and state and federal Historic Tax Credits. The project provides affordable housing and office space for tenants of different income levels through a community land trust model, and a portion of the office space will be leased to a Federally Qualified Health Center.
- A \$1.0 million loan to a multi-state CDFI to provide capital for the organization to make loans to small business borrowers located in Jefferson, Orleans, and St. Tammany parishes.
- IBERIABANK extended an \$850,000 line of credit to a nonprofit organization that is working to aid in the recovery of disaster-affected communities and to renovate blighted properties, putting them back into service as affordable for-sale and rental housing. The line of credit addresses two important community needs, including assisting families who were displaced by Hurricane Katrina and providing affordable housing for LMI families in blighted communities throughout the New Orleans area.



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- A \$4.1 million loan to finance the acquisition of vacant land and the construction of a chain drug store in the New Orleans East neighborhood, which is still in the process of recovering from Hurricane Katrina. The opening of this store will help support the revitalization of a low-income area, which is in need of basic retail, community services, and economic investment following Hurricane Katrina.
- IBERIABANK provided two construction loans totaling \$6.3 million for two LIHTC projects, which helped with the redevelopment of one of New Orleans' largest public housing projects. The projects were eligible for state and federal Historic Tax Credits in addition to Low Income Housing Tax Credits, and received a grant from the Neighborhood Stabilization Program (NSP). These projects addressed the need for renovating blighted properties and providing affordable housing for low-income individuals.

### **INVESTMENT TEST**

IBERIABANK makes an excellent level of qualified investments and grants in the New Orleans assessment area, often in a leadership position and demonstrating responsiveness to several assessment area needs. Combined investment and contribution activity inside the assessment area totaled \$35.1 million, or 35.7 percent of total investment activity for the state.

The bank made investments (excluding contributions) totaling \$33.1 million in the assessment area; of that, \$26.8 million was invested during the review period. The bank was responsive to the need across the region for affordable rental housing, including \$10.9 million in a LIHTC project that will provide 26 new affordable units for seniors and \$1.4 million in a Ginnie Mae Project Loan in Marerro, Jefferson Parish, representing 200 Project-Based Section 8 housing units. In addition, the bank made a complex and impactful investment of \$1.5 million in a minority-owned financial institution in New Orleans. The remaining current period investments were new purchases of eligible mortgage-backed securities. Prior period investments included a New Markets Tax Credit investment and eligible mortgage-back securities.

IBERIABANK also contributed \$2.0 million to nonprofit organizations during the review period. The majority of the contributions, or 1.1 million, supported community services to LMI individuals, including significant contributions totaling \$666,200 to four organizations that assist other nonprofit organizations engaged in financial stability, health, education and other basic needs; one organization offering youth financial literacy; and another nonprofit engaged in economic empowerment initiatives. The remaining community services donations supported a range of areas included funding for basic needs and shelter, charter schools serving a majority of LMI youth, educational support and teacher development, and LMI youth enrichment programs.

The bank also supported affordable housing activities, including providing 52 mortgage grants to help qualified LMI homebuyers with down payments and closing costs to purchase a home. The mortgage grants were administered in partnership with local nonprofit organizations. In addition, the bank supported economic development for small businesses and activities that revitalize or stabilize LMI and disaster geographies with contributions to several organizations, including a sizeable multi-year commitment to a performing arts organization that is also an anchor institution in the Oretha Castle Haley Boulevard LMI community, as well as

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providing a multi-year title sponsorship for New Orleans Entrepreneur Week in partnership with an organization engaged in entrepreneurship development. Lastly, the bank provided \$9,500 in donations that benefitted a broader regional area that includes the bank's assessment areas.

Overall, the bank's investments and contributions exhibited leadership and responsiveness to several identified needs, including LMI homeownership with down payment assistance, revitalization and stabilization of distressed neighborhoods, small business assistance and enrichment programs for disadvantaged youth.

### **SERVICE TEST**

IBERIABANK's service test performance in the New Orleans assessment area is good based on the bank's retail services and its leadership in providing community development services.

#### ***Retail Services***

Retail banking services are adequate in the New Orleans full-scope assessment area.

Delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area. The distribution of 24 branch offices and 24 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 representing 8.3 percent of total branches and four branches in moderate-income tracts representing 16.7 percent of branches. For comparison purposes, 8.9 percent of households and 6.8 percent of businesses were located in low-income census tracts, and 22.2 percent of households and 18.1 percent of businesses were located in moderate-income tracts.

During the review period, the bank opened one branch without a full-service ATM in a low-income tract and opened two branches with full-service ATMs in moderate-income tracts. Additionally, the bank closed one branch with a full-service ATM in a moderate-income tract. Overall, the bank's record of opening and closing of branches has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals in the assessment area.

Bank products, services and standard business hours are consistent throughout the assessment area. However, IBERIABANK's extended hours and weekend hours at its branch offices do vary in a way that inconveniences the assessment area, particularly LMI geographies and/or LMI individuals. The bank does not offer extended hours at any of its branch offices. In addition, the bank offers weekend hours at only one of its branches in moderate-income tracts, compared to having weekend hours at multiple locations in middle- and upper-income tracts.

## New Orleans, Louisiana

### Geographic Distribution of Branches & ATMS

Assessment Area: LA New Orleans

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	2	8.3%	1	0	0	0	0	Total	2	6.7%	2	8.3%	0	0	0	0.0%	0	0	58	16.7%	8.9%	6.8%
DTO	0		0	0				SA	1		1		0	0	0		0	0				
Moderate	4	16.7%	2	1	2	0	1	Total	5	16.7%	4	16.7%	2	1	1	16.7%	0	0	88	25.4%	22.2%	18.1%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Middle	4	16.7%	1	1	4	0	3	Total	5	16.7%	4	16.7%	1	1	1	16.7%	0	0	99	28.5%	37.2%	30.4%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Upper	14	58.3%	1	2	11	0	5	Total	18	60.0%	14	58.3%	1	2	4	66.7%	0	0	92	26.5%	31.6%	44.6%
DTO	2		1	1				SA	4		0		0	0	4		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	2.9%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	24	100.0%	5	4	17	0	9	Total	30	100.0%	24	100.0%	4	4	6	100.0%	0	0	347	100.0%	100.0%	100.0%
DTO	2		1	1				SA	7		1		0	0	6		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

IBERIABANK is a leader in providing community development services in the New Orleans assessment area. Employees engaged in 99 service activities for 3,871 qualified hours of community development service.

IBERIABANK's community development service activities in the New Orleans assessment area benefitted organizations that provide affordable housing, community services, economic development, and revitalization and stabilization activities to low- and moderate-income individuals, communities and small businesses. Of the total service hours, 1,650 hours were committed to youth financial education and 528 hours supported adult financial education in the New Orleans assessment area. In addition, bank employees provided 1,659 hours of board or committee service to qualified nonprofit organizations.

The following were responsive and impactful bank community development activities during the review period.

- The bank supported first-time homeownership through homebuyer education to low- and moderate-income individuals through local employers, housing authority residents, and a local CDC housing counseling agency.
- The bank supported single-family and multifamily affordable housing preservation through board service leadership with Habitat for Humanity and a nonprofit housing organization, respectively.
- Bank employees facilitated financial literacy for youth primarily through Junior Achievement and the local recreational department in the assessment area.
- A bank leader served on the board of a micro-business development organization that provides education and an entrepreneurship accelerator program.
- IBERIABANK employees provided revitalization and stabilization leadership through service on the board and finance committee for a disaster recovery organization and a housing preservation organization.

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Given the bank's market share and branch network in the assessment area, the bank exhibits significant engagement and executes activities that are diverse and responsive to identified community development needs. Overall, the bank's performance is considered excellent in the New Orleans assessment area.

## Metropolitan Areas (Limited Review)

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

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LOUISIANA METROPOLITAN ASSESSMENT AREAS

- **Baton Rouge Assessment Area (Livingston and East Baton Rouge parishes)**
  - As of December 31, 2016, IBERIABANK operated seven branches in the assessment area, representing 9.2 percent of its branches in Louisiana.
  - As of June 30, 2016, the bank had \$675.8 million in deposits in this assessment area, representing a market share of 4.1 percent and 9.8 percent of IBERIABANK's total deposits in Louisiana.
- **Houma Assessment Area (Lafourche and Terrebonne parishes)**
  - As of December 31, 2016, IBERIABANK operated three branches in the assessment area, representing 3.9 percent of its branches in Louisiana.
  - As of June 30, 2016, the bank had \$61.6 million in deposits in this assessment area, representing a market share of 1.4 percent and 0.9 percent of IBERIABANK's total deposits in Louisiana.
- **Lake Charles Assessment Area (Calcasieu and Cameron parishes)**
  - As of December 31, 2016, IBERIABANK operated 11 branches in the assessment area, representing 14.5 percent of its branches in Louisiana.
  - As of June 30, 2016, the bank had \$561.0 million in deposits in this assessment area, representing a market share of 15.0 percent and 8.2 percent of IBERIABANK's total deposits in Louisiana.
- **Monroe Assessment Area (Ouachita Parish)**
  - As of December 31, 2016, IBERIABANK operated three branches in the assessment area, representing 3.9 percent of its branches in Louisiana.
  - As of June 30, 2016, the bank had \$410.1 million in deposits in this assessment area, representing a market share of 14.1 percent and 6.0 percent of IBERIABANK's total deposits in Louisiana.
- **Shreveport Assessment Area (Caddo Parish)**
  - As of December 31, 2016, IBERIABANK operated two branches in the assessment area, representing 2.6 percent of its branches in Louisiana.
  - As of June 30, 2016, the bank had \$226.4 million in deposits in this assessment area, representing a market share of 4.1 percent and 3.3 percent of IBERIABANK's total deposits in Louisiana.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

## Metropolitan Areas (Limited Review)

<b>Metropolitan Assessment Areas</b>			
<b>Assessment Areas</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Baton Rouge	Consistent	Consistent	Not Consistent (Below)
Houma	Not Consistent (Below)	Not Consistent (Below)	Consistent
Lake Charles	Consistent	Consistent	Consistent
Monroe	Not Consistent (Below)	Consistent	Not Consistent (Below)
Shreveport	Not Consistent (Below)	Not Consistent (Below)	Consistent

For the lending test, IBERIABANK received a high satisfactory rating for the State of Louisiana. Performance in the Baton Rouge and Lake Charles metropolitan limited-scope assessment areas was consistent with the bank's performance for the state. Although lending test performance in the remaining three assessment areas was weaker than the state, the performance in the Houma and Monroe assessment areas was still considered adequate. The absence of community development lending was a factor in the Houma and Shreveport ratings. Community development lending in the Baton Rouge assessment area was excellent.

For the investment test, IBERIABANK received a high satisfactory rating for the State of Louisiana. Investment test performance in the Houma and Shreveport metropolitan assessment areas was below the performance for the state while the bank's performance in the Baton Rouge, Lake Charles, and Monroe metropolitan assessment areas was consistent with the state.

For the service test, IBERIABANK received a rating of high satisfactory for the State of Louisiana. Service test performance in the Houma, Lake Charles, and Shreveport metropolitan assessment areas was consistent with the bank's performance for the state. The bank's performance in the Baton Rouge and Monroe metropolitan assessment areas was below the state, principally due to weaker retail banking services.

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

## St. Mary, Louisiana

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### **NON-METROPOLITAN STATEWIDE AREA**

*(Full-Scope Review)*

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. MARY, LOUISIANA FULL SCOPE ASSESSMENT AREA**

##### Overview

The St. Mary assessment area includes St. Mary Parish, a non-metropolitan area in Louisiana. As of December 31, 2016, the bank had four branches in the assessment area, which represent 5.3 percent of the branches statewide. In addition, 1.9 percent of the bank's statewide deposits are in this market. The assessment area represents 1.7 percent of combined HMDA-reportable and CRA small business lending by dollar volume in the state.

The assessment area's banking market has a significant presence of multi-regional banks. According to the June 30, 2016 FDIC Summary of Deposits Report, IBERIABANK ranked 4<sup>th</sup> out of 8 financial institutions operating in the assessment area, with 11.6 percent deposit market share and \$130.9 million in deposits. Whitney Bank has the largest market share with 26.8 percent, followed by M.C. Bank & Trust Company and Patterson State Bank with 22.9 percent and 17.1 percent, respectively.

HMDA-reportable and CRA small business lending are competitive. In 2014, IBERIABANK ranked 1<sup>st</sup> and IBERIABANK Mortgage ranked 3<sup>rd</sup> in HMDA-reportable lending and combined reported 22.5 percent of HMDA loans in the assessment area. IBERIABANK ranked 10<sup>th</sup> in CRA lending with 2.8 percent of total reportable loans in the assessment area. M.C. Bank & Trust Company and Whitney Bank were the next largest HMDA lenders in the assessment area, while Capital One Bank, Hancock Bank, and American Express were the primary CRA lenders in the market.

In 2015, IBERIABANK Mortgage ranked 1<sup>st</sup> and IBERIABANK ranked 8<sup>th</sup> in HMDA-reportable lending and combined reported 16.3 percent of total reportable loans in the assessment area. IBERIABANK ranked 8<sup>th</sup> in CRA lending with 3.5 percent of total reportable loans in the assessment area. M.C. Bank & Trust Company and First National Bank of Jeanerette were the second and third largest HMDA lenders in the assessment area, while Capital One Bank, MidSouth Bank, and Whitney Bank were the primary CRA lenders in the market.

##### Population and Income Characteristics

St. Mary's population was approximately 53,400 people in 2015, which represents a slight 1.7 percent decline from 2010.<sup>160</sup> The assessment area contains 17 census tracts. The 2010 Census data indicates there were no low-income census tracts, 2 (11.8 percent) moderate-income tracts, 11 (64.7 percent) middle-income tracts, 3 (17.6 percent) upper-income tracts, and 1 (5.9 percent) unknown-income tract. In 2014, eight of the census tracts were classified as persistent poverty tracts. A tract is characterized as persistent poverty if the tract has had 20.0 percent or more of its population living in poverty for the past 30 years.<sup>161</sup>

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<sup>160</sup> "St. Mary, LA assessment area (U.S. Census Bureau)." *Decennial Census and American Community Survey*. American Community Survey, n.d. Web. 12 Jul. 2017. <http://www.policymap.com/>

<sup>161</sup> "St. Mary, LA assessment area (U.S. Census Bureau)." *U.S. Census*, U.S. Census, American Community Survey, and Brown University's Longitudinal Tract Database, n.d. Web. 13 Jul. 2017. <http://www.policymap.com/>

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For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the relevant area. The following table sets forth the estimated median family income for the non-metropolitan Louisiana area, which includes the assessment area, and shows that the median family income decreased marginally between 2014 and 2016. In the assessment area, 39.1 percent of families are considered low- to moderate-income (LMI).

**Borrower Income Levels  
Louisiana State Non-Metro**

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
<b>2014</b>	<b>\$47,100</b>	0 - \$23,549	\$23,550 - \$37,679	\$37,680 - \$56,519	\$56,520 - & above
<b>2015</b>	<b>\$48,500</b>	0 - \$24,249	\$24,250 - \$38,799	\$38,800 - \$58,199	\$58,200 - & above
<b>2016</b>	<b>\$46,900</b>	0 - \$23,449	\$23,450 - \$37,519	\$37,520 - \$56,279	\$56,280 - & above

Poverty and financial instability are a concern throughout the assessment area. The percentage of families living below the poverty level as of 2011-2015 is 22.4 percent, a one percentage point increase from the previous 5-year period.<sup>162</sup> The statewide rate is 19.8 percent. In addition, a significant percentage of families living in LMI areas live below the poverty level. Specifically, 31.4 percent of families living in moderate-income census tracts live below the poverty level; as previously noted, there are no low-income census tracts in the assessment area. Moreover, 46.7 percent of St. Mary Parish households are liquid asset poor, meaning that they lack the savings to cover basic expenses or live at the poverty level for three months if a crisis led to a loss of stable income, according to Prosperity Now.<sup>163</sup>

### Economic Conditions

St. Mary is a coastal parish and is a center for oil and gas activity, maritime transportation and support services. Geographically, the assessment area is also heavily agricultural with a significant amount of acreage dedicated to sugar cane production.<sup>164</sup> The average employment across all industries in 2016 was approximately 18,060, an 18.1 percent decline over the review period. The top five employment sectors are heavy manufacturing, retail trade, mining, transportation, and accommodations and food services.<sup>165</sup> Key industry employers for St. Mary span from oilfield providers, offshore drillers, mooring companies, maritime construction companies, shipyards, and carbon black plants.<sup>166</sup>

<sup>162</sup> Ibid

<sup>163</sup> ProsperityNow. ProsperityNow Scorecard, n.d. Web. 8 Nov. 2017. < <http://scorecard.prosperitynow.org/data-by-location#county>.

<sup>164</sup> Southern Louisiana Economic Council. *Doing Business Here: St. Mary Parish*, n.d. Web 12 Jul. 2017. <http://bayouregion.com/doing-business-here/region/st-mary-parish/>

<sup>165</sup> "St. Mary, LA assessment area (U.S. Census Bureau)." *Longitudinal Employer – Household Dynamics*, LEHD Origin-Destination Employment Statistics (LODES), n.d. Web. 12 Jul. 2017. <http://www.policymap.com/>

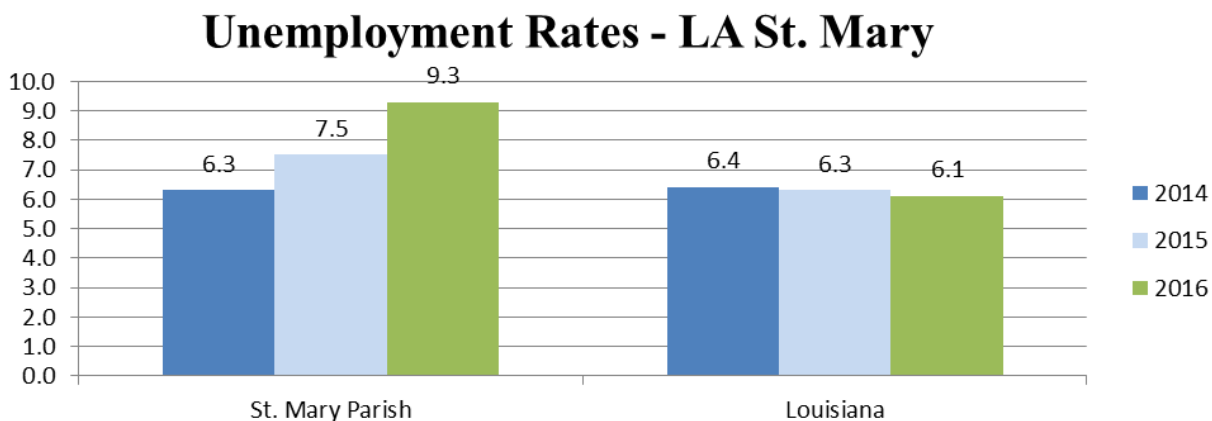
<sup>166</sup> St. Mary Parish Economic Development, *St. Mary Parish Community Overview*, n.d. Web 12 Jul. 2017. <http://stmaryparishdevelopment.com/community/>



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In terms of economic conditions for small businesses, there were 2,267 businesses operating in the assessment area, of which 88.4 percent had total annual revenues less than or equal to \$1.0 million and were therefore considered small businesses as of 2016 Dun & Bradstreet information. Only 4.2 percent of small businesses in the assessment area are located in LMI tracts. The number of small business loans in the assessment area has been trending downward in recent years. Small business lending in 2015 was down 13.0 percent, or 618 loans, from lending in 2013. However, the total percentage of loans to small businesses with revenues less than or equal to \$1.0 million increased from 44.9 percent in 2013 to 47.1 percent in 2015.<sup>167</sup> This may be an indication that there may be fewer obstacles for smaller firms to access credit in the market.

The unemployment rate in the assessment area has continued to rise sharply in recent years. As shown in the following table, the economy has not improved across the assessment area parish at the same rate as the State of Louisiana. In the assessment area, the unemployment rate drastically rose to 9.3 percent in 2016 up from 6.3 percent in 2014, while the statewide rate has trended downward. The assessment area's unemployment rate in 2016 was approximately equal to the highest unemployment rate for the last decade, which was 9.4 percent in 2010.<sup>168</sup> It is not surprising, given the high unemployment rate in this assessment area, that there is a high rate of poverty as well.



The assessment area contained 22,842 housing units in 2010, 61.6 percent of which were owner-occupied, 26.2 percent were rental units and 12.2 percent were vacant. In moderate-income census tracts, 47.4 percent of units were owner-occupied.<sup>169</sup> Vacant units are highly concentrated in moderate-income census tracts. The median age of housing stock in moderate-income census tracts is equal to the stock in middle-income census tracts, and at 38 years old, is newer than the median age of housing stock in upper-income census tracts, which is 42 years old. Residential home sales in this assessment area have fluctuated greatly in recent years. Home sales dramatically rose in 2012 and 2013 from historic lows in 2010 and 2011, but have decreased by 8.5 percent in

<sup>167</sup> "St. Mary, LA assessment area (U.S. Census Bureau)." *FFIEC: CRA, Community Reinvestment Act*, n.d. Web. 12 Jul. 2017. <http://www.policymap.com/>

<sup>168</sup> "St. Mary, LA assessment area (U.S. Census Bureau)." *Bureau of Labor Statistics Local Area Unemployment Statistics*, Bureau of Labor Statistics Local Area Unemployment Statistics Program, n.d. Web. 12 Jul. 2017. <http://www.policymap.com/>

<sup>169</sup> FRB Atlanta Calculations of Dun & Bradstreet, 2016 FFIEC Census data.

## St. Mary, Louisiana

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2014 from 2013.<sup>170</sup> New housing building permits have remained steady in recent years for this area after peaking in 2004.<sup>171</sup> The median sale price of a residential home in 2014 was \$93,800.<sup>172</sup> The percentage of homes that were affordable for a four-person family earning 80.0 percent of the area median income in 2015 was 53.1 percent of all homes, but this percentage decreases to 33.1 percent for a four-person family earning 50.0 percent of the area median income during the same timeframe.<sup>173</sup>

The estimated percentage of homeowners that were cost burdened has decreased in recent years. During the 2011 to 2015 time period, 16.2 percent of homeowners in the assessment area were cost burdened. However, the estimated percentage of renters that were cost burdened has increased in recent years. The estimated percentage of renters that were cost burdened during the same timeframe was 34.8 percent. Homeowners and renters are considered cost burdened when monthly owner or renter costs are 30 percent or more of household income. A notable percentage of renters in the assessment area were extremely cost burdened during this timeframe at 16.4 percent. Renters are extremely cost burdened when monthly renter costs are 50 percent or more of household income. The median gross rent for the assessment area was \$674 for 2011 to 2015, which has increased by 12.7 percent from the prior five-year period.<sup>174</sup> In St. Mary, a renter would need an hourly wage of \$13.00 to be able to afford a two-bedroom rental or would need to work 72 hours per week at the minimum wage.<sup>175</sup>

### Demographic Characteristics

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.

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<sup>170</sup> “St. Mary, LA assessment area (U.S. Census Bureau).” *Boxwood Means, Inc.*, Boxwood Means, Inc., n.d. Web. 12 Jul. 2017. <http://www.policymap.com/>

<sup>171</sup> “St. Mary, LA assessment area (U.S. Census Bureau).” *Census Manufacturing, Mining and Construction Statistics*, Census Manufacturing, Mining and Construction Statistics, n.d. Web. 12 Jul. 2017. <http://www.policymap.com/>

<sup>172</sup> “St. Mary, LA assessment area (U.S. Census Bureau).” *Boxwood Means, Inc.*, Boxwood Means, Inc., n.d. Web. 12 Jul. 2017. <http://www.policymap.com/>

<sup>173</sup> “St. Mary, LA assessment area (U.S. Census Bureau).” *HUD Income Limits*. US Department of Housing and Urban Development Income Limits, n.d. Web. 12 Jul. 2017. <http://www.policymap.com/>

<sup>174</sup> “St. Mary, LA assessment area (U.S. Census Bureau).” *Decennial Census and American Community Survey*. . American Community Survey, n.d. Web. 7 Jul. 2017. <http://www.policymap.com/>

<sup>175</sup> National Low Income Housing Coalition. *Out of Reach 2017: Louisiana*. n.d. Web. 12 Jul. 2017. <http://nlihc.org/oor/louisiana>

## St. Mary, Louisiana

### Combined Demographics Report

Assessment Area: LA St. Mary

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	3,254	22.8
Moderate-income	2	11.8	1,065	7.5	334	31.4	2,333	16.3
Middle-income	11	64.7	10,155	71.1	1,808	17.8	2,306	16.2
Upper-income	3	17.6	3,053	21.4	435	14.2	6,380	44.7
Unknown-income	1	5.9	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>17</b>	<b>100.0</b>	<b>14,273</b>	<b>100.0</b>	<b>2,577</b>	<b>18.1</b>	<b>14,273</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,897	899	6.4	47.4	527	27.8	471	24.8
Middle-income	16,018	10,202	72.5	63.7	3,978	24.8	1,838	11.5
Upper-income	4,927	2,966	21.1	60.2	1,482	30.1	479	9.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>22,842</b>	<b>14,067</b>	<b>100.0</b>	<b>61.6</b>	<b>5,987</b>	<b>26.2</b>	<b>2,788</b>	<b>12.2</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	96	4.2	84	4.2	9	3.9	3	8.8
Middle-income	1,344	59.3	1,168	58.3	159	69.1	17	50
Upper-income	827	36.5	751	37.5	62	27	14	41.2
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>2,267</b>	<b>100.0</b>	<b>2,003</b>	<b>100.0</b>	<b>230</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.4</b>		<b>10.1</b>		<b>1.5</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	2	6.3	2	6.7	0	0	0	0
Middle-income	24	75	22	73.3	2	100	0	0
Upper-income	6	18.8	6	20	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>32</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>93.8</b>		<b>6.3</b>		<b>.0</b>	

2016 FFIEC Census Data and 2016 D&B Information

## St. Mary, Louisiana

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### Credit and Community Development Needs

Bank management has indicated that there is a need for emergency and/or transitional housing for St. Mary residents. In addition, the prevalence of poverty and elevated unemployment highlight the importance of social support services offered by community service organizations in the assessment area. As these organizations attempt to serve significant low- and moderate-income populations, the need for additional financial support and technical assistance for these organizations is often identified. This creates community development service or investment opportunities for local financial institutions. Other opportunities may include helping organizations provide asset building initiatives and job training programs, as well as working collaboratively with city and county officials to address other community development issues.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. MARY, LOUISIANA FULL SCOPE ASSESSMENT AREA**

#### **LENDING TEST**

IBERIABANK's lending performance in the St. Mary assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of loans also reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes a low level of community development loans.

IBERIABANK reported 447 (88.0 percent) HMDA-reportable loans and 61 (12.0 percent) CRA small business loans in the St. Mary assessment area during the review period. Therefore, HMDA-reportable lending received greater weight in determining the bank's lending test rating in the assessment area. The St. Mary assessment area accounted for 2.6 percent of IBERIABANK's total HMDA-reportable lending in Louisiana and 0.2 percent of its total statewide CRA small business lending by dollar volume during the review period. In comparison, 1.9 percent of IBERIABANK's Louisiana 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, IBERIABANK's geographic distribution of loans reflects adequate penetration throughout the assessment area.

## St. Mary, Louisiana

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There are no low-income census tracts in the St. Mary assessment area. As such, no rating for each of the lending products was assigned in this category, and more weight was placed on the bank's lending in moderate-income census tracts.

### Home Purchase Loans

Home purchase lending in moderate-income census tracts is poor. IBERIABANK originated 2.7 percent of its home purchase loans in moderate-income census tracts during the review period. As a result, the bank's performance was less than the percentage of owner-occupied units in these tracts at 6.4 percent. However, in 2014 the bank's lending at 2.0 percent was less than aggregate lenders at 3.3 percent, and at 5.8 percent in 2015 was greater than aggregate lenders at 4.4 percent. The bank originated no home purchase loans in moderate-income tracts in 2016.

### Home Refinance Loans

Home refinance lending in moderate-income census tracts is adequate. The percentage of home refinance loans originated in moderate-income census tracts was less than the percentage of owner-occupied units in these tracts; however, performance was slightly less than the aggregate lending performance in 2014 and slightly greater than the aggregate lenders in 2015. The bank's volume of lending remained the same in 2016 as in 2014 and 2015.

### Home Improvement Loans

Home improvement lending in moderate-income census tracts is good. IBERIABANK originated 7.7 percent of its home improvement loans in moderate-income census tracts. The bank's performance was greater than the percentage of owner-occupied units at 6.4 percent and greater than the aggregate lenders in 2014 and 2015.

### Small Business Loans

Small business lending in moderate-income census tracts is adequate. The percentage of small business loans in moderate-income census tracts exceeded the percentage of small businesses located in these tracts. However, the bank originated no loans in these geographies in 2014, thus underperforming aggregate lenders in 2014, but outperforming aggregate lenders in 2015. The bank originated one small business loan in a moderate-income tract 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 adequate. For this analysis, the distribution of small business lending across business revenue sizes and HMDA lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

### Home Purchase Loans

Home purchase lending to low-income borrowers is adequate based on a small number of loan originations. IBERIABANK's lending performance was less than the percentage of low-income families living in the assessment area, while comparable to aggregate lenders in 2014 and greater than aggregate lenders in 2015. However, the bank made no loans to low-income borrowers in 2016.

## St. Mary, Louisiana

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Home purchase lending to moderate-income borrowers is poor. The percentage of home purchase loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area throughout the review period and also less than the aggregate lending performance in 2014 and 2015.

### Home Refinance Loans

Home refinance lending to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers was considerably less than the percentage of low-income families in the assessment area throughout the review period and also less than the aggregate lending performance in 2014 and 2015.

Home refinance lending to moderate-income borrowers is adequate. The percentage of home refinance loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area but greater than the aggregate lending performance in 2014 and 2015. The bank's volume of lending was similar in all three years.

### Home Improvement Loans

Home improvement lending to low-income borrowers is adequate based on a small number of loan originations during the review period. The percentage of home improvement loans to low-income borrowers was less than the percentage of low-income families in the assessment area but greater than the aggregate lending performance in 2014 and 2015. The bank's volume of lending was similar in all three years.

Home improvement lending to moderate-income borrowers is poor. The percentage of home improvement loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area throughout the review period and also less than the aggregate lending performance in 2014 and 2015.

### Small Business Loans

The distribution of small business loans to businesses of different sizes is excellent. Approximately 82.0 percent of small business loan originations were extended to businesses with revenues of \$1 million or less. While this performance is comparable to the percentage of small businesses in the assessment area, it is significantly greater than aggregate lending performance. In addition, 98.3 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.

### ***Community Development Lending***

IBERIABANK makes a low level of community development loans in the St. Mary assessment area. During the review period, the bank originated one community development loan for \$10,000 to support a nonprofit that provides services to victims of domestic violence. Community development lending opportunities are limited in this assessment area; however, the bank's lending exhibits poor responsiveness to assessment area community development and credit needs.

## St. Mary, Louisiana

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### INVESTMENT TEST

IBERIABANK makes a poor level of qualified investments and grants relative to the bank's presence in the St. Mary assessment area. Combined investment and contribution activity inside the assessment area equaled \$160,900.

The bank made investments (excluding contributions) totaling \$155,896 in the assessment area, which was invested entirely during the review period. All of the investments were purchases of mortgage-backed securities. The bank also contributed \$5,000 to three nonprofit organizations during the review period. All of the contributions supported community services to LMI individuals. Lastly, the bank provided \$9,500 in contributions to affordable housing organizations that benefitted a broader regional area that includes the bank's assessment area.

IBERIABANK's investments and contributions exhibited limited responsiveness to several identified needs during the review period, namely financial stability initiatives and workforce development. As noted earlier, the prevalence of poverty and high unemployment highlight the importance of private-public partnerships to address these needs.

### SERVICE TEST

IBERIABANK's service test performance in the St. Mary assessment area is adequate based on the bank's retail banking services and an adequate level of community development services.

#### *Retail Services*

Retail banking services are adequate in the St. Mary full-scope assessment area.

Delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area. The distribution of four branch offices and four 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 assessment area contains no low-income tracts, and the bank has branches in moderate-income tracts. However, the bank has two branches located in middle-income tracts that are designated as distressed tracts. For comparison purposes, 7.1 percent of households and 4.2 percent of businesses were located in moderate-income tracts, and 70.7 percent of households and 59.3 percent of businesses were located in middle-income designated distressed tracts.

During the review period, the bank opened four branches, two in middle-income designated distressed tracts and two 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 individuals in the assessment area.

## St. Mary, Louisiana

Bank products, services, and standard business hours are consistent throughout the assessment area. Both branches in distressed middle-income geographies have extended and weekend hours. Overall, banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in distressed middle-income geographies.

### Geographic Distribution of Branches & ATMs

Assessment Area: LA St. Mary

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			
	#	%						#	%	#	%	#	%	#	%	#	%	#	%			#	%	
Low	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%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0	0	0				
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0	2	11.8%	7.1%	4.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0	0					
Middle	2	50.0%	2	0	2	2	2	Total	2	50.0%	2	50.0%	2	0	0	0.0%	0	0	0	11	64.7%	70.7%	59.3%	
DTO	1		1	0				SA	0		0		0	0	0		0	0						
Upper	2	50.0%	2	0	2	2	1	Total	2	50.0%	2	50.0%	2	0	0	0.0%	0	0	0	3	17.6%	22.2%	36.5%	
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	1	5.9%	0.0%	0.0%	
DTO	0		0	0				SA	0		0		0	0	0		0	0						
Total	4	100.0%	4	0	4	4	3	Total	4	100.0%	4	100.0%	4	0	0	0.0%	0	0	0	17	100.0%	100.0%	100.0%	
DTO	1		1	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

IBERIABANK provides an adequate level of community development services in the St. Mary assessment area. Employees participated in 9 service activities, representing 162 qualified community development service hours during the review period.

IBERIABANK's community development activities in the St. Mary assessment area benefitted organizations that provide community services to low- and moderate-income individuals and communities. Of the total 162 qualified service hours, 159 hours were committed to youth financial education and 3 hours supported adult financial education in St. Mary. Bank employees did not engage in board or committee service to qualified nonprofit organizations. Employees' participation in *Teach Children to Save Day* was considered responsive to youth financial education needs.

The bank has adequate market share and a small branch network in the assessment area. While designated declared disaster areas and distressed middle-income tracts provide opportunities for community development, limited bank capacity in the market may hamper the bank's ability to respond to community development needs in the St. Mary assessment area.



## Nonmetropolitan Areas (Limited Review)

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

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE LOUISIANA NONMETROPOLITAN ASSESSMENT AREAS

- **Allen Assessment Area (Allen Parish)**
  - As of December 31, 2016, IBERIABANK operated one branch in the assessment area, representing 1.3 percent of its branches in Louisiana.
  - As of June 30, 2016, the bank had \$21.7 million in deposits in this assessment area, representing a market share of 14.4 percent and 0.3 percent of IBERIABANK’s total deposits in Louisiana.
- **Lincoln Assessment Area (Lincoln Parish)**
  - As of December 31, 2016, IBERIABANK operated two branches in the assessment area, representing 2.6 percent of its branches in Louisiana.
  - As of June 30, 2016, the bank had \$77.5 million in deposits in this assessment area, representing a market share of 6.7 percent and 1.1 percent of IBERIABANK’s total deposits in Louisiana.
- **Morehouse Assessment Area (Morehouse Parish)**
  - As of December 31, 2016, IBERIABANK operated no branches in this assessment area. The bank exited this market in February 2016.
  - As of June 30, 2016, the bank had no deposits in this assessment area.
- **St. Landry Assessment Area (St. Landry Parish)**
  - As of December 31, 2016, IBERIABANK operated one branch in the assessment area, representing 1.3 percent of its branches in Louisiana.
  - As of June 30, 2016, the bank had \$43.3 million in deposits in this assessment area, representing a market share of 3.3 percent and 0.6 percent of IBERIABANK’s total deposits in Louisiana.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

<b>Nonmetropolitan Assessment Areas</b>			
<b>Assessment Areas</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Allen	Not Consistent (Below)	Consistent	Not Consistent (Below)
Lincoln	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
Morehouse	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Below)
St. Landry	Not Consistent (Below)	Not Consistent (Below)	Consistent

For the lending test, IBERIABANK received a high satisfactory rating for the State of Louisiana. Performance in all the nonmetropolitan limited-scope assessment areas was below performance for the State of Louisiana.

## Nonmetropolitan Areas (Limited Review)

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However, each of these assessment areas, with the exception of the Morehouse assessment area, was still considered adequate. Weaker performance was primarily attributable to the lack of community development lending.

For the investment test, IBERIABANK received a high satisfactory rating for the State of Louisiana. Investment test performance in the Allen nonmetropolitan assessment area was consistent with the performance for the state while the bank's performance in the Lincoln, Morehouse, and St. Landry nonmetropolitan assessment areas was below the state.

For the service test, IBERIABANK received a rating of high satisfactory for the State of Louisiana. Service test performance in the St. Landry nonmetropolitan assessment area was consistent with the bank's state performance. Performance in the Allen, Lincoln, and Morehouse nonmetropolitan assessment areas was below the state, primarily driven by weaker retail banking services.

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

## TENNESSEE

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**CRA RATING FOR TENNESSEE:        SATISFACTORY**

**The Lending Test is rated:        Low 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 adequate penetration throughout the assessment area, and the distribution of loans by borrower income also reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes a low level of community development loans in its Tennessee assessment area.
- The bank provides an excellent level of qualified community development investments and grants that are responsive to several identified community development needs of the Tennessee assessment area.
- Retail banking services are adequate in the bank's assessment area.
- The bank is a leader in providing community development services throughout the assessment area.

## TENNESSEE

### SCOPE OF EXAMINATION

A full-scope review was conducted for the only assessment area in the State of Tennessee:

- Memphis

The Memphis assessment area is the only assessment area in the state; therefore, no limited-scope review was conducted in the State of Tennessee. 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 TENNESSEE

As of June 30, 2016, IBERIABANK had \$375.0 million in deposits in Tennessee accounting for 2.3 percent of the bank's total deposits. IBERIABANK operated 8 branch offices in Tennessee as of December 31, 2016, representing 4.0 percent of the bank's total branches. HMDA-reportable lending in Tennessee accounted for 8.0 percent of total institutional HMDA-reportable lending by number of loans, and CRA small business lending in Tennessee accounted for 4.4 percent of the bank's total CRA small business lending. Overall, HMDA-reportable and CRA lending in Tennessee accounted for 6.6 percent of the bank's total lending activity.

The following table shows lending activity from January 1, 2014, through December 31, 2016.

### Statewide Summary of Lending Activity Assessment Areas Located in TN STATE

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	1,815	56.9%	\$348,097	58.0%
HMDA Refinance	411	12.9%	\$78,837	13.1%
HMDA Home Improvement	108	3.4%	\$2,814	0.5%
HMDA Multi-Family	8	0.3%	\$4,306	0.7%
<b>Total HMDA</b>	<b>2,342</b>	<b>73.5%</b>	<b>\$434,054</b>	<b>72.3%</b>
<b>Total Small Business</b>	<b>845</b>	<b>26.5%</b>	<b>\$166,297</b>	<b>27.7%</b>
<b>Total Farm</b>	<b>1</b>	<b>0.0%</b>	<b>\$240</b>	<b>0.0%</b>
<b>TOTAL LOANS</b>	<b>3,188</b>	<b>100.0%</b>	<b>\$600,591</b>	<b>100.0%</b>

Originations and Purchases

## TENNESSEE

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### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

#### **Lending Test**

The lending test rating in the State of Tennessee is low satisfactory. Overall, performance in Tennessee with regard to the geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of loans by borrower income also reflects adequate penetration among customers of different income levels and businesses of different sizes. Additionally, IBERIABANK makes a low level of community development loans in Tennessee.

During the review period, IBERIABANK reported 2,342 HMDA-reportable loans and 845 small business loans in Tennessee. As such, HMDA-reportable lending was given greater weight when determining the lending test rating for Tennessee. The rating for Tennessee is based on performance in the Memphis 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 IBERIABANK's HMDA-reportable and small business loans is adequate, and the distribution of loans by borrower income and revenue size of businesses is also adequate. As noted above, the rating for the State of Tennessee is derived from the Memphis assessment area. A detailed discussion of the borrower and geographic distribution of lending for the assessment area is included in the next section of this report.

#### ***Community Development Lending***

IBERIABANK makes a low level of community development loans in the State of Tennessee. The bank originated 15 community development loans totaling \$4.2 million in Tennessee during the review period, all of which were in the Memphis full-scope assessment area. Overall, this level of statewide community development lending is considered poor based on the bank's size and presence in its Tennessee assessment area and the availability of community development lending opportunities. 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 Tennessee is outstanding.

IBERIABANK makes an excellent level of qualified community development investments and grants in Tennessee, occasionally in a leadership position. During the review period, IBERIABANK had qualified investments of \$10.8 million in the Tennessee assessment area, with 92.2 percent acquired during the current review period. In addition, the bank made 44 qualified contributions in the state for approximately \$176,400. The Memphis assessment area is the bank's only assessment area in Tennessee. Overall, the bank exhibited

## TENNESSEE

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outstanding responsiveness to credit and community development needs in the Memphis assessment area and the state overall. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section.

A summary of the bank's investments and contributions for full-scope and limited-scope assessment areas can be found in Appendix F.

### **Service Test**

The service test rating for Tennessee is high satisfactory.

#### ***Retail Services***

Retail banking services are adequate in Tennessee. The retail banking services rating consists of an evaluation of the bank's accessibility of delivery systems, changes in branch locations, and reasonableness of business hours and services in meeting assessment area needs. Additional detail on the bank's retail services can be found in the full-scope assessment area section.

#### ***Community Development Services***

IBERIABANK is considered a leader in providing community development services that benefit low- and moderate-income residents and small businesses in the State of Tennessee.

The bank provided a total of 972 qualified service hours during the review period. All service hours were conducted in Memphis, the bank's only assessment area in the state. The community development service performance is considered excellent given IBERIABANK's size and presence in the State of Tennessee.

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

## Memphis, Tennessee

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### **METROPOLITAN AREA** *(Full Scope Review)*

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MEMPHIS, TENNESSEE ASSESSMENT AREA**

##### Overview

IBERIABANK's Memphis assessment area consists of Shelby County in Tennessee. The assessment area is part of the nine-county Memphis, TN-MS-AR multistate MSA, which also includes Crittenden County in Arkansas; Benton, DeSoto, Marshall, Tate, and Tunica counties in Mississippi; and Fayette and Tipton counties in Tennessee.<sup>176</sup> As of December 31, 2016, IBERIABANK had eight branches in the Memphis assessment area.

According to the June 30, 2016 FDIC Summary of Deposits Report, IBERIABANK ranked 11<sup>th</sup> out of 34 banks in the assessment area with 1.6 percent deposit market share and \$375.0 million in deposits. First Tennessee Bank NA, based in Memphis, is the dominant financial institution, holding 38.5 percent of all deposits.

In 2014, IBERIABANK Mortgage ranked 6<sup>th</sup> and IBERIABANK ranked 43<sup>rd</sup> in HMDA-reportable lending and combined had 3.3 percent of total loans in the assessment area. IBERIABANK ranked 12<sup>th</sup> in CRA small business lending with 3.2 percent of total loans in the assessment area. Wells Fargo Bank and Regions Bank were the largest HMDA lenders in the assessment area, while American Express and Capital One Bank were the primary CRA lenders in the market.

In 2015, IBERIABANK Mortgage ranked 8<sup>th</sup> and IBERIABANK ranked 44<sup>th</sup> in HMDA-reportable lending and combined had 3.6 percent of total loans in the assessment area. IBERIABANK ranked 13<sup>th</sup> in CRA lending with 1.9 percent of total loans in the assessment area. Wells Fargo Bank, Community Mortgage Corporation, and Quicken Loans, Inc., were the largest HMDA lenders in the assessment area, while American Express and Capital One Bank were the primary CRA lenders in the market.

##### Population and Income Characteristics

The estimated population in 2016 for the Memphis assessment area was 935,000 people, representing a 0.7 percent increase from 2010.<sup>177</sup> Memphis, the principal city of the area, is located in Shelby County and is the largest city in Tennessee. The city of Memphis accounts for 70.0 percent of the population of Shelby County.<sup>178</sup>

There are 221 census tracts in the assessment area; 2010 census data indicates that there were 53 (24.0 percent) low-income census tracts, 52 (23.5 percent) moderate-income tracts, 46 (20.8 percent) middle-income tracts, 65 (29.4 percent) upper-income tracts, and 5 (2.3 percent) tracts with unknown income levels.

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<sup>176</sup> Greater Memphis Chamber, n.d. Web. 27 Jul. 2017. <http://www.memphischamber.com/Community/Live/About-Memphis>

<sup>177</sup> *QuickFacts*. US Census Bureau, n.d. Web. 27 Jul. 2017. <http://quickfacts.census.gov>

<sup>178</sup> *Ibid*

## Memphis, Tennessee

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income. The following table sets forth the estimated median family income for the Memphis, TN-MS-AR MSA and indicates that the estimated median family income decreased by \$1,300, or 2.2 percent, from 2015 to 2016. In addition, 41.3 percent of families within the assessment are considered low- to moderate-income (LMI), which is comparable to the percentage of LMI families in the MSA and in the state.

### Borrower Income Levels Memphis, TN-MS-AR MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2014</b>	<b>\$59,800</b>	0 - \$29,899	\$29,900 - \$47,839	\$47,840 - \$71,759	\$71,760 - & above
<b>2015</b>	<b>\$60,400</b>	0 - \$30,199	\$30,200 - \$48,319	\$48,320 - \$72,479	\$72,480 - & above
<b>2016</b>	<b>\$59,100</b>	0 - \$29,549	\$29,550 - \$47,279	\$47,280 - \$70,919	\$70,920 - & above

Poverty and financial instability are concerns in the assessment area, where the percentage of families living below the poverty level continues to increase each year. For the Memphis MSA, the percentage of families living in poverty was 14.9 percent between 2011 and 2015, while the poverty rate was 22.7 percent in the city of Memphis and 16.7 percent in Shelby County.<sup>179</sup> This rate, however, increases drastically to almost 50.0 percent in both areas for families headed by a single female with children and for children under the age of 5 living in poverty. In low-income tracts, 41.5 percent of families have incomes below the poverty level; this figure drops to 24.2 percent in moderate-income tracts. This may limit lending opportunities in these geographies, particularly in low-income tracts.<sup>180</sup>

### Economic Conditions

Strategically located on the Mississippi River, Memphis is one of the nation's most significant distribution and logistics hubs. It is served by five major freight railroads, two national interstate highways, an inland port, and more than 400 trucking companies.<sup>181</sup> In addition, it is home to the world's second busiest airport in terms of cargo tonnage; FedEx, which accounts for more than 99 percent of all cargo activity at the airport, is also the region's largest employer.<sup>182</sup> <sup>183</sup> Transportation and wholesale trade represent 27.4 percent of the employment base and are clearly vital components of the local economy. The other significant employment sectors include professional and business services; education and health services; and government. Besides FedEx, other major employers include Methodist Healthcare, Baptist Memorial Health Care Corporation, First Horizon National Corporation, University of Tennessee Health Science Center, and St. Jude Children's Research Hospital.<sup>184</sup> It is

<sup>179</sup> "Memphis, TN assessment area (US Census)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 31 Jul. 2017. <<http://www.policymap.com/>>.

<sup>180</sup> Ibid

<sup>181</sup> Beem, Richard. "Memphis, TN-MS-AR." Moody's Analytics. IHS Economics, Fall 2016. Web. 01 Aug. 2017. <<https://www.economy.com/>>.

<sup>182</sup> Beem, Richard. "Memphis, TN-MS-AR." Moody's Analytics. IHS Economics, Fall 2016. Web. 01 Aug. 2017. <<https://www.economy.com/>>.

<sup>183</sup> Corbet, Michelle. "Airport Cuts Terminal Charges by Almost 13 Percent, FedEx Smiles." *Memphis Business Journal*, Bizjournals.com, 5 May 2017, [www.bizjournals.com/memphis/news/2017/05/22/airport-cuts-terminal-charges-by-almost-13-percent.html](http://www.bizjournals.com/memphis/news/2017/05/22/airport-cuts-terminal-charges-by-almost-13-percent.html).

<sup>184</sup> Ibid

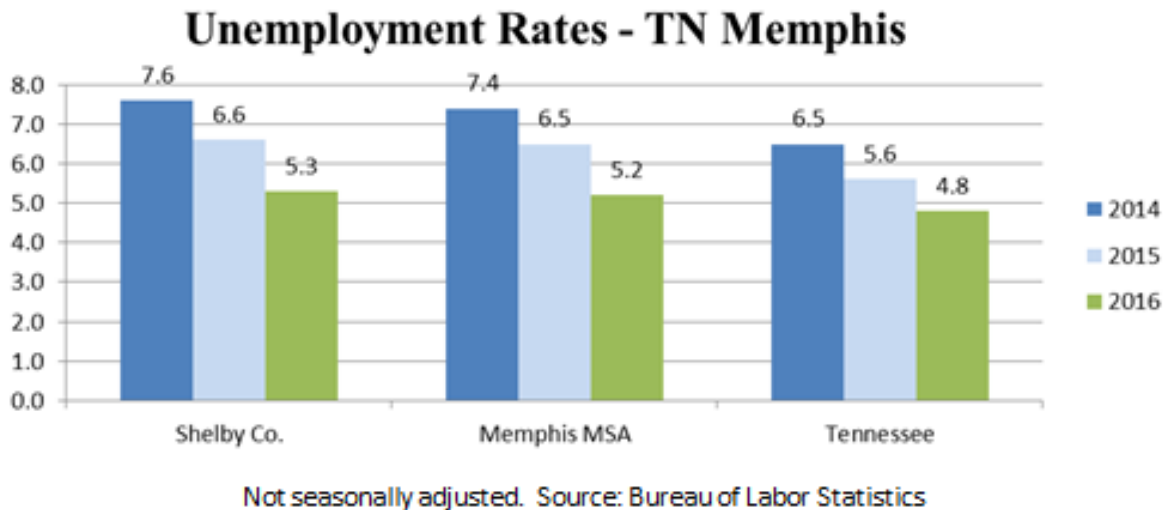


## Memphis, Tennessee

worth noting that the trade and transportation sector provides well-paying jobs without the need for a post-high school degree. In 2014, the average annual wage in transportation and warehousing was \$61,938 in the assessment area as compared to \$47,910 for all industries in the Memphis MSA.<sup>185</sup>

Small businesses also play an important role in the Memphis economy. According to 2016 Dun & Bradstreet information, there were 32,572 businesses in the assessment area, of which 87.8 percent had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses.<sup>186</sup> Additionally, 28.8 percent of small businesses in the assessment area are located in LMI tracts. Lending to small businesses increased by 34.2 percent between 2013 and 2015 in the assessment area, with 5,971 loans made in 2015. During this same period, loans made to firms with revenues of \$1.0 million or less represented 49.6 percent of total small business loans, which is a higher proportion than previous years and an indication that there may be fewer obstacles for smaller firms to access credit in the market.<sup>187</sup>

The following graph illustrates the unemployment rates for Shelby County, the Memphis MSA, and Tennessee. Overall, the unemployment rate in Shelby County declined during the review period, but remained slightly higher than the state rate and was consistent with the Memphis MSA.



Census data indicates there were 396,303 housing units in the assessment area in 2010, of which 53.0 percent were owner-occupied, 32.9 percent were rental units, and 14.1 percent were vacant. In low-income tracts, only 29.0 percent of housing units were owner-occupied. In moderate-income tracts, 42.6 percent of housing units were owner-occupied. Rental and vacant units are highly concentrated in low- and moderate-income tracts, and housing is much older in these areas compared to the assessment area overall. These factors suggest that lending may be more challenging in LMI areas than in other areas.

<sup>185</sup> "Memphis, TN assessment area (US Census)." *Bureau of Labor Statistics Quarterly Census of Employment and Wages*. Bureau of Labor Statistics Quarterly Census of Employment and Wages, n.d. Web. 31 Jul. 2017. <<http://www.policymap.com/>>.

<sup>186</sup> 2016 FFIEC Census Data and Dun & Bradstreet Information.

<sup>187</sup> "Memphis, TN assessment area (US Census)." *FFIEC: CRA. Community Reinvestment Act*, n.d. Web. 31 Jul. 2017. <<http://www.policymap.com/>>.

## Memphis, Tennessee

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The housing market in the Memphis metropolitan area is stable, with annual increases in home sales and home values. For the 12 months ending November 2016, annual home sales increased by 13.0 percent and home values appreciated by 3.0 percent.<sup>188</sup> The median home sales price for the Memphis area in December 2016 was \$133,000, representing an increase of 33.8 percent from January 2013.<sup>189</sup> In 2015, only 37.5 percent of homes were affordable for a four-person family earning 80.0 percent of the area median income; this indicates that despite relatively low home prices compared with other areas in the state, housing affordability is still a challenge due to persistent low wages and poverty in the assessment area. During the same timeframe, 76.8 percent of rental units were likely affordable for a four-person family earning 80.0 percent of the area median income.<sup>190</sup>

The market is also experiencing lower delinquency levels. The percentage of seriously delinquent mortgages in the assessment area (defined as more than 90 days past due or in foreclosure) fell from 6.0 percent in December 2013 to 5.0 percent in December of 2015, but remains higher than the national rate.<sup>191</sup> Furthermore, the Memphis Area Association of Realtors reports that foreclosed properties continue to decline as a proportion of residential total sales.<sup>192</sup> Lastly, Zillow.com reports that 13.1 percent of homeowners in the assessment area were still underwater with their mortgages as of September 2016, down from 25.0 percent in September 2014. This suggests that during the review period, conditions were improving but foreclosures may continue to pose risks to the recovery of the housing market and homeowners may still lack the equity needed to borrow against their homes, which may limit home improvement and home refinance opportunities.

### 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.

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<sup>188</sup> Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic.

<sup>189</sup> "Market Reports & MLS Sales Reports." Memphis Area Association of Realtors. N.p., n.d. Web. 01 Aug. 2017. <https://maar.org/marketreports>

<sup>190</sup> "Memphis, TN assessment area (U.S. Census Bureau)." *HUD Income Limits*. US Department of Housing and Urban Development Income Limits, n.d. Web. 02 Aug. 2017. <http://www.policymap.com/>

<sup>191</sup> "Mortgage Foreclosures and Delinquencies Continue to Drop | Mortgage Bankers Association." Mortgage Bankers Association, 18 Feb. 2016. Web. 02 Aug. 2017. <https://www.mba.org/2016-press-releases/feb/mortgage-foreclosures-and-delinquencies-continue-to-drop>

<sup>192</sup> "Market Reports & MLS Sales Reports." Memphis Area Association of Realtors. N.p., n.d. Web. 02 Aug. 2017. <https://maar.org/marketreports>

# Memphis, Tennessee

## Combined Demographics Report

Assessment Area: TN Memphis

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	53	24	33,700	15.1	13,997	41.5	56,264	25.2
Moderate-income	52	23.5	49,730	22.3	12,048	24.2	35,969	16.1
Middle-income	46	20.8	48,542	21.8	5,080	10.5	36,769	16.5
Upper-income	65	29.4	91,067	40.8	3,112	3.4	94,037	42.2
Unknown-income	5	2.3	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>221</b>	<b>100.0</b>	<b>223,039</b>	<b>100.0</b>	<b>34,237</b>	<b>15.4</b>	<b>223,039</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	74,510	21,618	10.3	29	35,085	47.1	17,807	23.9
Moderate-income	94,624	40,291	19.2	42.6	37,534	39.7	16,799	17.8
Middle-income	88,400	47,928	22.8	54.2	30,167	34.1	10,305	11.7
Upper-income	138,769	100,195	47.7	72.2	27,625	19.9	10,949	7.9
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>396,303</b>	<b>210,032</b>	<b>100.0</b>	<b>53.0</b>	<b>130,411</b>	<b>32.9</b>	<b>55,860</b>	<b>14.1</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	3,480	10.7	3,017	10.5	451	11.9	12	6.7
Moderate-income	6,156	18.9	5,245	18.3	889	23.5	22	12.3
Middle-income	6,881	21.1	6,123	21.4	730	19.3	28	15.6
Upper-income	15,766	48.4	14,030	49.1	1,620	42.7	116	64.8
Unknown-income	289	0.9	188	0.7	100	2.6	1	0.6
<b>Total Assessment Area</b>	<b>32,572</b>	<b>100.0</b>	<b>28,603</b>	<b>100.0</b>	<b>3,790</b>	<b>100.0</b>	<b>179</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.8</b>		<b>11.6</b>		<b>.5</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	10	5.1	8	4.3	2	18.2	0	0
Moderate-income	14	7.1	14	7.6	0	0	0	0
Middle-income	24	12.2	22	12	2	18.2	0	0
Upper-income	145	74	138	75	6	54.5	1	100
Unknown-income	3	1.5	2	1.1	1	9.1	0	0
<b>Total Assessment Area</b>	<b>196</b>	<b>100.0</b>	<b>184</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>93.9</b>		<b>5.6</b>		<b>.5</b>

2016 FFIEC Census Data and 2016 D&B Information

## Memphis, Tennessee

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### Credit and Community Development Needs

According to local community contacts, current economic conditions appear to be stable overall; however, conditions have deteriorated for low- and moderate-income segments of the community over the last two years, and there are well-defined neighborhoods with more pressing investment needs than others. Within the greater Memphis area, many neighborhoods located both north and south of what is known locally as “Poplar Corridor” make up a substantial part of the MSA’s low- and moderate-income areas. North of Poplar Corridor, neighborhoods such as Raleigh, Frayser, North Memphis, Smokey City, Douglass, and New Chicago are among the more depressed LMI neighborhoods. Located south of the corridor are Westview, Parkway Village, Hickory Hill, and Southeast Memphis, which are among the neighborhoods having the greatest investment and development needs. Local community contacts indicate that support from lending institutions to partner with nonprofits or invest in these LMI neighborhoods has been limited.

A community contact also indicated that there is a dearth of banking offices and ATMs within walking distance of LMI residents in Memphis. In a September 2016 article titled, “All Low- and Moderate-Income Areas Are Not Created Equal,” the author reports that 77.4 percent of the population in LMI neighborhoods in Memphis (nearly 8 out of every 10 people) are credit constrained.<sup>193</sup> Credit constrained neighborhoods are described as having poor, fair, or no credit history. The author also indicates that these credit constrained neighborhoods are usually located in the south, and they tend to have relatively high poverty rates. The prevalence of poverty and economic challenges facing LMI residents and neighborhoods in Memphis, in particular, highlight the importance of strategic partnerships with community service organizations within the assessment area.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEMPHIS, TENNESSEE ASSESSMENT AREA**

#### **LENDING TEST**

IBERIABANK’s lending performance in the Memphis assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of loans also reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes a low level of community development loans.

IBERIABANK reported 2,342 (73.5 percent) HMDA-reportable loans and 845 (26.5 percent) CRA small business loans in the Memphis assessment area during the review period. Therefore, HMDA-reportable lending received greater weight in determining the bank’s lending test rating in the 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.

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<sup>193</sup> Eggleston, Michael C. "All Low- and Moderate-Income Areas Are Not Created Equal." Federal Reserve Bank of St. Louis, n.d. Web. 02 Aug. 2017. <https://www.stlouisfed.org/publications/bridges/summer-2016/all-low-and-moderate-income-areas-are-not-created-equal>

## Memphis, Tennessee

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### ***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. There are a number of issues that are likely to impact lending opportunities in the Memphis market. First, the Memphis assessment area is characterized by high rates of poverty, particularly in LMI geographies, and higher rates of unemployment relative to the state. Additionally, the housing stock in the LMI communities is older relative to the rest of the assessment area. Finally, the bank has only one branch in a low-income tract and one-branch in a moderate-income tract; the bank's limited presence in a highly competitive banking market may also impact lending in these targeted geographies. Considering all of these factors, IBERIABANK's geographic distribution of loans reflects adequate penetration throughout the assessment area.

### **Home Purchase Loans**

Home purchase lending in low-income census tracts is poor. The bank's home purchase lending in low-income census tracts was considerably less than the percentage of owner-occupied units in those tracts throughout the review period. IBERIABANK originated 2.3 percent of its home purchase loans in low-income census tracts, where 10.3 percent of owner-occupied units are located. Moreover, IBERIABANK's performance was less than the aggregate performance in low-income census tracts in 2014 and 2015.

Home purchase lending in moderate-income census tracts is also poor. The bank's home purchase lending in moderate-income census tracts was considerably less than the percentage of owner-occupied units in moderate-income census tracts. IBERIABANK originated 4.5 percent of its home purchase loans in moderate-income census tracts, where 19.2 percent of owner-occupied units are located. Additionally, the bank's performance was less than aggregate lenders in 2014 and 2015.

### **Home Refinance Loans**

Home refinance lending in low-income census tracts is poor based on five loan originations during the review period. The bank's lending performance in low-income census tracts was substantially less than the percentage of owner-occupied units located in low-income census tracts. In addition, the bank's performance was also less than aggregate performance in 2014 and 2015.

Home refinance lending in moderate-income census tracts is also poor. Lending performance in moderate-income census tracts was considerably less than the percentage of owner-occupied units located in moderate-income census tracts. Additionally, the bank's lending was less than aggregate lending performance in 2014 and comparable to aggregate in 2015.

### **Home Improvement Loans**

Home improvement lending in low-income census tracts is good. IBERIABANK's home improvement lending in low-income census tracts was greater than the percentage of owner-occupied units in those tracts during the review period. Additionally, IBERIABANK's performance was greater than the aggregate lenders in 2014 and less than aggregate in 2015.

## Memphis, Tennessee

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Home improvement lending in moderate-income census tracts is poor. Lending performance in moderate-income census tracts was less than the percentage of owner-occupied units located in these tracts and less than aggregate lending performance in 2014 and 2015.

### Small Business Loans

Small business lending in low-income census tracts is adequate. Although the percentage of small business loans in low-income census tracts was less than the percentage of small businesses located in low-income census tracts, the bank's lending volume on average from 2014 through 2015 was similar to aggregate lending. Along with increased opportunities for small business lending, there was increased competition from larger financial institutions for IBERIABANK to extend credit to businesses earning revenues of \$1 million or less. Small business lending in moderate-income census tracts is excellent. The percentage of small business loans in moderate-income census tracts was greater than the percentage of small businesses located in moderate-income census tracts. Additionally, the bank's performance was greater than aggregate lending performance in 2014 and 2015.

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

For this analysis, the distribution of small business lending across business revenue sizes and HMDA lending across borrower income levels was compared to available demographic information. Performance context issues were considered as well as the performance of other banks. Specifically, the housing conditions in the Memphis market were considered in evaluating the bank's lending to borrowers of different income levels for all HMDA products. As discussed earlier, while housing market conditions improved during the review period, the market is still recovering from the financial crisis. There are still a high number of homes with underwater mortgages, and the impact of high rates of foreclosure and bankruptcy has created unfavorable credit conditions, particularly for lower-income borrowers. These factors are likely to impact all HMDA lending opportunities. Considering all of these factors, IBERIABANK's distribution of loans by borrower income or revenue size of businesses is adequate.

### Home Purchase Loans

Home purchase lending to low-income borrowers is good. The percentage of home purchase loans to low-income borrowers was significantly less than the percentage of low-income families located in the assessment area; however, lending performance was significantly greater than aggregate lending performance in 2014 and 2015.

Home purchase lending to moderate-income borrowers is excellent. The bank's percentage of home purchase loans was greater than the percentage of moderate-income families located in the assessment area. The bank's home purchase lending was also greater than the aggregate lending performance in 2014 and 2015.

### Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. Lending to low-income borrowers was significantly less than the percentage of low-income families in the assessment area. However, the bank's lending was notably greater than aggregate lending in 2014, and slightly less than aggregate performance in 2015.

## Memphis, Tennessee

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Home refinance lending to moderate-income borrowers is good. The bank's percentage of home refinance loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area. However, IBERIABANK's lending was comparable to aggregate lending performance in 2014 and greater than aggregate in 2015.

### Home Improvement Loans

Home improvement lending to low-income borrowers is poor based on five loan originations during the review period. The bank's home improvement lending to low-income borrowers was significantly less than the percentage of low-income families in the assessment area throughout the review period. Additionally, the bank's lending performance was less than aggregate lenders in 2014 and 2015. The bank originated no home improvement loans to low-income borrowers in 2015 and only one in 2016.

Home improvement lending to moderate-income borrowers is also poor. The bank's home improvement lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area during the review period. Additionally, the bank's lending performance was significantly less than aggregate lenders in 2014 and greater than aggregate in 2015.

### Small Business Loans

The distribution of small business loans to businesses of different sizes is adequate. 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, IBERIABANK's performance was greater than aggregate lending performance in 2014 and less than aggregate in 2015. Additionally, 76.7 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.

### ***Community Development Lending***

IBERIABANK makes a low level of community development loans in the Memphis assessment area. The bank originated or renewed 15 community development loans totaling \$4.2 million during the review period. Specifically, the bank provided four loans for \$1.4 million to support economic development activities, including one SBA 504 loan for \$1.2 million; eight loans for \$1.3 million towards community services for LMI individuals; and three loans totaling \$1.5 million towards affordable housing for LMI individuals. Notably, IBERIABANK provided support for a local CDFI by providing a \$75,000 loan to increase the organization's small business lending capacity. Access to credit for small businesses is an identified need in the assessment area. The bank also provided a line of credit to a nonprofit affordable housing developer to help the organization acquire land and build new affordable housing; access to quality, affordable housing is needed to address the affordability gap in this assessment area.

IBERIABANK's community development lending is responsive to some community development and credit needs. However, the bank's volume of community development lending is low relative to its presence in this market, which is reflected in the overall performance conclusion.

## Memphis, Tennessee

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### INVESTMENT TEST

IBERIABANK makes an excellent level of qualified investments and grants in the Memphis assessment area. Combined investment and contribution activity inside the assessment area totaled \$11.0 million.

The bank made investments (excluding contributions) totaling \$10.8 million in the assessment area; of that, \$10.0 million was invested during the review period. The bank was responsive to the need across the assessment area for affordable rental housing and revitalization activities with a \$6.9 million LIHTC project investment, which involved the redevelopment of a former public housing site into 67 new affordable housing units for families in Memphis. All other current period investments were mortgage-backed securities. Prior period investments included eligible mortgage-backed securities and an affordable housing investment fund.

IBERIABANK also contributed \$176,400 to nonprofit organizations during the review period. Nearly all of the contributions supported organizations that provide community services to low- or moderate-income individuals, including LMI youth character development programs, abuse shelter and prevention services, emergency assistance for LMI families, and arts and culture programming for LMI youth. Notably, the bank provided \$35,000 in mortgage grants to qualified LMI homebuyers with down payment assistance and closing costs and sponsored first-time home buyer training. Other impactful contributions included support to a community development organization working in the Binghampton neighborhood, an economically challenged area, as well as funding for Bank On Memphis, a financial stability initiative.

IBERIABANK demonstrated limited engagement with activities that support small businesses and workforce development during the review period. However, the bank's investments and contributions did exhibit significant responsiveness to other identified needs, including assisting in LMI homeownership with down payment assistance; increasing the availability of affordable multifamily units; supporting LMI youth enrichment through educational and cultural opportunities; and lastly, engaging in revitalization and stabilization activities in a targeted LMI community.

### SERVICE TEST

IBERIABANK's service test performance in the Memphis assessment area is good based on the bank's retail banking services and its leadership in providing community development services.

#### ***Retail Services***

Retail banking services are adequate in the Memphis full-scope assessment area.

The distribution of eight branch offices and eight 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 representing 12.5 percent of branches and one in a moderate-income tract representing 12.5 percent of branches. For comparison purposes, 16.7 percent of households and 10.7 percent of businesses were located in low-income census tracts, and 22.9 percent of households and 18.9 percent of businesses were located in moderate-income tracts. Due to the limited number of branches in LMI geographies, delivery systems are considered inaccessible to portions of IBERIABANK's geographies and individuals of different income levels.



## Memphis, Tennessee

During the review period, the bank opened five branches. Two branches with two full-service ATMs were opened in low- and moderate-income tracts. Meanwhile, the bank did not close any branches or ATMs during the review period. Overall, the bank’s record of opening and closing of branches has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals in the assessment area.

Bank products, services and standard business hours are consistent throughout the assessment area. IBERIABANK does not offer any extended hours at any of its branch offices in the assessment area. Additionally, the bank does not offer weekend hours at the branches in low- and moderate-income tracts, and offers weekend hours at only one of its branches in upper-income tracts. In general, banking services and hours of operations do not vary in a way that inconveniences the assessment area, including low- and moderate-income geographies and low- and moderate income individuals.

**Geographic Distribution of Branches & ATMS**

Assessment Area: TN Memphis

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	12.5%	1	0	1	0	0	Total	2	11.8%	1	12.5%	1	0	1	11.1%	0	0	53	24.0%	16.7%	10.7%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Moderate	1	12.5%	1	0	1	0	0	Total	2	11.8%	1	12.5%	1	0	1	11.1%	0	0	52	23.5%	22.9%	18.9%
DTO	0		0	0				SA	1		0		0	0	1		0	0				
Middle	0	0.0%	0	0	0	0	0	Total	4	23.5%	0	0.0%	0	0	4	44.4%	1	0	46	20.8%	22.9%	21.1%
DTO	0		0	0				SA	4		0		0	0	4		1	0				
Upper	6	75.0%	3	0	6	0	1	Total	9	52.9%	6	75.0%	3	0	3	33.3%	0	0	65	29.4%	37.5%	48.4%
DTO	0		0	0				SA	3		0		0	0	3		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	2.3%	0.0%	0.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	8	100.0%	5	0	8	0	1	Total	17	100.0%	8	100.0%	5	0	9	100.0%	1	0	221	100.0%	100.0%	100.0%
DTO	0		0	0				SA	9		0		0	0	9		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

IBERIABANK is considered a leader in providing community development services in the Memphis assessment area. Employees participated in 32 activities, providing 972 community development service hours to qualified organizations during the review period.

IBERIABANK’s community development activities in the Memphis assessment area benefitted organizations that provide affordable housing, community services, economic development, and revitalization and stabilization activities for low- and moderate-income individuals, communities and small businesses. Of the bank’s total service hours, 124 hours were committed to youth financial education, and 172 hours supported adult financial education in Memphis. Bank employees also provided 659 hours of board or committee service to qualified nonprofit organizations.

## Memphis, Tennessee

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Examples of responsive community development services during the review period include:

- The bank engaged in single-family affordable housing ownership and multifamily affordable housing preservation through board service at the city housing authority and Habitat for Humanity.
- The bank supported financial literacy initiatives through Bank On Memphis advisory board leadership.
- The bank supported small business through technical assistance support to a local CDFI and small business financing entity.
- The bank engaged in revitalization efforts through service leadership on a city consortium that promotes urban community development in the assessment area.

Given the bank's limited market share and branch network in the assessment area, the bank exhibits significant bank engagement and executes activities that are diverse and responsive to identified community development needs, particularly affordable housing and economic development. Overall, the bank's performance is considered excellent in the Memphis assessment area.

## TEXAS

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**CRA RATING FOR TEXAS: 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 good penetration throughout the assessment areas, and the distribution of loans by borrower income also reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank is a leader in making community development loans in its Texas 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 Texas assessment areas.
- Retail banking services are adequate in the bank's assessment areas.
- The bank is a leader in providing community development services throughout the assessment areas.

## TEXAS

### SCOPE OF EXAMINATION

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

- Houston

A limited-scope review was conducted for the remaining assessment area:

- Dallas

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, IBERIABANK had \$1.6 billion in deposits in Texas accounting for 9.7 percent of the bank's total deposits. IBERIABANK operated 10 branch offices in Texas as of December 31, 2016, representing 5.1 percent of the bank's total branches. HMDA-reportable lending in Texas accounted for 6.7 percent of total institutional HMDA-reportable lending by number of loans, and CRA small business lending in Texas accounted for 5.3 percent of the bank's total CRA small business lending. Overall, HMDA-reportable and CRA lending in Texas accounted for 6.2 percent of the bank's total lending activity.

The following table shows lending activity from January 1, 2014, through December 31, 2016.

### Statewide Summary of Lending Activity Assessment Areas Located in TX STATE

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	1,465	49.1%	\$494,955	50.1%
HMDA Refinance	399	13.4%	\$137,083	13.9%
HMDA Home Improvement	71	2.4%	\$19,920	2.0%
HMDA Multi-Family	28	0.9%	\$128,448	13.0%
<b>Total HMDA</b>	<b>1,963</b>	<b>65.8%</b>	<b>\$780,406</b>	<b>79.0%</b>
<b>Total Small Business</b>	<b>1,021</b>	<b>34.2%</b>	<b>\$207,534</b>	<b>21.0%</b>
<b>Total Farm</b>	<b>1</b>	<b>0.0%</b>	<b>\$20</b>	<b>0.0%</b>
<b>TOTAL LOANS</b>	<b>2,985</b>	<b>100.0%</b>	<b>\$987,960</b>	<b>100.0%</b>

Originations and Purchases

## TEXAS

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### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

#### Lending Test

The lending test rating in the State of Texas is high satisfactory. 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 also reflects good penetration among customers of different income levels and businesses of different sizes. Additionally, IBERIABANK is a leader in making community development loans in Texas.

During the review period, IBERIABANK reported 1,963 HMDA-reportable loans and 1,021 small business loans in Texas. As such, HMDA-reportable lending was given greater weight when determining the lending test rating for Texas. The rating for Texas is based on performance in the Houston full-scope assessment area, which accounts for 42.0 percent of the bank's HMDA-reportable and small business lending by number of loans and 41.9 percent by dollar volume in Texas during the review period.

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 IBERIABANK's HMDA-reportable and small business loans is good, and the distribution of loans by borrower income and revenue size of businesses is also good. As noted above, the rating for the State of Texas is derived from the Houston full-scope assessment area. A detailed discussion of the borrower and geographic distribution of lending for the assessment area is included in the next section of this report.

#### *Community Development Lending*

IBERIABANK is a leader in making community development loans in Texas. The bank originated 22 community development loans totaling \$55.0 million in the Texas assessment areas during the review period; in Houston, the only full-scope assessment area, the bank had 15 loans for \$42.0 million. Performance was excellent in Houston. The bank's performance in the Dallas limited-scope assessment area was also considered excellent. Notably, the bank provided a \$1.0 million line of credit to a CDFI that provides small business loans in the Dallas market.

The bank was considered responsive to the community credit needs in its assessment areas in the state. Therefore, positive consideration was given to six loans totaling \$15.3 million to borrowers located in a broader statewide area, without a purpose, mandate or function of serving one of the Texas assessment areas. All of the loans outside the bank's assessment areas were SBA 504 loans originated by the bank's affiliate, Mercantile Capital Corporation. Overall, this level statewide community development lending is considered excellent relative to the bank's presence and the level of competition in the state.

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

## TEXAS

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### **Investment Test**

The investment test rating for Texas is high satisfactory.

IBERIABANK makes a significant level of qualified community development investments and grants in Texas. During the review period, IBERIABANK had qualified investments of \$23.0 million in the Texas assessment areas, with nearly 90.0 percent acquired during the current review period. In addition, the bank made 73 qualified contributions in the assessment areas for approximately \$637,570. The state investment rating also reflects one contribution of \$1,100 that benefits a broader statewide or regional area that includes the Texas assessment areas.

Approximately 68.8 percent of combined investment and contribution activity occurred inside the Houston full-scope assessment area compared to 72.3 percent of deposits in this market. Performance is good in both the Houston full-scope assessment area and the Dallas limited-scope assessment area. Overall, the bank exhibited good responsiveness to credit and community development needs in Texas. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section.

A summary of the bank's investments and contributions for full-scope and limited-scope assessment areas can be found in Appendix F.

### **Service Test**

The service test rating for Texas is high satisfactory.

#### ***Retail Services***

Retail banking services are adequate in Texas. The retail banking services rating consists of an evaluation of the bank's accessibility of delivery systems, changes in branch locations, and reasonableness of business hours and services in meeting assessment area needs. Additional detail on the bank's retail services can be found in the full-scope assessment area section.

#### ***Community Development Services***

IBERIABANK is a leader in providing community development services that benefit low- and moderate-income residents and small businesses in the State of Texas.

The bank provided a total of 1,722 qualified service hours during the examination period, including 1,328 hours in Houston. The bank's performance in Houston was excellent. The bank also exhibited excellent performance in Dallas. Employees engaged in 394 service hours during the review period. The community development service performance in Texas is considered excellent given IBERIABANK'S size and presence in the state.

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

## Houston, Texas

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### **METROPOLITAN AREA** *(Full Scope Review)*

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

##### Overview

The Houston assessment area contains two of the nine counties in the Houston-The Woodlands-Sugar Land, Texas MSA, including Fort Bend and Harris counties. As of December 31, 2016, IBERIABANK had seven branches in the Houston assessment area, which represent 3.5 percent of the institution's branches.

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, IBERIABANK ranks 19<sup>th</sup> out of 81 financial institutions operating in the assessment area with 0.6 percent deposit market share. The top financial institution by deposit market share is JPMorgan Chase Bank with 41.4 percent, followed by Wells Fargo Bank and Bank of America.

IBERIABANK's loan production accounted for less than 1.0 percent of total CRA-reportable (small business) and HMDA-reportable lending activity in the assessment area in 2015. Assessment area lending is dominated by a few large-volume lenders, including the banks mentioned above.

##### Population and Income Characteristics

The Houston-The Woodlands-Sugar Land, Texas MSA is the 5<sup>th</sup> most populous MSA in the United States with 6.7 million residents.<sup>194</sup> The majority of the MSA population resides in Harris County. Its county seat is Houston, the 4<sup>th</sup> largest city in the country with 2.3 million residents.<sup>195</sup> The assessment area comprises 862 census tracts; 121 tracts (14.0 percent) are low-income and 295 tracts (30.0 percent) are moderate-income. Of the families living in the assessment area, 41.9 percent are considered low- to moderate-income (LMI), which is slightly higher than the state level of 39.7 percent. Additionally, 23.7 percent of families living in LMI tracts have incomes 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 \$68,400 to \$68,000 between 2014 and 2016.

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<sup>194</sup> *Houston's Economy*. Greater Houston Partnership, n.d. Web. 8 Aug. 2017.  
[http://www.houston.org/pdf/research/quickview/Most\\_Current\\_Talking\\_Points.pdf](http://www.houston.org/pdf/research/quickview/Most_Current_Talking_Points.pdf).

<sup>195</sup> Ibid

## Houston, Texas

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

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
<b>2014</b>	<b>\$68,400</b>	0 - \$34,199	\$34,200 - \$54,719	\$54,720 - \$82,079	\$82,080 - & above
<b>2015</b>	<b>\$70,100</b>	0 - \$35,049	\$35,050 - \$56,079	\$56,080 - \$84,119	\$84,120 - & above
<b>2016</b>	<b>\$68,000</b>	0 - \$33,999	\$34,000 - \$54,399	\$54,400 - \$81,599	\$81,600 - & above

#### Economic Conditions

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 a quarter 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.<sup>196</sup>

Healthcare is also a primary economic driver in the assessment area, employing over 290,000. Most notably, Houston is home to the world's largest medical complex, the Texas Medical Center (TMC), which covers over 1,300 acres and accounts for total employment of 106,000. The TMC's 56 member institutions include 6 general hospitals, 11 specialty hospitals, 3 medical schools, 5 nursing schools, and schools of dentistry and pharmacy.<sup>197</sup>

Nonfarm payroll employment in the Houston metro area totaled 3.0 million jobs in March 2016.<sup>198</sup> Service industries account for 8 out of 10 workers in the region.<sup>199</sup> The largest service industries are trade, transportation, and utilities (21.0 percent of jobs), professional and business services (15.2 percent), educational and health services (12.9 percent), and government (13.2 percent).<sup>200</sup> The goods-producing sector employs more than half a million workers. Manufacturing is the largest goods-producing industry with 7.7 percent of total jobs, followed by construction (7.0 percent), and mining and logging (2.9 percent).<sup>201</sup> 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.<sup>202</sup>

<sup>196</sup> Greater Houston Partnership. Web. 8 Sept. 2017. [http://www.houston.org/pdf/research/quickview/Most\\_Current\\_Talking\\_Points.pdf](http://www.houston.org/pdf/research/quickview/Most_Current_Talking_Points.pdf)

<sup>197</sup> Houston Economic Development Guide 2016 Guide. Greater Houston Partnership, 08 Feb. 2016. Web. 8 Aug. 2017.

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<sup>198</sup> Greater Houston Partnership. Web. 8 Aug. 2017. [http://www.houston.org/pdf/research/quickview/Most\\_Current\\_Talking\\_Points.pdf](http://www.houston.org/pdf/research/quickview/Most_Current_Talking_Points.pdf)

<sup>199</sup> Ibid

<sup>200</sup> Ibid

<sup>201</sup> Ibid

<sup>202</sup> Houston Economic Development Guide 2016 Guide. Greater Houston Partnership, 08 Feb. 2016. Web. 8 Aug. 2017.

[http://trendmag2.trendoffset.com/publication/?i=289955&pre=1#{\"issue\\_id\":289955,\"page\":46}](http://trendmag2.trendoffset.com/publication/?i=289955&pre=1#{\)

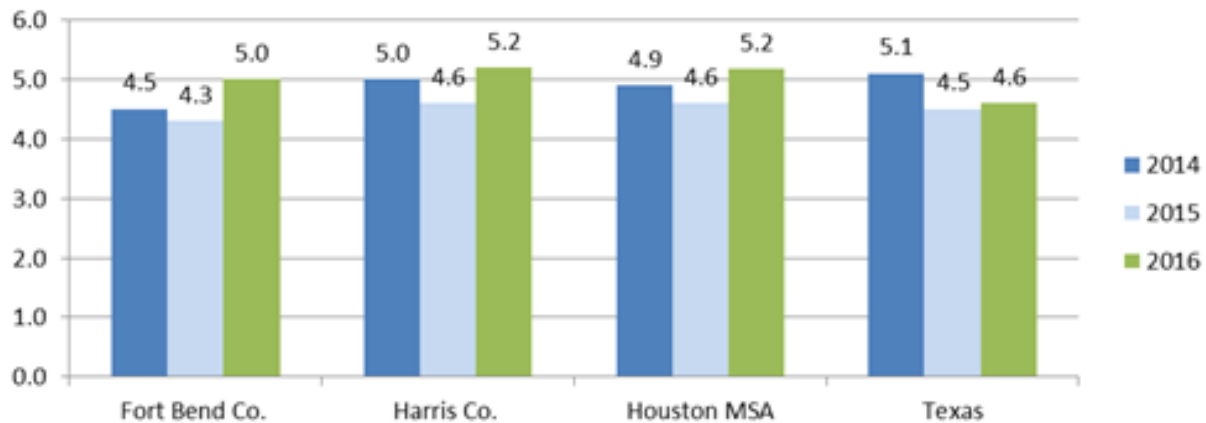


## Houston, Texas

Small businesses play an important role in the Houston economy. According to 2016 Dun & Bradstreet data, there were 241,802 businesses within the Houston assessment area, 90.2 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered small businesses.<sup>203</sup> 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.<sup>204</sup>

Economic conditions in the Houston assessment area weakened slightly during the review period. As shown in the table below, the unemployment rate increased between 2014 and 2016. The unemployment rate for the MSA in 2016 was 5.2 percent, compared to the statewide unemployment rate of 4.6 percent.

### Unemployment Rates - TX Houston



Not seasonally adjusted. Source: Bureau of Labor Statistics

The increase in the unemployment rate is largely a result of plummeting oil prices. For the period May 2015 to May 2016, the following sectors experienced employment declines: mining and lodging (13.3 percent); manufacturing (7.0 percent); and professional services (2.8 percent). Over the same period, jobs were added in retail trade, leisure and hospitality, health care, government, and arts, entertainment and recreation. Despite the addition of jobs in these non-energy sectors, the region created only 5,100 jobs for the 12 months ending May 2016, in contrast to 66,000 jobs created in the 12 months ending May 2015, and 98,500 jobs created in the 12 months ending May 2014. The diversity of the local economy has allowed the Houston region to weather the recent downturn.<sup>205</sup>

<sup>203</sup> FRB Atlanta Calculations of Dun & Bradstreet, 2016 American Community Survey data.

<sup>204</sup> 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>>.

<sup>205</sup> Houston Economy at a Glance. Greater Houston Partnership. Web. 8 Aug. 2017. <[http://www.houston.org/pdf/research/glance\\_archives/Glance\\_Jul16.pdf](http://www.houston.org/pdf/research/glance_archives/Glance_Jul16.pdf)> .

## Houston, Texas

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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.<sup>206</sup> 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.<sup>207</sup> At year-end 2016, there was a 3.3-month supply of homes, ending the year exactly where it began, which is less than the five-month period considered normal.<sup>208</sup> Concurrently, the metro area experienced a decrease in the number of new single-family building permits, from 39,297 in 2014 to 35,749 in 2016.<sup>209</sup>

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, low-income individuals would be able to afford homes priced at or below \$101,997, and moderate-income individuals would be able to afford homes priced at or below \$163,197. In 2016, only 7.1 percent of houses sold for less than \$100,000, which would be affordable for low-income families, and 21.1 percent sold for less than \$150,000, which would be affordable for moderate-income families. These numbers suggest that low- and moderate-income individuals would have some difficulty finding affordable homes in the current housing market and relatively close to employment centers.<sup>210</sup>

Census data indicates there were 1,735,000 housing units located in the assessment area, 53.5 percent of which were owner-occupied, 35.2 percent were rental units, and 11.3 percent were vacant. In low-income census tracts, only 21.0 percent of housing units are owner-occupied, while 43.8 percent are owner-occupied in moderate-income tracts. The median age of the housing stock across the assessment area is 30 years, while the median age is 37 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.

### 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.

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<sup>206</sup> *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>

<sup>207</sup> Ibid

<sup>208</sup> Ibid

<sup>209</sup> "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/>>.

<sup>210</sup> *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](https://www.recenter.tamu.edu/data/housing-activity/#!/activity/MLS_Area/Houston)>.

## 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	121	14	112,278	10.4	38,768	34.5	270,623	25
Moderate-income	259	30	293,293	27.1	57,224	19.5	182,649	16.9
Middle-income	210	24.4	291,590	26.9	27,755	9.5	187,716	17.3
Upper-income	268	31.1	385,736	35.6	13,523	3.5	441,909	40.8
Unknown-income	4	0.5	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>862</b>	<b>100.0</b>	<b>1,082,897</b>	<b>100.0</b>	<b>137,270</b>	<b>12.7</b>	<b>1,082,897</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%
Low-income	217,531	45,582	4.9	21	129,979	59.8	41,970	19.3
Moderate-income	482,480	211,538	22.8	43.8	206,109	42.7	64,833	13.4
Middle-income	450,585	266,829	28.7	59.2	140,215	31.1	43,541	9.7
Upper-income	584,325	404,860	43.6	69.3	134,621	23	44,844	7.7
Unknown-income	79	0	0	0	50	63.3	29	36.7
<b>Total Assessment Area</b>	<b>1,735,000</b>	<b>928,809</b>	<b>100.0</b>	<b>53.5</b>	<b>610,974</b>	<b>35.2</b>	<b>195,217</b>	<b>11.3</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	21,732	9	18,721	8.6	2,895	13.4	116	5.9
Moderate-income	48,771	20.2	43,625	20	4,922	22.7	224	11.3
Middle-income	58,651	24.3	53,162	24.4	5,125	23.6	364	18.4
Upper-income	112,516	46.5	102,514	47	8,726	40.2	1,276	64.4
Unknown-income	132	0.1	114	0.1	16	0.1	2	0.1
<b>Total Assessment Area</b>	<b>241,802</b>	<b>100.0</b>	<b>218,136</b>	<b>100.0</b>	<b>21,684</b>	<b>100.0</b>	<b>1,982</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.2</b>		<b>9.0</b>		<b>.8</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	52	3.5	49	3.4	3	8.8	0	0
Moderate-income	149	10.1	145	10.1	4	11.8	0	0
Middle-income	407	27.7	392	27.3	14	41.2	1	100
Upper-income	862	58.6	849	59.2	13	38.2	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>1,470</b>	<b>100.0</b>	<b>1,435</b>	<b>100.0</b>	<b>34</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>97.6</b>		<b>2.3</b>		<b>.1</b>	

2016 FFIEC Census Data and 2016 D&B Information

## Houston, Texas

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### 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 lack of zoning. 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. More leadership from financial institutions could also improve the affordable housing environment.

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. The contact 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 Local Initiatives Support Corporation (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) plan, 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'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 assessment area.<sup>211</sup> Seventy-five percent of the awarded tax credit amounts were in urban markets in 2015. While LIHTC participation can be competitive, it presents a good opportunity for bank investments and

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<sup>211</sup> *Multifamily Housing Programs*. Texas Department of Housing and Community Affairs, n.d. Web. 29 Oct. 2015.  
<<http://www.tdhca.state.tx.us/multifamily/>>.

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financing. The TIRZs are created by city council to attract and encourage new investment in areas that have a “substantial number of substandard, slum, deteriorated, or deteriorating structures,” as well as things like failing site infrastructure or unsanitary conditions.<sup>212</sup> 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 8 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 Bank on Houston, United Way THRIVE, and LISC Financial Opportunity Centers (FOCs). Bank on 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. One contact noted that financial institutions have provided more financial literacy training; however, 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).

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOUSTON, TEXAS ASSESSMENT AREA**

#### **LENDING TEST**

IBERIABANK’s lending performance in the Houston assessment area is good. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of loans also 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 in this assessment area.

IBERIABANK reported 721 (42.5 percent) CRA small business loans and 533 (57.5 percent) HMDA-reportable loans in the Houston assessment area during the review period. Therefore, CRA small business lending received greater weight in determining the bank’s lending test rating in the assessment area. The Houston assessment area accounted for 41.9 percent of IBERIABANK’s total HMDA-reportable and CRA small business lending by dollar volume in Texas during the review period. In comparison, 72.3 percent of IBERIABANK’s Texas deposits are in this assessment area.

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<sup>212</sup> 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](http://www.bizjournals.com/houston/morning_call/2015/11/houstons-affordable-housing-wouldnt-work-without.html)>.

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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, IBERIABANK's geographic distribution of loans reflects good penetration throughout the assessment area.

#### Small Business Loans

Small business lending in low-income census tracts is good. IBERIABANK originated 9.3 percent of its small business loans in low-income census tracts, where 8.6 percent of small businesses in the assessment area are located. IBERIABANK's performance was also greater than aggregate lenders in 2014 and comparable to aggregate lenders in 2015.

Small business lending in moderate-income census tracts is excellent. IBERIABANK originated 24.5 percent of its small business loans in moderate-income census tracts, where 20.0 percent of small businesses in the assessment area are located. Additionally, IBERIABANK's performance exceeded aggregate lenders in 2014 and 2015.

#### Home Purchase Loans

Home purchase lending in low-income census tracts is good. Although the bank's lending performance in these tracts was less than the percentage of owner-occupied units during the review period, the bank's performance exceeded aggregate in 2014 and 2015.

Home purchase lending in moderate-income census tracts is excellent. IBERIABANK's home purchase lending in moderate-income census tracts was comparable to the percentage of owner-occupied units in these tracts. The bank's performance was greater than aggregate lending performance in 2014 and 2015.

#### Home Refinance Loans

Home refinance lending in low-income census tracts is poor based on limited production of two home refinance loans in these geographies during the review period. The bank's home refinance lending in low-income census tracts was significantly less than the percentage of owner-occupied units in those tracts throughout the review period. IBERIABANK originated 2.0 percent of its home refinance loans in these tracts, where 4.9 percent of

## Houston, Texas

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owner-occupied units are located. Moreover, IBERIABANK had no home refinance loan originations in 2014, thus underperforming compared to aggregate lenders. However, the bank exceeded aggregate performance in 2015.

Home refinance lending in moderate-income census tracts is good. Although the bank's lending performance in moderate-income census tracts was less than the percentage of owner-occupied units located in these tracts, the bank's performance significantly exceeded aggregate lenders in 2014 and 2015.

### Home Improvement Loans

Home improvement lending in low-income census tracts is adequate based on limited production during the review period. The bank's home improvement lending in low-income census tracts exceeded the percentage of owner-occupied units in those tracts during the review period. IBERIABANK originated 6.1 percent of its home improvement loans in these tracts, where 4.9 percent of owner-occupied units are located. The bank made no home improvement loan originations in these geographies in 2014, thus the bank's performance was less than the aggregate lenders. However, the bank's lending exceeded aggregate in 2015.

Home improvement lending in moderate-income census tracts is also adequate based on limited production during the review period. Although the bank's lending performance in moderate-income census tracts was less than the percentage of owner-occupied units located in these tracts, the bank's performance significantly exceeded aggregate lenders in 2014 and 2015.

### ***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 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. IBERIABANK's originations of small business loans to businesses with revenues of \$1 million or less at 58.4 percent was significantly less than the percentage of small businesses in the assessment area at 90.2 percent. However, IBERIABANK's performance was greater than aggregate lending performance in 2014 and 2015. Additionally, 79.4 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-income borrowers is adequate. Although the bank's percentage of home purchase lending to low-income borrowers was significantly less than the percentage of low-income families in the assessment area during the review period, the bank's lending performance to low-income borrowers exceeded aggregate lending performance in 2014 and 2015.

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Home purchase lending to moderate-income borrowers is good. IBERIABANK's home purchase lending to moderate-income borrowers was comparable to the percentage of moderate-income families located in the assessment area. Additionally, the bank's home purchase lending was similar to aggregate lending in 2014 and greater than aggregate in 2015.

### Home Refinance Loans

Home refinance lending to low-income borrowers is good. Although the bank's percentage of home refinance lending to low-income borrowers was significantly less than the percentage of low-income families in the assessment area during the review period, the bank's home refinance lending to low-income borrowers significantly exceeded aggregate lending performance in 2014 and 2015.

Home refinance lending to moderate-income borrowers is adequate. The bank's percentage of home refinance loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area during the review period. In addition, the bank's home refinance lending to moderate-income borrowers was less than aggregate lending performance in 2014 but greater than aggregate in 2015.

### Home Improvement Loans

Home improvement lending to low-income borrowers is very poor. The bank originated one home improvement loan to low-income borrowers during the review period. As such, the bank's home improvement lending to low-income borrowers was less than the percentage of low-income families in the assessment area. The bank made no home improvement loans to low-income borrowers in 2014, thus underperforming compared to aggregate. However, the bank's performance exceeded aggregate in 2015.

Home improvement lending to moderate-income borrowers is adequate. Although the bank's percentage of home improvement loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area, the bank's performance exceeded aggregate lending performance in 2014 and 2015.

### ***Community Development Lending***

IBERIABANK is a leader in making community development loans in the Houston assessment area when considering the bank's presence and the level of competition in the assessment area. As noted earlier, IBERIABANK has less than 1 percent of the deposit market share in this assessment area.

IBERIABANK originated or renewed 15 community development loans totaling \$42.0 million during the review period. The bank provided \$34.7 million in loans to support affordable housing; the majority of these loans financed multifamily housing located in moderate-income tracts, with rents that are below fair market rent and are affordable to households earning less than 80.0 percent of the area median income. Additionally, the bank provided four loans for \$6.9 million for economic development purposes, including three SBA 504 loans for \$5.4 million. Finally, the bank provided one loan for \$400,000 to a Federally Qualified Health Center, which provides essential health services for LMI individuals.



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Examples of other notable community development loans include but are not limited to:

- A \$1.5 million line of credit to a multi-state CDFI to provide capital for the organization to make loans to small business borrowers located in Harris and Fort Bend counties.
- A \$500,000 line of credit to a local Habitat for Humanity affiliate to support the nonprofit organization's goal of building more than 200 affordable homes in the Houston area. The line of credit will help the organization acquire land for future affordable housing development and rehabilitate existing homes to sell to LMI homebuyers.

### **INVESTMENT TEST**

IBERIABANK makes a significant level of qualified investments and grants relative to the bank's presence in the Houston assessment area. Combined investment and contribution activity inside the assessment area equaled \$16.3 million, or 68.8 percent of total investment activity for the state.

The bank made investments (excluding contributions) totaling \$15.9 million in the assessment area; of that, \$14.3 million was invested during the review period. The bank was responsive to the need across the assessment area for affordable rental housing with a \$5.0 million LIHTC fund investment, which uses capital to rehabilitate LIHTC properties that are approaching or are past their LIHTC compliance period. This particular investment supported a 228-unit project in north Houston. All remaining current period investments were eligible mortgage-backed securities. Prior period investments included an investment in an equity fund that specializes in equity investments in middle-market companies located in low- to moderate-income communities throughout the area and state; the bank had funded \$550,000 of its initial commitment at the end of the assessment period. In addition, the bank's prior period investments supported affordable housing and LMI borrowers with investments in a LIHTC investment fund and mortgage-backed securities.

IBERIABANK contributed \$396,700 to nonprofit organizations during the review period. Nearly all of the contributions supported organizations that provide community services to low- or moderate-income individuals, including charter schools and youth character building programs targeted to LMI youth. Notably, the bank provided \$34,000 in mortgage grants to qualified LMI homebuyers with down payment assistance and closing costs. Another significant contribution included support to an organization that provides renovations and repairs to homes of low-income elderly homeowners. Other contributions provided support for small business development, financial education and stability initiatives, youth and family support services, and other community services that assist low- and moderate-income individuals and communities. As noted earlier, the bank also had a contribution that served a broader regional area that includes the bank's assessment area.

IBERIABANK's investments and contributions exhibited responsiveness to several identified needs, including increasing LMI homeownership with down payment assistance, combatting rental cost burdens and overcrowding by preserving affordable rental housing, and revitalizing and stabilizing targeted neighborhoods with home renovations and repairs for LMI families.

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### SERVICE TEST

IBERIABANK's service test performance in the Houston assessment area is good based on the bank's retail services and its leadership in providing community development services.

#### *Retail Services*

Retail banking services are adequate in the Houston full-scope assessment area.

The distribution of seven branch offices and seven 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 representing 14.3 percent of branches and one in a moderate-income tract representing 14.3 percent of branches. For comparison purposes, 11.4 percent of households and 9.0 percent of businesses were located in low-income census tracts, and 27.1 percent of households and 20.2 percent of businesses were located in moderate-income tracts. Due to the limited number of branches in LMI geographies, delivery systems are considered inaccessible to portions of IBERIABANK's geographies and individuals of different income levels.

During the review period, the bank opened the one branch and one full service ATM in a low-income tract. Meanwhile, the bank did not close any branches or ATMs during the review period. 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.

Bank products, services and standard business hours are consistent throughout the assessment area. IBERIABANK offers extended hours in both of its branches in low- and moderate-income tracts. The bank does not offer weekend hours at any of its branches. In general, banking services and hours of operations do not vary in a way that inconveniences the assessment area, including low- and moderate-income geographies and low- and moderate income individuals.

## Houston, Texas

### Geographic Distribution of Branches & ATMS

Assessment Area: TX Houston

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	Open	Closed	#	%			%
Low	1	14.3%	1	0	1	1	0	Total	1	14.3%	1	14.3%	1	0	0	0.0%	0	0	121	14.0%	11.4%	9.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	14.3%	0	0	0	1	0	Total	1	14.3%	1	14.3%	0	0	0	0.0%	0	0	259	30.0%	27.1%	20.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	1	14.3%	0	0	1	0	0	Total	1	14.3%	1	14.3%	0	0	0	0.0%	0	0	210	24.4%	26.4%	24.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	4	57.1%	0	0	4	4	0	Total	4	57.1%	4	57.1%	0	0	0	0.0%	0	0	268	31.1%	35.0%	46.5%
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	4	0.5%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	7	100.0%	1	0	6	6	0	Total	7	100.0%	7	100.0%	1	0	0	0.0%	0	0	862	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

IBERIABANK is a leader in providing community development services in the Houston assessment area. Employees engaged in 1,328 qualified hours by participating in 34 community development service activities during the review period.

IBERIABANK's community development service activities in the Houston assessment area benefitted organizations that provide affordable housing, community services, and economic development support to low- and moderate-income individuals, communities, and small businesses. Of the total 1,328 qualified service hours, 298 hours were committed to youth financial education, and 152 hours supported adult financial education in Houston. Bank employees provided 831 hours of board or committee service to qualified nonprofit organizations.

The following were considered particularly responsive community development activities during the review period.

- The bank committed to affordable housing preservation and homeownership through board service leadership and technical assistance for the local Habitat for Humanity chapter, a nonprofit organization that repairs and refurbishes homes for seniors and low- and moderate-income individuals, and a neighborhood CDC.
- Bank employees facilitated homebuyer education through a housing counseling community development organization and a minority real estate association.
- IBERIABANK employees executed financial literacy activities and service leadership to support Bank on Houston, a re-entry workforce program, and a child care council.
- Bank leaders served on the advisory council, board, and loan committee of a small business development corporation and a CDC that provides financing to small businesses in the assessment area.

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The bank is considered a leader in community development services in Houston given its low market share and limited branch network in the assessment area. The bank's community development services demonstrated particularly good responsiveness to identified affordable housing needs in the assessment area.

## Metropolitan Area (Limited Review)

The following metropolitan assessment area was reviewed using limited-scope examination procedures.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TEXAS METROPOLITAN ASSESSMENT AREA

- **Dallas Assessment Area (Collin, Dallas and Denton counties)**
  - As of December 31, 2016, IBERIABANK operated three branches in the assessment area, representing 30.0 percent of its branches in Texas.
  - As of June 30, 2016, the bank had \$434.6 million in deposits in this assessment area, representing a market share of 0.2 percent and 27.7 percent of IBERIABANK’s total deposits in Texas.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

<b>Metropolitan Assessment Area</b>			
<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Dallas	Not Consistent (Below)	Consistent	Consistent

For the lending test, IBERIABANK received a high satisfactory rating for the State of Texas. Although performance in Dallas was weaker than the institution’s performance for the state, it was still considered adequate. Weaker performance was primarily attributable to the borrower distribution of loans. The bank’s community development lending in this assessment area was excellent.

For the investment test, IBERIABANK received a high satisfactory rating for the State of Texas. Performance in the Dallas metropolitan assessment area was consistent with the state.

For the service test, IBERIABANK received a rating of high satisfactory for the State of Texas. Service test performance in the Dallas assessment area was consistent with the state.

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

## Appendices

### APPENDIX A - SCOPE OF THE EXAMINATION

<b>SCOPE OF EXAMINATION</b>			
<b>TIME PERIOD REVIEWED</b>			
HMDA-reportable and CRA Small Business Lending: January 1, 2014, to December 31, 2016			
Community Development Lending, Investments and Services: April 1, 2013, to December 31, 2016			
<b>FINANCIAL INSTITUTION</b>		<b>PRODUCTS REVIEWED</b>	
IBERIABANK – Lafayette, Louisiana		HMDA-reportable loans & CRA small business loans	
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED</b>	
IBERIABANK Mortgage Company	Mortgage Company	HMDA-reportable loans	
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
<b>ALABAMA</b>			
Birmingham, MSA#13820	Full-Scope Review		
Daphne-Fairhope-Foley, MSA#19300	Limited-Scope Review		
Huntsville, MSA#26620	Limited-Scope Review		
Mobile, MSA#33660	Limited-Scope Review		
Montgomery, MSA#33860	Limited-Scope Review		Two branches closed in the assessment area (AA) in November 2015, exiting the market. The scope of examination only encompasses time period in the market.

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<b>ARKANSAS</b>			
Fayetteville, MSA#22220	Limited-Scope Review		
Jonesboro, MSA#27860	Limited-Scope Review		
Little Rock, MSA#30780	Full-Scope Review		
Northeast Arkansas, non-MSA	Limited-Scope Review		
<b>FLORIDA</b>			
Fort Myers, MSA#15980	Full-Scope Review		
Homosassa Springs, MSA#26140	Limited-Scope Review		The bank added this assessment area in 2015. The scope of examination only encompasses 24 months of the review period.
Jacksonville, MSA#27260	Limited-Scope Review		The bank added this assessment area in 2015. The scope of examination only encompasses 24 months of the review period.
Keys, non-MSA	Limited-Scope Review		
Naples, MSA#34940	Limited-Scope Review		
Orlando, MSA#36740	Full-Scope Review		The bank added this assessment area in 2015. The scope of examination only encompasses 24 months.
Palm Beach-Broward, MSA#48424 & 22744	Limited-Scope Review		

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Sarasota, MSA#35840	Limited-Scope Review		
Tallahassee, MSA#45220	Limited-Scope Review		The bank closed its only branch in the assessment area in Jan 2016, exiting the market. The scope of examination only encompasses time period in the market.
Tampa, MSA#45300	Limited-Scope Review		The bank added this assessment area in 2015. The scope of examination only encompasses 24 months.
<b>GEORGIA</b>			
Atlanta, MSA#12060	Full-Scope Review		The bank added this assessment area in 2015. The scope of examination only encompasses 24 months.
<b>LOUISIANA</b>			
Allen, non-MSA	Limited-Scope Review		
Baton Rouge, MSA#12940	Limited-Scope Review		
Houma, MSA#26380	Limited-Scope Review		
Lafayette, MSA#29180	Full-Scope Review		
Lake Charles, MSA#29340	Limited-Scope Review		
Lincoln, non-MSA	Limited-Scope Review		
Monroe, MSA #33740	Limited-Scope Review		



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Morehouse, non-MSA	Limited-Scope Review		The bank exited this market in February 2016. The scope of examination only encompasses time period in the market.
New Orleans, MSA#35380	Full-Scope Review		
St. Landry, non-MSA	Limited-Scope Review		The bank added this assessment area in 2014. The scope of examination only encompasses 36 months.
St. Mary, non-MSA	Full-Scope Review		The bank added this assessment area in 2014. The scope of examination only encompasses 36 months.
Shreveport, MSA#43340	Limited-Scope Review		
<b>TENNESSEE</b>			
Memphis, MSA#32820	Full-Scope Review		
<b>TEXAS</b>			
Dallas, MSA#19124	Limited-Scope Review		The bank added this assessment area in 2014. The scope of examination only encompasses 36 months.
Houston, MSA#26420	Full-Scope Review		

Appendices

**APPENDIX B - SUMMARY OF STATE RATINGS**

<b>State Area Name</b>	<b>Lending Test Rating</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall State Rating</b>
<b>Alabama</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
<b>Arkansas</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>
<b>Florida</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
<b>Georgia</b>	<b>Low Satisfactory</b>	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>
<b>Louisiana</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
<b>Tennessee</b>	<b>Low Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
<b>Texas</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>

## Appendices

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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
LMI -	Low- and Moderate-Income
LIHTC -	Low Income Housing Tax Credit
LTD -	Loan-to-Deposit
LTV -	Loan-to-Value Ratio
MD -	Metropolitan Division
MSA -	Metropolitan Statistical Area
OMB -	Office of Management and Budget
REIS -	Regional Economic Information System
SBA -	Small Business Administration
USDA -	United States Department of Agriculture

## Appendices

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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.

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

- I. Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
- II. Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and

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- III. Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**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 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).

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**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.

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

**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.

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**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 more than 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 **IBERIABANK** prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **May 10, 2017**. 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 AND 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
<b>ALABAMA</b>								
<b>AL Birmingham</b>	\$6,810,573	\$12,205,637	\$19,016,210	64.2%	\$470,915	\$19,487,125	80.4%	--
AL Daphne-Fairhope-Foley	\$129,911	\$701,894	\$831,805	84.4%	\$40,530	\$872,335	3.6%	--
AL Huntsville	\$347,038	\$1,035,307	\$1,382,345	74.9%	\$60,174	\$1,442,519	6.0%	--
AL Mobile	\$247,850	\$1,111,996	\$1,359,846	81.8%	\$49,599	\$1,409,445	5.8%	--
AL Montgomery	\$397,656	\$580,018	\$977,674	59.3%	\$31,476	\$1,009,150	4.2%	--
<b>Subtotal--Assessment Area Investments</b>	<b>\$7,933,028</b>	<b>\$15,634,852</b>	<b>\$23,567,880</b>	<b>66.3%</b>	<b>\$652,694</b>	<b>\$24,220,574</b>	<b>100.0%</b>	<b>--</b>
<i>Statewide-with purpose, mandate or function to serve AAs</i>	\$0	\$0	\$0	--	\$12,080	\$12,080	0.0%	--
<b>TOTAL</b>	<b>\$7,933,028</b>	<b>\$15,634,852</b>	<b>\$23,567,880</b>	<b>66.3%</b>	<b>\$664,774</b>	<b>\$24,232,654</b>	<b>100.0%</b>	<b>9.7%</b>
<b>ARKANSAS</b>								
<b>AR Little Rock</b>	<b>\$6,302,466</b>	<b>\$5,034,390</b>	<b>\$11,336,856</b>	<b>44.4%</b>	<b>\$208,904</b>	<b>\$11,545,760</b>	<b>55.1%</b>	<b>--</b>
AR Fayetteville	\$787,688	\$2,240,975	\$3,028,663	74.0%	\$89,426	\$3,118,089	14.9%	--
AR Jonesboro	\$114,678	\$2,374,728	\$2,489,406	95.4%	\$54,014	\$2,543,420	12.1%	--
AR Northeast AR	\$651,372	\$2,038,969	\$2,690,341	75.8%	\$47,842	\$2,738,183	13.1%	--
<b>Subtotal--Assessment Area Investments</b>	<b>\$7,856,204</b>	<b>\$11,689,062</b>	<b>\$19,545,266</b>	<b>59.8%</b>	<b>\$400,186</b>	<b>\$19,945,452</b>	<b>95.1%</b>	<b>--</b>
<i>Statewide-with purpose, mandate or function to serve AAs</i>	\$0	\$1,000,000	\$1,000,000	100.0%	\$18,475	\$1,018,475	4.9%	--
<b>TOTAL</b>	<b>\$7,856,204</b>	<b>\$12,689,062</b>	<b>\$20,545,266</b>	<b>61.8%</b>	<b>\$418,661</b>	<b>\$20,963,927</b>	<b>100.0%</b>	<b>8.4%</b>
<b>FLORIDA</b>								
<b>FL Ft. Myers</b>	<b>\$782,480</b>	<b>\$4,090,539</b>	<b>\$4,873,019</b>	<b>83.9%</b>	<b>\$68,544</b>	<b>\$4,941,563</b>	<b>8.7%</b>	<b>--</b>
<b>FL Orlando</b>	<b>\$0</b>	<b>\$11,825,986</b>	<b>\$11,825,986</b>	<b>100.0%</b>	<b>\$1,129,367</b>	<b>\$12,955,353</b>	<b>22.7%</b>	<b>--</b>
FL Homosassa Springs	\$0	\$356,850	\$356,850	100.0%	\$10,780	\$367,630	0.6%	--
FL Jacksonville	\$490,086	\$363,164	\$853,250	42.6%	\$17,332	\$870,582	1.5%	--
FL Keys	\$8,820,000	\$2,284,845	\$11,104,845	20.6%	\$1,838,435	\$12,943,280	22.7%	--
FL Naples	\$685,353	\$7,029,686	\$7,715,039	91.1%	\$846,267	\$8,561,306	15.0%	--
FL Palm Beach-Broward	\$1,154,082	\$4,067,300	\$5,221,382	77.9%	\$249,804	\$5,471,186	9.6%	--
FL Sarasota	\$2,077,670	\$5,543,945	\$7,621,615	72.7%	\$89,135	\$7,710,750	13.5%	--
FL Tallahassee	\$0	\$155,000	\$155,000	100.0%	\$2,000	\$157,000	0.3%	--

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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
FL Tampa	\$0	\$2,900,184	\$2,900,184	100.0%	\$32,175	\$2,932,359	5.1%	--
<b>Subtotal--Assessment Area Investments</b>	<b>\$14,009,671</b>	<b>\$38,617,499</b>	<b>\$52,627,170</b>	<b>73.4%</b>	<b>\$4,283,839</b>	<b>\$56,911,009</b>	<b>99.9%</b>	<b>--</b>
<i>Statewide-with purpose, mandate or function to serve AAs</i>	\$0	\$0	\$0	--	\$62,152	\$62,152	0.1%	--
<b>TOTAL</b>	<b>\$14,009,671</b>	<b>\$38,617,499</b>	<b>\$52,627,170</b>	<b>73.4%</b>	<b>\$4,345,991</b>	<b>\$56,973,161</b>	<b>100.0%</b>	<b>22.9%</b>
<b>GEORGIA</b>								
GA Atlanta	\$5,159,954	\$5,704,382	\$10,864,336	52.5%	\$189,293	\$11,053,629	100.0%	--
<b>TOTAL</b>	<b>\$5,159,954</b>	<b>\$5,704,382</b>	<b>\$10,864,336</b>	<b>52.5%</b>	<b>\$189,293</b>	<b>\$11,053,629</b>		<b>4.4%</b>
<b>LOUISIANA</b>								
LA Lafayette	\$4,554,887	\$34,682,421	\$39,237,308	88.4%	\$629,497	\$39,866,805	40.5%	--
LA New Orleans	\$6,319,201	\$26,809,397	\$33,128,598	80.9%	\$1,976,330	\$35,104,928	35.66%	--
LA St. Mary	\$0	\$155,896	\$155,896	100.0%	\$5,000	\$160,896	0.16%	--
LA Allen	\$0	\$0	\$0	0.0%	\$127,100	\$127,100	0.13%	--
LA Baton Rouge	\$1,434,248	\$5,860,759	\$7,295,007	80.3%	\$86,128	\$7,381,135	7.50%	--
LA Houma	\$82,783	\$1,642,977	\$1,725,760	95.2%	\$5,160	\$1,730,920	1.76%	--
LA Lake Charles	\$1,212,452	\$4,915,801	\$6,128,253	80.2%	\$89,394	\$6,217,647	6.32%	--
LA Lincoln	\$158,144	\$389,217	\$547,361	71.1%	\$6,500	\$553,861	0.56%	--
LA Monroe	\$616,249	\$3,310,426	\$3,926,675	84.3%	\$101,919	\$4,028,594	4.09%	--
LA Morehouse	\$140,457	\$275,609	\$416,066	66.2%	\$6,500	\$422,566	0.43%	--
LA Shreveport	\$500,324	\$1,804,024	\$2,304,348	78.3%	\$18,550	\$2,322,898	2.36%	--
LA St. Landry	\$0	\$506,055	\$506,055	100.0%	\$4,000	\$510,055	0.52%	--
<b>Subtotal--Assessment Area Investments</b>	<b>\$15,018,745</b>	<b>\$80,352,582</b>	<b>\$95,371,327</b>	<b>84.3%</b>	<b>\$3,056,078</b>	<b>\$98,427,405</b>	<b>100.0%</b>	<b>--</b>
<i>Statewide-with purpose, mandate or function to serve AAs</i>	\$0	\$0	\$0	--	\$9,500	\$9,500	0.01%	--
<b>TOTAL</b>	<b>\$15,018,745</b>	<b>\$80,352,582</b>	<b>\$95,371,327</b>	<b>84.3%</b>	<b>\$3,065,578</b>	<b>\$98,436,905</b>	<b>100.0%</b>	<b>39.5%</b>
<b>TENNESSEE</b>								
TN Memphis	\$839,687	\$9,967,092	\$10,806,779	92.2%	\$176,400	\$10,983,179	100.0%	--
<b>TOTAL</b>	<b>\$839,687</b>	<b>\$9,967,092</b>	<b>\$10,806,779</b>	<b>92.2%</b>	<b>\$176,400</b>	<b>\$10,983,179</b>		<b>4.4%</b>
<b>TEXAS</b>								
TX Houston	\$1,627,465	\$14,276,226	\$15,903,691	89.8%	\$396,685	\$16,300,376	68.8%	--
TX Dallas	\$757,004	\$6,382,939	\$7,139,943	89.4%	\$240,885	\$7,380,828	31.2%	--

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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
<b>Subtotal--Assessment Area Investments</b>	\$2,384,469	\$20,659,165	\$23,043,634	89.7%	\$637,570	\$23,681,204	100.0%	--
<i>Statewide-with purpose, mandate or function to serve AAs</i>	\$0	\$0	\$0	--	\$1,105	\$1,105	0.0%	--
<b>TOTAL</b>	\$2,384,469	\$20,659,165	\$23,043,634	89.7%	\$638,675	\$23,682,309	100.0%	9.5%
<b>TOTAL INSTITUTION</b>								
<b>State Investments</b>	\$53,201,758	\$183,624,634	\$236,826,392	77.5%	\$9,499,372	\$246,325,764	--	98.9%
<b>Institution Investments</b>								
<i>Institution-with purpose, mandate or function to serve AAs</i>	--	--	--	--	\$202,500	\$202,500	--	0.1%
<i>Institution-without purpose, mandate or function to serve AAs</i>	\$2,356,316	\$106,534	\$2,462,850	--	\$153,387	\$2,616,237	--	--
<b>TOTAL INVESTMENTS (STATE AND INSTITUTION)</b>	\$55,558,074	\$183,731,168	\$239,289,242	76.8%	\$9,855,259	\$249,144,501	--	98.9%

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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											
		2014, 2015, 2016					2014						2015					
		Bank		Owner Occupied Units			Count			Dollar			Count			Dollar		
		Count	Dollar		%	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	6	0.6%	\$926	0.5%	5.7%	3	1.0%	0.9%	\$470	0.8%	0.4%	1	0.3%	1.0%	\$78	0.1%	0.4%
	Moderate	69	7.2%	\$7,629	3.8%	14.8%	29	9.9%	5.9%	\$2,562	4.4%	3.0%	16	5.2%	5.3%	\$1,638	2.5%	2.9%
	Middle	245	25.4%	\$37,882	18.7%	34.0%	77	26.2%	29.6%	\$10,619	18.3%	20.9%	73	23.9%	29.1%	\$12,121	18.2%	20.7%
	Upper	644	66.8%	\$155,658	77.0%	45.5%	185	62.9%	63.6%	\$44,424	76.5%	75.6%	215	70.5%	64.5%	\$52,901	79.3%	76.0%
	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%
	<b>Total</b>	<b>964</b>	<b>100.0%</b>	<b>\$202,095</b>	<b>100.0%</b>	<b>100.0%</b>	<b>294</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58,075</b>	<b>100.0%</b>	<b>100.0%</b>	<b>305</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$66,738</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	2	1.0%	\$60	0.1%	5.7%	2	4.3%	2.1%	\$60	0.5%	1.0%	0	0.0%	1.4%	\$0	0.0%	0.5%
	Moderate	12	5.8%	\$1,240	2.1%	14.8%	5	10.6%	8.0%	\$371	2.8%	4.2%	5	6.1%	6.4%	\$477	1.9%	3.1%
	Middle	35	17.0%	\$4,514	7.5%	34.0%	9	19.1%	32.0%	\$826	6.3%	23.8%	14	17.1%	28.9%	\$2,076	8.4%	20.0%
	Upper	157	76.2%	\$54,445	90.4%	45.5%	31	66.0%	57.9%	\$11,803	90.4%	71.0%	63	76.8%	63.4%	\$22,040	89.6%	76.4%
	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%
	<b>Total</b>	<b>206</b>	<b>100.0%</b>	<b>\$60,259</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,060</b>	<b>100.0%</b>	<b>100.0%</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,593</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	6	3.1%	\$32	0.3%	5.7%	2	3.0%	4.7%	\$14	0.4%	1.5%	3	3.5%	4.6%	\$16	0.6%	1.4%
	Moderate	23	11.8%	\$291	3.1%	14.8%	14	20.9%	13.4%	\$138	4.2%	5.8%	7	8.1%	11.0%	\$121	4.7%	4.8%
	Middle	54	27.7%	\$1,465	15.8%	34.0%	17	25.4%	34.1%	\$244	7.4%	25.5%	20	23.3%	31.8%	\$707	27.7%	25.1%
	Upper	112	57.4%	\$7,502	80.8%	45.5%	34	50.7%	47.9%	\$2,894	88.0%	67.2%	56	65.1%	52.6%	\$1,708	66.9%	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%
	<b>Total</b>	<b>195</b>	<b>100.0%</b>	<b>\$9,290</b>	<b>100.0%</b>	<b>100.0%</b>	<b>67</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,290</b>	<b>100.0%</b>	<b>100.0%</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,552</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	<b>Multi-Family Units</b>																	
	Low	1	50.0%	\$2,000	61.4%	14.1%	0	0.0%	23.3%	\$0	0.0%	4.7%	0	0.0%	14.9%	\$0	0.0%	4.6%
	Moderate	0	0.0%	\$0	0.0%	27.8%	0	0.0%	18.6%	\$0	0.0%	4.0%	0	0.0%	18.9%	\$0	0.0%	16.1%
	Middle	0	0.0%	\$0	0.0%	30.2%	0	0.0%	38.4%	\$0	0.0%	15.7%	0	0.0%	39.2%	\$0	0.0%	40.8%
	Upper	1	50.0%	\$1,255	38.6%	27.9%	0	0.0%	19.8%	\$0	0.0%	75.6%	1	100.0%	27.0%	\$1,255	100.0%	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%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$3,255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,255</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	15	1.1%	\$3,018	1.1%	5.7%	7	1.7%	1.6%	\$544	0.7%	1.0%	4	0.8%	1.4%	\$94	0.1%	0.8%
	Moderate	104	7.6%	\$9,160	3.3%	14.8%	48	11.8%	7.0%	\$3,071	4.1%	3.5%	28	5.9%	6.0%	\$2,236	2.4%	4.1%
	Middle	334	24.4%	\$43,861	16.0%	34.0%	103	25.2%	30.7%	\$11,689	15.7%	21.5%	107	22.6%	29.2%	\$14,904	15.7%	22.2%
	Upper	914	66.9%	\$218,860	79.6%	45.5%	250	61.3%	60.7%	\$59,121	79.4%	74.0%	335	70.7%	63.5%	\$77,904	81.9%	72.9%
	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%
	<b>Total</b>	<b>1,367</b>	<b>100.0%</b>	<b>\$274,899</b>	<b>100.0%</b>	<b>100.0%</b>	<b>408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$74,425</b>	<b>100.0%</b>	<b>100.0%</b>	<b>474</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$95,138</b>	<b>100.0%</b>	<b>100.0%</b>

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											
		2014, 2015, 2016					2014						2015					
		Bank		Families by Family Income %	Count		Dollar		Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	\$ %	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	75	7.8%	\$6,803	3.4%	21.0%	15	5.1%	5.0%	\$1,139	2.0%	2.2%	14	4.6%	5.7%	\$1,114	1.7%	2.6%
	Moderate	206	21.4%	\$25,144	12.4%	16.3%	63	21.4%	17.2%	\$6,847	11.8%	10.9%	57	18.7%	17.6%	\$6,966	10.4%	11.7%
	Middle	219	22.7%	\$35,907	17.8%	18.7%	75	25.5%	21.1%	\$10,440	18.0%	17.9%	79	25.9%	20.1%	\$12,904	19.3%	17.3%
	Upper	450	46.7%	\$128,350	63.5%	44.0%	135	45.9%	37.7%	\$38,405	66.1%	52.7%	149	48.9%	37.6%	\$42,409	63.5%	51.3%
	Unknown	14	1.5%	\$5,891	2.9%	0.0%	6	2.0%	18.9%	\$1,244	2.1%	16.3%	6	2.0%	19.0%	\$3,345	5.0%	17.1%
	<b>Total</b>	<b>964</b>	<b>100.0%</b>	<b>\$202,095</b>	<b>100.0%</b>	<b>100.0%</b>	<b>294</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58,075</b>	<b>100.0%</b>	<b>100.0%</b>	<b>305</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$66,738</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	15	7.3%	\$1,298	2.2%	21.0%	5	10.6%	6.7%	\$240	1.8%	3.3%	5	6.1%	5.4%	\$534	2.2%	2.5%
	Moderate	25	12.1%	\$3,234	5.4%	16.3%	8	17.0%	12.1%	\$774	5.9%	7.6%	7	8.5%	10.3%	\$1,101	4.5%	6.3%
	Middle	32	15.5%	\$6,259	10.4%	18.7%	7	14.9%	18.2%	\$1,015	7.8%	13.9%	15	18.3%	16.9%	\$2,843	11.6%	12.8%
	Upper	122	59.2%	\$47,331	78.5%	44.0%	25	53.2%	39.8%	\$10,296	78.8%	51.4%	47	57.3%	39.6%	\$19,226	78.2%	53.0%
	Unknown	12	5.8%	\$2,137	3.5%	0.0%	2	4.3%	23.2%	\$735	5.6%	23.7%	8	9.8%	27.8%	\$889	3.6%	25.5%
	<b>Total</b>	<b>206</b>	<b>100.0%</b>	<b>\$60,259</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,060</b>	<b>100.0%</b>	<b>100.0%</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,593</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	15	7.7%	\$149	1.6%	21.0%	7	10.4%	10.3%	\$34	1.0%	3.6%	7	8.1%	9.7%	\$110	4.3%	3.2%
	Moderate	19	9.7%	\$324	3.5%	16.3%	10	14.9%	18.4%	\$135	4.1%	10.8%	7	8.1%	16.4%	\$57	2.2%	8.2%
	Middle	28	14.4%	\$628	6.8%	18.7%	10	14.9%	22.4%	\$435	13.2%	15.1%	12	14.0%	24.6%	\$127	5.0%	18.3%
	Upper	115	59.0%	\$7,815	84.1%	44.0%	35	52.2%	41.3%	\$2,610	79.3%	60.8%	55	64.0%	42.1%	\$2,152	84.3%	56.6%
	Unknown	18	9.2%	\$374	4.0%	0.0%	5	7.5%	7.6%	\$76	2.3%	9.7%	5	5.8%	7.2%	\$106	4.2%	13.7%
	<b>Total</b>	<b>195</b>	<b>100.0%</b>	<b>\$9,290</b>	<b>100.0%</b>	<b>100.0%</b>	<b>67</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,290</b>	<b>100.0%</b>	<b>100.0%</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,552</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	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%	16.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	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%	44.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$3,255	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,255	100.0%	100.0%
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$3,255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,255</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	105	7.7%	\$8,250	3.0%	21.0%	27	6.6%	5.9%	\$1,413	1.9%	2.4%	26	5.5%	5.7%	\$1,758	1.8%	2.4%
	Moderate	250	18.3%	\$28,702	10.4%	16.3%	81	19.9%	15.4%	\$7,756	10.4%	8.9%	71	15.0%	14.8%	\$8,124	8.5%	8.7%
	Middle	279	20.4%	\$42,794	15.6%	18.7%	92	22.5%	20.1%	\$11,890	16.0%	15.1%	106	22.4%	19.0%	\$15,874	16.7%	14.3%
	Upper	687	50.3%	\$183,496	66.8%	44.0%	195	47.8%	38.5%	\$51,311	68.9%	48.0%	251	53.0%	38.4%	\$63,787	67.0%	47.6%
	Unknown	46	3.4%	\$11,657	4.2%	0.0%	13	3.2%	20.2%	\$2,055	2.8%	25.6%	20	4.2%	22.0%	\$5,595	5.9%	27.0%
	<b>Total</b>	<b>1,367</b>	<b>100.0%</b>	<b>\$274,899</b>	<b>100.0%</b>	<b>100.0%</b>	<b>408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$74,425</b>	<b>100.0%</b>	<b>100.0%</b>	<b>474</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$95,138</b>	<b>100.0%</b>	<b>100.0%</b>

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											
		2014, 2015, 2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ Bank	\$ %	Agg \$ %	#	%	Agg %	\$ Bank	\$ %	Agg \$ %
SMALL BUSINESSES	Low	77	11.0%	\$18,709	18.2%	8.6%	25	11.9%	8.0%	\$6,774	21.1%	11.5%	26	10.7%	8.2%	\$6,025	15.2%	10.7%
	Moderate	110	15.7%	\$16,498	16.0%	15.3%	31	14.8%	13.0%	\$4,027	12.6%	15.7%	40	16.5%	13.0%	\$7,491	19.0%	16.5%
	Middle	164	23.4%	\$23,612	23.0%	27.9%	51	24.3%	25.1%	\$7,458	23.3%	24.0%	58	23.9%	25.1%	\$10,012	25.3%	25.5%
	Upper	350	49.9%	\$43,985	42.8%	48.1%	103	49.0%	52.2%	\$13,811	43.1%	48.3%	119	49.0%	52.4%	\$15,993	40.5%	46.8%
	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%	1.7%	\$0	0.0%	0.5%	0	0.0%	1.4%	\$0	0.0%	0.4%
	<b>Total</b>	<b>701</b>	<b>100.0%</b>	<b>\$102,804</b>	<b>100.0%</b>	<b>100.0%</b>	<b>210</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,070</b>	<b>100.0%</b>	<b>100.0%</b>	<b>243</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$39,521</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	2.5%	\$0	0.0%	0.5%	0	0.0%	6.7%	\$0	0.0%	14.2%
	Moderate	0	0.0%	\$0	0.0%	8.3%	0	0.0%	7.5%	\$0	0.0%	13.4%	0	0.0%	8.9%	\$0	0.0%	1.4%
	Middle	1	50.0%	\$1	10.0%	29.9%	1	50.0%	40.0%	\$1	10.0%	21.6%	0	0.0%	42.2%	\$0	0.0%	37.2%
	Upper	1	50.0%	\$9	90.0%	61.3%	1	50.0%	50.0%	\$9	90.0%	64.5%	0	0.0%	42.2%	\$0	0.0%	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%
	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%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count	Dollar		Count		Dollar							
		#	%	\$ (000s)	\$ %	%		Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %
Small Business	Revenue	\$1 Million or Less	427	60.9%	\$40,862	39.7%	88.5%	108	51.4%	46.9%	\$10,622	33.1%	37.3%	156	64.2%	52.4%	\$17,337	43.9%	40.6%
		Over \$1 Million	234	33.4%	\$58,480	56.9%	10.7%	81	38.6%				79	32.5%					
		Total Rev. available	661	94.3%	\$99,342	96.6%	99.2%	189	90.0%				235	96.7%					
		Rev. Not Known	40	5.7%	\$3,462	3.4%	0.8%	21	10.0%				8	3.3%					
		Total	701	100.0%	\$102,804	100.0%	100.0%	210	100.0%				243	100.0%					
	Loan Size	\$100,000 or Less	472	67.3%	\$17,968	17.5%		133	63.3%	88.9%	\$4,813	15.0%	26.1%	157	64.6%	89.1%	\$6,296	15.9%	26.9%
		\$100,001 - \$250,000	109	15.5%	\$20,190	19.6%		35	16.7%	5.2%	\$6,330	19.7%	16.8%	41	16.9%	4.8%	\$7,928	20.1%	15.6%
		\$250,001 - \$1 Million	120	17.1%	\$64,646	62.9%		42	20.0%	5.9%	\$20,927	65.3%	57.1%	45	18.5%	6.1%	\$25,297	64.0%	57.5%
		Total	701	100.0%	\$102,804	100.0%		210	100.0%	100.0%	\$32,070	100.0%	100.0%	243	100.0%	100.0%	\$39,521	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	345	80.8%	\$12,349	30.2%													
		\$100,001 - \$250,000	42	9.8%	\$7,286	17.8%													
		\$250,001 - \$1 Million	40	9.4%	\$21,227	51.9%													
		Total	427	100.0%	\$40,862	100.0%													
Small Farm	Revenue	\$1 Million or Less	1	50.0%	\$9	90.0%	94.4%	1	50.0%	42.5%	\$9	90.0%	47.3%	0	0.0%	53.3%	\$0	0.0%	70.6%
		Over \$1 Million	0	0.0%	\$0	0.0%	5.6%	0	0.0%				0	0.0%					
		Total Rev. available	1	50.0%	\$9	90.0%	100.0%	1	50.0%				0	0.0%					
		Not Known	1	50.0%	\$1	10.0%	0.0%	1	50.0%				0	0.0%					
		Total	2	100.0%	\$10	100.0%	100.0%	2	100.0%				0	0.0%					
	Loan Size	\$100,000 or Less	2	100.0%	\$10	100.0%		2	100.0%	80.0%	\$10	100.0%	22.4%	0	0.0%	84.4%	\$0	0.0%	32.4%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.5%	\$0	0.0%	16.3%	0	0.0%	6.7%	\$0	0.0%	19.7%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.5%	\$0	0.0%	61.3%	0	0.0%	8.9%	\$0	0.0%	47.8%
		Total	2	100.0%	\$10	100.0%		2	100.0%	100.0%	\$10	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	1	100.0%	\$9	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%	\$9	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 and 2016 D&B Information

## Appendices

### Geographic Distribution of HMDA Loans

Assessment Area: AR Little Rock

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014					2015						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	%		Bank #	%	Agg %	Dollar \$ (000s)	%	Agg %	Bank #	%	Agg %	Dollar \$ (000s)	%	Agg %
HOME PURCHASE	Low	29	1.7%	\$2,119	0.7%	3.7%	13	2.4%	1.8%	\$780	0.9%	0.8%	12	2.0%	1.5%	\$941	1.0%	0.8%
	Moderate	150	8.8%	\$13,020	4.5%	19.5%	59	10.7%	10.8%	\$4,706	5.4%	7.3%	66	11.1%	11.2%	\$5,395	5.6%	6.3%
	Middle	682	40.0%	\$99,229	34.3%	42.3%	249	45.3%	46.3%	\$33,261	38.1%	40.4%	231	38.8%	45.7%	\$34,051	35.4%	40.1%
	Upper	844	49.5%	\$175,178	60.5%	34.5%	229	41.6%	41.2%	\$48,561	55.6%	51.6%	286	48.1%	41.6%	\$55,818	58.0%	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%
	<b>Total</b>	<b>1,705</b>	<b>100.0%</b>	<b>\$289,546</b>	<b>100.0%</b>	<b>100.0%</b>	<b>550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$87,308</b>	<b>100.0%</b>	<b>100.0%</b>	<b>595</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$96,205</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	5	1.2%	\$284	0.3%	3.7%	3	2.8%	2.3%	\$149	0.7%	1.0%	1	0.7%	1.6%	\$101	0.3%	0.9%
	Moderate	34	8.3%	\$2,983	3.3%	19.5%	17	15.7%	12.6%	\$817	3.7%	7.0%	10	6.8%	10.1%	\$835	2.6%	5.7%
	Middle	119	29.1%	\$17,603	19.8%	42.3%	35	32.4%	42.0%	\$4,692	21.3%	37.2%	44	30.1%	41.4%	\$6,298	19.6%	35.1%
	Upper	251	61.4%	\$68,247	76.6%	34.5%	53	49.1%	43.2%	\$16,334	74.3%	54.9%	91	62.3%	46.8%	\$24,890	77.5%	58.3%
	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%
	<b>Total</b>	<b>409</b>	<b>100.0%</b>	<b>\$89,117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,992</b>	<b>100.0%</b>	<b>100.0%</b>	<b>146</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,124</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	16	3.6%	\$152	1.5%	3.7%	5	2.8%	4.0%	\$51	2.0%	5.3%	10	5.6%	2.6%	\$96	2.0%	1.0%
	Moderate	89	20.1%	\$964	9.7%	19.5%	44	25.0%	18.7%	\$599	23.7%	10.4%	36	20.3%	18.2%	\$286	6.0%	7.4%
	Middle	172	38.8%	\$2,971	29.8%	42.3%	64	36.4%	43.1%	\$1,029	40.8%	37.5%	74	41.8%	44.2%	\$1,150	24.2%	35.4%
	Upper	166	37.5%	\$5,883	59.0%	34.5%	63	35.8%	34.3%	\$846	33.5%	46.8%	57	32.2%	35.0%	\$3,225	67.8%	56.3%
	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%
	<b>Total</b>	<b>443</b>	<b>100.0%</b>	<b>\$9,970</b>	<b>100.0%</b>	<b>100.0%</b>	<b>176</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,525</b>	<b>100.0%</b>	<b>100.0%</b>	<b>177</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,757</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	9.9%	0	0.0%	5.6%	\$0	0.0%	0.9%	0	0.0%	10.9%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	23.2%	0	0.0%	34.7%	\$0	0.0%	25.3%	0	0.0%	23.6%	\$0	0.0%	11.0%
	Middle	2	50.0%	\$275	19.1%	38.3%	1	100.0%	36.1%	\$75	100.0%	29.3%	1	50.0%	27.3%	\$200	26.5%	19.5%
	Upper	2	50.0%	\$1,168	80.9%	28.6%	0	0.0%	23.6%	\$0	0.0%	44.6%	1	50.0%	38.2%	\$556	73.5%	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%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$1,443</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$75</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$756</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	50	2.0%	\$2,555	0.7%	3.7%	21	2.5%	2.0%	\$980	0.9%	0.9%	23	2.5%	1.7%	\$1,138	0.9%	0.9%
	Moderate	273	10.7%	\$16,967	4.3%	19.5%	120	14.4%	11.8%	\$6,122	5.5%	9.1%	112	12.2%	11.3%	\$6,516	4.9%	6.5%
	Middle	975	38.1%	\$120,078	30.8%	42.3%	349	41.8%	44.8%	\$39,057	34.9%	38.3%	350	38.0%	44.2%	\$41,699	31.2%	37.1%
	Upper	1,263	49.3%	\$250,476	64.2%	34.5%	345	41.3%	41.3%	\$65,741	58.7%	51.7%	435	47.3%	42.9%	\$84,489	63.1%	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%
	<b>Total</b>	<b>2,561</b>	<b>100.0%</b>	<b>\$390,076</b>	<b>100.0%</b>	<b>100.0%</b>	<b>835</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$111,900</b>	<b>100.0%</b>	<b>100.0%</b>	<b>920</b>	<b>100.0%</b>	<b>100.0%</b>	<b>#####</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data



## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: AR Little Rock

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		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	133	7.8%	\$9,830	3.4%	21.7%	56	10.2%	5.9%	\$4,011	4.6%	3.0%	46	7.7%	6.7%	\$3,604	3.7%	3.4%
	Moderate	385	22.6%	\$39,830	13.8%	17.9%	138	25.1%	17.7%	\$13,509	15.5%	12.7%	138	23.2%	19.3%	\$14,087	14.6%	14.0%
	Middle	409	24.0%	\$60,559	20.9%	19.9%	126	22.9%	19.3%	\$18,265	20.9%	17.7%	151	25.4%	18.9%	\$21,676	22.5%	17.8%
	Upper	747	43.8%	\$173,099	59.8%	40.5%	222	40.4%	31.8%	\$50,312	57.6%	43.3%	246	41.3%	31.5%	\$54,678	56.8%	43.7%
	Unknown	31	1.8%	\$6,228	2.2%	0.0%	8	1.5%	25.3%	\$1,211	1.4%	23.2%	14	2.4%	23.6%	\$2,160	2.2%	21.1%
	<b>Total</b>	<b>1,705</b>	<b>100.0%</b>	<b>\$289,546</b>	<b>100.0%</b>	<b>100.0%</b>	<b>550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$87,308</b>	<b>100.0%</b>	<b>100.0%</b>	<b>595</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$96,205</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	21	5.1%	\$1,728	1.9%	21.7%	12	11.1%	5.7%	\$923	4.2%	2.9%	5	3.4%	4.7%	\$467	1.5%	2.1%
	Moderate	53	13.0%	\$5,818	6.5%	17.9%	18	16.7%	12.2%	\$1,781	8.1%	7.4%	22	15.1%	11.5%	\$2,559	8.0%	7.1%
	Middle	72	17.6%	\$10,290	11.5%	19.9%	16	14.8%	18.2%	\$2,043	9.3%	14.2%	32	21.9%	17.4%	\$4,465	13.9%	13.1%
	Upper	242	59.2%	\$68,445	76.8%	40.5%	52	48.1%	36.4%	\$16,429	74.7%	47.2%	80	54.8%	38.0%	\$23,959	74.6%	49.6%
	Unknown	21	5.1%	\$2,836	3.2%	0.0%	10	9.3%	27.6%	\$816	3.7%	28.3%	7	4.8%	28.4%	\$674	2.1%	28.1%
	<b>Total</b>	<b>409</b>	<b>100.0%</b>	<b>\$89,117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,992</b>	<b>100.0%</b>	<b>100.0%</b>	<b>146</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,124</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	23	5.2%	\$252	2.5%	21.7%	9	5.1%	8.1%	\$46	1.8%	3.5%	8	4.5%	6.4%	\$45	0.9%	2.0%
	Moderate	88	19.9%	\$1,493	15.0%	17.9%	34	19.3%	16.9%	\$312	12.4%	10.3%	41	23.2%	16.4%	\$461	9.7%	7.5%
	Middle	104	23.5%	\$1,490	14.9%	19.9%	43	24.4%	19.8%	\$677	26.8%	12.3%	42	23.7%	21.0%	\$511	10.7%	15.9%
	Upper	218	49.2%	\$6,405	64.2%	40.5%	88	50.0%	48.1%	\$1,435	56.8%	59.7%	83	46.9%	43.0%	\$3,615	76.0%	61.4%
	Unknown	10	2.3%	\$330	3.3%	0.0%	2	1.1%	7.2%	\$55	2.2%	14.3%	3	1.7%	13.1%	\$125	2.6%	13.3%
	<b>Total</b>	<b>443</b>	<b>100.0%</b>	<b>\$9,970</b>	<b>100.0%</b>	<b>100.0%</b>	<b>176</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,525</b>	<b>100.0%</b>	<b>100.0%</b>	<b>177</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,757</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	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%	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%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	4	100.0%	\$1,443	100.0%	0.0%	1	100.0%	100.0%	\$75	100.0%	100.0%	2	100.0%	100.0%	\$756	100.0%	100.0%
	<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$1,443</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$75</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$756</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	177	6.9%	\$11,810	3.0%	21.7%	77	9.2%	5.9%	\$4,980	4.5%	2.6%	59	6.4%	6.0%	\$4,116	3.1%	2.7%
	Moderate	526	20.5%	\$47,141	12.1%	17.9%	190	22.8%	15.9%	\$15,602	13.9%	9.8%	201	21.8%	16.6%	\$17,107	12.8%	10.8%
	Middle	585	22.8%	\$72,339	18.5%	19.9%	185	22.2%	18.9%	\$20,985	18.8%	14.8%	225	24.5%	18.5%	\$26,652	19.9%	15.1%
	Upper	1,207	47.1%	\$247,949	63.6%	40.5%	362	43.4%	33.9%	\$68,176	60.9%	40.0%	409	44.5%	34.1%	\$82,252	61.5%	42.9%
	Unknown	66	2.6%	\$10,837	2.8%	0.0%	21	2.5%	25.4%	\$2,157	1.9%	32.7%	26	2.8%	24.8%	\$3,715	2.8%	28.5%
	<b>Total</b>	<b>2,561</b>	<b>100.0%</b>	<b>\$390,076</b>	<b>100.0%</b>	<b>100.0%</b>	<b>835</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$111,900</b>	<b>100.0%</b>	<b>100.0%</b>	<b>920</b>	<b>100.0%</b>	<b>100.0%</b>	<b>#####</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Geographic Distribution of Small Business & Small Farm Loans Assessment Area: AR Little Rock

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	63	5.6%	\$9,766	7.9%	4.4%	25	6.8%	4.8%	\$4,401	10.0%	7.6%	20	5.2%	4.5%	\$3,209	7.8%	8.3%
	Moderate	325	28.8%	\$48,183	38.9%	25.2%	107	28.9%	22.1%	\$18,166	41.3%	28.7%	119	30.7%	21.8%	\$16,927	41.3%	26.6%
	Middle	351	31.1%	\$28,054	22.7%	35.7%	104	28.1%	34.2%	\$8,189	18.6%	28.1%	118	30.5%	34.0%	\$10,460	25.5%	28.6%
	Upper	391	34.6%	\$37,835	30.6%	34.6%	134	36.2%	36.9%	\$13,214	30.1%	34.7%	130	33.6%	38.1%	\$10,358	25.3%	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%	1.9%	\$0	0.0%	0.9%	0	0.0%	1.6%	\$0	0.0%	0.5%
	<b>Total</b>	<b>1,130</b>	<b>100.0%</b>	<b>\$123,838</b>	<b>100.0%</b>	<b>100.0%</b>	<b>370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$43,970</b>	<b>100.0%</b>	<b>100.0%</b>	<b>387</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$40,954</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	2.2%	\$0	0.0%	1.0%	0	0.0%	2.0%	\$0	0.0%	0.7%
	Moderate	7	33.3%	\$746	49.0%	14.0%	5	41.7%	22.0%	\$621	51.2%	23.3%	1	20.0%	18.6%	\$75	39.7%	22.0%
	Middle	4	19.0%	\$132	8.7%	39.3%	1	8.3%	34.1%	\$13	1.1%	29.7%	1	20.0%	36.3%	\$58	30.7%	42.1%
	Upper	10	47.6%	\$644	42.3%	43.8%	6	50.0%	41.8%	\$578	47.7%	45.9%	3	60.0%	43.1%	\$56	29.6%	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%
	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%
<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>\$1,522</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,212</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$189</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: AR Little Rock

Product Type		Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count	Dollar		Count		Dollar							
		#	%	\$ (000s)	\$ %	%		Bank	Agg	%	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %
Small Business	Revenue	\$1 Million or Less	666	58.9%	\$39,656	32.0%	89.1%	192	51.9%	44.9%	\$14,634	33.3%	41.9%	240	62.0%	47.6%	\$14,149	34.5%	39.4%
		Over \$1 Million	377	33.4%	\$79,422	64.1%	9.7%	126	34.1%				132	34.1%					
		<i>Total Rev. available</i>	1,043	92.3%	\$119,078	96.1%	98.8%	318	86.0%				372	96.1%					
		Rev. Not Known	87	7.7%	\$4,760	3.8%	1.2%	52	14.1%				15	3.9%					
		<b>Total</b>	<b>1,130</b>	<b>100.0%</b>	<b>\$123,838</b>	<b>100.0%</b>	<b>100.0%</b>	<b>370</b>	<b>100.0%</b>				<b>387</b>	<b>100.0%</b>					
	Loan Size	\$100,000 or Less	833	73.7%	\$24,617	19.9%		267	72.2%	89.8%	\$7,297	16.6%	27.3%	285	73.6%	89.2%	\$8,923	21.8%	27.9%
		\$100,001 - \$250,000	161	14.2%	\$30,078	24.3%		53	14.3%	4.9%	\$10,072	22.9%	16.7%	59	15.2%	5.4%	\$11,206	27.4%	17.6%
		\$250,001 - \$1 Million	136	12.0%	\$69,143	55.8%		50	13.5%	5.3%	\$26,601	60.5%	56.1%	43	11.1%	5.4%	\$20,825	50.8%	54.5%
		<b>Total</b>	<b>1,130</b>	<b>100.0%</b>	<b>\$123,838</b>	<b>100.0%</b>		<b>370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$43,970</b>	<b>100.0%</b>	<b>100.0%</b>	<b>387</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$40,954</b>	<b>100.0%</b>	<b>100.0%</b>
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	582	87.4%	\$14,669	37.0%													
\$100,001 - \$250,000		48	7.2%	\$8,225	20.7%														
\$250,001 - \$1 Million		36	5.4%	\$16,762	42.3%														
<b>Total</b>		<b>666</b>	<b>100.0%</b>	<b>\$39,656</b>	<b>100.0%</b>														
Small Farm	Revenue	\$1 Million or Less	16	76.2%	\$1,013	66.6%	97.5%	9	75.0%	80.2%	\$811	66.9%	78.7%	3	60.0%	48.0%	\$81	42.9%	55.8%
		Over \$1 Million	3	14.3%	\$458	30.1%	2.5%	2	16.7%				1	20.0%					
		<i>Total Rev. available</i>	19	90.5%	\$1,471	96.7%	100.0%	11	91.7%				4	80.0%					
		Not Known	2	9.5%	\$51	3.4%	0.0%	1	8.3%				1	20.0%					
		<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>\$1,522</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>				<b>5</b>	<b>100.0%</b>					
	Loan Size	\$100,000 or Less	16	76.2%	\$509	33.4%		7	58.3%	72.5%	\$199	16.4%	30.9%	5	100.0%	83.3%	\$189	100.0%	40.6%
		\$100,001 - \$250,000	4	19.0%	\$693	45.5%		4	33.3%	23.1%	\$693	57.2%	50.4%	0	0.0%	11.8%	\$0	0.0%	32.4%
		\$250,001 - \$500,000	1	4.8%	\$320	21.0%		1	8.3%	4.4%	\$320	26.4%	18.6%	0	0.0%	4.9%	\$0	0.0%	27.0%
		<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>\$1,522</b>	<b>100.0%</b>		<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,212</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$189</b>	<b>100.0%</b>	<b>100.0%</b>
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	13	81.3%	\$400	39.5%													
\$100,001 - \$250,000		2	12.5%	\$293	28.9%														
\$250,001 - \$500,000		1	6.3%	\$320	31.6%														
<b>Total</b>		<b>16</b>	<b>100.0%</b>	<b>\$1,013</b>	<b>100.0%</b>														

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 and 2016 D&B Information

## Appendices

### Geographic Distribution of HMDA Loans

Assessment Area: FL Ft. Myers

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	9	1.0%	\$826	0.7%	1.3%	5	1.8%	0.4%	\$253	0.8%	0.2%	0	0.0%	1.2%	\$0	0.0%	1.0%
	Moderate	166	18.9%	\$15,893	13.3%	14.2%	51	18.2%	11.9%	\$4,342	13.4%	8.4%	56	17.0%	12.2%	\$5,354	12.0%	8.8%
	Middle	526	59.8%	\$61,160	51.3%	55.6%	171	61.1%	52.8%	\$16,450	50.9%	44.6%	195	59.3%	54.6%	\$23,028	51.8%	47.1%
	Upper	178	20.3%	\$41,314	34.7%	28.9%	53	18.9%	34.8%	\$11,279	34.9%	46.9%	78	23.7%	32.0%	\$16,079	36.2%	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%
	<b>Total</b>	<b>879</b>	<b>100.0%</b>	<b>\$119,193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>280</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,324</b>	<b>100.0%</b>	<b>100.0%</b>	<b>329</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$44,461</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	2	1.7%	\$198	0.9%	1.3%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	10	8.7%	\$1,172	5.5%	14.2%	2	7.4%	10.4%	\$209	5.2%	7.7%	4	8.9%	9.2%	\$267	2.9%	6.5%
	Middle	65	56.5%	\$9,841	45.8%	55.6%	16	59.3%	56.5%	\$2,311	57.1%	47.4%	25	55.6%	56.0%	\$4,056	43.3%	47.2%
	Upper	38	33.0%	\$10,279	47.8%	28.9%	9	33.3%	32.6%	\$1,530	37.8%	44.6%	16	35.6%	34.4%	\$5,035	53.8%	46.0%
	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%
	<b>Total</b>	<b>115</b>	<b>100.0%</b>	<b>\$21,490</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,050</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,358</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	3	5.4%	\$18	1.3%	1.3%	2	11.1%	0.7%	\$12	4.5%	0.1%	1	3.7%	1.2%	\$6	0.9%	0.3%
	Moderate	12	21.4%	\$192	13.7%	14.2%	4	22.2%	12.8%	\$35	13.1%	5.9%	6	22.2%	10.2%	\$143	20.9%	4.2%
	Middle	29	51.8%	\$774	55.2%	55.6%	9	50.0%	60.8%	\$158	59.2%	53.7%	16	59.3%	60.3%	\$408	59.6%	53.3%
	Upper	12	21.4%	\$419	29.9%	28.9%	3	16.7%	25.7%	\$62	23.2%	40.3%	4	14.8%	28.0%	\$128	18.7%	42.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.1%
	<b>Total</b>	<b>56</b>	<b>100.0%</b>	<b>\$1,403</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$267</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$685</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	7.8%	0	0.0%	5.3%	\$0	0.0%	16.1%	0	0.0%	6.8%	\$0	0.0%	11.8%
	Moderate	1	11.1%	\$78	4.2%	15.0%	0	0.0%	21.1%	\$0	0.0%	19.8%	0	0.0%	29.5%	\$0	0.0%	54.9%
	Middle	3	33.3%	\$720	38.9%	39.7%	2	100.0%	42.1%	\$690	100.0%	7.3%	1	50.0%	36.4%	\$30	26.8%	29.4%
	Upper	5	55.6%	\$1,052	56.9%	37.4%	0	0.0%	31.6%	\$0	0.0%	56.8%	1	50.0%	27.3%	\$82	73.2%	3.8%
	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%
<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$1,850</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$690</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$112</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	14	1.3%	\$1,042	0.7%	1.3%	7	2.1%	0.4%	\$265	0.7%	0.7%	1	0.2%	1.0%	\$6	0.0%	1.2%
	Moderate	189	17.8%	\$17,335	12.0%	14.2%	57	17.4%	11.6%	\$4,586	12.3%	8.5%	66	16.4%	11.3%	\$5,764	10.6%	10.0%
	Middle	623	58.8%	\$72,495	50.4%	55.6%	198	60.6%	54.0%	\$19,609	52.5%	44.2%	237	58.8%	55.1%	\$27,522	50.4%	46.5%
	Upper	233	22.0%	\$53,064	36.9%	28.9%	65	19.9%	34.0%	\$12,871	34.5%	46.5%	99	24.6%	32.5%	\$21,324	39.0%	42.3%
	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%
	<b>Total</b>	<b>1,059</b>	<b>100.0%</b>	<b>\$143,936</b>	<b>100.0%</b>	<b>100.0%</b>	<b>327</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$37,331</b>	<b>100.0%</b>	<b>100.0%</b>	<b>403</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$54,616</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: FL Ft. Myers

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		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	90	10.2%	\$5,966	5.0%	19.0%	43	15.4%	4.4%	\$2,523	7.8%	1.9%	33	10.0%	3.4%	\$2,264	5.1%	1.5%
	Moderate	301	34.2%	\$25,067	21.0%	19.0%	108	38.6%	15.4%	\$7,568	23.4%	9.1%	105	31.9%	15.1%	\$9,002	20.2%	9.1%
	Middle	257	29.2%	\$29,360	24.6%	21.4%	63	22.5%	17.6%	\$6,107	18.9%	13.3%	107	32.5%	18.0%	\$12,659	28.5%	14.0%
	Upper	228	25.9%	\$57,466	48.2%	40.7%	66	23.6%	50.0%	\$16,126	49.9%	64.5%	83	25.2%	48.7%	\$20,454	46.0%	62.0%
	Unknown	3	0.3%	\$1,334	1.1%	0.0%	0	0.0%	12.7%	\$0	0.0%	11.2%	1	0.3%	14.7%	\$82	0.2%	13.4%
	<b>Total</b>	<b>879</b>	<b>100.0%</b>	<b>\$119,193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>280</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,324</b>	<b>100.0%</b>	<b>100.0%</b>	<b>329</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$44,461</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	9	7.8%	\$1,084	5.0%	19.0%	3	11.1%	6.8%	\$373	9.2%	3.8%	4	8.9%	4.8%	\$391	4.2%	2.5%
	Moderate	21	18.3%	\$1,861	8.7%	19.0%	7	25.9%	14.9%	\$587	14.5%	8.7%	9	20.0%	13.0%	\$834	8.9%	7.8%
	Middle	16	13.9%	\$2,266	10.5%	21.4%	2	7.4%	18.8%	\$346	8.5%	13.9%	4	8.9%	17.0%	\$568	6.1%	12.7%
	Upper	66	57.4%	\$15,688	73.0%	40.7%	15	55.6%	43.6%	\$2,744	67.8%	56.6%	26	57.8%	44.6%	\$7,041	75.2%	56.6%
	Unknown	3	2.6%	\$591	2.8%	0.0%	0	0.0%	15.9%	\$0	0.0%	17.0%	2	4.4%	20.7%	\$524	5.6%	20.5%
	<b>Total</b>	<b>115</b>	<b>100.0%</b>	<b>\$21,490</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,050</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,358</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	4	7.1%	\$16	1.1%	19.0%	1	5.6%	7.9%	\$2	0.7%	2.0%	1	3.7%	6.1%	\$6	0.9%	1.5%
	Moderate	7	12.5%	\$64	4.6%	19.0%	4	22.2%	18.3%	\$36	13.5%	7.9%	3	11.1%	17.5%	\$28	4.1%	8.7%
	Middle	15	26.8%	\$458	32.6%	21.4%	5	27.8%	23.4%	\$64	24.0%	19.6%	6	22.2%	20.4%	\$185	27.0%	16.8%
	Upper	28	50.0%	\$778	55.5%	40.7%	7	38.9%	46.0%	\$148	55.4%	65.8%	16	59.3%	51.0%	\$396	57.8%	63.0%
	Unknown	2	3.6%	\$87	6.2%	0.0%	1	5.6%	4.4%	\$17	6.4%	4.7%	1	3.7%	4.9%	\$70	10.2%	10.0%
	<b>Total</b>	<b>56</b>	<b>100.0%</b>	<b>\$1,403</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$267</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$685</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	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%	19.0%	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%	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%	40.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	9	100.0%	\$1,850	100.0%	0.0%	2	100.0%	100.0%	\$690	100.0%	100.0%	2	100.0%	100.0%	\$112	100.0%	100.0%
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$1,850</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$690</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$112</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	103	9.7%	\$7,066	4.9%	19.0%	47	14.4%	5.1%	\$2,898	7.8%	2.3%	38	9.4%	3.8%	\$2,661	4.9%	1.7%
	Moderate	329	31.1%	\$26,992	18.8%	19.0%	119	36.4%	15.3%	\$8,191	21.9%	8.7%	117	29.0%	14.6%	\$9,864	18.1%	8.4%
	Middle	288	27.2%	\$32,084	22.3%	21.4%	70	21.4%	18.0%	\$6,517	17.5%	13.1%	117	29.0%	17.8%	\$13,412	24.6%	13.1%
	Upper	322	30.4%	\$73,932	51.4%	40.7%	88	26.9%	48.1%	\$19,018	50.9%	60.6%	125	31.0%	47.6%	\$27,891	51.1%	58.2%
	Unknown	17	1.6%	\$3,862	2.7%	0.0%	3	0.9%	13.5%	\$707	1.9%	15.3%	6	1.5%	16.2%	\$788	1.4%	18.6%
	<b>Total</b>	<b>1,059</b>	<b>100.0%</b>	<b>\$143,936</b>	<b>100.0%</b>	<b>100.0%</b>	<b>327</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$37,331</b>	<b>100.0%</b>	<b>100.0%</b>	<b>403</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$54,616</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: FL Ft. Myers

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	53	6.8%	\$10,220	10.8%	3.1%	19	7.1%	3.2%	\$3,135	8.9%	5.6%	16	6.7%	3.0%	\$3,847	12.8%	5.1%
	Moderate	118	15.2%	\$16,491	17.3%	14.5%	37	13.8%	12.8%	\$4,982	14.1%	13.6%	45	18.8%	12.6%	\$6,663	22.2%	15.1%
	Middle	356	46.0%	\$36,715	38.6%	52.7%	130	48.3%	49.5%	\$15,907	45.0%	45.5%	107	44.6%	49.9%	\$9,807	32.7%	43.7%
	Upper	247	31.9%	\$31,640	33.3%	29.7%	83	30.9%	33.6%	\$11,344	32.1%	34.9%	72	30.0%	33.8%	\$9,695	32.3%	35.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.5%
	<b>Total</b>	<b>774</b>	<b>100.0%</b>	<b>\$95,066</b>	<b>100.0%</b>	<b>100.0%</b>	<b>269</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35,368</b>	<b>100.0%</b>	<b>100.0%</b>	<b>240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$30,012</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	Low	0	0.0%	\$0	0.0%	1.4%	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%	15.8%	0	0.0%	8.5%	\$0	0.0%	10.1%	0	0.0%	8.9%	\$0	0.0%	17.3%
	Middle	0	0.0%	\$0	0.0%	41.9%	0	0.0%	38.3%	\$0	0.0%	45.3%	0	0.0%	48.9%	\$0	0.0%	49.3%
	Upper	1	100.0%	\$35	100.0%	40.9%	1	100.0%	53.2%	\$35	100.0%	44.6%	0	0.0%	42.2%	\$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%
	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%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: FL Ft. Myers

Product Type		Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			#	%	%	Dollar		Count			Dollar				
		#	%	\$ (000s)	\$ %	%				Bank	Agg	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %
Small Business	Revenue	\$1 Million or Less	431	55.7%	\$31,130	32.7%	94.0%	145	53.9%	48.9%	\$10,710	30.3%	35.3%	132	55.0%	54.5%	\$9,874	32.9%	38.0%
		Over \$1 Million	318	41.1%	\$62,196	65.4%	5.3%	110	40.9%					104	43.3%				
		Total Rev. available	749	96.8%	\$93,326	98.1%	99.3%	255	94.8%					236	98.3%				
		Rev. Not Known	25	3.2%	\$1,740	1.8%	0.7%	14	5.2%					4	1.7%				
		Total	774	100.0%	\$95,066	100.0%	100.0%	269	100.0%					240	100.0%				
	Loan Size	\$100,000 or Less	538	69.5%	\$20,325	21.4%		183	68.0%	95.2%	\$7,466	21.1%	40.1%	161	67.1%	95.5%	\$6,156	20.5%	42.5%
		\$100,001 - \$250,000	135	17.4%	\$24,513	25.8%		47	17.5%	2.4%	\$8,223	23.2%	15.0%	50	20.8%	2.2%	\$9,233	30.8%	13.7%
		\$250,001 - \$1 Million	101	13.0%	\$50,228	52.8%		39	14.5%	2.4%	\$19,679	55.6%	44.9%	29	12.1%	2.3%	\$14,623	48.7%	43.8%
		Total	774	100.0%	\$95,066	100.0%		269	100.0%	100.0%	\$35,368	100.0%	100.0%	240	100.0%	100.0%	\$30,012	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	361	83.8%	\$11,535	37.1%													
\$100,001 - \$250,000		41	9.5%	\$7,298	23.4%														
\$250,001 - \$1 Million		29	6.7%	\$12,297	39.5%														
Total		431	100.0%	\$31,130	100.0%														
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	95.5%	0	0.0%	59.6%	\$0	0.0%	77.6%	0	0.0%	48.9%	\$0	0.0%	54.1%
		Over \$1 Million	1	100.0%	\$35	100.0%	4.1%	1	100.0%					0	0.0%				
		Total Rev. available	1	100.0%	\$35	100.0%	99.6%	1	100.0%					0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.3%	0	0.0%					0	0.0%				
		Total	1	100.0%	\$35	100.0%	100.0%	1	100.0%					0	0.0%				
	Loan Size	\$100,000 or Less	1	100.0%	\$35	100.0%		1	100.0%	95.7%	\$35	100.0%	56.8%	0	0.0%	86.7%	\$0	0.0%	29.6%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	13.5%	0	0.0%	11.1%	\$0	0.0%	52.5%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	29.7%	0	0.0%	2.2%	\$0	0.0%	17.9%
		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%
	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 with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Geographic Distribution of HMDA Loans

Assessment Area: FL Orlando

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	\$ %	%	#	%	Agg %	\$ (000s)	\$ %	\$ %	#	%	Agg %	\$ (000s)	\$ %
HOME PURCHASE	Low	3	1.1%	\$349	0.3%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Moderate	38	13.4%	\$6,852	6.5%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	18	11.8%	12.7%	\$1,880	3.2%	8.7%
	Middle	70	24.7%	\$15,844	15.0%	36.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	34	22.2%	33.8%	\$8,890	15.1%	28.5%
	Upper	172	60.8%	\$82,864	78.2%	46.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	101	66.0%	53.4%	\$47,960	81.7%	62.8%
	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%
	<b>Total</b>	<b>283</b>	<b>100.0%</b>	<b>\$105,909</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58,730</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	8	7.3%	\$1,461	4.3%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	5	9.6%	10.8%	\$838	4.9%	6.9%
	Middle	21	19.3%	\$4,104	12.0%	36.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	8	15.4%	32.6%	\$2,217	12.8%	26.7%
	Upper	80	73.4%	\$28,756	83.8%	46.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	39	75.0%	56.4%	\$14,222	82.3%	66.3%
	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%
	<b>Total</b>	<b>109</b>	<b>100.0%</b>	<b>\$34,321</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$17,277</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	2	13.3%	\$59	1.8%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	7.7%	12.6%	\$6	0.2%	6.8%
	Middle	5	33.3%	\$958	29.4%	36.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	5	38.5%	33.0%	\$958	30.1%	25.5%
	Upper	8	53.3%	\$2,238	68.8%	46.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	7	53.8%	54.2%	\$2,223	69.8%	67.5%
	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%
	<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>\$3,255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,187</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	3.8%
	Moderate	4	44.4%	\$10,375	71.9%	40.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	50.0%	42.2%	\$3,000	49.1%	38.8%
	Middle	1	11.1%	\$300	2.1%	39.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	24.4%	\$0	0.0%	31.5%
	Upper	4	44.4%	\$3,751	26.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	50.0%	27.8%	\$3,115	50.9%	25.9%
	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%
<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$14,426</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,115</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	3	0.7%	\$349	0.2%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.5%
	Moderate	52	12.5%	\$18,747	11.9%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	26	11.7%	12.1%	\$5,724	6.7%	11.6%
	Middle	97	23.3%	\$21,206	13.4%	36.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	47	21.2%	33.3%	\$12,065	14.1%	28.3%
	Upper	264	63.5%	\$117,609	74.5%	46.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	149	67.1%	54.4%	\$67,520	79.1%	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%
	<b>Total</b>	<b>416</b>	<b>100.0%</b>	<b>\$157,911</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>222</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$85,309</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data



## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: FL Orlando

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2014						2015					
		Bank		Families by Family Income		Count	Count		Dollar				Count		Dollar			
		Count	Dollar	Count	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	10	3.5%	\$782	0.7%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	9	5.9%	3.6%	\$689	1.2%	1.5%
	Moderate	31	11.0%	\$3,589	3.4%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	13	8.5%	13.9%	\$1,668	2.8%	8.5%
	Middle	45	15.9%	\$8,195	7.7%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	24	15.7%	19.2%	\$5,054	8.6%	15.4%
	Upper	174	61.5%	\$86,840	82.0%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	95	62.1%	48.2%	\$48,601	82.8%	60.6%
	Unknown	23	8.1%	\$6,503	6.1%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	12	7.8%	15.1%	\$2,718	4.6%	13.9%
	<b>Total</b>	<b>283</b>	<b>100.0%</b>	<b>\$105,909</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58,730</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	5	4.6%	\$390	1.1%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	5.8%	4.4%	\$263	1.5%	2.2%
	Moderate	16	14.7%	\$1,875	5.5%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	7.7%	9.6%	\$477	2.8%	5.9%
	Middle	9	8.3%	\$1,623	4.7%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	7	13.5%	15.8%	\$1,358	7.9%	12.2%
	Upper	74	67.9%	\$28,608	83.4%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	34	65.4%	46.3%	\$13,684	79.2%	56.3%
	Unknown	5	4.6%	\$1,825	5.3%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	7.7%	23.9%	\$1,495	8.7%	23.5%
	<b>Total</b>	<b>109</b>	<b>100.0%</b>	<b>\$34,321</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$17,277</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	12.1%	\$0	0.0%	6.3%
	Middle	1	6.7%	\$53	1.6%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	18.3%	\$0	0.0%	15.5%
	Upper	12	80.0%	\$3,116	95.7%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	11	84.6%	58.7%	\$3,101	97.3%	67.8%
	Unknown	2	13.3%	\$86	2.6%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	15.4%	5.5%	\$86	2.7%	8.8%
	<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>\$3,255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,187</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	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%
	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%	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%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	9	100.0%	\$14,426	100.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	100.0%	100.0%	\$6,115	100.0%	100.0%
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$14,426</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,115</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	15	3.6%	\$1,172	0.7%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	12	5.4%	3.9%	\$952	1.1%	1.5%
	Moderate	47	11.3%	\$5,464	3.5%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	17	7.7%	12.4%	\$2,145	2.5%	6.8%
	Middle	55	13.2%	\$9,871	6.3%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	31	14.0%	18.0%	\$6,412	7.5%	12.8%
	Upper	260	62.5%	\$118,564	75.1%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	140	63.1%	47.8%	\$65,386	76.6%	52.7%
	Unknown	39	9.4%	\$22,840	14.5%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	22	9.9%	17.8%	\$10,414	12.2%	26.2%
	<b>Total</b>	<b>416</b>	<b>100.0%</b>	<b>\$157,911</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>222</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$85,309</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Geographic Distribution of Small Business & Small Farm Loans Assessment Area: FL Orlando

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2014					2015						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %
SMALL BUSINESSES	Low	11	1.4%	\$1,591	1.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	0.6%	0.6%	\$88	0.1%	0.5%
	Moderate	237	31.1%	\$50,764	31.4%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	100	32.4%	19.3%	\$19,368	29.2%	24.8%
	Middle	234	30.7%	\$49,721	30.8%	33.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	96	31.1%	32.2%	\$23,170	35.0%	31.7%
	Upper	281	36.8%	\$59,549	36.8%	46.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	111	35.9%	47.1%	\$23,626	35.7%	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%
	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%	0.7%
	<b>Total</b>	<b>763</b>	<b>100.0%</b>	<b>\$161,625</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>309</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$66,252</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	Low	0	0.0%	\$0	0.0%	0.4%	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%	12.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.4%	\$0	0.0%	1.9%
	Middle	3	37.5%	\$233	12.4%	33.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	40.0%	37.5%	\$183	16.2%	28.6%
	Upper	5	62.5%	\$1,645	87.6%	54.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	60.0%	57.1%	\$950	83.8%	69.5%
	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%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>\$1,878</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,133</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: FL Orlando

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	278	36.4%	\$45,736	28.3%	92.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	122	39.5%	54.1%	\$19,820	29.9%	35.0%
		Over \$1 Million	413	54.1%	\$100,588	62.2%	6.4%	0	0.0%				166	53.7%					
		Total Rev. available	691	90.5%	\$146,324	90.5%	99.3%	0	0.0%				288	93.2%					
		Rev. Not Known	72	9.4%	\$15,301	9.5%	0.7%	0	0.0%				21	6.8%					
		Total	763	100.0%	\$161,625	100.0%	100.0%	0	0.0%				309	100.0%					
	Loan Size	\$100,000 or Less	340	44.6%	\$14,723	9.1%		0	0.0%	0.0%	\$0	0.0%	0.0%	145	46.9%	95.5%	\$6,350	9.6%	41.1%
		\$100,001 - \$250,000	218	28.6%	\$40,130	24.8%		0	0.0%	0.0%	\$0	0.0%	0.0%	79	25.6%	2.1%	\$14,620	22.1%	12.9%
		\$250,001 - \$1 Million	205	26.9%	\$106,772	66.1%		0	0.0%	0.0%	\$0	0.0%	0.0%	85	27.5%	2.4%	\$45,282	68.3%	46.0%
		Total	763	100.0%	\$161,625	100.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	309	100.0%	100.0%	\$66,252	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	153	55.0%	\$5,580	12.2%													
\$100,001 - \$250,000		67	24.1%	\$12,096	26.4%														
\$250,001 - \$1 Million		58	20.9%	\$28,060	61.4%														
Total		278	100.0%	\$45,736	100.0%														
Small Farm	Revenue	\$1 Million or Less	4	50.0%	\$750	39.9%	92.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	40.0%	53.6%	\$500	44.1%	54.1%
		Over \$1 Million	3	37.5%	\$633	33.7%	7.6%	0	0.0%				3	60.0%					
		Total Rev. available	7	87.5%	\$1,383	73.6%	100.0%	0	0.0%				5	100.0%					
		Not Known	1	12.5%	\$495	26.4%	0.0%	0	0.0%				0	0.0%					
		Total	8	100.0%	\$1,878	100.0%	100.0%	0	0.0%				5	100.0%					
	Loan Size	\$100,000 or Less	3	37.5%	\$170	9.1%		0	0.0%	0.0%	\$0	0.0%	0.0%	2	40.0%	83.9%	\$120	10.6%	28.9%
		\$100,001 - \$250,000	2	25.0%	\$363	19.3%		0	0.0%	0.0%	\$0	0.0%	0.0%	1	20.0%	5.4%	\$163	14.4%	13.4%
		\$250,001 - \$500,000	3	37.5%	\$1,345	71.6%		0	0.0%	0.0%	\$0	0.0%	0.0%	2	40.0%	10.7%	\$850	75.0%	57.7%
		Total	8	100.0%	\$1,878	100.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	5	100.0%	100.0%	\$1,133	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	50.0%	\$150	20.0%													
\$100,001 - \$250,000		1	25.0%	\$200	26.7%														
\$250,001 - \$500,000		1	25.0%	\$400	53.3%														
Total		4	100.0%	\$750	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 and 2016 D&B Information

## Appendices

### Geographic Distribution of HMDA Loans

Assessment Area: GA Atlanta

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2014					2015						
		Bank		Owner Occupied Units			Count		Dollar			Count		Dollar				
		Count	Dollar			%	Bank	Agg	Bank	Agg	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	6	3.0%	\$979	1.6%	3.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	2.5%	2.0%	\$128	0.5%	1.3%
	Moderate	32	16.0%	\$4,975	8.2%	14.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	7	8.6%	11.9%	\$1,058	4.4%	8.0%
	Middle	49	24.5%	\$9,587	15.8%	32.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	20	24.7%	31.7%	\$3,285	13.7%	25.5%
	Upper	113	56.5%	\$45,212	74.4%	49.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	52	64.2%	54.4%	\$19,592	81.4%	65.3%
	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%
	<b>Total</b>	<b>200</b>	<b>100.0%</b>	<b>\$60,753</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,063</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	2	1.4%	\$543	0.9%	3.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	2.0%	1.8%	\$317	1.2%	1.1%
	Moderate	13	9.4%	\$2,735	4.3%	14.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	5	9.8%	9.7%	\$706	2.6%	6.1%
	Middle	35	25.2%	\$12,232	19.3%	32.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	10	19.6%	29.0%	\$5,507	20.0%	22.4%
	Upper	89	64.0%	\$47,982	75.6%	49.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	35	68.6%	59.5%	\$20,965	76.3%	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%
	<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>\$63,492</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>51</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,495</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.7%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	14.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	11.2%	\$0	0.0%	5.7%
	Middle	3	14.3%	\$1,786	8.1%	32.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	29.9%	\$0	0.0%	21.0%
	Upper	18	85.7%	\$20,241	91.9%	49.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	8	100.0%	56.1%	\$3,116	100.0%	72.0%
	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%
	<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>\$22,027</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,116</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.9%	\$0	0.0%	9.1%
	Moderate	0	0.0%	\$0	0.0%	31.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	34.3%	\$0	0.0%	29.7%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	20.7%	\$0	0.0%	29.0%
	Upper	5	100.0%	\$1,684	100.0%	27.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	100.0%	28.2%	\$835	100.0%	32.2%
	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%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>\$1,684</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$835</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	8	2.2%	\$1,522	1.0%	3.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	2.1%	1.9%	\$445	0.8%	1.7%
	Moderate	45	12.3%	\$7,710	5.2%	14.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	12	8.4%	11.1%	\$1,764	3.2%	8.7%
	Middle	87	23.8%	\$23,605	16.0%	32.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	30	21.0%	30.6%	\$8,792	15.8%	24.5%
	Upper	225	61.6%	\$115,119	77.8%	49.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	98	68.5%	56.4%	\$44,508	80.2%	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%
	<b>Total</b>	<b>365</b>	<b>100.0%</b>	<b>\$147,956</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>143</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$55,509</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: GA Atlanta

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2014					2015						
		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	19	9.5%	\$2,152	3.5%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	8	9.9%	6.2%	\$777	3.2%	2.9%
	Moderate	42	21.0%	\$6,038	9.9%	15.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	19	23.5%	15.9%	\$2,523	10.5%	10.1%
	Middle	19	9.5%	\$3,884	6.4%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	9	11.1%	17.6%	\$1,870	7.8%	14.7%
	Upper	93	46.5%	\$37,986	62.5%	45.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	41	50.6%	40.9%	\$18,048	75.0%	55.5%
	Unknown	27	13.5%	\$10,693	17.6%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	4.9%	19.4%	\$845	3.5%	16.8%
	<b>Total</b>	<b>200</b>	<b>100.0%</b>	<b>\$60,753</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,063</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	8	5.8%	\$736	1.2%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	5.9%	4.6%	\$194	0.7%	2.2%
	Moderate	16	11.5%	\$1,932	3.0%	15.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	7.8%	10.2%	\$530	1.9%	6.2%
	Middle	9	6.5%	\$1,713	2.7%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	7.8%	15.6%	\$799	2.9%	12.0%
	Upper	92	66.2%	\$52,848	83.2%	45.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	38	74.5%	45.2%	\$24,182	88.0%	57.7%
	Unknown	14	10.1%	\$6,263	9.9%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	3.9%	24.3%	\$1,790	6.5%	21.9%
	<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>\$63,492</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>51</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,495</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.7%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	14.9%	\$0	0.0%	7.4%
	Middle	5	23.8%	\$1,198	5.4%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	50.0%	19.5%	\$866	27.8%	14.2%
	Upper	14	66.7%	\$20,023	90.9%	45.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	37.5%	53.8%	\$2,180	70.0%	67.9%
	Unknown	2	9.5%	\$806	3.7%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	12.5%	6.0%	\$70	2.2%	8.8%
	<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>\$22,027</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,116</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	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%
	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%	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%	45.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	5	100.0%	\$1,684	100.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	100.0%	100.0%	\$835	100.0%	100.0%
	<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>\$1,684</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$835</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	27	7.4%	\$2,888	2.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	11	7.7%	5.5%	\$971	1.7%	2.4%
	Moderate	58	15.9%	\$7,970	5.4%	15.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	23	16.1%	13.6%	\$3,053	5.5%	8.0%
	Middle	33	9.0%	\$6,795	4.6%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	17	11.9%	16.9%	\$3,535	6.4%	12.8%
	Upper	199	54.5%	\$110,857	74.9%	45.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	82	57.3%	42.9%	\$44,410	80.0%	52.9%
	Unknown	48	13.2%	\$19,446	13.1%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	10	7.0%	21.0%	\$3,540	6.4%	23.9%
	<b>Total</b>	<b>365</b>	<b>100.0%</b>	<b>\$147,956</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>143</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$55,509</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Geographic Distribution of Small Business & Small Farm Loans Assessment Area: GA Atlanta

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2014					2015						
		Bank		Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg %
SMALL BUSINESSES	Low	34	5.6%	\$9,496	5.6%	4.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	7	3.3%	4.5%	\$2,669	4.1%	5.7%
	Moderate	104	17.1%	\$31,570	18.7%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	45	21.0%	16.0%	\$16,414	25.4%	17.5%
	Middle	140	23.1%	\$40,737	24.2%	30.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	45	21.0%	27.1%	\$12,454	19.2%	27.8%
	Upper	329	54.2%	\$86,835	51.5%	47.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	117	54.7%	51.5%	\$33,196	51.3%	48.2%
	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%	0.9%	\$0	0.0%	0.7%
	<b>Total</b>	<b>607</b>	<b>100.0%</b>	<b>\$168,638</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>214</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$64,733</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	10.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	6.5%	\$0	0.0%	15.4%
	Middle	3	100.0%	\$321	100.0%	32.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	100.0%	43.1%	\$321	100.0%	60.8%
	Upper	0	0.0%	\$0	0.0%	54.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	47.2%	\$0	0.0%	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%	\$0	0.0%	0.0%	0	0.0%	2.4%	\$0	0.0%	1.1%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$321</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$321</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: GA Atlanta

Product Type		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count	Dollar		Count		Dollar							
		#	%	\$ (000s)	\$ %	%		Bank	Agg	\$ 000s	\$ %	\$ %	Bank	Agg	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	178	29.3%	\$31,025	18.4%	91.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	61	28.5%	56.8%	\$12,128	18.7%	36.5%
		Over \$1 Million	394	64.9%	\$129,513	76.8%	7.7%	0	0.0%					137	64.0%				
		Total Rev. available	572	94.2%	\$160,538	95.2%	99.3%	0	0.0%					198	92.5%				
		Rev. Not Known	35	5.8%	\$8,100	4.8%	0.7%	0	0.0%					16	7.5%				
		Total	607	100.0%	\$168,638	100.0%	100.0%	0	0.0%					214	100.0%				
	Loan Size	\$100,000 or Less	228	37.6%	\$12,004	7.1%		0	0.0%	0.0%	\$0	0.0%	0.0%	69	32.2%	94.4%	\$3,975	6.1%	37.6%
		\$100,001 - \$250,000	158	26.0%	\$29,404	17.4%		0	0.0%	0.0%	\$0	0.0%	0.0%	59	27.6%	2.6%	\$10,422	16.1%	13.7%
		\$250,001 - \$1 Million	221	36.4%	\$127,230	75.4%		0	0.0%	0.0%	\$0	0.0%	0.0%	86	40.2%	3.0%	\$50,336	77.8%	48.7%
		Total	607	100.0%	\$168,638	100.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	214	100.0%	100.0%	\$64,733	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	102	57.3%	\$4,283	13.8%													
		\$100,001 - \$250,000	36	20.2%	\$6,254	20.2%													
		\$250,001 - \$1 Million	40	22.5%	\$20,488	66.0%													
		Total	178	100.0%	\$31,025	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	97.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	54.5%	\$0	0.0%	32.0%
		Over \$1 Million	2	66.7%	\$198	61.7%	2.1%	0	0.0%					2	66.7%				
		Total Rev. available	2	66.7%	\$198	61.7%	100.0%	0	0.0%					2	66.7%				
		Not Known	1	33.3%	\$123	38.3%	0.0%	0	0.0%					1	33.3%				
		Total	3	100.0%	\$321	100.0%	100.0%	0	0.0%					3	100.0%				
	Loan Size	\$100,000 or Less	1	33.3%	\$70	21.8%		0	0.0%	0.0%	\$0	0.0%	0.0%	1	33.3%	88.6%	\$70	21.8%	40.9%
		\$100,001 - \$250,000	2	66.7%	\$251	78.2%		0	0.0%	0.0%	\$0	0.0%	0.0%	2	66.7%	7.3%	\$251	78.2%	26.2%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	32.9%
		Total	3	100.0%	\$321	100.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	3	100.0%	100.0%	\$321	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 with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Geographic Distribution of HMDA Loans

Assessment Area: LA Lafayette

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	\$ %	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	16	1.6%	\$1,099	0.6%	2.7%	3	0.7%	0.5%	\$174	0.2%	0.2%	8	2.3%	0.9%	\$592	0.9%	0.4%
	Moderate	128	12.6%	\$14,328	8.0%	20.0%	48	10.8%	12.5%	\$5,501	7.5%	9.5%	48	14.0%	12.7%	\$5,468	8.2%	9.3%
	Middle	366	36.0%	\$48,494	27.2%	47.3%	176	39.5%	36.6%	\$20,916	28.6%	30.3%	100	29.2%	38.8%	\$15,190	22.7%	33.2%
	Upper	506	49.8%	\$114,468	64.2%	30.0%	219	49.1%	50.3%	\$46,536	63.6%	60.0%	187	54.5%	47.6%	\$45,704	68.3%	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%
	<b>Total</b>	<b>1,016</b>	<b>100.0%</b>	<b>\$178,389</b>	<b>100.0%</b>	<b>100.0%</b>	<b>446</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$73,127</b>	<b>100.0%</b>	<b>100.0%</b>	<b>343</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$66,954</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	7	1.2%	\$329	0.4%	2.7%	1	0.7%	1.7%	\$23	0.1%	0.7%	3	1.3%	1.0%	\$130	0.4%	0.5%
	Moderate	108	18.4%	\$11,335	12.7%	20.0%	31	22.6%	17.6%	\$3,279	16.4%	12.6%	40	17.8%	15.8%	\$4,376	12.8%	12.8%
	Middle	227	38.7%	\$26,727	29.9%	47.3%	51	37.2%	42.7%	\$5,813	29.0%	36.9%	81	36.0%	40.0%	\$9,449	27.5%	32.2%
	Upper	245	41.7%	\$50,993	57.0%	30.0%	54	39.4%	38.0%	\$10,918	54.5%	49.9%	101	44.9%	43.2%	\$20,365	59.3%	54.5%
	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%
	<b>Total</b>	<b>587</b>	<b>100.0%</b>	<b>\$89,384</b>	<b>100.0%</b>	<b>100.0%</b>	<b>137</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20,033</b>	<b>100.0%</b>	<b>100.0%</b>	<b>225</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,320</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	14	1.9%	\$124	1.0%	2.7%	6	1.9%	2.0%	\$67	1.3%	0.8%	3	1.3%	1.9%	\$30	0.7%	1.0%
	Moderate	170	23.1%	\$1,844	14.5%	20.0%	88	27.2%	22.8%	\$869	16.3%	15.2%	50	21.4%	20.4%	\$703	15.4%	14.9%
	Middle	314	42.6%	\$4,951	38.9%	47.3%	128	39.6%	45.4%	\$1,862	35.0%	44.1%	98	41.9%	45.6%	\$1,585	34.8%	38.0%
	Upper	239	32.4%	\$5,801	45.6%	30.0%	101	31.3%	29.8%	\$2,525	47.4%	39.9%	83	35.5%	32.1%	\$2,243	49.2%	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%
	<b>Total</b>	<b>737</b>	<b>100.0%</b>	<b>\$12,720</b>	<b>100.0%</b>	<b>100.0%</b>	<b>323</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,323</b>	<b>100.0%</b>	<b>100.0%</b>	<b>234</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,561</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	4.0%	\$0	0.0%	3.9%	0	0.0%	3.1%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.2%	0	0.0%	16.0%	\$0	0.0%	2.2%	0	0.0%	18.8%	\$0	0.0%	4.9%
	Middle	1	33.3%	\$240	5.4%	56.3%	0	0.0%	68.0%	\$0	0.0%	88.0%	1	50.0%	59.4%	\$240	38.4%	55.8%
	Upper	2	66.7%	\$4,225	94.6%	25.5%	0	0.0%	12.0%	\$0	0.0%	5.9%	1	50.0%	18.8%	\$385	61.6%	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%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$4,465</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$625</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	37	1.6%	\$1,552	0.5%	2.7%	10	1.1%	1.0%	\$264	0.3%	0.5%	14	1.7%	1.0%	\$752	0.7%	0.4%
	Moderate	406	17.3%	\$27,507	9.7%	20.0%	167	18.4%	15.0%	\$9,649	9.8%	10.2%	138	17.2%	14.5%	\$10,547	9.9%	10.3%
	Middle	908	38.8%	\$80,412	28.2%	47.3%	355	39.2%	39.2%	\$28,591	29.0%	34.1%	280	34.8%	39.9%	\$26,464	24.9%	34.6%
	Upper	992	42.3%	\$175,487	61.6%	30.0%	374	41.3%	44.8%	\$59,979	60.9%	55.2%	372	46.3%	44.6%	\$68,697	64.5%	54.8%
	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%
	<b>Total</b>	<b>2,343</b>	<b>100.0%</b>	<b>\$284,958</b>	<b>100.0%</b>	<b>100.0%</b>	<b>906</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$98,483</b>	<b>100.0%</b>	<b>100.0%</b>	<b>804</b>	<b>100.0%</b>	<b>100.0%</b>	<b>#####</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data



## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: LA Lafayette

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Families by Family Income %	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	90	8.9%	\$6,218	3.5%	23.9%	29	6.5%	3.7%	\$1,943	2.7%	1.6%	33	9.6%	3.8%	\$2,459	3.7%	1.6%
	Moderate	165	16.2%	\$17,891	10.0%	16.2%	64	14.3%	14.2%	\$6,563	9.0%	9.8%	55	16.0%	16.0%	\$6,091	9.1%	10.6%
	Middle	194	19.1%	\$26,594	14.9%	17.9%	90	20.2%	20.3%	\$10,261	14.0%	17.8%	56	16.3%	21.7%	\$8,816	13.2%	19.4%
	Upper	516	50.8%	\$120,391	67.5%	42.0%	239	53.6%	42.8%	\$51,213	70.0%	53.2%	185	53.9%	40.7%	\$47,553	71.0%	52.5%
	Unknown	51	5.0%	\$7,295	4.1%	0.0%	24	5.4%	18.9%	\$3,147	4.3%	17.6%	14	4.1%	17.8%	\$2,035	3.0%	15.9%
	<b>Total</b>	<b>1,016</b>	<b>100.0%</b>	<b>\$178,389</b>	<b>100.0%</b>	<b>100.0%</b>	<b>446</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$73,127</b>	<b>100.0%</b>	<b>100.0%</b>	<b>343</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$66,954</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	62	10.6%	\$3,871	4.3%	23.9%	16	11.7%	7.5%	\$942	4.7%	3.1%	20	8.9%	5.2%	\$1,146	3.3%	2.2%
	Moderate	83	14.1%	\$8,023	9.0%	16.2%	22	16.1%	12.2%	\$2,172	10.8%	7.5%	23	10.2%	10.3%	\$2,169	6.3%	5.9%
	Middle	107	18.2%	\$11,442	12.8%	17.9%	33	24.1%	17.6%	\$3,055	15.2%	13.5%	36	16.0%	16.1%	\$3,642	10.6%	11.4%
	Upper	275	46.8%	\$58,209	65.1%	42.0%	49	35.8%	44.9%	\$11,568	57.7%	54.1%	115	51.1%	47.2%	\$23,392	68.2%	56.7%
	Unknown	60	10.2%	\$7,839	8.8%	0.0%	17	12.4%	17.8%	\$2,296	11.5%	21.7%	31	13.8%	21.2%	\$3,971	11.6%	23.9%
	<b>Total</b>	<b>587</b>	<b>100.0%</b>	<b>\$89,384</b>	<b>100.0%</b>	<b>100.0%</b>	<b>137</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20,033</b>	<b>100.0%</b>	<b>100.0%</b>	<b>225</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,320</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	93	12.6%	\$588	4.6%	23.9%	34	10.5%	11.9%	\$194	3.6%	3.1%	39	16.7%	13.7%	\$281	6.2%	3.5%
	Moderate	130	17.6%	\$1,231	9.7%	16.2%	56	17.3%	14.1%	\$539	10.1%	7.4%	43	18.4%	15.5%	\$491	10.8%	7.3%
	Middle	125	17.0%	\$2,144	16.9%	17.9%	50	15.5%	17.7%	\$477	9.0%	10.8%	40	17.1%	19.6%	\$709	15.5%	14.3%
	Upper	270	36.6%	\$7,291	57.3%	42.0%	142	44.0%	49.4%	\$3,448	64.8%	71.8%	75	32.1%	42.9%	\$2,631	57.7%	66.1%
	Unknown	119	16.1%	\$1,466	11.5%	0.0%	41	12.7%	7.0%	\$665	12.5%	6.9%	37	15.8%	8.3%	\$449	9.8%	8.8%
	<b>Total</b>	<b>737</b>	<b>100.0%</b>	<b>\$12,720</b>	<b>100.0%</b>	<b>100.0%</b>	<b>323</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,323</b>	<b>100.0%</b>	<b>100.0%</b>	<b>234</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,561</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.9%	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%	16.2%	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%	17.9%	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%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	3	100.0%	\$4,465	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$625	100.0%	100.0%
	<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$4,465</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$625</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	245	10.5%	\$10,677	3.7%	23.9%	79	8.7%	5.6%	\$3,079	3.1%	2.0%	92	11.4%	5.2%	\$3,886	3.7%	1.7%
	Moderate	378	16.1%	\$27,145	9.5%	16.2%	142	15.7%	13.6%	\$9,274	9.4%	8.8%	121	15.0%	14.1%	\$8,751	8.2%	8.3%
	Middle	426	18.2%	\$40,180	14.1%	17.9%	173	19.1%	19.3%	\$13,793	14.0%	16.0%	132	16.4%	19.6%	\$13,167	12.4%	15.4%
	Upper	1,061	45.3%	\$185,891	65.2%	42.0%	430	47.5%	44.0%	\$66,229	67.2%	52.2%	375	46.6%	42.9%	\$73,576	69.1%	50.5%
	Unknown	233	9.9%	\$21,065	7.4%	0.0%	82	9.1%	17.6%	\$6,108	6.2%	21.0%	84	10.4%	18.2%	\$7,080	6.7%	24.0%
	<b>Total</b>	<b>2,343</b>	<b>100.0%</b>	<b>\$284,958</b>	<b>100.0%</b>	<b>100.0%</b>	<b>906</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$98,483</b>	<b>100.0%</b>	<b>100.0%</b>	<b>804</b>	<b>100.0%</b>	<b>100.0%</b>	<b>#####</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: LA Lafayette

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	12	0.5%	\$678	0.3%	2.0%	8	0.7%	1.3%	\$518	0.5%	0.8%	3	0.4%	1.3%	\$154	0.2%	0.8%
	Moderate	328	13.8%	\$26,740	11.1%	17.9%	151	12.7%	14.6%	\$10,568	10.2%	11.5%	109	15.2%	15.2%	\$9,766	12.2%	12.3%
	Middle	1,118	47.1%	\$115,331	48.0%	44.8%	559	46.9%	43.8%	\$50,286	48.5%	46.0%	353	49.3%	43.3%	\$39,876	49.6%	44.2%
	Upper	911	38.4%	\$97,213	40.4%	35.3%	474	39.7%	37.7%	\$41,776	40.3%	40.6%	250	34.9%	37.8%	\$30,532	38.0%	42.0%
	Unknown	3	0.1%	\$525	0.2%	0.1%	1	0.1%	0.0%	\$445	0.4%	0.1%	1	0.1%	0.1%	\$5	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	1.1%	0	0.0%	2.3%	\$0	0.0%	0.7%
	<b>Total</b>	<b>2,372</b>	<b>100.0%</b>	<b>\$240,487</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$103,593</b>	<b>100.0%</b>	<b>100.0%</b>	<b>716</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80,333</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	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	6	16.7%	\$124	5.8%	18.0%	3	15.0%	17.9%	\$49	4.3%	15.4%	2	15.4%	19.8%	\$70	7.4%	14.3%
	Middle	23	63.9%	\$1,475	69.5%	56.8%	13	65.0%	61.0%	\$697	60.7%	60.7%	9	69.2%	60.4%	\$773	81.5%	65.5%
	Upper	7	19.4%	\$523	24.6%	24.5%	4	20.0%	19.9%	\$403	35.1%	20.4%	2	15.4%	19.4%	\$105	11.1%	20.0%
	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%	1.2%	\$0	0.0%	3.5%	0	0.0%	0.5%	\$0	0.0%	0.2%
<b>Total</b>	<b>36</b>	<b>100.0%</b>	<b>\$2,122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$948</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: LA Lafayette

Product Type		Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count		Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	Bank #	Agg %	\$ 000s	\$ %	\$ %	Bank #	Agg %	\$ 000s	\$ %	\$ %			
Small Business	Revenue	\$1 Million or Less	1,337	56.4%	\$78,612	32.7%	90.6%	605	50.7%	36.2%	\$33,636	32.5%	29.6%	456	63.7%	40.7%	\$26,693	33.2%	30.3%
		Over \$1 Million	724	30.5%	\$143,762	59.8%	8.4%	336	28.2%					238	33.2%				
		<i>Total Rev. available</i>	2,061	86.9%	\$222,374	92.5%	99.0%	941	78.9%					694	96.9%				
		Rev. Not Known	311	13.1%	\$18,113	7.5%	1.0%	252	21.1%					22	3.1%				
		<b>Total</b>	<b>2,372</b>	<b>100.0%</b>	<b>\$240,487</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,193</b>	<b>100.0%</b>					<b>716</b>	<b>100.0%</b>				
	Loan Size	\$100,000 or Less	1,837	77.4%	\$56,194	23.4%		978	82.0%	91.1%	\$25,993	25.1%	28.0%	532	74.3%	91.4%	\$18,448	23.0%	29.0%
		\$100,001 - \$250,000	276	11.6%	\$49,230	20.5%		104	8.7%	3.9%	\$18,612	18.0%	14.6%	96	13.4%	4.1%	\$17,048	21.2%	16.0%
		\$250,001 - \$1 Million	259	10.9%	\$135,063	56.2%		111	9.3%	4.9%	\$58,988	56.9%	57.5%	88	12.3%	4.4%	\$44,837	55.8%	55.0%
		<b>Total</b>	<b>2,372</b>	<b>100.0%</b>	<b>\$240,487</b>	<b>100.0%</b>		<b>1,193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$103,593</b>	<b>100.0%</b>	<b>100.0%</b>	<b>716</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80,333</b>	<b>100.0%</b>	<b>100.0%</b>
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,171	87.6%	\$32,437	41.3%													
		\$100,001 - \$250,000	103	7.7%	\$17,450	22.2%													
		\$250,001 - \$1 Million	63	4.7%	\$28,725	36.5%													
		<b>Total</b>	<b>1,337</b>	<b>100.0%</b>	<b>\$78,612</b>	<b>100.0%</b>													
Small Farm	Revenue	\$1 Million or Less	24	66.7%	\$857	40.4%	96.7%	13	65.0%	42.7%	\$453	39.4%	68.6%	8	61.5%	36.9%	\$379	40.0%	67.6%
		Over \$1 Million	5	13.9%	\$688	32.4%	3.3%	2	10.0%					3	23.1%				
		<i>Total Rev. available</i>	29	80.6%	\$1,545	72.8%	100.0%	15	75.0%					11	84.6%				
		Not Known	7	19.4%	\$577	27.2%	0.0%	5	25.0%					2	15.4%				
		<b>Total</b>	<b>36</b>	<b>100.0%</b>	<b>\$2,122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>					<b>13</b>	<b>100.0%</b>				
	Loan Size	\$100,000 or Less	31	86.1%	\$942	44.4%		17	85.0%	82.5%	\$421	36.6%	24.2%	11	84.6%	81.1%	\$496	52.3%	19.1%
		\$100,001 - \$250,000	3	8.3%	\$567	26.7%		2	10.0%	6.1%	\$428	37.2%	16.0%	1	7.7%	6.5%	\$139	14.7%	17.6%
		\$250,001 - \$500,000	2	5.6%	\$613	28.9%		1	5.0%	11.4%	\$300	26.1%	59.8%	1	7.7%	12.4%	\$313	33.0%	63.3%
		<b>Total</b>	<b>36</b>	<b>100.0%</b>	<b>\$2,122</b>	<b>100.0%</b>		<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$948</b>	<b>100.0%</b>	<b>100.0%</b>
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	22	91.7%	\$490	57.2%													
		\$100,001 - \$250,000	2	8.3%	\$367	42.8%													
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%													
		<b>Total</b>	<b>24</b>	<b>100.0%</b>	<b>\$857</b>	<b>100.0%</b>													

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 and 2016 D&B Information

## Appendices

### Geographic Distribution of HMDA Loans

Assessment Area: LA New Orleans

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	166	6.8%	\$34,427	5.8%	4.9%	42	5.8%	5.0%	\$6,564	4.1%	3.9%	65	7.1%	5.7%	\$15,530	6.5%	4.9%
	Moderate	434	17.8%	\$80,117	13.4%	17.2%	116	16.0%	15.8%	\$16,462	10.4%	12.1%	168	18.3%	16.4%	\$32,850	13.8%	13.2%
	Middle	705	28.9%	\$137,146	23.0%	41.0%	224	31.0%	37.6%	\$41,915	26.4%	31.4%	261	28.4%	37.4%	\$51,732	21.8%	30.9%
	Upper	1,138	46.6%	\$344,299	57.8%	36.9%	341	47.2%	41.6%	\$93,926	59.1%	52.6%	425	46.2%	40.5%	\$137,270	57.8%	51.0%
	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%
	<b>Total</b>	<b>2,443</b>	<b>100.0%</b>	<b>\$595,989</b>	<b>100.0%</b>	<b>100.0%</b>	<b>723</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$158,867</b>	<b>100.0%</b>	<b>100.0%</b>	<b>919</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$237,382</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	66	6.7%	\$12,499	4.3%	4.9%	14	6.5%	4.8%	\$2,666	4.6%	4.1%	18	5.2%	4.2%	\$3,967	3.6%	3.4%
	Moderate	135	13.7%	\$23,403	8.1%	17.2%	34	15.9%	14.9%	\$5,224	9.0%	11.1%	44	12.8%	14.7%	\$7,619	7.0%	11.0%
	Middle	268	27.2%	\$58,781	20.5%	41.0%	64	29.9%	39.3%	\$13,053	22.5%	31.8%	88	25.7%	36.8%	\$17,770	16.3%	28.7%
	Upper	516	52.4%	\$192,659	67.0%	36.9%	102	47.7%	40.9%	\$37,166	64.0%	53.0%	193	56.3%	44.3%	\$79,569	73.0%	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%
	<b>Total</b>	<b>985</b>	<b>100.0%</b>	<b>\$287,342</b>	<b>100.0%</b>	<b>100.0%</b>	<b>214</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58,109</b>	<b>100.0%</b>	<b>100.0%</b>	<b>343</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$108,925</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	15	5.1%	\$884	2.3%	4.9%	9	7.8%	7.9%	\$88	1.0%	8.7%	5	4.2%	6.5%	\$332	2.4%	5.6%
	Moderate	70	23.7%	\$3,580	9.4%	17.2%	38	33.0%	20.9%	\$1,612	18.6%	13.8%	25	21.2%	20.4%	\$1,158	8.5%	13.4%
	Middle	94	31.9%	\$5,762	15.2%	41.0%	35	30.4%	37.0%	\$2,161	24.9%	28.9%	42	35.6%	35.6%	\$2,016	14.7%	25.6%
	Upper	116	39.3%	\$27,799	73.1%	36.9%	33	28.7%	34.3%	\$4,826	55.6%	48.6%	46	39.0%	37.5%	\$10,181	74.4%	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%
	<b>Total</b>	<b>295</b>	<b>100.0%</b>	<b>\$38,025</b>	<b>100.0%</b>	<b>100.0%</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,687</b>	<b>100.0%</b>	<b>100.0%</b>	<b>118</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,687</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI-FAMILY	<b>Multi-Family Units</b>																	
	Low	7	20.0%	\$15,743	19.6%	15.3%	1	7.1%	8.5%	\$904	3.2%	6.8%	2	22.2%	12.9%	\$5,807	19.9%	3.9%
	Moderate	8	22.9%	\$15,663	19.5%	31.1%	5	35.7%	37.2%	\$10,009	35.9%	29.5%	0	0.0%	30.2%	\$0	0.0%	23.7%
	Middle	2	5.7%	\$8,485	10.6%	28.7%	0	0.0%	20.2%	\$0	0.0%	24.5%	1	11.1%	24.5%	\$8,125	27.8%	41.2%
	Upper	17	48.6%	\$39,165	48.8%	24.7%	7	50.0%	33.3%	\$15,752	56.6%	38.9%	6	66.7%	32.4%	\$15,259	52.3%	31.2%
	Unknown	1	2.9%	\$1,183	1.5%	0.2%	1	7.1%	0.8%	\$1,183	4.2%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>35</b>	<b>100.0%</b>	<b>\$80,239</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,848</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,191</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	254	6.8%	\$63,553	6.3%	4.9%	66	6.2%	5.1%	\$10,222	4.0%	4.2%	90	6.5%	5.2%	\$25,636	6.6%	4.4%
	Moderate	647	17.2%	\$122,763	12.3%	17.2%	193	18.1%	15.8%	\$33,307	13.1%	12.8%	237	17.1%	16.0%	\$41,627	10.7%	13.1%
	Middle	1,069	28.4%	\$210,174	21.0%	41.0%	323	30.3%	38.1%	\$57,129	22.5%	31.1%	392	28.2%	37.0%	\$79,643	20.5%	30.7%
	Upper	1,787	47.6%	\$603,922	60.3%	36.9%	483	45.3%	40.9%	\$151,670	59.8%	51.8%	670	48.2%	41.7%	\$242,279	62.3%	51.8%
	Unknown	1	0.0%	\$1,183	0.1%	0.0%	1	0.1%	0.0%	\$1,183	0.5%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>3,758</b>	<b>100.0%</b>	<b>\$1,001,595</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,066</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$253,511</b>	<b>100.0%</b>	<b>100.0%</b>	<b>###</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$389,185</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: LA New Orleans

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014						2015					
		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	166	6.8%	\$12,989	2.2%	23.4%	77	10.7%	5.1%	\$5,666	3.6%	2.2%	42	4.6%	4.3%	\$3,645	1.5%	2.0%
	Moderate	346	14.2%	\$44,195	7.4%	16.7%	113	15.6%	16.7%	\$13,386	8.4%	10.5%	127	13.8%	16.0%	\$16,965	7.1%	10.2%
	Middle	395	16.2%	\$70,747	11.9%	18.5%	109	15.1%	18.5%	\$18,311	11.5%	15.5%	170	18.5%	19.0%	\$30,839	13.0%	15.7%
	Upper	1,460	59.8%	\$443,976	74.5%	41.4%	405	56.0%	41.2%	\$115,292	72.6%	55.1%	545	59.3%	41.2%	\$174,499	73.5%	55.2%
	Unknown	76	3.1%	\$24,082	4.0%	0.0%	19	2.6%	18.6%	\$6,212	3.9%	16.8%	35	3.8%	19.5%	\$11,434	4.8%	17.0%
	<b>Total</b>	<b>2,443</b>	<b>100.0%</b>	<b>\$595,989</b>	<b>100.0%</b>	<b>100.0%</b>	<b>723</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$158,867</b>	<b>100.0%</b>	<b>100.0%</b>	<b>919</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$237,382</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	19	1.9%	\$1,691	0.6%	23.4%	8	3.7%	6.6%	\$559	1.0%	3.3%	6	1.7%	5.2%	\$686	0.6%	2.5%
	Moderate	99	10.1%	\$11,994	4.2%	16.7%	35	16.4%	12.5%	\$3,921	6.7%	7.5%	35	10.2%	11.6%	\$4,735	4.3%	6.8%
	Middle	152	15.4%	\$26,571	9.2%	18.5%	38	17.8%	18.0%	\$6,467	11.1%	13.9%	52	15.2%	15.7%	\$8,821	8.1%	11.7%
	Upper	652	66.2%	\$222,706	77.5%	41.4%	119	55.6%	42.6%	\$41,637	71.7%	53.7%	229	66.8%	44.7%	\$84,279	77.4%	56.0%
	Unknown	63	6.4%	\$24,380	8.5%	0.0%	14	6.5%	20.3%	\$5,525	9.5%	21.7%	21	6.1%	22.8%	\$10,404	9.6%	22.9%
	<b>Total</b>	<b>985</b>	<b>100.0%</b>	<b>\$287,342</b>	<b>100.0%</b>	<b>100.0%</b>	<b>214</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58,109</b>	<b>100.0%</b>	<b>100.0%</b>	<b>343</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$108,925</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	35	11.9%	\$240	0.6%	23.4%	20	17.4%	11.1%	\$150	1.7%	3.1%	10	8.5%	8.7%	\$60	0.4%	2.0%
	Moderate	47	15.9%	\$1,192	3.1%	16.7%	22	19.1%	15.7%	\$959	11.0%	9.3%	20	16.9%	15.8%	\$199	1.5%	7.2%
	Middle	37	12.5%	\$1,293	3.4%	18.5%	11	9.6%	19.6%	\$122	1.4%	11.9%	18	15.3%	20.4%	\$753	5.5%	12.8%
	Upper	135	45.8%	\$24,802	65.2%	41.4%	48	41.7%	42.6%	\$3,062	35.2%	57.1%	52	44.1%	45.3%	\$10,454	76.4%	63.3%
	Unknown	41	13.9%	\$10,498	27.6%	0.0%	14	12.2%	11.0%	\$4,394	50.6%	18.7%	18	15.3%	9.8%	\$2,221	16.2%	14.7%
	<b>Total</b>	<b>295</b>	<b>100.0%</b>	<b>\$38,025</b>	<b>100.0%</b>	<b>100.0%</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,687</b>	<b>100.0%</b>	<b>100.0%</b>	<b>118</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,687</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	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%	16.7%	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%	18.5%	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%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	35	100.0%	\$80,239	100.0%	0.0%	14	100.0%	100.0%	\$27,848	100.0%	100.0%	9	100.0%	100.0%	\$29,191	100.0%	100.0%
	<b>Total</b>	<b>35</b>	<b>100.0%</b>	<b>\$80,239</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,848</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,191</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	220	5.9%	\$14,920	1.5%	23.4%	105	9.8%	5.9%	\$6,375	2.5%	2.4%	58	4.2%	4.8%	\$4,391	1.1%	2.0%
	Moderate	492	13.1%	\$57,381	5.7%	16.7%	170	15.9%	15.0%	\$18,266	7.2%	8.9%	182	13.1%	14.3%	\$21,899	5.6%	8.3%
	Middle	584	15.5%	\$98,611	9.8%	18.5%	158	14.8%	18.3%	\$24,900	9.8%	13.9%	240	17.3%	17.7%	\$40,413	10.4%	13.2%
	Upper	2,247	59.8%	\$691,484	69.0%	41.4%	572	53.7%	41.5%	\$159,991	63.1%	51.3%	826	59.5%	42.5%	\$269,232	69.2%	51.9%
	Unknown	215	5.7%	\$139,199	13.9%	0.0%	61	5.7%	19.2%	\$43,979	17.3%	23.5%	83	6.0%	20.7%	\$53,250	13.7%	24.7%
	<b>Total</b>	<b>3,758</b>	<b>100.0%</b>	<b>\$1,001,595</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,066</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$253,511</b>	<b>100.0%</b>	<b>100.0%</b>	<b>###</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$389,185</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Geographic Distribution of Small Business & Small Farm Loans Assessment Area: LA New Orleans

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014						2015					
		Bank		Dollar		Small Businesses	Count		Dollar				Count		Dollar			
		Count	%	\$ (000s)	\$ %		#	%	Agg %	\$ 000s	\$ %	Agg \$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	205	8.1%	\$38,932	10.5%	6.6%	54	6.0%	6.6%	\$13,426	10.8%	8.0%	80	9.9%	6.7%	\$12,930	10.5%	8.5%
	Moderate	490	19.3%	\$62,951	17.0%	17.8%	154	17.2%	18.0%	\$17,440	14.0%	16.7%	174	21.6%	19.1%	\$24,852	20.2%	18.3%
	Middle	673	26.5%	\$81,778	22.1%	31.0%	249	27.9%	27.4%	\$28,950	23.2%	22.3%	208	25.8%	28.2%	\$26,165	21.2%	22.2%
	Upper	1,176	46.2%	\$186,490	50.4%	44.4%	437	48.9%	46.2%	\$64,971	52.1%	52.1%	344	42.7%	44.6%	\$59,346	48.1%	50.4%
	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%	1.7%	\$0	0.0%	0.9%	0	0.0%	1.3%	\$0	0.0%	0.5%
	<b>Total</b>	<b>2,544</b>	<b>100.0%</b>	<b>\$370,151</b>	<b>100.0%</b>	<b>100.0%</b>	<b>894</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$124,787</b>	<b>100.0%</b>	<b>100.0%</b>	<b>806</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$123,293</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	3.4%	\$0	0.0%	2.3%	0	0.0%	3.8%	\$0	0.0%	9.3%
	Moderate	0	0.0%	\$0	0.0%	7.1%	0	0.0%	13.8%	\$0	0.0%	2.2%	0	0.0%	11.5%	\$0	0.0%	1.0%
	Middle	1	25.0%	\$382	59.9%	39.9%	0	0.0%	34.5%	\$0	0.0%	12.7%	1	50.0%	38.5%	\$382	99.2%	68.1%
	Upper	3	75.0%	\$256	40.1%	48.3%	1	100.0%	44.8%	\$3	100.0%	82.7%	1	50.0%	38.5%	\$3	0.8%	20.9%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	3.4%	\$0	0.0%	0.2%	0	0.0%	7.7%	\$0	0.0%	0.7%
	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%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$638</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$385</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: LA New Orleans

Product Type		Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014					2015							
		Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	1,428	56.1%	\$143,987	38.9%	91.6%	446	49.9%	43.1%	\$45,097	36.1%	37.0%	463	57.4%	48.0%	\$47,554	38.6%	37.9%
		Over \$1 Million	844	33.2%	\$201,112	54.3%	7.7%	292	32.7%					292	36.2%				
		Total Rev. available	2,272	89.3%	\$345,099	93.2%	99.3%	738	82.6%					755	93.6%				
		Rev. Not Known	272	10.7%	\$25,052	6.8%	0.8%	156	17.4%					51	6.3%				
		Total	2,544	100.0%	\$370,151	100.0%	100.0%	894	100.0%					806	100.0%				
	Loan Size	\$100,000 or Less	1,686	66.3%	\$51,277	13.9%		599	67.0%	89.4%	\$16,812	13.5%	22.4%	521	64.6%	89.1%	\$16,229	13.2%	22.1%
		\$100,001 - \$250,000	417	16.4%	\$77,829	21.0%		141	15.8%	4.7%	\$25,731	20.6%	16.3%	142	17.6%	4.6%	\$26,812	21.7%	15.1%
		\$250,001 - \$1 Million	441	17.3%	\$241,045	65.1%		154	17.2%	5.8%	\$82,244	65.9%	61.3%	143	17.7%	6.3%	\$80,252	65.1%	62.8%
		Total	2,544	100.0%	\$370,151	100.0%		894	100.0%	100.0%	\$124,787	100.0%	100.0%	806	100.0%	100.0%	\$123,293	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1,095	76.7%	\$28,794	20.0%													
\$100,001 - \$250,000		170	11.9%	\$30,598	21.3%														
\$250,001 - \$1 Million		163	11.4%	\$84,595	58.8%														
Total		1,428	100.0%	\$143,987	100.0%														
Small Farm	Revenue	\$1 Million or Less	3	75.0%	\$256	40.1%	97.9%	1	100.0%	48.3%	\$3	100.0%	17.1%	1	50.0%	61.5%	\$3	0.8%	39.7%
		Over \$1 Million	0	0.0%	\$0	0.0%	2.1%	0	0.0%					0	0.0%				
		Total Rev. available	3	75.0%	\$256	40.1%	100.0%	1	100.0%					1	50.0%				
		Not Known	1	25.0%	\$382	59.9%	0.0%	0	0.0%					1	50.0%				
		Total	4	100.0%	\$638	100.0%	100.0%	1	100.0%					2	100.0%				
	Loan Size	\$100,000 or Less	2	50.0%	\$6	0.9%		1	100.0%	93.1%	\$3	100.0%	37.6%	1	50.0%	96.2%	\$3	0.8%	53.2%
		\$100,001 - \$250,000	1	25.0%	\$250	39.2%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
		\$250,001 - \$500,000	1	25.0%	\$382	59.9%		0	0.0%	6.9%	\$0	0.0%	62.4%	1	50.0%	3.8%	\$382	99.2%	46.8%
		Total	4	100.0%	\$638	100.0%		1	100.0%	100.0%	\$3	100.0%	100.0%	2	100.0%	100.0%	\$385	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	66.7%	\$6	2.3%													
\$100,001 - \$250,000		1	33.3%	\$250	97.7%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
Total		3	100.0%	\$256	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 and 2016 D&B Information

## Appendices

### Geographic Distribution of HMDA Loans

Assessment Area: LA St. Mary

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Dollar		Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		%	Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (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	2.7%	\$423	1.4%	6.4%	2	2.0%	3.3%	\$223	1.7%	2.6%	4	5.8%	4.4%	\$200	2.0%	5.6%
	Middle	139	61.5%	\$17,666	56.8%	72.5%	65	63.7%	66.2%	\$7,484	56.0%	61.8%	38	55.1%	64.9%	\$5,450	54.1%	58.8%
	Upper	81	35.8%	\$13,010	41.8%	21.1%	35	34.3%	30.5%	\$5,655	42.3%	35.6%	27	39.1%	30.8%	\$4,430	43.9%	35.6%
	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%
	<b>Total</b>	<b>226</b>	<b>100.0%</b>	<b>\$31,099</b>	<b>100.0%</b>	<b>100.0%</b>	<b>102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,362</b>	<b>100.0%</b>	<b>100.0%</b>	<b>69</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,080</b>	<b>100.0%</b>	<b>100.0%</b>
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	4.2%	\$710	4.0%	6.4%	2	3.7%	4.1%	\$180	2.7%	4.4%	2	4.4%	3.8%	\$396	6.4%	5.6%
	Middle	88	61.5%	\$10,029	56.2%	72.5%	40	74.1%	65.4%	\$5,053	74.8%	61.5%	28	62.2%	61.0%	\$3,190	51.4%	53.9%
	Upper	49	34.3%	\$7,109	39.8%	21.1%	12	22.2%	30.5%	\$1,520	22.5%	34.0%	15	33.3%	35.2%	\$2,616	42.2%	40.6%
	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%
	<b>Total</b>	<b>143</b>	<b>100.0%</b>	<b>\$17,848</b>	<b>100.0%</b>	<b>100.0%</b>	<b>54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,753</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,202</b>	<b>100.0%</b>	<b>100.0%</b>
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	6	7.7%	\$47	1.6%	6.4%	3	8.1%	4.5%	\$23	2.1%	19.5%	2	7.7%	5.1%	\$8	0.5%	0.7%
	Middle	48	61.5%	\$1,379	46.9%	72.5%	24	64.9%	72.7%	\$569	51.4%	56.6%	16	61.5%	73.5%	\$756	47.5%	65.6%
	Upper	24	30.8%	\$1,514	51.5%	21.1%	10	27.0%	22.7%	\$514	46.5%	23.8%	8	30.8%	21.4%	\$828	52.0%	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%
	<b>Total</b>	<b>78</b>	<b>100.0%</b>	<b>\$2,940</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,592</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	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%	2.5%	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%	69.3%	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%	28.2%	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%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
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	18	4.0%	\$1,180	2.3%	6.4%	7	3.6%	3.7%	\$426	2.0%	3.9%	8	5.7%	4.2%	\$604	3.4%	5.3%
	Middle	275	61.5%	\$29,074	56.0%	72.5%	129	66.8%	67.1%	\$13,106	61.8%	61.9%	82	58.6%	64.8%	\$9,396	52.6%	57.6%
	Upper	154	34.5%	\$21,633	41.7%	21.1%	57	29.5%	29.1%	\$7,689	36.2%	34.2%	50	35.7%	31.0%	\$7,874	44.1%	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%
	<b>Total</b>	<b>447</b>	<b>100.0%</b>	<b>\$51,887</b>	<b>100.0%</b>	<b>100.0%</b>	<b>193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,221</b>	<b>100.0%</b>	<b>100.0%</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$17,874</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data



## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: LA St. Mary

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar					
		Count	Dollar	Count	Dollar		Bank	Agg		Bank	Agg		Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	5	2.2%	\$277	0.9%	22.8%	1	1.0%	1.1%	\$40	0.3%	0.4%	4	5.8%	2.8%	\$237	2.4%	1.0%
	Moderate	23	10.2%	\$1,631	5.2%	16.3%	12	11.8%	13.3%	\$771	5.8%	8.2%	5	7.2%	10.3%	\$423	4.2%	5.7%
	Middle	77	34.1%	\$8,587	27.6%	16.2%	41	40.2%	22.3%	\$4,490	33.6%	19.1%	19	27.5%	21.0%	\$2,166	21.5%	17.5%
	Upper	118	52.2%	\$20,277	65.2%	44.7%	47	46.1%	45.8%	\$7,960	59.6%	56.7%	40	58.0%	45.6%	\$7,058	70.0%	57.7%
	Unknown	3	1.3%	\$327	1.1%	0.0%	1	1.0%	17.5%	\$101	0.8%	15.7%	1	1.4%	20.3%	\$196	1.9%	18.2%
	<i>Total</i>	<i>226</i>	<i>100.0%</i>	<i>\$31,099</i>	<i>100.0%</i>	<i>100.0%</i>	<i>102</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$13,362</i>	<i>100.0%</i>	<i>100.0%</i>	<i>69</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,080</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	6	4.2%	\$368	2.1%	22.8%	1	1.9%	4.5%	\$128	1.9%	1.5%	1	2.2%	4.7%	\$30	0.5%	1.8%
	Moderate	13	9.1%	\$979	5.5%	16.3%	5	9.3%	7.8%	\$417	6.2%	5.0%	4	8.9%	7.6%	\$264	4.3%	4.0%
	Middle	24	16.8%	\$2,339	13.1%	16.2%	7	13.0%	13.8%	\$665	9.8%	9.7%	8	17.8%	18.0%	\$879	14.2%	15.3%
	Upper	82	57.3%	\$11,405	63.9%	44.7%	24	44.4%	48.3%	\$2,812	41.6%	46.6%	31	68.9%	48.5%	\$5,003	80.7%	54.3%
	Unknown	18	12.6%	\$2,757	15.4%	0.0%	17	31.5%	25.7%	\$2,731	40.4%	37.2%	1	2.2%	21.2%	\$26	0.4%	24.6%
	<i>Total</i>	<i>143</i>	<i>100.0%</i>	<i>\$17,848</i>	<i>100.0%</i>	<i>100.0%</i>	<i>54</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,753</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,202</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	7	9.0%	\$27	0.9%	22.8%	4	10.8%	7.6%	\$18	1.6%	3.2%	2	7.7%	6.8%	\$8	0.5%	0.9%
	Moderate	6	7.7%	\$171	5.8%	16.3%	3	8.1%	15.9%	\$82	7.4%	5.8%	1	3.8%	11.1%	\$72	4.5%	4.3%
	Middle	18	23.1%	\$614	20.9%	16.2%	9	24.3%	19.7%	\$302	27.3%	19.0%	6	23.1%	19.7%	\$292	18.3%	14.6%
	Upper	31	39.7%	\$1,883	64.0%	44.7%	14	37.8%	47.7%	\$528	47.7%	44.5%	11	42.3%	53.8%	\$1,180	74.1%	70.2%
	Unknown	16	20.5%	\$245	8.3%	0.0%	7	18.9%	9.1%	\$176	15.9%	27.5%	6	23.1%	8.5%	\$40	2.5%	10.0%
	<i>Total</i>	<i>78</i>	<i>100.0%</i>	<i>\$2,940</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,592</i>	<i>100.0%</i>	<i>100.0%</i>
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%	16.3%	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%	16.2%	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%	44.7%	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	18	4.0%	\$672	1.3%	22.8%	6	3.1%	3.1%	\$186	0.9%	0.9%	7	5.0%	4.1%	\$275	1.5%	1.3%
	Moderate	42	9.4%	\$2,781	5.4%	16.3%	20	10.4%	11.9%	\$1,270	6.0%	6.9%	10	7.1%	9.2%	\$759	4.2%	4.8%
	Middle	119	26.6%	\$11,540	22.2%	16.2%	57	29.5%	19.1%	\$5,457	25.7%	15.7%	33	23.6%	19.5%	\$3,337	18.7%	16.2%
	Upper	231	51.7%	\$33,565	64.7%	44.7%	85	44.0%	46.6%	\$11,300	53.2%	52.2%	82	58.6%	47.6%	\$13,241	74.1%	56.4%
	Unknown	37	8.3%	\$3,329	6.4%	0.0%	25	13.0%	19.2%	\$3,008	14.2%	24.3%	8	5.7%	19.7%	\$262	1.5%	21.2%
	<i>Total</i>	<i>447</i>	<i>100.0%</i>	<i>\$51,887</i>	<i>100.0%</i>	<i>100.0%</i>	<i>193</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,221</i>	<i>100.0%</i>	<i>100.0%</i>	<i>140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,874</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: LA St. Mary

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	Bank \$ 000s	Agg \$ %	Agg \$ %	#	%	Bank \$ 000s	Agg \$ %	Agg \$ %		
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	6.6%	\$34	1.3%	4.2%	0	0.0%	2.9%	\$0	0.0%	0.7%	3	12.5%	3.4%	\$33	2.9%	2.0%
	Middle	34	55.7%	\$1,364	53.3%	58.3%	19	82.6%	57.4%	\$703	78.7%	58.0%	9	37.5%	58.7%	\$568	49.9%	64.9%
	Upper	23	37.7%	\$1,161	45.4%	37.5%	4	17.4%	34.1%	\$190	21.3%	39.4%	12	50.0%	32.5%	\$537	47.2%	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	5.7%	\$0	0.0%	1.9%	0	0.0%	5.3%	\$0	0.0%	2.2%
	<b>Total</b>	<b>61</b>	<b>100.0%</b>	<b>\$2,559</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$893</b>	<b>100.0%</b>	<b>100.0%</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,138</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	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%	6.7%	0	0.0%	9.5%	\$0	0.0%	18.7%	0	0.0%	18.2%	\$0	0.0%	5.7%
	Middle	0	0.0%	\$0	0.0%	73.3%	0	0.0%	85.7%	\$0	0.0%	80.2%	0	0.0%	72.7%	\$0	0.0%	74.5%
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: LA St. Mary

Product Type		Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			Count	Dollar		Count		Dollar							
		#	%	\$ (000s)	\$ %	%		#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %
Small Business	Revenue	\$1 Million or Less	50	82.0%	\$1,856	72.5%	88.4%	18	78.3%	40.4%	\$629	70.4%	33.0%	20	83.3%	43.2%	\$749	65.8%	28.4%
		Over \$1 Million	7	11.5%	\$480	18.8%	10.1%	3	13.0%					3	12.5%				
		Total Rev. available	57	93.5%	\$2,336	91.3%	98.5%	21	91.3%					23	95.8%				
		Rev. Not Known	4	6.6%	\$223	8.7%	1.5%	2	8.7%					1	4.2%				
		Total	61	100.0%	\$2,559	100.0%	100.0%	23	100.0%					24	100.0%				
	Loan Size	\$100,000 or Less	54	88.5%	\$1,430	55.9%		21	91.3%	88.3%	\$635	71.1%	25.8%	20	83.3%	88.6%	\$525	46.1%	25.5%
		\$100,001 - \$250,000	6	9.8%	\$871	34.0%		2	8.7%	6.2%	\$258	28.9%	19.3%	4	16.7%	5.9%	\$613	53.9%	20.1%
		\$250,001 - \$1 Million	1	1.6%	\$258	10.1%		0	0.0%	5.5%	\$0	0.0%	54.9%	0	0.0%	5.5%	\$0	0.0%	54.4%
		Total	61	100.0%	\$2,559	100.0%		23	100.0%	100.0%	\$893	100.0%	100.0%	24	100.0%	100.0%	\$1,138	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	44	88.0%	\$952	51.3%													
		\$100,001 - \$250,000	5	10.0%	\$646	34.8%													
		\$250,001 - \$1 Million	1	2.0%	\$258	13.9%													
		Total	50	100.0%	\$1,856	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	93.8%	0	0.0%	19.0%	\$0	0.0%	21.1%	0	0.0%	27.3%	\$0	0.0%	24.8%
		Over \$1 Million	0	0.0%	\$0	0.0%	6.3%	0	0.0%					0	0.0%				
		Total Rev. available	0	0.0%	\$0	0.0%	100.1%	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%				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	95.2%	\$0	0.0%	69.1%	0	0.0%	100.0%	\$0	0.0%	100.0%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	30.9%	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%
	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 with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Geographic Distribution of HMDA Loans

Assessment Area: TN Memphis

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014					2015						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	41	2.3%	\$2,940	0.8%	10.3%	6	1.2%	3.0%	\$465	0.5%	1.0%	11	1.9%	2.5%	\$671	0.6%	0.9%
	Moderate	82	4.5%	\$8,290	2.4%	19.2%	22	4.3%	7.7%	\$2,495	2.6%	3.1%	30	5.1%	7.4%	\$2,064	1.9%	3.2%
	Middle	305	16.8%	\$34,410	9.9%	22.8%	82	15.9%	18.6%	\$9,168	9.6%	11.5%	99	16.7%	19.5%	\$10,456	9.4%	12.1%
	Upper	1,387	76.4%	\$302,457	86.9%	47.7%	405	78.6%	70.7%	\$83,851	87.4%	84.3%	453	76.4%	70.6%	\$97,531	88.1%	83.8%
	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%
	<b>Total</b>	<b>1,815</b>	<b>100.0%</b>	<b>\$348,097</b>	<b>100.0%</b>	<b>100.0%</b>	<b>515</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$95,979</b>	<b>100.0%</b>	<b>100.0%</b>	<b>593</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$110,722</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	5	1.2%	\$700	0.9%	10.3%	2	2.2%	5.3%	\$106	0.7%	1.6%	0	0.0%	2.7%	\$0	0.0%	0.9%
	Moderate	29	7.1%	\$2,205	2.8%	19.2%	7	7.9%	11.2%	\$318	2.0%	5.3%	14	9.0%	8.9%	\$1,010	3.6%	3.7%
	Middle	53	12.9%	\$7,367	9.3%	22.8%	6	6.7%	21.9%	\$763	4.8%	15.5%	31	20.0%	19.5%	\$4,153	14.6%	12.7%
	Upper	324	78.8%	\$68,565	87.0%	47.7%	74	83.1%	61.7%	\$14,811	92.6%	77.6%	110	71.0%	68.9%	\$23,235	81.8%	82.7%
	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%
	<b>Total</b>	<b>411</b>	<b>100.0%</b>	<b>\$78,837</b>	<b>100.0%</b>	<b>100.0%</b>	<b>89</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,998</b>	<b>100.0%</b>	<b>100.0%</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$28,398</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	12	11.1%	\$83	2.9%	10.3%	5	11.6%	10.2%	\$37	7.3%	2.5%	3	7.9%	9.8%	\$24	1.2%	3.2%
	Moderate	12	11.1%	\$73	2.6%	19.2%	7	16.3%	18.6%	\$36	7.1%	8.1%	3	7.9%	16.2%	\$27	1.4%	6.6%
	Middle	23	21.3%	\$311	11.1%	22.8%	10	23.3%	22.5%	\$168	33.1%	16.9%	7	18.4%	23.5%	\$80	4.2%	16.3%
	Upper	61	56.5%	\$2,347	83.4%	47.7%	21	48.8%	48.7%	\$266	52.5%	72.4%	25	65.8%	50.5%	\$1,796	93.2%	73.9%
	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%
	<b>Total</b>	<b>108</b>	<b>100.0%</b>	<b>\$2,814</b>	<b>100.0%</b>	<b>100.0%</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$507</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,927</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	26.0%	0	0.0%	14.7%	\$0	0.0%	7.1%	0	0.0%	9.6%	\$0	0.0%	0.9%
	Moderate	2	25.0%	\$995	23.1%	27.1%	0	0.0%	25.3%	\$0	0.0%	19.1%	1	50.0%	24.7%	\$315	39.6%	16.0%
	Middle	5	62.5%	\$2,831	65.7%	21.6%	0	0.0%	29.3%	\$0	0.0%	21.4%	0	0.0%	39.7%	\$0	0.0%	16.1%
	Upper	1	12.5%	\$480	11.1%	25.3%	0	0.0%	30.7%	\$0	0.0%	52.4%	1	50.0%	26.0%	\$480	60.4%	67.0%
	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%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>\$4,306</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$795</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	58	2.5%	\$3,723	0.9%	10.3%	13	2.0%	4.1%	\$608	0.5%	1.7%	14	1.8%	2.8%	\$695	0.5%	0.9%
	Moderate	125	5.3%	\$11,563	2.7%	19.2%	36	5.6%	9.4%	\$2,849	2.5%	5.0%	48	6.1%	8.3%	\$3,416	2.4%	4.4%
	Middle	386	16.5%	\$44,919	10.3%	22.8%	98	15.1%	20.0%	\$10,099	9.0%	13.5%	137	17.4%	19.8%	\$14,689	10.4%	12.6%
	Upper	1,773	75.7%	\$373,849	86.1%	47.7%	500	77.3%	66.4%	\$98,928	87.9%	79.8%	589	74.7%	69.1%	\$123,042	86.7%	82.1%
	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%
	<b>Total</b>	<b>2,342</b>	<b>100.0%</b>	<b>\$434,054</b>	<b>100.0%</b>	<b>100.0%</b>	<b>647</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$112,484</b>	<b>100.0%</b>	<b>100.0%</b>	<b>788</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$141,842</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data

## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: TN Memphis

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014						2015					
		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	115	6.3%	\$7,903	2.3%	25.2%	33	6.4%	3.7%	\$2,553	2.7%	1.6%	51	8.6%	4.3%	\$3,028	2.7%	2.0%
	Moderate	320	17.6%	\$36,475	10.5%	16.1%	88	17.1%	13.7%	\$8,958	9.3%	8.9%	113	19.1%	13.3%	\$13,359	12.1%	9.2%
	Middle	372	20.5%	\$58,795	16.9%	16.5%	91	17.7%	17.4%	\$14,048	14.6%	15.3%	126	21.2%	17.3%	\$20,099	18.2%	15.6%
	Upper	996	54.9%	\$242,495	69.7%	42.2%	299	58.1%	38.8%	\$69,505	72.4%	51.4%	300	50.6%	39.0%	\$73,417	66.3%	51.0%
	Unknown	12	0.7%	\$2,429	0.7%	0.0%	4	0.8%	26.4%	\$915	1.0%	22.8%	3	0.5%	26.0%	\$819	0.7%	22.3%
	<i>Total</i>	<i>1,815</i>	<i>100.0%</i>	<i>\$348,097</i>	<i>100.0%</i>	<i>100.0%</i>	<i>515</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$95,979</i>	<i>100.0%</i>	<i>100.0%</i>	<i>593</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$110,722</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	14	3.4%	\$818	1.0%	25.2%	9	10.1%	4.1%	\$575	3.6%	2.1%	4	2.6%	3.5%	\$182	0.6%	1.7%
	Moderate	43	10.5%	\$4,444	5.6%	16.1%	8	9.0%	8.6%	\$752	4.7%	5.3%	19	12.3%	8.2%	\$1,989	7.0%	4.7%
	Middle	57	13.9%	\$8,326	10.6%	16.5%	17	19.1%	15.0%	\$2,233	14.0%	11.5%	19	12.3%	14.3%	\$2,833	10.0%	10.9%
	Upper	284	69.1%	\$62,774	79.6%	42.2%	52	58.4%	38.0%	\$12,015	75.1%	48.0%	109	70.3%	39.2%	\$22,383	78.8%	48.8%
	Unknown	13	3.2%	\$2,475	3.1%	0.0%	3	3.4%	34.4%	\$423	2.6%	33.2%	4	2.6%	34.8%	\$1,011	3.6%	34.1%
	<i>Total</i>	<i>411</i>	<i>100.0%</i>	<i>\$78,837</i>	<i>100.0%</i>	<i>100.0%</i>	<i>89</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$15,998</i>	<i>100.0%</i>	<i>100.0%</i>	<i>155</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$28,398</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	5	4.6%	\$22	0.8%	25.2%	4	9.3%	10.3%	\$16	3.2%	2.4%	0	0.0%	9.5%	\$0	0.0%	2.8%
	Moderate	13	12.0%	\$67	2.4%	16.1%	3	7.0%	17.7%	\$7	1.4%	7.7%	7	18.4%	16.9%	\$47	2.4%	8.1%
	Middle	27	25.0%	\$261	9.3%	16.5%	13	30.2%	21.2%	\$118	23.3%	11.5%	6	15.8%	19.2%	\$58	3.0%	12.9%
	Upper	58	53.7%	\$2,224	79.0%	42.2%	22	51.2%	40.9%	\$363	71.6%	65.9%	22	57.9%	47.7%	\$1,588	82.4%	62.4%
	Unknown	5	4.6%	\$240	8.5%	0.0%	1	2.3%	9.9%	\$3	0.6%	12.6%	3	7.9%	6.8%	\$234	12.1%	13.8%
	<i>Total</i>	<i>108</i>	<i>100.0%</i>	<i>\$2,814</i>	<i>100.0%</i>	<i>100.0%</i>	<i>43</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$507</i>	<i>100.0%</i>	<i>100.0%</i>	<i>38</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,927</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	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%	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%	16.5%	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%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	8	100.0%	\$4,306	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$795	100.0%	100.0%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$4,306</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>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$795</i>	<i>100.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	134	5.7%	\$8,743	2.0%	25.2%	46	7.1%	4.1%	\$3,144	2.8%	1.6%	55	7.0%	4.2%	\$3,210	2.3%	1.7%
	Moderate	376	16.1%	\$40,986	9.4%	16.1%	99	15.3%	12.0%	\$9,717	8.6%	7.2%	139	17.6%	11.6%	\$15,395	10.9%	7.0%
	Middle	456	19.5%	\$67,382	15.5%	16.5%	121	18.7%	16.6%	\$16,399	14.6%	13.0%	151	19.2%	16.3%	\$22,990	16.2%	12.8%
	Upper	1,338	57.1%	\$307,493	70.8%	42.2%	373	57.7%	38.4%	\$81,883	72.8%	46.7%	431	54.7%	39.3%	\$97,388	68.7%	46.7%
	Unknown	38	1.6%	\$9,450	2.2%	0.0%	8	1.2%	28.9%	\$1,341	1.2%	31.5%	12	1.5%	28.6%	\$2,859	2.0%	31.7%
	<i>Total</i>	<i>2,342</i>	<i>100.0%</i>	<i>\$434,054</i>	<i>100.0%</i>	<i>100.0%</i>	<i>647</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$112,484</i>	<i>100.0%</i>	<i>100.0%</i>	<i>788</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$141,842</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: TN Memphis

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	68	8.0%	\$18,735	11.3%	10.5%	33	9.0%	8.9%	\$10,015	14.0%	11.2%	15	6.3%	8.0%	\$4,957	10.0%	9.0%
	Moderate	176	20.8%	\$39,012	23.5%	18.3%	69	18.9%	17.0%	\$16,925	23.7%	24.3%	55	22.9%	17.0%	\$11,193	22.7%	21.5%
	Middle	144	17.0%	\$26,910	16.2%	21.4%	63	17.2%	19.0%	\$9,377	13.1%	17.9%	37	15.4%	19.4%	\$9,267	18.8%	18.7%
	Upper	418	49.5%	\$72,155	43.4%	49.1%	186	50.8%	52.9%	\$32,499	45.5%	44.5%	119	49.6%	53.5%	\$20,112	40.8%	47.6%
	Unknown	39	4.6%	\$9,485	5.7%	0.7%	15	4.1%	1.1%	\$2,610	3.7%	1.9%	14	5.8%	1.2%	\$3,821	7.7%	2.9%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.3%	0	0.0%	0.9%	\$0	0.0%	0.3%
	<b>Total</b>	<b>845</b>	<b>100.0%</b>	<b>\$166,297</b>	<b>100.0%</b>	<b>100.0%</b>	<b>366</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$71,426</b>	<b>100.0%</b>	<b>100.0%</b>	<b>240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$49,350</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	Low	0	0.0%	\$0	0.0%	4.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	7.6%	0	0.0%	2.6%	\$0	0.0%	0.8%	0	0.0%	4.2%	\$0	0.0%	1.3%
	Middle	0	0.0%	\$0	0.0%	12.0%	0	0.0%	2.6%	\$0	0.0%	0.4%	0	0.0%	6.3%	\$0	0.0%	4.3%
	Upper	1	100.0%	\$240	100.0%	75.0%	1	100.0%	94.7%	\$240	100.0%	98.8%	0	0.0%	87.5%	\$0	0.0%	94.4%
	Unknown	0	0.0%	\$0	0.0%	1.1%	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%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Memphis

Product Type		Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			#	%	%	Bank		%	Bank		%	Dollar			
		#	%	\$ (000s)	\$ %	\$ 000s				\$ %	\$ %		#	%		\$ 000s	\$ %	\$ %	
Small Business	Revenue	\$1 Million or Less	379	44.9%	\$43,658	26.3%	87.8%	163	44.5%	42.3%	\$22,854	32.0%	31.6%	105	43.8%	48.1%	\$10,215	20.7%	32.2%
		Over \$1 Million	369	43.7%	\$101,020	60.7%	11.6%	135	36.9%					120	50.0%				
		<i>Total Rev. available</i>	748	88.6%	\$144,678	87.0%	99.4%	298	81.4%					225	93.8%				
		Rev. Not Known	97	11.5%	\$21,619	13.0%	0.5%	68	18.6%					15	6.3%				
		<b>Total</b>	<b>845</b>	<b>100.0%</b>	<b>\$166,297</b>	<b>100.0%</b>	<b>100.0%</b>	<b>366</b>	<b>100.0%</b>					<b>240</b>	<b>100.0%</b>				
	Loan Size	\$100,000 or Less	485	57.4%	\$22,959	13.8%		194	53.0%	89.6%	\$9,285	13.0%	24.4%	141	58.8%	90.9%	\$6,698	13.6%	26.7%
		\$100,001 - \$250,000	163	19.3%	\$29,355	17.7%		88	24.0%	5.1%	\$15,810	22.1%	18.0%	42	17.5%	4.3%	\$7,936	16.1%	15.6%
		\$250,001 - \$1 Million	197	23.3%	\$113,983	68.5%		84	23.0%	5.4%	\$46,331	64.9%	57.6%	57	23.8%	4.9%	\$34,716	70.3%	57.6%
		<b>Total</b>	<b>845</b>	<b>100.0%</b>	<b>\$166,297</b>	<b>100.0%</b>		<b>366</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$71,426</b>	<b>100.0%</b>	<b>100.0%</b>	<b>240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$49,350</b>	<b>100.0%</b>	<b>100.0%</b>
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	284	74.9%	\$11,967	27.4%													
\$100,001 - \$250,000		53	14.0%	\$9,148	21.0%														
\$250,001 - \$1 Million		42	11.1%	\$22,543	51.6%														
<b>Total</b>		<b>379</b>	<b>100.0%</b>	<b>\$43,658</b>	<b>100.0%</b>														
Small Farm	Revenue	\$1 Million or Less	1	100.0%	\$240	100.0%	93.9%	1	100.0%	68.4%	\$240	100.0%	66.4%	0	0.0%	60.4%	\$0	0.0%	86.8%
		Over \$1 Million	0	0.0%	\$0	0.0%	5.6%	0	0.0%					0	0.0%				
		<i>Total Rev. available</i>	1	100.0%	\$240	100.0%	99.5%	1	100.0%					0	0.0%				
		Not Known	0	0.0%	\$0	0.0%	0.5%	0	0.0%					0	0.0%				
		<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>					<b>0</b>	<b>0.0%</b>				
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	78.9%	\$0	0.0%	25.6%	0	0.0%	70.8%	\$0	0.0%	16.0%
		\$100,001 - \$250,000	1	100.0%	\$240	100.0%		1	100.0%	15.8%	\$240	100.0%	43.4%	0	0.0%	20.8%	\$0	0.0%	45.0%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.3%	\$0	0.0%	31.0%	0	0.0%	8.3%	\$0	0.0%	39.0%
		<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$240</b>	<b>100.0%</b>		<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%													
\$100,001 - \$250,000		1	100.0%	\$240	100.0%														
\$250,001 - \$500,000		0	0.0%	\$0	0.0%														
<b>Total</b>		<b>1</b>	<b>100.0%</b>	<b>\$240</b>	<b>100.0%</b>														

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 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																
		2014, 2015, 2016					2014					2015											
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar			Count		Dollar							
		#	%		\$ (000s)	\$ %	%	#	%	Agg %	\$ (000s)	\$ %	\$ %	#	%	Agg %	\$ (000s)	\$ %	\$ %				
HOME PURCHASE	Low	13	3.5%	\$3,356	2.7%	4.9%	2	2.2%	1.6%	\$229	0.7%	1.2%	4	3.2%	1.8%	\$1,000	2.2%	1.4%					
	Moderate	80	21.4%	\$12,343	9.9%	22.8%	18	20.2%	10.6%	\$2,373	6.8%	6.7%	17	13.7%	10.7%	\$3,207	7.0%	6.7%					
	Middle	92	24.6%	\$16,717	13.4%	28.7%	22	24.7%	28.7%	\$4,956	14.2%	21.8%	26	21.0%	31.0%	\$5,543	12.1%	23.9%					
	Upper	189	50.5%	\$92,080	74.0%	43.6%	47	52.8%	59.0%	\$27,429	78.4%	70.3%	77	62.1%	56.5%	\$36,157	78.8%	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%					
	<b>Total</b>	<b>374</b>	<b>100.0%</b>	<b>\$124,496</b>	<b>100.0%</b>	<b>100.0%</b>	<b>89</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,987</b>	<b>100.0%</b>	<b>100.0%</b>	<b>124</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$45,907</b>	<b>100.0%</b>	<b>100.0%</b>					
REFINANCE	Low	2	2.0%	\$302	0.9%	4.9%	0	0.0%	1.8%	\$0	0.0%	1.3%	1	2.3%	1.7%	\$94	0.7%	1.2%					
	Moderate	19	19.4%	\$2,037	5.9%	22.8%	4	20.0%	12.7%	\$462	6.4%	7.8%	11	25.0%	10.6%	\$1,155	8.6%	6.1%					
	Middle	14	14.3%	\$2,236	6.5%	28.7%	2	10.0%	29.5%	\$198	2.7%	21.0%	5	11.4%	26.7%	\$559	4.2%	19.1%					
	Upper	63	64.3%	\$29,913	86.7%	43.6%	14	70.0%	56.0%	\$6,600	90.9%	69.9%	27	61.4%	61.0%	\$11,563	86.5%	73.6%					
	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%					
	<b>Total</b>	<b>98</b>	<b>100.0%</b>	<b>\$34,488</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,260</b>	<b>100.0%</b>	<b>100.0%</b>	<b>44</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,371</b>	<b>100.0%</b>	<b>100.0%</b>					
HOME IMPROVEMENT	Low	2	6.1%	\$92	1.8%	4.9%	0	0.0%	3.1%	\$0	0.0%	1.8%	1	8.3%	2.8%	\$2	0.2%	1.2%					
	Moderate	6	18.2%	\$143	2.8%	22.8%	4	26.7%	13.6%	\$27	2.0%	6.9%	2	16.7%	13.1%	\$116	11.4%	7.2%					
	Middle	6	18.2%	\$269	5.2%	28.7%	1	6.7%	23.1%	\$10	0.7%	18.4%	3	25.0%	23.9%	\$38	3.7%	17.4%					
	Upper	19	57.6%	\$4,626	90.2%	43.6%	10	66.7%	60.1%	\$1,315	97.3%	72.9%	6	50.0%	60.3%	\$858	84.6%	74.3%					
	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%					
	<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>\$5,130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,352</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,014</b>	<b>100.0%</b>	<b>100.0%</b>					
MULTI FAMILY	<b>Multi-Family Units</b>					Low	4	14.3%	\$29,715	23.1%	24.2%	0	0.0%	20.5%	\$0	0.0%	13.0%	1	8.3%	23.8%	\$7,248	17.7%	14.7%
	Moderate	9	32.1%	\$48,680	37.9%	32.2%	3	50.0%	33.2%	\$16,688	76.1%	27.8%	5	41.7%	37.3%	\$22,154	54.2%	27.9%					
	Middle	8	28.6%	\$40,224	31.3%	19.9%	1	16.7%	25.4%	\$2,650	12.1%	31.9%	4	33.3%	21.1%	\$7,322	17.9%	28.3%					
	Upper	7	25.0%	\$9,829	7.7%	23.6%	2	33.3%	20.5%	\$2,581	11.8%	27.1%	2	16.7%	17.8%	\$4,188	10.2%	29.0%					
	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%					
	<b>Total</b>	<b>28</b>	<b>100.0%</b>	<b>\$128,448</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,919</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$40,912</b>	<b>100.0%</b>	<b>100.0%</b>					
HMDA TOTALS	Low	21	3.9%	\$33,465	11.4%	4.9%	2	1.5%	1.8%	\$229	0.3%	2.1%	7	3.6%	1.9%	\$8,344	8.2%	2.4%					
	Moderate	114	21.4%	\$63,203	21.6%	22.8%	29	22.3%	11.3%	\$19,550	29.8%	8.6%	35	18.2%	10.8%	\$26,632	26.3%	8.2%					
	Middle	120	22.5%	\$59,446	20.3%	28.7%	26	20.0%	28.7%	\$7,814	11.9%	22.4%	38	19.8%	29.4%	\$13,462	13.3%	22.9%					
	Upper	278	52.2%	\$136,448	46.6%	43.6%	73	56.2%	58.2%	\$37,925	57.9%	66.7%	112	58.3%	57.9%	\$52,766	52.1%	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%					
	<b>Total</b>	<b>533</b>	<b>100.0%</b>	<b>\$292,562</b>	<b>100.0%</b>	<b>100.0%</b>	<b>130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$65,518</b>	<b>100.0%</b>	<b>100.0%</b>	<b>192</b>	<b>100.0%</b>	<b>100.0%</b>	<b>#####</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data



## Appendices

### Borrower Distribution of HMDA Loans

Assessment Area: TX Houston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		Count	Dollar	Count	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$(000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	31	8.3%	\$2,371	1.9%	25.0%	6	6.7%	3.2%	\$504	1.4%	1.4%	7	5.6%	3.2%	\$705	1.5%	1.4%
	Moderate	60	16.0%	\$7,971	6.4%	16.9%	11	12.4%	12.3%	\$1,162	3.3%	7.0%	19	15.3%	13.2%	\$2,586	5.6%	7.8%
	Middle	58	15.5%	\$10,426	8.4%	17.3%	19	21.3%	18.0%	\$3,474	9.9%	13.2%	14	11.3%	18.0%	\$2,868	6.2%	13.7%
	Upper	195	52.1%	\$95,059	76.4%	40.8%	50	56.2%	50.1%	\$26,143	74.7%	64.5%	80	64.5%	47.2%	\$38,115	83.0%	61.5%
	Unknown	30	8.0%	\$8,669	7.0%	0.0%	3	3.4%	16.4%	\$3,704	10.6%	14.0%	4	3.2%	18.4%	\$1,633	3.6%	15.6%
	<b>Total</b>	<b>374</b>	<b>100.0%</b>	<b>\$124,496</b>	<b>100.0%</b>	<b>100.0%</b>	<b>89</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,987</b>	<b>100.0%</b>	<b>100.0%</b>	<b>124</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$45,907</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	12	12.2%	\$1,028	3.0%	25.0%	4	20.0%	5.5%	\$336	4.6%	2.7%	7	15.9%	3.9%	\$581	4.3%	1.7%
	Moderate	13	13.3%	\$1,093	3.2%	16.9%	2	10.0%	11.1%	\$116	1.6%	6.2%	7	15.9%	9.6%	\$667	5.0%	5.1%
	Middle	11	11.2%	\$1,778	5.2%	17.3%	0	0.0%	17.1%	\$0	0.0%	11.8%	6	13.6%	15.5%	\$1,054	7.9%	10.3%
	Upper	59	60.2%	\$28,209	81.8%	40.8%	14	70.0%	46.1%	\$6,808	93.8%	60.7%	22	50.0%	49.1%	\$10,489	78.4%	62.7%
	Unknown	3	3.1%	\$2,380	6.9%	0.0%	0	0.0%	20.3%	\$0	0.0%	18.6%	2	4.5%	21.9%	\$580	4.3%	20.1%
	<b>Total</b>	<b>98</b>	<b>100.0%</b>	<b>\$34,488</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,260</b>	<b>100.0%</b>	<b>100.0%</b>	<b>44</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,371</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	1	3.0%	\$2	0.0%	25.0%	0	0.0%	5.2%	\$0	0.0%	1.9%	1	8.3%	5.3%	\$2	0.2%	1.4%
	Moderate	5	15.2%	\$128	2.5%	16.9%	3	20.0%	9.7%	\$24	1.8%	4.3%	2	16.7%	10.8%	\$104	10.3%	5.1%
	Middle	5	15.2%	\$181	3.5%	17.3%	3	20.0%	16.1%	\$21	1.6%	9.8%	0	0.0%	16.5%	\$0	0.0%	10.2%
	Upper	21	63.6%	\$2,389	46.6%	40.8%	9	60.0%	64.2%	\$1,307	96.7%	76.9%	9	75.0%	63.6%	\$908	89.5%	78.1%
	Unknown	1	3.0%	\$2,430	47.4%	0.0%	0	0.0%	4.8%	\$0	0.0%	7.2%	0	0.0%	3.8%	\$0	0.0%	5.1%
	<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>\$5,130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,352</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,014</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	25.0%	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%	16.9%	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%	17.3%	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%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	28	100.0%	\$128,448	100.0%	0.0%	6	100.0%	100.0%	\$21,919	100.0%	100.0%	12	100.0%	100.0%	\$40,912	100.0%	100.0%
	<b>Total</b>	<b>28</b>	<b>100.0%</b>	<b>\$128,448</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,919</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$40,912</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	44	8.3%	\$3,401	1.2%	25.0%	10	7.7%	3.9%	\$840	1.3%	1.5%	15	7.8%	3.5%	\$1,288	1.3%	1.4%
	Moderate	78	14.6%	\$9,192	3.1%	16.9%	16	12.3%	11.8%	\$1,302	2.0%	6.2%	28	14.6%	11.9%	\$3,357	3.3%	6.4%
	Middle	74	13.9%	\$12,385	4.2%	17.3%	22	16.9%	17.6%	\$3,495	5.3%	11.8%	20	10.4%	17.1%	\$3,922	3.9%	11.7%
	Upper	275	51.6%	\$125,657	43.0%	40.8%	73	56.2%	49.4%	\$34,258	52.3%	58.7%	111	57.8%	48.2%	\$49,512	48.9%	57.3%
	Unknown	62	11.6%	\$141,927	48.5%	0.0%	9	6.9%	17.3%	\$25,623	39.1%	21.8%	18	9.4%	19.2%	\$43,125	42.6%	23.2%
	<b>Total</b>	<b>533</b>	<b>100.0%</b>	<b>\$292,562</b>	<b>100.0%</b>	<b>100.0%</b>	<b>130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$65,518</b>	<b>100.0%</b>	<b>100.0%</b>	<b>192</b>	<b>100.0%</b>	<b>100.0%</b>	<b>#####</b>	<b>100.0%</b>	<b>100.0%</b>

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											
		2014, 2015, 2016					2014					2015						
		Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ 000s	\$ %	\$ %	#	%	Agg %	\$ 000s	\$ %	Agg \$ %
SMALL BUSINESSES	Low	67	9.3%	\$9,233	7.6%	8.6%	25	11.8%	8.8%	\$3,144	7.9%	10.5%	22	8.1%	9.0%	\$2,077	5.2%	10.3%
	Moderate	177	24.5%	\$22,393	18.5%	20.0%	60	28.3%	19.2%	\$8,834	22.1%	20.2%	65	23.8%	19.7%	\$6,566	16.4%	20.0%
	Middle	170	23.6%	\$29,277	24.2%	24.4%	39	18.4%	23.5%	\$10,261	25.7%	23.5%	73	26.7%	24.0%	\$10,342	25.8%	23.9%
	Upper	307	42.6%	\$60,096	49.7%	47.0%	88	41.5%	46.8%	\$17,682	44.3%	44.6%	113	41.4%	45.9%	\$21,152	52.7%	44.9%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.1%	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%	1.0%	0	0.0%	1.4%	\$0	0.0%	0.9%
	<b>Total</b>	<b>721</b>	<b>100.0%</b>	<b>\$120,999</b>	<b>100.0%</b>	<b>100.0%</b>	<b>212</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$39,921</b>	<b>100.0%</b>	<b>100.0%</b>	<b>273</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$40,137</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL FARM					<b>Small Farms</b>													
	Low	0	0.0%	\$0	0.0%	3.4%	0	0.0%	0.6%	\$0	0.0%	0.1%	0	0.0%	2.3%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	10.1%	0	0.0%	8.8%	\$0	0.0%	10.7%	0	0.0%	8.5%	\$0	0.0%	5.6%
	Middle	0	0.0%	\$0	0.0%	27.3%	0	0.0%	42.4%	\$0	0.0%	58.3%	0	0.0%	40.5%	\$0	0.0%	55.2%
	Upper	0	0.0%	\$0	0.0%	59.2%	0	0.0%	43.8%	\$0	0.0%	28.3%	0	0.0%	45.8%	\$0	0.0%	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%	4.4%	\$0	0.0%	2.5%	0	0.0%	2.9%	\$0	0.0%	2.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses	2014			2015									
		Count		Dollar			#	%	%	Count		Dollar							
		#	%	\$ (000s)	\$ %	Bank				Agg	Bank	Agg	Bank	Agg	Bank	Agg			
		#	%	\$ (000s)	\$ %	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %				
Small Business	Revenue	\$1 Million or Less	421	58.4%	\$32,111	26.5%	90.2%	108	50.9%	43.7%	\$10,877	27.2%	31.8%	167	61.2%	46.9%	\$11,169	27.8%	32.0%
		Over \$1 Million	262	36.3%	\$81,250	67.1%	9.0%	85	40.1%				99	36.3%					
		Total Rev. available	683	94.7%	\$113,361	93.6%	99.2%	193	91.0%				266	97.5%					
		Rev. Not Known	38	5.3%	\$7,638	6.3%	0.8%	19	9.0%				7	2.6%					
		Total	721	100.0%	\$120,999	100.0%	100.0%	212	100.0%				273	100.0%					
	Loan Size	\$100,000 or Less	466	64.6%	\$16,247	13.4%		126	59.4%	93.5%	\$3,882	9.7%	34.8%	185	67.8%	93.3%	\$6,828	17.0%	34.9%
		\$100,001 - \$250,000	107	14.8%	\$19,845	16.4%		40	18.9%	3.0%	\$7,353	18.4%	13.8%	37	13.6%	3.1%	\$6,673	16.6%	13.7%
		\$250,001 - \$1 Million	148	20.5%	\$84,907	70.2%		46	21.7%	3.5%	\$28,686	71.9%	51.4%	51	18.7%	3.6%	\$26,636	66.4%	51.4%
		Total	721	100.0%	\$120,999	100.0%		212	100.0%	100.0%	\$39,921	100.0%	100.0%	273	100.0%	100.0%	\$40,137	100.0%	100.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	360	85.5%	\$11,707	36.5%													
		\$100,001 - \$250,000	32	7.6%	\$5,372	16.7%													
		\$250,001 - \$1 Million	29	6.9%	\$15,032	46.8%													
		Total	421	100.0%	\$32,111	100.0%													
Small Farm	Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	97.6%	0	0.0%	50.3%	\$0	0.0%	67.2%	0	0.0%	52.6%	\$0	0.0%	74.8%
		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%	99.9%	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%					
	Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	86.8%	\$0	0.0%	36.7%	0	0.0%	85.3%	\$0	0.0%	31.6%
		\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.4%	\$0	0.0%	22.2%	0	0.0%	8.2%	\$0	0.0%	24.1%
		\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.9%	\$0	0.0%	41.1%	0	0.0%	6.5%	\$0	0.0%	44.3%
		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%
	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 with revenue over \$1 million or revenue unknown, and for loan size by revenue.  
2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### APPENDIX H – LIMITED SCOPE ASSESSMENT AREA LENDING TABLES

#### 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 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank		Owner Occupied Units	2014		2015											
		Count	Dollar		Count		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	2.8%	\$898	2.1%	15.1%	2	5.9%	7.0%	\$780	7.3%	5.0%	0	0.0%	6.8%	\$0	0.0%	5.2%
	Middle	62	57.4%	\$26,581	60.7%	60.1%	16	47.1%	58.2%	\$4,960	46.3%	54.6%	24	63.2%	58.3%	\$15,859	72.4%	54.9%
	Upper	43	39.8%	\$16,304	37.2%	24.8%	16	47.1%	34.8%	\$4,969	46.4%	40.4%	14	36.8%	34.9%	\$6,040	27.6%	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%
	<b>Total</b>	<b>108</b>	<b>100.0%</b>	<b>\$43,783</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,709</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,899</b>	<b>100.0%</b>	<b>100.0%</b>
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	11.5%	\$1,121	5.8%	15.1%	1	10.0%	9.3%	\$205	6.2%	6.9%	2	10.5%	8.7%	\$291	4.5%	6.9%
	Middle	31	59.6%	\$12,098	63.0%	60.1%	6	60.0%	60.7%	\$1,702	51.6%	57.0%	11	57.9%	57.7%	\$4,325	66.2%	55.7%
	Upper	15	28.8%	\$5,977	31.1%	24.8%	3	30.0%	29.9%	\$1,391	42.2%	36.1%	6	31.6%	33.6%	\$1,922	29.4%	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%
	<b>Total</b>	<b>52</b>	<b>100.0%</b>	<b>\$19,196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,298</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,538</b>	<b>100.0%</b>	<b>100.0%</b>
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%	15.1%	0	0.0%	17.5%	\$0	0.0%	11.0%	0	0.0%	16.1%	\$0	0.0%	10.5%
	Middle	7	87.5%	\$3,461	98.2%	60.1%	2	100.0%	58.2%	\$32	100.0%	55.7%	3	75.0%	62.7%	\$3,349	98.1%	67.0%
	Upper	1	12.5%	\$65	1.8%	24.8%	0	0.0%	24.2%	\$0	0.0%	33.3%	1	25.0%	21.2%	\$65	1.9%	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%
	<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>\$3,526</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,414</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	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%	7.7%	\$0	0.0%	1.1%	0	0.0%	14.3%	\$0	0.0%	2.0%
	Middle	0	0.0%	\$0	0.0%	67.1%	0	0.0%	69.2%	\$0	0.0%	74.4%	0	0.0%	57.1%	\$0	0.0%	45.5%
	Upper	1	100.0%	\$6,794	100.0%	31.9%	0	0.0%	23.1%	\$0	0.0%	24.5%	1	100.0%	28.6%	\$6,794	100.0%	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%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$6,794</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,794</b>	<b>100.0%</b>	<b>100.0%</b>	
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	5.3%	\$2,019	2.8%	15.1%	3	6.5%	8.2%	\$985	7.0%	5.5%	2	3.2%	7.8%	\$291	0.8%	5.6%
	Middle	100	59.2%	\$42,140	57.5%	60.1%	24	52.2%	59.0%	\$6,694	47.7%	56.2%	38	61.3%	58.3%	\$23,533	60.9%	55.0%
	Upper	60	35.5%	\$29,140	39.8%	24.8%	19	41.3%	32.9%	\$6,360	45.3%	38.4%	22	35.5%	34.0%	\$14,821	38.4%	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%
	<b>Total</b>	<b>169</b>	<b>100.0%</b>	<b>\$73,299</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,039</b>	<b>100.0%</b>	<b>100.0%</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$38,645</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	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	4.6%	\$489	1.1%	10.0%	2	3.2%	7.8%	\$11	0.1%	7.3%	4	6.6%	8.2%	\$427	3.6%	9.2%
	Middle	164	83.7%	\$34,490	80.3%	69.6%	47	75.8%	63.6%	\$9,544	67.4%	67.8%	52	85.2%	65.3%	\$9,909	84.4%	66.3%
	Upper	23	11.7%	\$7,950	18.5%	20.3%	13	21.0%	25.1%	\$4,599	32.5%	23.7%	5	8.2%	23.7%	\$1,402	11.9%	23.6%
	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%	3.5%	\$0	0.0%	1.1%	0	0.0%	2.8%	\$0	0.0%	0.9%
<b>Total</b>	<b>196</b>	<b>100.0%</b>	<b>\$42,929</b>	<b>100.0%</b>	<b>100.0%</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,154</b>	<b>100.0%</b>	<b>100.0%</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,738</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Small Farms</b>																	
	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%	46.0%	\$0	0.0%	27.0%	0	0.0%	28.4%	\$0	0.0%	13.6%
	Middle	0	0.0%	\$0	0.0%	60.4%	0	0.0%	44.4%	\$0	0.0%	49.3%	0	0.0%	53.1%	\$0	0.0%	48.8%
	Upper	0	0.0%	\$0	0.0%	12.3%	0	0.0%	7.9%	\$0	0.0%	23.3%	0	0.0%	17.3%	\$0	0.0%	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%	1.6%	\$0	0.0%	0.4%	0	0.0%	1.2%	\$0	0.0%	0.4%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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											
		2014, 2015, 2016					2014					2015						
		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	2	1.9%	\$213	0.5%	19.4%	1	2.9%	6.0%	\$95	0.9%	3.0%	0	0.0%	2.9%	\$0	0.0%	1.3%
	Moderate	11	10.2%	\$1,591	3.6%	18.6%	5	14.7%	17.9%	\$767	7.2%	11.9%	2	5.3%	12.0%	\$288	1.3%	7.7%
	Middle	10	9.3%	\$2,046	4.7%	21.5%	3	8.8%	18.0%	\$603	5.6%	15.2%	2	5.3%	17.3%	\$423	1.9%	13.4%
	Upper	81	75.0%	\$38,530	88.0%	40.4%	24	70.6%	39.9%	\$8,975	83.8%	51.8%	32	84.2%	46.9%	\$20,504	93.6%	56.4%
	Unknown	4	3.7%	\$1,403	3.2%	0.0%	1	2.9%	18.3%	\$269	2.5%	18.2%	2	5.3%	20.9%	\$684	3.1%	21.2%
	<b>Total</b>	<b>108</b>	<b>100.0%</b>	<b>\$43,783</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,709</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,899</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	1	1.9%	\$160	0.8%	19.4%	0	0.0%	8.8%	\$0	0.0%	4.8%	0	0.0%	3.9%	\$0	0.0%	1.8%
	Moderate	1	1.9%	\$226	1.2%	18.6%	0	0.0%	14.4%	\$0	0.0%	8.9%	1	5.3%	10.2%	\$226	3.5%	6.1%
	Middle	3	5.8%	\$466	2.4%	21.5%	1	10.0%	17.4%	\$207	6.3%	13.4%	1	5.3%	15.7%	\$65	1.0%	11.4%
	Upper	44	84.6%	\$17,133	89.3%	40.4%	8	80.0%	37.6%	\$2,660	80.7%	47.3%	15	78.9%	44.8%	\$5,467	83.6%	54.2%
	Unknown	3	5.8%	\$1,211	6.3%	0.0%	1	10.0%	21.8%	\$431	13.1%	25.6%	2	10.5%	25.4%	\$780	11.9%	26.4%
	<b>Total</b>	<b>52</b>	<b>100.0%</b>	<b>\$19,196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,298</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,538</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	14.1%	\$0	0.0%	5.4%	0	0.0%	8.2%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	19.5%	\$0	0.0%	10.9%	0	0.0%	12.0%	\$0	0.0%	6.2%
	Middle	1	12.5%	\$25	0.7%	21.5%	1	50.0%	22.6%	\$25	78.1%	22.7%	0	0.0%	31.3%	\$0	0.0%	16.5%
	Upper	7	87.5%	\$3,501	99.3%	40.4%	1	50.0%	40.1%	\$7	21.9%	57.7%	4	100.0%	42.1%	\$3,414	100.0%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.7%	\$0	0.0%	3.3%	0	0.0%	6.3%	\$0	0.0%	14.9%
	<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>\$3,526</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,414</b>	<b>100.0%</b>	<b>100.0%</b>
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	1	100.0%	\$6,794	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$6,794	100.0%	100.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$6,794</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,794</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	3	1.8%	\$373	0.5%	19.4%	1	2.2%	7.2%	\$95	0.7%	3.4%	0	0.0%	3.4%	\$0	0.0%	1.4%
	Moderate	12	7.1%	\$1,817	2.5%	18.6%	5	10.9%	16.9%	\$767	5.5%	10.5%	3	4.8%	11.4%	\$514	1.3%	6.9%
	Middle	14	8.3%	\$2,537	3.5%	21.5%	5	10.9%	18.0%	\$835	5.9%	14.1%	3	4.8%	17.3%	\$488	1.3%	12.3%
	Upper	132	78.1%	\$59,164	80.7%	40.4%	33	71.7%	39.1%	\$11,642	82.9%	48.3%	51	82.3%	46.0%	\$29,385	76.0%	53.6%
	Unknown	8	4.7%	\$9,408	12.8%	0.0%	2	4.3%	18.9%	\$700	5.0%	23.7%	5	8.1%	21.9%	\$8,258	21.4%	25.8%
	<b>Total</b>	<b>169</b>	<b>100.0%</b>	<b>\$73,299</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,039</b>	<b>100.0%</b>	<b>100.0%</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$38,645</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	84	42.9%	\$8,615	20.1%	91.7%	26	41.9%	51.6%	\$4,417	31.2%	43.5%	29	47.5%	51.9%	\$1,895	16.1%	44.4%
	Over \$1 Million	99	50.5%	\$33,618	78.3%	7.4%	25	40.3%					31	50.8%				
	<b>Total Rev. available</b>	<b>183</b>	<b>93.4%</b>	<b>\$42,233</b>	<b>98.4%</b>	<b>99.1%</b>	<b>51</b>	<b>82.2%</b>					<b>60</b>	<b>98.3%</b>				
	Rev. Not Known	13	6.6%	\$696	1.6%	0.9%	11	17.7%					1	1.6%				
<b>Total</b>	<b>196</b>	<b>100.0%</b>	<b>\$42,929</b>	<b>100.0%</b>	<b>100.0%</b>	<b>62</b>	<b>100.0%</b>					<b>61</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	102	52.0%	\$3,284	7.6%		34	54.8%	90.5%	\$894	6.3%	30.5%	34	55.7%	89.4%	\$1,234	10.5%	30.9%
	\$100,001 - \$250,000	36	18.4%	\$7,172	16.7%		7	11.3%	4.8%	\$1,465	10.4%	17.7%	13	21.3%	5.2%	\$2,587	22.0%	18.3%
	\$250,001 - \$1 Million	58	29.6%	\$32,473	75.6%		21	33.9%	4.7%	\$11,795	83.3%	51.8%	14	23.0%	5.4%	\$7,917	67.4%	50.9%
	<b>Total</b>	<b>196</b>	<b>100.0%</b>	<b>\$42,929</b>	<b>100.0%</b>		<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,154</b>	<b>100.0%</b>	<b>100.0%</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,738</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.0%	0	0.0%	34.9%	\$0	0.0%	65.8%	0	0.0%	28.4%	\$0	0.0%	59.6%
	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%				
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>0</b>	<b>0.0%</b>				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.1%	\$0	0.0%	26.7%	0	0.0%	91.4%	\$0	0.0%	37.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.2%	\$0	0.0%	15.2%	0	0.0%	6.2%	\$0	0.0%	33.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	58.1%	0	0.0%	2.5%	\$0	0.0%	29.6%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>		<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

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 Huntsville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014						2015					
		Bank		Dollar			Count		Dollar				Count		Dollar			
		#	%	\$ (000s)	\$ %		Bank #	Agg %	\$ (000s)	\$ %	\$ %	Bank #	Agg %	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	1.1%	\$46	0.2%	4.2%	0	0.0%	2.0%	\$0	0.0%	0.7%	0	0.0%	2.2%	\$0	0.0%	0.9%
	Moderate	10	10.9%	\$1,150	5.8%	16.2%	1	5.6%	10.0%	\$112	1.9%	6.3%	5	9.3%	10.1%	\$467	4.7%	6.3%
	Middle	28	30.4%	\$4,112	20.8%	37.5%	4	22.2%	40.3%	\$558	9.6%	36.0%	18	33.3%	40.6%	\$2,651	26.6%	37.0%
	Upper	53	57.6%	\$14,455	73.1%	42.0%	13	72.2%	47.6%	\$5,119	88.4%	57.1%	31	57.4%	47.0%	\$6,860	68.8%	55.8%
	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	92	100.0%	\$19,763	100.0%	100.0%	18	100.0%	100.0%	\$5,789	100.0%	100.0%	54	100.0%	100.0%	\$9,978	100.0%	100.0%
REFINANCE	Low	1	2.0%	\$59	0.4%	4.2%	1	6.3%	2.5%	\$59	1.1%	1.4%	0	0.0%	1.9%	\$0	0.0%	1.0%
	Moderate	2	4.1%	\$283	1.8%	16.2%	1	6.3%	12.0%	\$133	2.5%	7.1%	1	7.1%	11.5%	\$150	3.5%	7.4%
	Middle	14	28.6%	\$2,794	18.2%	37.5%	3	18.8%	39.9%	\$349	6.5%	35.7%	3	21.4%	39.2%	\$779	18.1%	34.0%
	Upper	32	65.3%	\$12,232	79.6%	42.0%	11	68.8%	45.6%	\$4,800	89.9%	55.7%	10	71.4%	47.4%	\$3,380	78.4%	57.6%
	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%	\$15,368	100.0%	100.0%	16	100.0%	100.0%	\$5,341	100.0%	100.0%	14	100.0%	100.0%	\$4,309	100.0%	100.0%
HOME IMPROVEMENT	Low	2	11.8%	\$19	1.3%	4.2%	1	20.0%	3.1%	\$13	2.2%	1.1%	0	0.0%	3.2%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	16.7%	\$0	0.0%	10.6%	0	0.0%	17.7%	\$0	0.0%	10.4%
	Middle	9	52.9%	\$154	10.2%	37.5%	2	40.0%	44.7%	\$61	10.2%	36.5%	5	62.5%	44.0%	\$58	13.1%	32.8%
	Upper	6	35.3%	\$1,337	88.5%	42.0%	2	40.0%	35.5%	\$522	87.6%	51.8%	3	37.5%	35.2%	\$385	86.9%	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%
	Total	17	100.0%	\$1,510	100.0%	100.0%	5	100.0%	100.0%	\$596	100.0%	100.0%	8	100.0%	100.0%	\$443	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	61.5%	\$0	0.0%	33.6%	0	0.0%	38.7%	\$0	0.0%	3.4%
	Moderate	1	50.0%	\$21,249	68.0%	33.5%	0	0.0%	30.8%	\$0	0.0%	29.0%	0	0.0%	29.0%	\$0	0.0%	27.3%
	Middle	0	0.0%	\$0	0.0%	26.9%	0	0.0%	7.7%	\$0	0.0%	37.4%	0	0.0%	12.9%	\$0	0.0%	22.3%
	Upper	1	50.0%	\$9,999	32.0%	15.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	19.4%	\$9,999	100.0%	47.0%
	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	2	100.0%	\$31,248	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$9,999	100.0%	100.0%	
HMDA TOTALS	Low	4	2.5%	\$124	0.2%	4.2%	2	5.1%	2.4%	\$72	0.6%	1.3%	0	0.0%	2.3%	\$0	0.0%	1.1%
	Moderate	13	8.1%	\$22,682	33.4%	16.2%	2	5.1%	11.5%	\$245	2.1%	6.9%	6	7.8%	11.4%	\$617	2.5%	7.9%
	Middle	51	31.9%	\$7,060	10.4%	37.5%	9	23.1%	40.6%	\$968	8.3%	35.9%	26	33.8%	40.4%	\$3,488	14.1%	35.0%
	Upper	92	57.5%	\$38,023	56.0%	42.0%	26	66.7%	45.5%	\$10,441	89.0%	55.9%	45	58.4%	45.9%	\$20,624	83.4%	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	160	100.0%	\$67,889	100.0%	100.0%	39	100.0%	100.0%	\$11,726	100.0%	100.0%	77	100.0%	100.0%	\$24,729	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	38	19.3%	\$5,110	16.3%	11.2%	10	17.2%	13.1%	\$1,636	13.9%	20.2%	17	26.6%	13.8%	\$1,750	23.0%	18.6%
	Moderate	27	13.7%	\$6,494	20.7%	18.8%	9	15.5%	14.3%	\$3,455	29.5%	18.3%	3	4.7%	14.8%	\$283	3.7%	16.4%
	Middle	59	29.9%	\$9,263	29.5%	32.0%	15	25.9%	29.4%	\$2,579	22.0%	25.8%	16	25.0%	27.4%	\$2,061	27.1%	22.9%
	Upper	73	37.1%	\$10,549	33.6%	38.0%	24	41.4%	42.0%	\$4,060	34.6%	35.3%	28	43.8%	43.4%	\$3,518	46.2%	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%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	0.4%	0	0.0%	0.6%	\$0	0.0%	0.3%
Total	197	100.0%	\$31,416	100.0%	100.0%	58	100.0%	100.0%	\$11,730	100.0%	100.0%	64	100.0%	100.0%	\$7,612	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.7%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	14.4%	0	0.0%	22.4%	\$0	0.0%	20.3%	0	0.0%	13.5%	\$0	0.0%	31.8%
	Middle	3	75.0%	\$5	6.3%	55.8%	3	100.0%	53.7%	\$5	100.0%	38.9%	0	0.0%	54.1%	\$0	0.0%	32.6%
	Upper	1	25.0%	\$75	93.8%	28.2%	0	0.0%	23.9%	\$0	0.0%	40.8%	1	100.0%	29.7%	\$75	100.0%	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%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	4	100.0%	\$80	100.0%	100.0%	3	100.0%	100.0%	\$5	100.0%	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: AL Huntsville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		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	7	7.6%	\$544	2.8%	21.7%	0	0.0%	9.7%	\$0	0.0%	5.0%	7	13.0%	12.2%	\$544	5.5%	6.7%
	Moderate	18	19.6%	\$1,673	8.5%	15.5%	2	11.1%	17.3%	\$224	3.9%	12.2%	12	22.2%	18.2%	\$1,161	11.6%	13.8%
	Middle	20	21.7%	\$2,803	14.2%	18.3%	4	22.2%	19.6%	\$430	7.4%	18.6%	12	22.2%	19.1%	\$1,530	15.3%	19.0%
	Upper	42	45.7%	\$14,379	72.8%	44.5%	12	66.7%	32.1%	\$5,135	88.7%	44.5%	21	38.9%	30.0%	\$6,558	65.7%	42.1%
	Unknown	5	5.4%	\$364	1.8%	0.0%	0	0.0%	21.3%	\$0	0.0%	19.7%	2	3.7%	20.6%	\$185	1.9%	18.5%
	Total	92	100.0%	\$19,763	100.0%	100.0%	18	100.0%	100.0%	\$5,789	100.0%	100.0%	54	100.0%	100.0%	\$9,978	100.0%	100.0%
REFINANCE	Low	5	10.2%	\$488	3.2%	21.7%	5	31.3%	8.4%	\$488	9.1%	4.2%	0	0.0%	8.0%	\$0	0.0%	4.2%
	Moderate	1	2.0%	\$150	1.0%	15.5%	1	6.3%	13.4%	\$150	2.8%	8.9%	0	0.0%	12.0%	\$0	0.0%	8.3%
	Middle	7	14.3%	\$1,173	7.6%	18.3%	2	12.5%	14.6%	\$285	5.3%	12.1%	2	14.3%	16.5%	\$402	9.3%	14.3%
	Upper	34	69.4%	\$12,942	84.2%	44.5%	7	43.8%	34.4%	\$4,218	79.0%	44.4%	11	78.6%	30.6%	\$3,492	81.0%	39.1%
	Unknown	2	4.1%	\$615	4.0%	0.0%	1	6.3%	29.2%	\$200	3.7%	30.4%	1	7.1%	32.9%	\$415	9.6%	34.2%
	Total	49	100.0%	\$15,368	100.0%	100.0%	16	100.0%	100.0%	\$5,341	100.0%	100.0%	14	100.0%	100.0%	\$4,309	100.0%	100.0%
HOME IMPROVEMENT	Low	1	5.9%	\$9	0.6%	21.7%	0	0.0%	17.4%	\$0	0.0%	7.2%	1	12.5%	20.1%	\$9	2.0%	6.2%
	Moderate	1	5.9%	\$6	0.4%	15.5%	0	0.0%	25.3%	\$0	0.0%	12.3%	0	0.0%	23.1%	\$0	0.0%	12.5%
	Middle	7	41.2%	\$85	5.6%	18.3%	2	40.0%	21.8%	\$26	4.4%	18.7%	4	50.0%	24.6%	\$49	11.1%	18.9%
	Upper	5	29.4%	\$1,280	84.8%	44.5%	3	60.0%	32.4%	\$570	95.6%	49.2%	1	12.5%	29.6%	\$280	63.2%	52.4%
	Unknown	3	17.6%	\$130	8.6%	0.0%	0	0.0%	3.1%	\$0	0.0%	12.5%	2	25.0%	2.6%	\$105	23.7%	10.1%
	Total	17	100.0%	\$1,510	100.0%	100.0%	5	100.0%	100.0%	\$596	100.0%	100.0%	8	100.0%	100.0%	\$443	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%	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%	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%	44.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$31,248	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$9,999	100.0%	100.0%
	Total	2	100.0%	\$31,248	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$9,999	100.0%	100.0%
HMDA TOTALS	Low	13	8.1%	\$1,041	1.5%	21.7%	5	12.8%	10.1%	\$488	4.2%	4.7%	8	10.4%	11.5%	\$553	2.2%	5.4%
	Moderate	20	12.5%	\$1,829	2.7%	15.5%	3	7.7%	16.9%	\$374	3.2%	10.9%	12	15.6%	16.5%	\$1,161	4.7%	11.0%
	Middle	34	21.3%	\$4,061	6.0%	18.3%	8	20.5%	18.2%	\$741	6.3%	16.2%	18	23.4%	18.7%	\$1,981	8.0%	16.2%
	Upper	81	50.6%	\$28,601	42.1%	44.5%	22	56.4%	32.8%	\$9,923	84.6%	44.1%	33	42.9%	30.1%	\$10,330	41.8%	38.8%
	Unknown	12	7.5%	\$32,357	47.7%	0.0%	1	2.6%	21.9%	\$200	1.7%	24.0%	6	7.8%	23.2%	\$10,704	43.3%	28.7%
	Total	160	100.0%	\$67,889	100.0%	100.0%	39	100.0%	100.0%	\$11,726	100.0%	100.0%	77	100.0%	100.0%	\$24,729	100.0%	100.0%
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	105	53.3%	\$9,359	29.8%	90.3%	28	48.3%	50.5%	\$3,280	28.0%	42.6%	40	62.5%	55.5%	\$2,240	29.4%	46.4%
	Over \$1 Million	83	42.1%	\$21,508	68.5%	9.0%	25	43.1%					24	37.5%				
	Total Rev. available	188	95.4%	\$30,867	98.3%	99.3%	53	91.4%					64	100.0%				
	Rev. Not Known	9	4.6%	\$549	1.7%	0.7%	5	8.6%					0	0.0%				
Total	197	100.0%	\$31,416	100.0%	100.0%	58	100.0%					64	100.0%					
Small Business Loan Size	\$100,000 or Less	132	67.0%	\$4,447	14.2%		33	56.9%	89.7%	\$1,028	8.8%	28.8%	49	76.6%	89.2%	\$1,828	24.0%	28.2%
	\$100,001 - \$250,000	25	12.7%	\$5,059	16.1%		10	17.2%	5.4%	\$1,948	16.6%	19.8%	6	9.4%	5.3%	\$1,250	16.4%	18.1%
	\$250,001 - \$1 Million	40	20.3%	\$21,910	69.7%		15	25.9%	4.9%	\$8,754	74.6%	51.4%	9	14.1%	5.5%	\$4,534	59.6%	53.7%
	Total	197	100.0%	\$31,416	100.0%		58	100.0%	100.0%	\$11,730	100.0%	100.0%	64	100.0%	100.0%	\$7,612	100.0%	100.0%
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	4	100.0%	\$80	100.0%	96.3%	3	100.0%	44.8%	\$5	100.0%	44.3%	1	100.0%	40.5%	\$75	100.0%	70.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	3.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	4	100.0%	\$80	100.0%	100.0%	3	100.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	4	100.0%	\$80	100.0%		3	100.0%	82.1%	\$5	100.0%	20.8%	1	100.0%	83.8%	\$75	100.0%	27.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.5%	\$0	0.0%	18.5%	0	0.0%	5.4%	\$0	0.0%	12.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.4%	\$0	0.0%	60.7%	0	0.0%	10.8%	\$0	0.0%	60.0%
	Total	4	100.0%	\$80	100.0%		3	100.0%	100.0%	\$5	100.0%	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: AL Mobile

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014						2015					
		Bank		Dollar			Count		Dollar				Count		Dollar			
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	7	9.7%	\$1,368	5.9%	19.6%	3	23.1%	10.0%	\$570	21.7%	6.9%	3	8.8%	10.2%	\$528	4.2%	7.1%
	Middle	15	20.8%	\$5,296	22.7%	40.7%	3	23.1%	39.4%	\$603	22.9%	36.6%	7	20.6%	40.0%	\$3,510	27.8%	37.1%
	Upper	50	69.4%	\$16,647	71.4%	35.6%	7	53.8%	50.1%	\$1,457	55.4%	56.3%	24	70.6%	49.4%	\$8,604	68.1%	55.5%
	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%
	<b>Total</b>	<b>72</b>	<b>100.0%</b>	<b>\$23,311</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,630</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,642</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	0.8%	\$0	0.0%	0.5%	0	0.0%	1.2%	\$0	0.0%	0.6%
	Moderate	1	2.0%	\$58	0.4%	19.6%	1	9.1%	12.6%	\$58	1.8%	8.5%	0	0.0%	12.5%	\$0	0.0%	8.5%
	Middle	11	21.6%	\$2,333	14.9%	40.7%	2	18.2%	39.9%	\$379	11.9%	35.8%	4	20.0%	38.5%	\$986	14.9%	35.6%
	Upper	39	76.5%	\$13,252	84.7%	35.6%	8	72.7%	46.7%	\$2,741	86.2%	55.2%	16	80.0%	47.8%	\$5,632	85.1%	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%
	<b>Total</b>	<b>51</b>	<b>100.0%</b>	<b>\$15,643</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,178</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,618</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	3.3%	\$0	0.0%	1.9%	0	0.0%	3.1%	\$0	0.0%	1.4%
	Moderate	2	33.3%	\$357	50.1%	19.6%	0	0.0%	16.3%	\$0	0.0%	10.6%	1	50.0%	17.2%	\$352	95.4%	11.9%
	Middle	0	0.0%	\$0	0.0%	40.7%	0	0.0%	37.8%	\$0	0.0%	37.3%	0	0.0%	40.8%	\$0	0.0%	38.4%
	Upper	4	66.7%	\$355	49.9%	35.6%	1	100.0%	42.6%	\$272	100.0%	50.2%	1	50.0%	38.9%	\$17	4.6%	48.2%
	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%
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$712</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$272</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$369</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	6.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.5%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	34.3%	0	0.0%	5.9%	\$0	0.0%	0.6%	0	0.0%	36.4%	\$0	0.0%	8.6%
	Middle	1	100.0%	\$1,650	100.0%	35.5%	0	0.0%	47.1%	\$0	0.0%	13.4%	0	0.0%	36.4%	\$0	0.0%	54.2%
	Upper	0	0.0%	\$0	0.0%	24.1%	0	0.0%	47.1%	\$0	0.0%	86.1%	0	0.0%	22.7%	\$0	0.0%	36.6%
	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%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$1,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	0.8%	\$0	0.0%	0.3%	0	0.0%	0.9%	\$0	0.0%	0.4%
	Moderate	10	7.7%	\$1,783	4.3%	19.6%	4	16.0%	11.3%	\$628	10.3%	7.1%	4	7.1%	11.5%	\$880	4.5%	7.8%
	Middle	27	20.8%	\$9,279	22.5%	40.7%	5	20.0%	39.5%	\$982	16.2%	34.8%	11	19.6%	39.5%	\$4,496	22.9%	37.9%
	Upper	93	71.5%	\$30,254	73.2%	35.6%	16	64.0%	48.4%	\$4,470	73.5%	57.8%	41	73.2%	48.0%	\$14,253	72.6%	53.9%
	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%
	<b>Total</b>	<b>130</b>	<b>100.0%</b>	<b>\$41,316</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,080</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$19,629</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	Small Businesses																	
	Low	48	13.9%	\$11,655	16.6%	5.8%	14	12.0%	6.1%	\$3,067	12.7%	8.5%	14	12.8%	6.3%	\$3,703	16.8%	8.5%
	Moderate	56	16.2%	\$9,734	13.8%	19.0%	19	16.2%	18.9%	\$3,071	12.7%	24.0%	19	17.4%	19.9%	\$4,054	18.4%	24.4%
	Middle	91	26.4%	\$18,103	25.7%	34.8%	33	28.2%	30.3%	\$6,232	25.8%	24.4%	29	26.6%	29.6%	\$5,350	24.3%	24.7%
	Upper	150	43.5%	\$30,882	43.9%	40.3%	51	43.6%	43.1%	\$11,800	48.8%	42.7%	47	43.1%	42.8%	\$8,928	40.5%	42.1%
	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%	1.5%	\$0	0.0%	0.4%	0	0.0%	1.3%	\$0	0.0%	0.3%
<b>Total</b>	<b>345</b>	<b>100.0%</b>	<b>\$70,374</b>	<b>100.0%</b>	<b>100.0%</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>109</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,035</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	4.9%	\$0	0.0%	12.3%	0	0.0%	4.1%	\$0	0.0%	11.5%
	Moderate	0	0.0%	\$0	0.0%	9.1%	0	0.0%	9.8%	\$0	0.0%	0.3%	0	0.0%	4.1%	\$0	0.0%	0.3%
	Middle	0	0.0%	\$0	0.0%	50.3%	0	0.0%	29.3%	\$0	0.0%	29.5%	0	0.0%	36.7%	\$0	0.0%	41.6%
	Upper	0	0.0%	\$0	0.0%	37.1%	0	0.0%	56.1%	\$0	0.0%	57.8%	0	0.0%	53.1%	\$0	0.0%	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	1.7%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Families by Family Income			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	2	2.8%	\$173	0.7%	23.2%	0	0.0%	4.5%	\$0	0.0%	2.4%	2	5.9%	3.8%	\$173	1.4%	2.0%
	Moderate	9	12.5%	\$1,070	4.6%	16.7%	2	15.4%	19.2%	\$244	9.3%	13.8%	2	5.9%	17.0%	\$286	2.3%	12.1%
	Middle	2	2.8%	\$166	0.7%	19.5%	1	7.7%	21.0%	\$53	2.0%	19.3%	1	2.9%	22.9%	\$113	0.9%	20.7%
	Upper	55	76.4%	\$20,924	89.8%	40.6%	9	69.2%	32.3%	\$2,297	87.3%	43.5%	26	76.5%	33.9%	\$11,128	88.0%	44.7%
	Unknown	4	5.6%	\$978	4.2%	0.0%	1	7.7%	23.0%	\$36	1.4%	21.0%	3	8.8%	22.5%	\$942	7.5%	20.5%
	<b>Total</b>	<b>72</b>	<b>100.0%</b>	<b>\$23,311</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,630</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,642</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	2	3.9%	\$154	1.0%	23.2%	2	18.2%	5.6%	\$154	4.8%	3.3%	0	0.0%	4.5%	\$0	0.0%	2.1%
	Moderate	3	5.9%	\$300	1.9%	16.7%	2	18.2%	13.0%	\$194	6.1%	8.6%	1	5.0%	11.0%	\$106	1.6%	7.1%
	Middle	1	2.0%	\$124	0.8%	19.5%	0	0.0%	16.9%	\$0	0.0%	13.5%	0	0.0%	16.0%	\$0	0.0%	12.6%
	Upper	41	80.4%	\$13,547	86.6%	40.6%	7	63.6%	36.9%	\$2,830	89.0%	45.4%	17	85.0%	39.2%	\$5,866	88.6%	46.7%
	Unknown	4	7.8%	\$1,518	9.7%	0.0%	0	0.0%	27.6%	\$0	0.0%	29.2%	2	10.0%	29.3%	\$646	9.8%	31.5%
	<b>Total</b>	<b>51</b>	<b>100.0%</b>	<b>\$15,643</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,178</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,618</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.2%	0	0.0%	9.0%	\$0	0.0%	2.7%	0	0.0%	8.3%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	18.7%	\$0	0.0%	11.7%	0	0.0%	17.0%	\$0	0.0%	9.9%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	19.6%	\$0	0.0%	13.2%	0	0.0%	19.9%	\$0	0.0%	12.4%
	Upper	4	66.7%	\$690	96.9%	40.6%	1	100.0%	44.8%	\$272	100.0%	63.2%	1	50.0%	49.2%	\$352	95.4%	61.6%
	Unknown	2	33.3%	\$22	3.1%	0.0%	0	0.0%	7.9%	\$0	0.0%	9.2%	1	50.0%	5.6%	\$17	4.6%	13.1%
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$712</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$272</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$369</b>	<b>100.0%</b>	<b>100.0%</b>
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	1	100.0%	\$1,650	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$1,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	4	3.1%	\$327	0.8%	23.2%	2	8.0%	5.2%	\$154	2.5%	2.6%	2	3.6%	4.3%	\$173	0.9%	1.9%
	Moderate	12	9.2%	\$1,370	3.3%	16.7%	4	16.0%	16.8%	\$438	7.2%	11.1%	3	5.4%	14.8%	\$392	2.0%	9.4%
	Middle	3	2.3%	\$290	0.7%	19.5%	1	4.0%	19.3%	\$53	0.9%	16.0%	1	1.8%	20.2%	\$113	0.6%	16.3%
	Upper	100	76.9%	\$35,161	85.1%	40.6%	17	68.0%	34.7%	\$5,399	88.8%	41.6%	44	78.6%	36.8%	\$17,346	88.4%	42.2%
	Unknown	11	8.5%	\$4,168	10.1%	0.0%	1	4.0%	24.0%	\$36	0.6%	28.8%	6	10.7%	23.9%	\$1,605	8.2%	30.2%
	<b>Total</b>	<b>130</b>	<b>100.0%</b>	<b>\$41,316</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,080</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$19,629</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	148	42.9%	\$21,323	30.3%	88.4%	49	41.9%	44.3%	\$8,242	34.1%	33.5%	48	44.0%	46.8%	\$5,035	22.9%	35.3%
	Over \$1 Million	171	49.6%	\$45,350	64.4%	10.9%	54	46.2%					57	52.3%				
	<b>Total Rev. available</b>	<b>319</b>	<b>92.5%</b>	<b>\$66,673</b>	<b>94.7%</b>	<b>99.3%</b>	<b>103</b>	<b>88.1%</b>					<b>105</b>	<b>96.3%</b>				
	Rev. Not Known	26	7.5%	\$3,701	5.3%	0.7%	14	12.0%					4	3.7%				
<b>Total</b>	<b>345</b>	<b>100.0%</b>	<b>\$70,374</b>	<b>100.0%</b>	<b>100.0%</b>	<b>117</b>	<b>100.0%</b>					<b>109</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	173	50.1%	\$8,153	11.6%		64	54.7%	83.6%	\$2,866	11.9%	22.7%	55	50.5%	84.0%	\$2,773	12.6%	22.5%
	\$100,001 - \$250,000	85	24.6%	\$15,294	21.7%		20	17.1%	8.0%	\$3,304	13.7%	19.0%	26	23.9%	7.4%	\$4,816	21.9%	17.4%
	\$250,001 - \$1 Million	87	25.2%	\$46,927	66.7%		33	28.2%	8.4%	\$18,000	74.5%	58.3%	28	25.7%	8.6%	\$14,446	65.6%	60.1%
	<b>Total</b>	<b>345</b>	<b>100.0%</b>	<b>\$70,374</b>	<b>100.0%</b>		<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>109</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,035</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	89.9%	0	0.0%	24.4%	\$0	0.0%	20.4%	0	0.0%	38.8%	\$0	0.0%	25.8%
	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%				
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>0</b>	<b>0.0%</b>				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	70.7%	\$0	0.0%	14.2%	0	0.0%	61.2%	\$0	0.0%	10.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	14.6%	\$0	0.0%	25.5%	0	0.0%	24.5%	\$0	0.0%	32.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	14.6%	\$0	0.0%	60.3%	0	0.0%	14.3%	\$0	0.0%	57.1%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>		<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

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 2014, 2015					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014				2015							
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	2	0.3%	\$318	0.3%	6.1%	2	0.7%	1.5%	\$318	0.8%	0.7%	0	0.0%	1.2%	\$0	0.0%	0.6%
	Moderate	45	7.3%	\$4,942	5.1%	17.6%	25	8.2%	10.3%	\$2,224	5.5%	6.4%	20	6.4%	8.8%	\$2,718	4.9%	5.6%
	Middle	242	39.2%	\$39,607	41.3%	40.5%	118	38.6%	37.7%	\$16,602	40.8%	35.4%	124	39.9%	38.5%	\$23,005	41.6%	36.3%
	Upper	328	53.2%	\$51,121	53.3%	35.8%	161	52.6%	50.4%	\$21,576	53.0%	57.6%	167	53.7%	51.5%	\$29,545	53.5%	57.6%
	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>617</i>	<i>100.0%</i>	<i>\$95,988</i>	<i>100.0%</i>	<i>100.0%</i>	<i>306</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$40,720</i>	<i>100.0%</i>	<i>100.0%</i>	<i>311</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$55,268</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	1.4%	\$95	0.7%	6.1%	1	2.6%	2.1%	\$95	1.4%	1.0%	0	0.0%	1.6%	\$0	0.0%	0.8%
	Moderate	2	2.7%	\$503	3.6%	17.6%	2	5.3%	10.5%	\$503	7.2%	6.4%	0	0.0%	9.8%	\$0	0.0%	5.9%
	Middle	33	44.6%	\$5,710	41.0%	40.5%	16	42.1%	40.2%	\$2,763	39.4%	39.1%	17	47.2%	38.9%	\$2,947	42.6%	36.7%
	Upper	38	51.4%	\$7,620	54.7%	35.8%	19	50.0%	47.2%	\$3,650	52.1%	53.6%	19	52.8%	49.6%	\$3,970	57.4%	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%
	<i>Total</i>	<i>74</i>	<i>100.0%</i>	<i>\$13,928</i>	<i>100.0%</i>	<i>100.0%</i>	<i>38</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,011</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,917</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	6.1%	0	0.0%	5.2%	\$0	0.0%	3.3%	0	0.0%	5.4%	\$0	0.0%	2.2%
	Moderate	1	6.3%	\$4	0.7%	17.6%	1	14.3%	16.3%	\$4	3.7%	12.2%	0	0.0%	14.2%	\$0	0.0%	7.8%
	Middle	4	25.0%	\$85	15.8%	40.5%	2	28.6%	42.6%	\$35	32.7%	44.3%	2	22.2%	43.9%	\$50	11.6%	45.8%
	Upper	11	68.8%	\$448	83.4%	35.8%	4	57.1%	35.9%	\$68	63.6%	40.2%	7	77.8%	36.4%	\$380	88.4%	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%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$537</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$107</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$430</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	1	100.0%	\$8,500	100.0%	14.5%	1	100.0%	27.8%	\$8,500	100.0%	20.8%	0	0.0%	8.3%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	23.8%	0	0.0%	33.3%	\$0	0.0%	31.3%	0	0.0%	33.3%	\$0	0.0%	25.5%
	Middle	0	0.0%	\$0	0.0%	28.2%	0	0.0%	11.1%	\$0	0.0%	0.8%	0	0.0%	16.7%	\$0	0.0%	4.5%
	Upper	0	0.0%	\$0	0.0%	33.5%	0	0.0%	27.8%	\$0	0.0%	47.2%	0	0.0%	41.7%	\$0	0.0%	67.0%
	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>1</i>	<i>100.0%</i>	<i>\$8,500</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,500</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>	
HMDA TOTALS	Low	4	0.6%	\$8,913	7.5%	6.1%	4	1.1%	2.0%	\$8,913	15.8%	2.1%	0	0.0%	1.6%	\$0	0.0%	0.8%
	Moderate	48	6.8%	\$5,449	4.6%	17.6%	28	8.0%	10.8%	\$2,731	4.8%	8.1%	20	5.6%	9.6%	\$2,718	4.3%	7.0%
	Middle	279	39.4%	\$45,402	38.2%	40.5%	136	38.6%	38.9%	\$19,400	34.4%	34.6%	143	40.2%	39.0%	\$26,002	41.5%	34.6%
	Upper	377	53.2%	\$59,189	49.8%	35.8%	184	52.3%	48.4%	\$25,294	44.9%	55.3%	193	54.2%	49.8%	\$33,895	54.1%	57.6%
	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>708</i>	<i>100.0%</i>	<i>\$118,953</i>	<i>100.0%</i>	<i>100.0%</i>	<i>352</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$56,338</i>	<i>100.0%</i>	<i>100.0%</i>	<i>356</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$62,615</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	4	6.7%	\$314	3.0%	13.0%	3	8.1%	14.7%	\$266	4.0%	21.7%	1	4.3%	13.0%	\$48	1.2%	18.1%
	Moderate	4	6.7%	\$179	1.7%	15.7%	3	8.1%	14.1%	\$178	2.7%	14.6%	1	4.3%	14.3%	\$1	0.0%	13.5%
	Middle	6	10.0%	\$1,179	11.2%	33.3%	4	10.8%	27.2%	\$1,024	15.5%	20.6%	2	8.7%	28.3%	\$155	4.0%	23.6%
	Upper	46	76.7%	\$8,857	84.1%	37.9%	27	73.0%	42.3%	\$5,155	77.8%	42.7%	19	82.6%	42.8%	\$3,702	94.8%	44.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	0.5%	0	0.0%	1.6%	\$0	0.0%	0.6%
<i>Total</i>	<i>60</i>	<i>100.0%</i>	<i>\$10,529</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,623</i>	<i>100.0%</i>	<i>100.0%</i>	<i>23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,906</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	2.3%	\$0	0.0%	0.4%	0	0.0%	1.6%	\$0	0.0%	0.1%
	Moderate	21	100.0%	\$3,550	100.0%	15.5%	18	100.0%	40.2%	\$2,983	100.0%	39.6%	3	100.0%	23.0%	\$567	100.0%	19.1%
	Middle	0	0.0%	\$0	0.0%	58.1%	0	0.0%	37.1%	\$0	0.0%	42.2%	0	0.0%	50.0%	\$0	0.0%	45.3%
	Upper	0	0.0%	\$0	0.0%	23.5%	0	0.0%	19.7%	\$0	0.0%	17.8%	0	0.0%	25.4%	\$0	0.0%	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%	0.8%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$3,550</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,983</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$567</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations & Purchases  
2015 FFIEC Census Data, ACS 2010 data, and 2015 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 2014, 2015					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2014			2015								
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank	Agg	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	56	9.1%	\$4,220	4.4%	23.6%	27	8.8%	7.5%	\$1,821	4.5%	3.5%	29	9.3%	6.7%	\$2,399	4.3%	3.1%
	Moderate	176	28.5%	\$18,209	19.0%	16.5%	111	36.3%	21.4%	\$10,442	25.6%	15.0%	65	20.9%	20.8%	\$7,767	14.1%	14.1%
	Middle	167	27.1%	\$25,044	26.1%	18.6%	74	24.2%	21.2%	\$10,245	25.2%	19.8%	93	29.9%	21.7%	\$14,799	26.8%	20.3%
	Upper	216	35.0%	\$48,117	50.1%	41.4%	92	30.1%	29.8%	\$17,814	43.7%	42.8%	124	39.9%	31.8%	\$30,303	54.8%	45.3%
	Unknown	2	0.3%	\$398	0.4%	0.0%	2	0.7%	20.1%	\$398	1.0%	18.9%	0	0.0%	18.9%	\$0	0.0%	17.2%
	<b>Total</b>	<b>617</b>	<b>100.0%</b>	<b>\$95,988</b>	<b>100.0%</b>	<b>100.0%</b>	<b>306</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$40,720</b>	<b>100.0%</b>	<b>100.0%</b>	<b>311</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$55,268</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	2	2.7%	\$100	0.7%	23.6%	2	5.3%	6.1%	\$100	1.4%	3.1%	0	0.0%	5.6%	\$0	0.0%	2.9%
	Moderate	10	13.5%	\$1,268	9.1%	16.5%	8	21.1%	13.7%	\$969	13.8%	9.0%	2	5.6%	11.0%	\$299	4.3%	7.1%
	Middle	16	21.6%	\$2,036	14.6%	18.6%	7	18.4%	16.7%	\$995	14.2%	13.8%	9	25.0%	17.1%	\$1,041	15.0%	13.8%
	Upper	43	58.1%	\$10,102	72.5%	41.4%	19	50.0%	35.1%	\$4,649	66.3%	44.6%	24	66.7%	33.7%	\$5,453	78.8%	41.3%
	Unknown	3	4.1%	\$422	3.0%	0.0%	2	5.3%	28.5%	\$298	4.3%	29.6%	1	2.8%	32.7%	\$124	1.8%	35.0%
	<b>Total</b>	<b>74</b>	<b>100.0%</b>	<b>\$13,928</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,011</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,917</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	2	12.5%	\$7	1.3%	23.6%	1	14.3%	15.7%	\$4	3.7%	6.2%	1	11.1%	11.2%	\$3	0.7%	3.9%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	22.0%	\$0	0.0%	16.3%	0	0.0%	20.6%	\$0	0.0%	12.1%
	Middle	2	12.5%	\$28	5.2%	18.6%	0	0.0%	24.6%	\$0	0.0%	19.5%	2	22.2%	25.8%	\$28	6.5%	19.6%
	Upper	11	68.8%	\$487	90.7%	41.4%	5	71.4%	34.8%	\$88	82.2%	44.3%	6	66.7%	37.8%	\$399	92.8%	48.9%
	Unknown	1	6.3%	\$15	2.8%	0.0%	1	14.3%	3.0%	\$15	14.0%	13.8%	0	0.0%	4.6%	\$0	0.0%	15.5%
	<b>Total</b>	<b>16</b>	<b>100.0%</b>	<b>\$537</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$107</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$430</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	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%	16.5%	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%	18.6%	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%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$8,500	100.0%	0.0%	1	100.0%	100.0%	\$8,500	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$8,500</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,500</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	60	8.5%	\$4,327	3.6%	23.6%	30	8.5%	7.4%	\$1,925	3.4%	3.2%	30	8.4%	6.5%	\$2,402	3.8%	2.8%
	Moderate	186	26.3%	\$19,477	16.4%	16.5%	119	33.8%	18.4%	\$11,411	20.3%	11.8%	67	18.8%	16.8%	\$8,066	12.9%	10.4%
	Middle	185	26.1%	\$27,108	22.8%	18.6%	81	23.0%	19.6%	\$11,240	20.0%	16.3%	104	29.2%	20.1%	\$15,868	25.3%	16.5%
	Upper	270	38.1%	\$58,706	49.4%	41.4%	116	33.0%	32.0%	\$22,551	40.0%	40.7%	154	43.3%	32.9%	\$36,155	57.7%	40.9%
	Unknown	7	1.0%	\$9,335	7.8%	0.0%	6	1.7%	22.6%	\$9,211	16.3%	28.0%	1	0.3%	23.7%	\$124	0.2%	29.3%
	<b>Total</b>	<b>708</b>	<b>100.0%</b>	<b>\$118,953</b>	<b>100.0%</b>	<b>100.0%</b>	<b>352</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$56,338</b>	<b>100.0%</b>	<b>100.0%</b>	<b>356</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$62,615</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	31	51.7%	\$4,539	43.1%	90.3%	19	51.4%	48.3%	\$3,099	46.8%	39.0%	12	52.2%	52.6%	\$1,440	36.9%	45.9%
	Over \$1 Million	19	31.7%	\$5,865	55.7%	8.3%	12	32.4%					7	30.4%				
	<b>Total Rev. available</b>	<b>50</b>	<b>83.4%</b>	<b>\$10,404</b>	<b>98.8%</b>	<b>98.6%</b>	<b>31</b>	<b>83.8%</b>					<b>19</b>	<b>82.6%</b>				
	Rev. Not Known	10	16.7%	\$125	1.2%	1.4%	6	16.2%					4	17.4%				
<b>Total</b>	<b>60</b>	<b>100.0%</b>	<b>\$10,529</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>					<b>23</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	35	58.3%	\$1,167	11.1%		22	59.5%	87.8%	\$707	10.7%	27.4%	13	56.5%	90.0%	\$460	11.8%	30.3%
	\$100,001 - \$250,000	9	15.0%	\$1,535	14.6%		5	13.5%	6.5%	\$905	13.7%	20.5%	4	17.4%	4.7%	\$630	16.1%	15.9%
	\$250,001 - \$1 Million	16	26.7%	\$7,827	74.3%		10	27.0%	5.7%	\$5,011	75.7%	52.1%	6	26.1%	5.3%	\$2,816	72.1%	53.8%
	<b>Total</b>	<b>60</b>	<b>100.0%</b>	<b>\$10,529</b>	<b>100.0%</b>		<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,623</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,906</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.4%	0	0.0%	49.2%	\$0	0.0%	52.5%	0	0.0%	49.2%	\$0	0.0%	60.7%
	Over \$1 Million	21	100.0%	\$3,550	100.0%	4.6%	18	100.0%					3	100.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>\$3,550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>					<b>3</b>	<b>100.0%</b>				
Small Farm Loan Size	\$100,000 or Less	6	28.6%	\$416	11.7%		5	27.8%	65.2%	\$346	11.6%	18.6%	1	33.3%	77.9%	\$70	12.3%	26.4%
	\$100,001 - \$250,000	11	52.4%	\$1,724	48.6%		10	55.6%	23.5%	\$1,577	52.9%	39.7%	1	33.3%	14.8%	\$147	25.9%	35.4%
	\$250,001 - \$500,000	4	19.0%	\$1,410	39.7%		3	16.7%	11.4%	\$1,060	35.5%	41.7%	1	33.3%	7.4%	\$350	61.7%	38.2%
	<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>\$3,550</b>	<b>100.0%</b>		<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,983</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$567</b>	<b>100.0%</b>	<b>100.0%</b>

Originations & Purchases

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

2015 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

## Appendices

**Geographic Distribution of HMDA, Small Business, & Small Farm Loans**  
Assessment Area: AR Fayetteville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014			2015								
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %				
HOME PURCHASE	Low	32	1.3%	\$3,722	0.9%	1.7%	10	1.4%	1.2%	\$1,239	1.0%	0.9%	15	1.7%	1.0%	\$1,575	1.0%	0.7%
	Moderate	176	7.4%	\$24,134	5.7%	8.7%	41	5.8%	7.2%	\$5,177	4.2%	5.1%	69	7.8%	6.7%	\$9,137	6.0%	5.0%
	Middle	1,178	49.3%	\$191,948	45.0%	57.2%	355	50.2%	50.7%	\$54,487	44.7%	45.5%	448	50.8%	51.8%	\$72,137	47.0%	47.7%
	Upper	1,003	42.0%	\$206,568	48.4%	32.4%	301	42.6%	40.9%	\$60,947	50.0%	48.6%	350	39.7%	40.4%	\$70,542	46.0%	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%
	<b>Total</b>	<b>2,389</b>	<b>100.0%</b>	<b>\$426,372</b>	<b>100.0%</b>	<b>100.0%</b>	<b>707</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$121,850</b>	<b>100.0%</b>	<b>100.0%</b>	<b>882</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$153,391</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	12	2.3%	\$1,772	1.7%	1.7%	5	4.3%	1.2%	\$348	1.7%	1.0%	4	1.9%	1.6%	\$945	2.3%	1.2%
	Moderate	31	6.0%	\$3,422	3.2%	8.7%	10	8.5%	9.0%	\$880	4.3%	6.6%	12	5.8%	7.8%	\$1,449	3.5%	6.0%
	Middle	248	47.6%	\$44,259	41.5%	57.2%	54	46.2%	53.9%	\$7,112	34.6%	46.6%	91	44.2%	50.8%	\$15,951	38.6%	44.8%
	Upper	230	44.1%	\$57,147	53.6%	32.4%	48	41.0%	35.9%	\$12,216	59.4%	45.8%	99	48.1%	39.8%	\$23,021	55.7%	48.1%
	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%
	<b>Total</b>	<b>521</b>	<b>100.0%</b>	<b>\$106,600</b>	<b>100.0%</b>	<b>100.0%</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20,556</b>	<b>100.0%</b>	<b>100.0%</b>	<b>206</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$41,366</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	1.3%	\$0	0.0%	0.5%	0	0.0%	1.4%	\$0	0.0%	0.5%
	Moderate	15	12.1%	\$315	4.9%	8.7%	7	13.2%	7.9%	\$222	19.9%	10.9%	5	12.8%	7.2%	\$34	1.3%	8.0%
	Middle	63	50.8%	\$1,648	25.4%	57.2%	29	54.7%	59.5%	\$457	41.0%	47.9%	17	43.6%	56.5%	\$519	20.3%	48.5%
	Upper	46	37.1%	\$4,525	69.7%	32.4%	17	32.1%	31.3%	\$435	39.0%	40.7%	17	43.6%	34.9%	\$2,007	78.4%	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%
	<b>Total</b>	<b>124</b>	<b>100.0%</b>	<b>\$6,488</b>	<b>100.0%</b>	<b>100.0%</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,560</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	15.8%	0	0.0%	16.0%	\$0	0.0%	3.7%	0	0.0%	22.8%	\$0	0.0%	7.4%
	Moderate	0	0.0%	\$0	0.0%	19.5%	0	0.0%	26.0%	\$0	0.0%	37.1%	0	0.0%	26.3%	\$0	0.0%	21.8%
	Middle	2	100.0%	\$964	100.0%	45.6%	0	0.0%	58.0%	\$0	0.0%	59.2%	0	0.0%	35.1%	\$0	0.0%	41.6%
	Upper	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	15.8%	\$0	0.0%	29.2%
	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%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$964</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	44	1.4%	\$5,494	1.0%	1.7%	15	1.7%	1.3%	\$1,587	1.1%	1.0%	19	1.7%	1.3%	\$2,520	1.3%	1.3%
	Moderate	222	7.3%	\$27,871	5.2%	8.7%	58	6.6%	7.7%	\$6,279	4.4%	7.4%	86	7.6%	7.1%	\$10,620	5.4%	6.4%
	Middle	1,491	49.1%	\$238,819	44.2%	57.2%	438	49.9%	52.0%	\$62,056	43.2%	46.6%	556	49.3%	51.7%	\$88,607	44.9%	46.5%
	Upper	1,279	42.1%	\$268,240	49.6%	32.4%	366	41.7%	38.9%	\$73,598	51.3%	45.0%	466	41.3%	39.9%	\$95,570	48.4%	45.8%
	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%
	<b>Total</b>	<b>3,036</b>	<b>100.0%</b>	<b>\$540,424</b>	<b>100.0%</b>	<b>100.0%</b>	<b>877</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$143,520</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,127</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$197,317</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	Low	17	5.0%	\$5,249	11.1%	3.7%	5	4.6%	3.5%	\$1,392	9.3%	4.7%	4	3.7%	3.6%	\$1,276	8.0%	4.0%
	Moderate	87	25.5%	\$11,507	24.3%	17.9%	24	22.2%	16.2%	\$3,931	26.1%	17.8%	25	23.1%	15.1%	\$3,738	23.5%	16.1%
	Middle	152	44.6%	\$22,045	46.6%	48.6%	51	47.2%	47.1%	\$6,354	42.2%	45.8%	49	45.4%	47.2%	\$8,461	53.3%	46.2%
	Upper	85	24.9%	\$8,510	18.0%	29.9%	28	25.9%	31.4%	\$3,369	22.4%	31.2%	30	27.8%	32.7%	\$2,404	15.1%	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.7%	\$0	0.0%	0.6%	0	0.0%	1.4%	\$0	0.0%	0.4%
<b>Total</b>	<b>341</b>	<b>100.0%</b>	<b>\$47,311</b>	<b>100.0%</b>	<b>100.0%</b>	<b>108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,046</b>	<b>100.0%</b>	<b>100.0%</b>	<b>108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,879</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Small Farms</b>																	
	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.1%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	3.7%	0	0.0%	2.2%	\$0	0.0%	3.7%	0	0.0%	1.8%	\$0	0.0%	2.5%
	Middle	4	100.0%	\$597	100.0%	72.3%	0	0.0%	84.0%	\$0	0.0%	81.3%	2	100.0%	81.4%	\$420	100.0%	80.3%
	Upper	0	0.0%	\$0	0.0%	22.3%	0	0.0%	13.3%	\$0	0.0%	14.2%	0	0.0%	16.2%	\$0	0.0%	16.7%
	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%	0.3%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$597</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$420</b>	<b>100.0%</b>	<b>100.0%</b>	

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: AR Fayetteville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income %	2014			2015									
		Count		Dollar			Bank	Agg	Dollar	Bank	Agg	Count		Dollar					
		#	%	\$ (000s)	\$ %							#	%	%	\$ (000s)	\$ %	\$ %	#	%
HOME PURCHASE	Low	171	7.2%	\$15,656	3.7%	19.6%	50	7.1%	6.5%	\$3,998	3.3%	3.2%	68	7.7%	6.4%	\$6,153	4.0%	3.3%	
	Moderate	383	16.0%	\$45,091	10.6%	18.0%	110	15.6%	15.5%	\$11,866	9.7%	10.2%	129	14.6%	13.7%	\$15,254	9.9%	8.9%	
	Middle	522	21.9%	\$80,612	18.9%	20.5%	151	21.4%	18.6%	\$22,402	18.4%	15.6%	208	23.6%	19.2%	\$31,567	20.6%	15.9%	
	Upper	1,297	54.3%	\$279,802	65.6%	41.9%	395	55.9%	41.1%	\$83,284	68.3%	52.7%	468	53.1%	42.5%	\$97,518	63.6%	53.4%	
	Unknown	16	0.7%	\$5,211	1.2%	0.0%	1	0.1%	18.2%	\$300	0.2%	18.3%	9	1.0%	18.1%	\$2,899	1.9%	18.5%	
	<b>Total</b>	<b>2,389</b>	<b>100.0%</b>	<b>\$426,372</b>	<b>100.0%</b>	<b>100.0%</b>	<b>707</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$121,850</b>	<b>100.0%</b>	<b>100.0%</b>	<b>882</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$153,391</b>	<b>100.0%</b>	<b>100.0%</b>	
REFINANCE	Low	29	5.6%	\$2,271	2.1%	19.6%	12	10.3%	7.5%	\$823	4.0%	3.6%	10	4.9%	6.0%	\$827	2.0%	2.5%	
	Moderate	57	10.9%	\$6,073	5.7%	18.0%	15	12.8%	13.6%	\$1,374	6.7%	8.2%	15	7.3%	10.8%	\$1,749	4.2%	5.7%	
	Middle	101	19.4%	\$15,530	14.6%	20.5%	13	11.1%	16.2%	\$1,953	9.5%	12.3%	43	20.9%	15.0%	\$6,784	16.4%	10.1%	
	Upper	315	60.5%	\$77,746	72.9%	41.9%	73	62.4%	42.6%	\$15,794	76.8%	51.0%	132	64.1%	46.0%	\$30,714	74.2%	52.8%	
	Unknown	19	3.6%	\$4,980	4.7%	0.0%	4	3.4%	20.2%	\$612	3.0%	24.9%	6	2.9%	22.1%	\$1,292	3.1%	28.8%	
	<b>Total</b>	<b>521</b>	<b>100.0%</b>	<b>\$106,600</b>	<b>100.0%</b>	<b>100.0%</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20,556</b>	<b>100.0%</b>	<b>100.0%</b>	<b>206</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$41,366</b>	<b>100.0%</b>	<b>100.0%</b>	
HOME IMPROVEMENT	Low	7	5.6%	\$105	1.6%	19.6%	1	1.9%	7.4%	\$10	0.9%	2.2%	4	10.3%	8.0%	\$80	3.1%	3.1%	
	Moderate	21	16.9%	\$428	6.6%	18.0%	11	20.8%	17.5%	\$72	6.5%	9.6%	3	7.7%	13.0%	\$53	2.1%	6.6%	
	Middle	32	25.8%	\$803	12.4%	20.5%	13	24.5%	23.9%	\$410	36.8%	16.2%	13	33.3%	21.8%	\$206	8.0%	15.3%	
	Upper	63	50.8%	\$5,145	79.3%	41.9%	27	50.9%	43.1%	\$615	55.2%	57.5%	19	48.7%	45.1%	\$2,221	86.8%	62.5%	
	Unknown	1	0.8%	\$7	0.1%	0.0%	1	1.9%	8.1%	\$7	0.6%	14.5%	0	0.0%	12.1%	\$0	0.0%	12.5%	
	<b>Total</b>	<b>124</b>	<b>100.0%</b>	<b>\$6,488</b>	<b>100.0%</b>	<b>100.0%</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,560</b>	<b>100.0%</b>	<b>100.0%</b>	
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%	18.0%	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%	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%	41.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	2	100.0%	\$964	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$964</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	207	6.8%	\$18,032	3.3%	19.6%	63	7.2%	6.8%	\$4,831	3.4%	3.1%	82	7.3%	6.4%	\$7,060	3.6%	2.9%	
	Moderate	461	15.2%	\$51,592	9.5%	18.0%	136	15.5%	15.1%	\$13,312	9.3%	9.1%	147	13.0%	12.8%	\$17,056	8.6%	7.4%	
	Middle	655	21.6%	\$96,945	17.9%	20.5%	177	20.2%	18.2%	\$24,765	17.3%	13.9%	264	23.4%	18.1%	\$38,557	19.5%	13.3%	
	Upper	1,675	55.2%	\$362,693	67.1%	41.9%	495	56.4%	41.5%	\$99,693	69.5%	49.3%	619	54.9%	43.5%	\$130,453	66.1%	50.0%	
	Unknown	38	1.3%	\$11,162	2.1%	0.0%	6	0.7%	18.5%	\$919	0.6%	24.5%	15	1.3%	19.2%	\$4,191	2.1%	26.5%	
	<b>Total</b>	<b>3,036</b>	<b>100.0%</b>	<b>\$540,424</b>	<b>100.0%</b>	<b>100.0%</b>	<b>877</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$143,520</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,127</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$197,317</b>	<b>100.0%</b>	<b>100.0%</b>	
Small Business Revenue	<b>Total Businesses</b>																		
	\$1 Million or Less	187	54.8%	\$14,480	30.6%	90.4%	55	50.9%	51.2%	\$4,584	30.5%	52.7%	65	60.2%	53.4%	\$4,928	31.0%	55.4%	
	Over \$1 Million	136	39.9%	\$32,327	68.3%	8.6%	44	40.7%				40	37.0%						
	<b>Total Rev. available</b>	<b>323</b>	<b>94.7%</b>	<b>\$46,807</b>	<b>98.9%</b>	<b>99.0%</b>	<b>99</b>	<b>91.6%</b>				<b>105</b>	<b>97.2%</b>						
	Rev. Not Known	18	5.3%	\$504	1.1%	1.0%	9	8.3%				3	2.8%						
	<b>Total</b>	<b>341</b>	<b>100.0%</b>	<b>\$47,311</b>	<b>100.0%</b>	<b>100.0%</b>	<b>108</b>	<b>100.0%</b>				<b>108</b>	<b>100.0%</b>						
	Small Business Loan Size	\$100,000 or Less	220	64.5%	\$6,416	13.6%		72	66.7%	86.2%	\$1,950	13.0%	26.1%	68	63.0%	87.0%	\$2,139	13.5%	27.0%
		\$100,001 - \$250,000	61	17.9%	\$10,676	22.6%		14	13.0%	7.5%	\$2,512	16.7%	21.9%	21	19.4%	6.6%	\$3,680	23.2%	18.9%
		\$250,001 - \$1 Million	60	17.6%	\$30,219	63.9%		22	20.4%	6.3%	\$10,584	70.3%	52.0%	19	17.6%	6.4%	\$10,060	63.4%	54.1%
		<b>Total</b>	<b>341</b>	<b>100.0%</b>	<b>\$47,311</b>	<b>100.0%</b>		<b>108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,046</b>	<b>100.0%</b>	<b>100.0%</b>	<b>108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,879</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue		<b>Total Farms</b>																	
	\$1 Million or Less	2	50.0%	\$420	70.4%	97.0%	0	0.0%	90.6%	\$0	0.0%	88.3%	2	100.0%	84.5%	\$420	100.0%	90.4%	
	Over \$1 Million	0	0.0%	\$0	0.0%	3.0%	0	0.0%				0	0.0%						
	Not Known	2	50.0%	\$177	29.6%	0.0%	0	0.0%				0	0.0%						
	<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$597</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>				<b>2</b>	<b>100.0%</b>						
	Small Farm Loan Size	\$100,000 or Less	1	25.0%	\$30	5.0%		0	0.0%	81.1%	\$0	0.0%	36.5%	0	0.0%	81.0%	\$0	0.0%	35.9%
		\$100,001 - \$250,000	3	75.0%	\$567	95.0%		0	0.0%	13.8%	\$0	0.0%	35.6%	2	100.0%	13.7%	\$420	100.0%	33.8%
\$250,001 - \$500,000		0	0.0%	\$0	0.0%		0	0.0%	5.1%	\$0	0.0%	27.9%	0	0.0%	5.4%	\$0	0.0%	30.3%	
<b>Total</b>		<b>4</b>	<b>100.0%</b>	<b>\$597</b>	<b>100.0%</b>		<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$420</b>	<b>100.0%</b>	<b>100.0%</b>	

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 HHEC Census Data, ACS 2010 data, and 2016 L&B Information

## Appendices

### Geographic Distribution of HMDA, Small Business, & Small Farm Loans Assessment Area: AR Jonesboro

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014						2015					
		Bank		Dollar			Count			Dollar			Count			Dollar		
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	%	\$ (000s)	\$ %	\$ %	Bank #	Agg %	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	3	1.0%	\$252	0.5%	2.7%	0	0.0%	1.6%	\$0	0.0%	1.1%	3	2.6%	1.3%	\$252	1.3%	0.7%
	Moderate	57	19.4%	\$10,076	19.7%	25.5%	14	21.2%	19.5%	\$1,421	12.5%	15.4%	16	13.8%	18.8%	\$2,236	11.8%	16.9%
	Middle	80	27.2%	\$10,893	21.3%	43.1%	11	16.7%	35.6%	\$2,076	18.3%	29.5%	36	31.0%	35.7%	\$4,512	23.9%	29.8%
	Upper	154	52.4%	\$29,949	58.5%	28.7%	41	62.1%	43.3%	\$7,873	69.2%	54.1%	61	52.6%	44.1%	\$11,876	62.9%	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%
	<b>Total</b>	<b>294</b>	<b>100.0%</b>	<b>\$51,170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>66</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$18,876</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	2.7%	0	0.0%	2.9%	\$0	0.0%	1.3%	0	0.0%	2.1%	\$0	0.0%	1.4%
	Moderate	27	19.4%	\$2,751	10.5%	25.5%	10	26.3%	18.6%	\$801	10.6%	15.2%	12	23.1%	19.3%	\$1,590	14.6%	15.1%
	Middle	42	30.2%	\$5,062	19.4%	43.1%	12	31.6%	34.4%	\$921	12.2%	32.1%	10	19.2%	36.6%	\$1,430	13.1%	32.4%
	Upper	70	50.4%	\$18,299	70.1%	28.7%	16	42.1%	44.1%	\$5,812	77.1%	51.3%	30	57.7%	42.0%	\$7,891	72.3%	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%
	<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>\$26,112</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,534</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,911</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	2	1.3%	\$8	0.1%	2.7%	1	1.8%	4.2%	\$3	0.3%	3.0%	0	0.0%	2.8%	\$0	0.0%	0.9%
	Moderate	45	29.0%	\$1,724	26.1%	25.5%	20	35.7%	25.8%	\$267	28.9%	19.5%	15	27.3%	25.6%	\$1,351	57.6%	17.7%
	Middle	54	34.8%	\$987	15.0%	43.1%	18	32.1%	34.5%	\$243	26.3%	35.0%	22	40.0%	41.1%	\$439	18.7%	33.8%
	Upper	54	34.8%	\$3,883	58.8%	28.7%	17	30.4%	35.6%	\$411	44.5%	42.5%	18	32.7%	30.5%	\$557	23.7%	47.6%
	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%
	<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>\$6,602</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$924</b>	<b>100.0%</b>	<b>100.0%</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,347</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	24.2%	0	0.0%	13.6%	\$0	0.0%	3.6%	0	0.0%	11.1%	\$0	0.0%	14.1%
	Moderate	1	33.3%	\$279	29.9%	44.8%	0	0.0%	50.0%	\$0	0.0%	83.4%	0	0.0%	55.6%	\$0	0.0%	67.1%
	Middle	1	33.3%	\$311	33.3%	9.6%	0	0.0%	31.8%	\$0	0.0%	9.2%	0	0.0%	22.2%	\$0	0.0%	7.7%
	Upper	1	33.3%	\$343	36.8%	21.4%	0	0.0%	4.5%	\$0	0.0%	3.8%	0	0.0%	11.1%	\$0	0.0%	11.1%
	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%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$933</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	5	0.8%	\$260	0.3%	2.7%	1	0.6%	2.3%	\$3	0.0%	1.4%	3	1.3%	1.7%	\$252	0.8%	1.4%
	Moderate	130	22.0%	\$14,830	17.5%	25.5%	44	27.5%	19.8%	\$2,489	12.6%	19.8%	43	19.3%	19.7%	\$5,177	16.1%	18.3%
	Middle	177	29.9%	\$17,253	20.3%	43.1%	41	25.6%	35.1%	\$3,240	16.3%	29.3%	68	30.5%	36.3%	\$6,381	19.9%	29.9%
	Upper	279	47.2%	\$52,474	61.9%	28.7%	74	46.3%	42.8%	\$14,096	71.1%	49.6%	109	48.9%	42.3%	\$20,324	63.2%	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%
	<b>Total</b>	<b>591</b>	<b>100.0%</b>	<b>\$84,817</b>	<b>100.0%</b>	<b>100.0%</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$19,828</b>	<b>100.0%</b>	<b>100.0%</b>	<b>223</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,134</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	Small Businesses																	
	Low	18	3.1%	\$4,254	6.0%	3.1%	5	2.6%	2.3%	\$373	1.5%	1.0%	4	2.2%	1.6%	\$1,047	4.3%	2.0%
	Moderate	208	36.2%	\$27,169	38.4%	36.9%	75	38.3%	31.1%	\$10,777	44.6%	37.3%	60	32.6%	29.2%	\$8,352	34.6%	33.0%
	Middle	177	30.8%	\$18,296	25.9%	27.5%	52	26.5%	31.0%	\$5,974	24.7%	28.5%	62	33.7%	32.1%	\$5,857	24.3%	27.8%
	Upper	172	29.9%	\$20,986	29.7%	32.5%	64	32.7%	32.9%	\$7,064	29.2%	32.6%	58	31.5%	34.9%	\$8,884	36.8%	36.6%
	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%	2.6%	\$0	0.0%	0.5%	0	0.0%	2.2%	\$0	0.0%	0.5%
<b>Total</b>	<b>575</b>	<b>100.0%</b>	<b>\$70,705</b>	<b>100.0%</b>	<b>100.0%</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,188</b>	<b>100.0%</b>	<b>100.0%</b>	<b>184</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,140</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	1.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Moderate	3	8.1%	\$213	3.3%	26.4%	0	0.0%	13.2%	\$0	0.0%	6.3%	2	16.7%	16.5%	\$198	8.1%	14.1%
	Middle	18	48.6%	\$3,344	52.2%	49.3%	5	50.0%	56.8%	\$496	48.5%	66.7%	8	66.7%	58.8%	\$1,506	61.8%	63.0%
	Upper	16	43.2%	\$2,851	44.5%	22.9%	5	50.0%	28.7%	\$526	51.5%	26.8%	2	16.7%	22.9%	\$732	30.0%	22.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.2%	0	0.0%	1.5%	\$0	0.0%	0.2%
<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>\$6,408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,022</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,436</b>	<b>100.0%</b>	<b>100.0%</b>	

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: AR Jonesboro

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Families by Family Income	Count		Dollar		Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	11	3.7%	\$839	1.6%	24.2%	1	1.5%	3.9%	\$54	0.5%	1.7%	7	6.0%	6.0%	\$548	2.9%	3.0%
	Moderate	40	13.6%	\$3,995	7.8%	17.0%	4	6.1%	12.2%	\$420	3.7%	8.3%	23	19.8%	15.5%	\$2,277	12.1%	11.5%
	Middle	55	18.7%	\$7,255	14.2%	18.9%	11	16.7%	17.9%	\$1,423	12.5%	14.8%	20	17.2%	19.2%	\$2,951	15.6%	16.9%
	Upper	168	57.1%	\$37,098	72.5%	39.9%	46	69.7%	41.1%	\$9,176	80.7%	52.0%	60	51.7%	35.3%	\$12,522	66.3%	44.7%
	Unknown	20	6.8%	\$1,983	3.9%	0.0%	4	6.1%	25.0%	\$297	2.6%	23.2%	6	5.2%	24.0%	\$578	3.1%	24.0%
	<b>Total</b>	<b>294</b>	<b>100.0%</b>	<b>\$51,170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>66</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$18,876</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	6	4.3%	\$442	1.7%	24.2%	2	5.3%	4.6%	\$114	1.5%	1.7%	2	3.8%	4.8%	\$256	2.3%	2.1%
	Moderate	15	10.8%	\$1,251	4.8%	17.0%	4	10.5%	8.6%	\$271	3.6%	4.0%	7	13.5%	12.8%	\$601	5.5%	7.9%
	Middle	19	13.7%	\$1,418	5.4%	18.9%	4	10.5%	14.7%	\$215	2.9%	8.8%	11	21.2%	15.9%	\$968	8.9%	10.8%
	Upper	78	56.1%	\$20,931	80.2%	39.9%	22	57.9%	48.7%	\$6,427	85.3%	52.9%	26	50.0%	39.7%	\$8,345	76.5%	50.8%
	Unknown	21	15.1%	\$2,070	7.9%	0.0%	6	15.8%	23.4%	\$507	6.7%	32.6%	6	11.5%	26.8%	\$741	6.8%	28.3%
	<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>\$26,112</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,534</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,911</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	14	9.0%	\$107	1.6%	24.2%	5	8.9%	6.8%	\$17	1.8%	1.6%	6	10.9%	7.4%	\$77	3.3%	2.3%
	Moderate	27	17.4%	\$263	4.0%	17.0%	12	21.4%	17.4%	\$140	15.2%	9.9%	8	14.5%	16.5%	\$41	1.7%	7.9%
	Middle	34	21.9%	\$669	10.1%	18.9%	11	19.6%	14.4%	\$222	24.0%	9.9%	12	21.8%	19.6%	\$246	10.5%	10.0%
	Upper	71	45.8%	\$5,311	80.4%	39.9%	23	41.1%	51.5%	\$344	37.2%	52.8%	27	49.1%	46.0%	\$1,967	83.8%	65.1%
	Unknown	9	5.8%	\$252	3.8%	0.0%	5	8.9%	9.8%	\$201	21.8%	25.8%	2	3.6%	10.5%	\$16	0.7%	14.8%
	<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>\$6,602</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$924</b>	<b>100.0%</b>	<b>100.0%</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,347</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.2%	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%	17.0%	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%	18.9%	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%	39.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	3	100.0%	\$933	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$933</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	31	5.2%	\$1,388	1.6%	24.2%	8	5.0%	4.3%	\$185	0.9%	1.6%	15	6.7%	5.7%	\$881	2.7%	2.6%
	Moderate	82	13.9%	\$5,509	6.5%	17.0%	20	12.5%	11.3%	\$831	4.2%	6.3%	38	17.0%	14.6%	\$2,919	9.1%	9.7%
	Middle	108	18.3%	\$9,342	11.0%	18.9%	26	16.3%	16.5%	\$1,860	9.4%	11.6%	43	19.3%	18.1%	\$4,165	13.0%	14.1%
	Upper	317	53.6%	\$63,340	74.7%	39.9%	91	56.9%	44.1%	\$15,947	80.4%	49.0%	113	50.7%	37.2%	\$22,834	71.1%	45.5%
	Unknown	53	9.0%	\$5,238	6.2%	0.0%	15	9.4%	23.8%	\$1,005	5.1%	31.6%	14	6.3%	24.4%	\$1,335	4.2%	28.1%
	<b>Total</b>	<b>591</b>	<b>100.0%</b>	<b>\$84,817</b>	<b>100.0%</b>	<b>100.0%</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$19,828</b>	<b>100.0%</b>	<b>100.0%</b>	<b>223</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,134</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	329	57.2%	\$29,250	41.4%	88.4%	111	56.6%	46.9%	\$8,771	36.3%	50.8%	107	58.2%	35.6%	\$11,206	46.4%	38.6%
	Over \$1 Million	202	35.1%	\$38,189	54.0%	10.1%	70	35.7%					67	36.4%				
	Total Rev. available	531	92.3%	\$67,439	95.4%	98.5%	181	92.3%					174	94.6%				
	Rev. Not Known	44	7.7%	\$3,266	4.6%	1.5%	15	7.7%					10	5.4%				
<b>Total</b>	<b>575</b>	<b>100.0%</b>	<b>\$70,705</b>	<b>100.0%</b>	<b>100.0%</b>	<b>196</b>	<b>100.0%</b>					<b>184</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	418	72.7%	\$14,881	21.0%		143	73.0%	90.6%	\$5,205	21.5%	33.1%	136	73.9%	91.9%	\$4,675	19.4%	37.2%
	\$100,001 - \$250,000	67	11.7%	\$12,065	17.1%		23	11.7%	4.4%	\$4,008	16.6%	15.7%	15	8.2%	4.2%	\$2,783	11.5%	15.9%
	\$250,001 - \$1 Million	90	15.7%	\$43,759	61.9%		30	15.3%	4.9%	\$14,975	61.9%	51.2%	33	17.9%	4.0%	\$16,682	69.1%	46.8%
	Total	575	100.0%	\$70,705	100.0%		196	100.0%	100.0%	\$24,188	100.0%	100.0%	184	100.0%	100.0%	\$24,140	100.0%	100.0%
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	24	64.9%	\$3,705	57.8%	97.5%	8	80.0%	58.8%	\$938	91.8%	74.3%	6	50.0%	32.3%	\$781	32.1%	36.2%
	Over \$1 Million	10	27.0%	\$2,271	35.4%	2.5%	1	10.0%					5	41.7%				
	Not Known	3	8.1%	\$432	6.7%	0.0%	1	10.0%					1	8.3%				
	Total	37	100.0%	\$6,408	100.0%	100.0%	10	100.0%					12	100.0%				
Small Farm Loan Size	\$100,000 or Less	14	37.8%	\$487	7.6%		7	70.0%	74.0%	\$272	26.6%	24.6%	4	33.3%	65.6%	\$132	5.4%	17.0%
	\$100,001 - \$250,000	13	35.1%	\$2,405	37.5%		1	10.0%	14.5%	\$150	14.7%	29.3%	4	33.3%	16.5%	\$718	29.5%	24.5%
	\$250,001 - \$500,000	10	27.0%	\$3,516	54.9%		2	20.0%	11.5%	\$600	58.7%	46.1%	4	33.3%	17.8%	\$1,586	65.1%	58.5%
	Total	37	100.0%	\$6,408	100.0%		10	100.0%	100.0%	\$1,022	100.0%	100.0%	12	100.0%	100.0%	\$2,436	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: AR Northeast AR

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014				2015							
		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	12	5.4%	\$824	3.8%	8.2%	4	6.2%	6.1%	\$269	5.0%	5.0%	5	5.7%	5.8%	\$309	3.5%	4.5%
	Middle	199	89.2%	\$19,243	87.7%	83.7%	59	90.8%	83.7%	\$4,888	90.0%	83.7%	80	90.9%	85.2%	\$8,075	92.6%	84.7%
	Upper	12	5.4%	\$1,883	8.6%	8.0%	2	3.1%	10.0%	\$274	5.0%	11.2%	3	3.4%	8.9%	\$338	3.9%	10.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	223	100.0%	\$21,950	100.0%	100.0%	65	100.0%	100.0%	\$5,431	100.0%	100.0%	88	100.0%	100.0%	\$8,722	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	14	11.6%	\$1,398	15.8%	8.2%	5	13.5%	7.1%	\$760	27.7%	6.4%	3	8.1%	5.6%	\$221	8.0%	4.7%
	Middle	105	86.8%	\$7,248	82.1%	83.7%	31	83.8%	81.6%	\$1,955	71.2%	80.6%	33	89.2%	84.2%	\$2,395	86.6%	86.2%
	Upper	2	1.7%	\$182	2.1%	8.0%	1	2.7%	10.8%	\$32	1.2%	12.0%	1	2.7%	10.0%	\$150	5.4%	9.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	1.0%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Total	121	100.0%	\$8,828	100.0%	100.0%	37	100.0%	100.0%	\$2,747	100.0%	100.0%	37	100.0%	100.0%	\$2,766	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	26	10.9%	\$314	8.6%	8.2%	9	8.9%	9.8%	\$60	4.2%	7.5%	11	13.1%	8.1%	\$113	9.5%	4.5%
	Middle	201	84.5%	\$3,023	82.5%	83.7%	88	87.1%	81.8%	\$1,303	92.3%	79.9%	69	82.1%	82.2%	\$1,031	86.7%	84.4%
	Upper	11	4.6%	\$329	9.0%	8.0%	4	4.0%	8.4%	\$49	3.5%	12.6%	4	4.8%	9.8%	\$45	3.8%	11.1%
	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	238	100.0%	\$3,666	100.0%	100.0%	101	100.0%	100.0%	\$1,412	100.0%	100.0%	84	100.0%	100.0%	\$1,189	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	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	2.6%
	Middle	0	0.0%	\$0	0.0%	75.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	66.7%	\$0	0.0%	32.5%
	Upper	0	0.0%	\$0	0.0%	20.7%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	16.7%	\$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%	
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	52	8.9%	\$2,536	7.4%	8.2%	18	8.9%	6.9%	\$1,089	11.4%	5.6%	19	9.1%	6.1%	\$643	5.1%	4.5%
	Middle	505	86.8%	\$29,514	85.7%	83.7%	178	87.7%	82.7%	\$8,146	84.9%	82.3%	182	87.1%	84.4%	\$11,501	90.7%	84.3%
	Upper	25	4.3%	\$2,394	7.0%	8.0%	7	3.4%	10.1%	\$355	3.7%	11.7%	8	3.8%	9.4%	\$533	4.2%	11.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.4%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	582	100.0%	\$34,444	100.0%	100.0%	203	100.0%	100.0%	\$9,590	100.0%	100.0%	209	100.0%	100.0%	\$12,677	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	14.3%	\$2,941	15.5%	7.9%	12	16.7%	6.4%	\$1,727	29.1%	11.2%	9	12.0%	7.9%	\$736	10.9%	5.1%
	Middle	178	82.0%	\$14,802	78.1%	86.8%	59	81.9%	81.7%	\$4,181	70.4%	81.7%	64	85.3%	83.7%	\$5,935	87.6%	88.8%
	Upper	8	3.7%	\$1,213	6.4%	5.3%	1	1.4%	7.0%	\$35	0.6%	5.0%	2	2.7%	5.3%	\$105	1.5%	4.6%
	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%	4.9%	\$0	0.0%	2.1%	0	0.0%	3.1%	\$0	0.0%	1.5%
Total	217	100.0%	\$18,956	100.0%	100.0%	72	100.0%	100.0%	\$5,943	100.0%	100.0%	75	100.0%	100.0%	\$6,776	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	18	16.7%	\$3,086	26.5%	7.4%	3	7.5%	5.2%	\$695	17.5%	4.7%	7	15.6%	9.5%	\$831	18.5%	5.8%
	Middle	90	83.3%	\$8,551	73.5%	90.7%	37	92.5%	88.5%	\$3,268	82.5%	86.8%	38	84.4%	85.6%	\$3,659	81.5%	89.6%
	Upper	0	0.0%	\$0	0.0%	1.9%	0	0.0%	5.0%	\$0	0.0%	8.1%	0	0.0%	4.3%	\$0	0.0%	4.4%
	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%	1.3%	\$0	0.0%	0.4%	0	0.0%	0.7%	\$0	0.0%	0.2%
Total	108	100.0%	\$11,637	100.0%	100.0%	40	100.0%	100.0%	\$3,963	100.0%	100.0%	45	100.0%	100.0%	\$4,490	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: AR Northeast AR

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank		Families by Family Income %	2014			2015										
		Count	Dollar		Count	Dollar	Count	Dollar										
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	24	10.8%	\$1,178	5.4%	21.3%	7	10.8%	6.3%	\$393	7.2%	3.8%	9	10.2%	6.0%	\$388	4.4%	3.4%
	Moderate	44	19.7%	\$3,149	14.3%	17.9%	11	16.9%	18.1%	\$627	11.5%	14.0%	22	25.0%	18.4%	\$1,634	18.7%	13.7%
	Middle	68	30.5%	\$6,018	27.4%	21.6%	16	24.6%	19.8%	\$964	17.7%	18.4%	29	33.0%	20.5%	\$2,497	28.6%	18.9%
	Upper	75	33.6%	\$10,740	48.9%	39.2%	28	43.1%	35.1%	\$3,221	59.3%	45.2%	25	28.4%	35.0%	\$4,057	46.5%	45.2%
	Unknown	12	5.4%	\$865	3.9%	0.0%	3	4.6%	20.8%	\$226	4.2%	18.7%	3	3.4%	20.1%	\$146	1.7%	18.9%
	<b>Total</b>	<b>223</b>	<b>100.0%</b>	<b>\$21,950</b>	<b>100.0%</b>	<b>100.0%</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,431</b>	<b>100.0%</b>	<b>100.0%</b>	<b>88</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,722</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	10	8.3%	\$361	4.1%	21.3%	5	13.5%	7.2%	\$258	9.4%	3.4%	2	5.4%	5.7%	\$27	1.0%	2.3%
	Moderate	20	16.5%	\$898	10.2%	17.9%	4	10.8%	13.3%	\$114	4.1%	8.5%	9	24.3%	11.9%	\$550	19.9%	6.6%
	Middle	28	23.1%	\$1,419	16.1%	21.6%	9	24.3%	20.9%	\$556	20.2%	16.6%	6	16.2%	19.4%	\$293	10.6%	13.7%
	Upper	53	43.8%	\$5,706	64.6%	39.2%	14	37.8%	45.0%	\$1,591	57.9%	56.4%	18	48.6%	45.0%	\$1,782	64.4%	54.8%
	Unknown	10	8.3%	\$444	5.0%	0.0%	5	13.5%	13.6%	\$228	8.3%	15.2%	2	5.4%	18.0%	\$114	4.1%	22.5%
	<b>Total</b>	<b>121</b>	<b>100.0%</b>	<b>\$8,828</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,747</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,766</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	32	13.4%	\$189	5.2%	21.3%	13	12.9%	10.2%	\$56	4.0%	2.9%	11	13.1%	13.0%	\$99	8.3%	6.4%
	Moderate	42	17.6%	\$432	11.8%	17.9%	19	18.8%	19.3%	\$209	14.8%	11.8%	13	15.5%	17.4%	\$117	9.8%	8.4%
	Middle	52	21.8%	\$793	21.6%	21.6%	22	21.8%	25.3%	\$290	20.5%	24.7%	21	25.0%	21.8%	\$344	28.9%	20.1%
	Upper	95	39.9%	\$2,049	55.9%	39.2%	38	37.6%	39.3%	\$749	53.0%	52.6%	36	42.9%	42.1%	\$604	50.8%	50.7%
	Unknown	17	7.1%	\$203	5.5%	0.0%	9	8.9%	6.0%	\$108	7.6%	8.0%	3	3.6%	5.9%	\$25	2.1%	14.4%
	<b>Total</b>	<b>238</b>	<b>100.0%</b>	<b>\$3,666</b>	<b>100.0%</b>	<b>100.0%</b>	<b>101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,412</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,189</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	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%
	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%	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%	39.2%	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%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	66	11.3%	\$1,728	5.0%	21.3%	25	12.3%	7.0%	\$707	7.4%	3.6%	22	10.5%	6.9%	\$514	4.1%	3.1%
	Moderate	106	18.2%	\$4,479	13.0%	17.9%	34	16.7%	16.7%	\$950	9.9%	12.0%	44	21.1%	16.4%	\$2,301	18.2%	10.7%
	Middle	148	25.4%	\$8,230	23.9%	21.6%	47	23.2%	20.8%	\$1,810	18.9%	18.0%	56	26.8%	20.3%	\$3,134	24.7%	16.8%
	Upper	223	38.3%	\$18,495	53.7%	39.2%	80	39.4%	38.6%	\$5,561	58.0%	49.3%	79	37.8%	38.8%	\$6,443	50.8%	48.1%
	Unknown	39	6.7%	\$1,512	4.4%	0.0%	17	8.4%	16.8%	\$562	5.9%	17.1%	8	3.8%	17.7%	\$285	2.2%	21.3%
	<b>Total</b>	<b>582</b>	<b>100.0%</b>	<b>\$34,444</b>	<b>100.0%</b>	<b>100.0%</b>	<b>203</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,590</b>	<b>100.0%</b>	<b>100.0%</b>	<b>209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,677</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	144	66.4%	\$6,264	33.0%	89.7%	43	59.7%	43.5%	\$1,894	31.9%	49.0%	49	65.3%	45.6%	\$2,206	32.6%	43.5%
	Over \$1 Million	58	26.7%	\$10,920	57.6%	7.7%	20	27.8%					24	32.0%				
	Total Rev. available	202	93.1%	\$17,184	90.6%	97.4%	63	87.5%					73	97.3%				
	Rev. Not Known	15	6.9%	\$1,772	9.3%	2.6%	9	12.5%					2	2.7%				
<b>Total</b>	<b>217</b>	<b>100.0%</b>	<b>\$18,956</b>	<b>100.0%</b>	<b>100.0%</b>	<b>72</b>	<b>100.0%</b>					<b>75</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	174	80.2%	\$5,628	29.7%		58	80.6%	95.1%	\$2,041	34.3%	48.1%	60	80.0%	93.3%	\$2,015	29.7%	39.1%
	\$100,001 - \$250,000	22	10.1%	\$3,534	18.6%		7	9.7%	2.8%	\$1,115	18.8%	16.8%	8	10.7%	3.9%	\$1,207	17.8%	18.6%
	\$250,001 - \$1 Million	21	9.7%	\$9,794	51.7%		7	9.7%	2.1%	\$2,787	46.9%	35.1%	7	9.3%	2.8%	\$3,554	52.4%	42.3%
	<b>Total</b>	<b>217</b>	<b>100.0%</b>	<b>\$18,956</b>	<b>100.0%</b>		<b>72</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,943</b>	<b>100.0%</b>	<b>100.0%</b>	<b>75</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,776</b>	<b>100.0%</b>	<b>100.0%</b>
	Small Farm Revenue	<b>Total Farms</b>																
\$1 Million or Less		93	86.1%	\$9,430	81.0%	98.1%	33	82.5%	56.5%	\$2,789	70.4%	70.5%	39	86.7%	55.2%	\$3,557	79.2%	74.1%
Over \$1 Million		12	11.1%	\$2,059	17.7%	1.9%	7	17.5%					4	8.9%				
Not Known		3	2.8%	\$148	1.3%	0.0%	0	0.0%					2	4.4%				
<b>Total</b>		<b>108</b>	<b>100.0%</b>	<b>\$11,637</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>					<b>45</b>	<b>100.0%</b>				
Small Farm Loan Size	\$100,000 or Less	76	70.4%	\$3,148	27.1%		29	72.5%	71.5%	\$1,279	32.3%	18.5%	32	71.1%	78.6%	\$1,225	27.3%	26.6%
	\$100,001 - \$250,000	17	15.7%	\$2,826	24.3%		7	17.5%	15.2%	\$1,071	27.0%	27.3%	8	17.8%	13.1%	\$1,385	30.8%	31.6%
	\$250,001 - \$500,000	15	13.9%	\$5,663	48.7%		4	10.0%	13.4%	\$1,613	40.7%	54.2%	5	11.1%	8.3%	\$1,880	41.9%	41.8%
	<b>Total</b>	<b>108</b>	<b>100.0%</b>	<b>\$11,637</b>	<b>100.0%</b>		<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,963</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,490</b>	<b>100.0%</b>	<b>100.0%</b>

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 Homosassa Springs

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014			2015								
		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	10.0%	\$54	2.9%	8.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	11.1%	7.7%	\$54	6.7%	5.8%
	Middle	8	80.0%	\$1,689	91.4%	75.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	7	77.8%	75.2%	\$649	80.3%	70.0%
	Upper	1	10.0%	\$105	5.7%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	11.1%	17.1%	\$105	13.0%	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%
	<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>\$1,848</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$808</b>	<b>100.0%</b>	<b>100.0%</b>
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	11.1%	\$50	2.7%	8.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	4.5%
	Middle	7	77.8%	\$1,438	77.3%	75.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	75.0%	72.5%	\$523	58.4%	68.9%
	Upper	1	11.1%	\$373	20.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	25.0%	21.4%	\$373	41.6%	26.7%
	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%
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$1,861</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$896</b>	<b>100.0%</b>	<b>100.0%</b>
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%	0.0%	\$0	0.0%	0.0%	0	0.0%	10.5%	\$0	0.0%	3.5%
	Middle	2	66.7%	\$95	88.8%	75.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	71.5%	\$90	100.0%	72.7%
	Upper	1	33.3%	\$12	11.2%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	18.0%	\$0	0.0%	23.8%
	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%
	<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$107</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$90</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	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%	10.9%	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%	72.1%	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%	17.0%	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%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
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	9.1%	\$104	2.7%	8.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	7.1%	7.4%	\$54	3.0%	5.2%
	Middle	17	77.3%	\$3,222	84.4%	75.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	11	78.6%	74.3%	\$1,262	70.3%	70.4%
	Upper	3	13.6%	\$490	12.8%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	14.3%	18.4%	\$478	26.6%	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%
	<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>\$3,816</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,794</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	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	8.1%	\$440	5.9%	9.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	8.5%	\$0	0.0%	12.6%
	Middle	30	81.1%	\$6,529	88.2%	74.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	12	100.0%	72.5%	\$2,889	100.0%	74.5%
	Upper	4	10.8%	\$437	5.9%	15.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	17.1%	\$0	0.0%	12.1%
	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%	1.9%	\$0	0.0%	0.8%
<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>\$7,406</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,889</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Small Farms</b>																	
	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%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%	2.7%
	Middle	0	0.0%	\$0	0.0%	66.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	73.7%	\$0	0.0%	90.2%
	Upper	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	21.1%	\$0	0.0%	7.1%
	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%	\$0	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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 %	2014			2015								
		Count		Dollar			Bank	Agg	Dollar		Count			Dollar				
		#	%	\$ (000s)	\$ %	#			%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	3	30.0%	\$154	8.3%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	33.3%	6.6%	\$154	19.1%	3.3%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	17.3%	\$0	0.0%	11.5%
	Middle	3	30.0%	\$366	19.8%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	33.3%	22.0%	\$366	45.3%	19.2%
	Upper	3	30.0%	\$1,164	63.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	22.2%	41.4%	\$124	15.3%	53.5%
	Unknown	1	10.0%	\$164	8.9%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	11.1%	12.8%	\$164	20.3%	12.5%
	<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>\$1,848</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$808</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	6.9%	\$0	0.0%	4.0%
	Moderate	1	11.1%	\$129	6.9%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	25.0%	13.3%	\$129	14.4%	9.4%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	19.6%	\$0	0.0%	16.3%
	Upper	6	66.7%	\$1,646	88.4%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	75.0%	35.2%	\$767	85.6%	41.9%
	Unknown	2	22.2%	\$86	4.6%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	25.0%	\$0	0.0%	28.3%
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$1,861</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$896</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	19.0%	\$0	0.0%	6.0%
	Moderate	1	33.3%	\$5	4.7%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.0%	\$0	0.0%	14.9%
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	22.0%	\$0	0.0%	24.6%
	Upper	2	66.7%	\$102	95.3%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	40.0%	\$90	100.0%	51.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	3.4%
	<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$107</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$90</b>	<b>100.0%</b>	<b>100.0%</b>
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%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	3	13.6%	\$154	4.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	21.4%	7.4%	\$154	8.6%	3.5%
	Moderate	2	9.1%	\$134	3.5%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	7.1%	16.0%	\$129	7.2%	10.6%
	Middle	3	13.6%	\$366	9.6%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	21.4%	21.2%	\$366	20.4%	18.0%
	Upper	11	50.0%	\$2,912	76.3%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	6	42.9%	39.5%	\$981	54.7%	48.8%
	Unknown	3	13.6%	\$250	6.6%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	7.1%	15.9%	\$164	9.1%	19.2%
	<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>\$3,816</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,794</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	14	37.8%	\$1,828	24.7%	95.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	33.3%	57.3%	\$81	2.8%	39.1%
	Over \$1 Million	21	56.8%	\$5,478	74.0%	3.9%	0	0.0%					8	66.7%				
	Total Rev. available	35	94.6%	\$7,306	98.7%	99.5%	0	0.0%					12	100.0%				
	Rev. Not Known	2	5.4%	\$100	1.4%	0.5%	0	0.0%					0	0.0%				
<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>\$7,406</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>12</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	19	51.4%	\$792	10.7%		0	0.0%	0.0%	\$0	0.0%	0.0%	5	41.7%	96.0%	\$102	3.5%	43.4%
	\$100,001 - \$250,000	3	8.1%	\$377	5.1%		0	0.0%	0.0%	\$0	0.0%	0.0%	1	8.3%	1.8%	\$125	4.3%	12.4%
	\$250,001 - \$1 Million	15	40.5%	\$6,237	84.2%		0	0.0%	0.0%	\$0	0.0%	0.0%	6	50.0%	2.1%	\$2,662	92.1%	44.2%
	<b>Total</b>	<b>37</b>	<b>100.0%</b>	<b>\$7,406</b>	<b>100.0%</b>		<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,889</b>	<b>100.0%</b>	<b>100.0%</b>
	Small Farm Revenue	<b>Total Farms</b>																
\$1 Million or Less		0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	73.7%	\$0	0.0%	78.3%
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%				
<b>Total</b>		<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>0</b>	<b>0.0%</b>				
Small Farm Loan Size	\$100,000 or Less	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%
	\$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%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>		<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

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 Jacksonville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2014				2015							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Moderate	1	3.0%	\$153	1.6%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	8.3%	10.8%	\$153	6.4%	6.0%
	Middle	16	48.5%	\$4,120	44.0%	41.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	8	66.7%	42.4%	\$1,200	50.4%	38.0%
	Upper	16	48.5%	\$5,091	54.4%	36.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	25.0%	45.9%	\$1,029	43.2%	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%
	<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>\$9,364</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,382</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	1	10.0%	\$70	2.2%	3.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	33.3%	1.0%	\$70	27.2%	0.4%
	Moderate	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	10.7%	\$0	0.0%	6.5%
	Middle	4	40.0%	\$1,535	48.9%	41.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	66.7%	39.6%	\$187	72.8%	33.7%
	Upper	5	50.0%	\$1,531	48.8%	36.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	48.7%	\$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%
	<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>\$3,136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$257</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.6%	\$0	0.0%	1.4%
	Moderate	1	25.0%	\$4	0.9%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	33.3%	13.8%	\$4	1.0%	6.6%
	Middle	1	25.0%	\$20	4.7%	41.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	33.3%	43.2%	\$20	4.8%	35.9%
	Upper	2	50.0%	\$400	94.3%	36.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	33.3%	40.4%	\$390	94.2%	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%
	<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$424</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$414</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	6.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.8%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	32.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	30.8%	\$0	0.0%	18.6%
	Middle	0	0.0%	\$0	0.0%	35.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	48.1%	\$0	0.0%	45.0%
	Upper	2	100.0%	\$3,683	100.0%	26.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	17.3%	\$0	0.0%	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%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$3,683</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	1	2.0%	\$70	0.4%	3.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	5.6%	1.0%	\$70	2.3%	0.4%
	Moderate	2	4.1%	\$157	0.9%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	11.1%	10.9%	\$157	5.1%	6.7%
	Middle	21	42.9%	\$5,675	34.2%	41.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	11	61.1%	41.5%	\$1,407	46.1%	37.0%
	Upper	25	51.0%	\$10,705	64.5%	36.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	22.2%	46.5%	\$1,419	46.5%	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%
	<b>Total</b>	<b>49</b>	<b>100.0%</b>	<b>\$16,607</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,053</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	Low	2	3.4%	\$1,213	9.7%	4.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	5.9%	3.6%	\$213	7.8%	5.4%
	Moderate	8	13.6%	\$2,775	22.1%	20.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	5.9%	19.9%	\$250	9.2%	23.5%
	Middle	17	28.8%	\$3,432	27.4%	38.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	6	35.3%	35.3%	\$1,478	54.3%	34.4%
	Upper	32	54.2%	\$5,126	40.9%	37.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	9	52.9%	40.1%	\$781	28.7%	35.8%
	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%	1.0%	\$0	0.0%	0.9%
<b>Total</b>	<b>59</b>	<b>100.0%</b>	<b>\$12,546</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,722</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Small Farms</b>																	
	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%	12.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	16.2%
	Middle	0	0.0%	\$0	0.0%	39.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	37.5%	\$0	0.0%	49.0%
	Upper	0	0.0%	\$0	0.0%	47.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	45.8%	\$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%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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 Jacksonville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2014			2015								
		Count		Dollar			Bank	Agg	Dollar		Count			Dollar				
		#	%	\$ (000s)	\$ %	#			%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	5	15.2%	\$290	3.1%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	5	41.7%	4.9%	\$290	12.2%	2.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	15.5%	\$0	0.0%	9.2%
	Middle	4	12.1%	\$687	7.3%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	16.7%	20.4%	\$324	13.6%	17.0%
	Upper	19	57.6%	\$6,818	72.8%	39.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	5	41.7%	42.9%	\$1,768	74.2%	57.0%
	Unknown	5	15.2%	\$1,569	16.8%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.3%	\$0	0.0%	14.8%
	<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>\$9,364</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,382</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.5%	\$0	0.0%	2.3%
	Moderate	2	20.0%	\$208	6.6%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	66.7%	10.9%	\$208	80.9%	6.5%
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.1%	\$0	0.0%	12.2%
	Upper	8	80.0%	\$2,928	93.4%	39.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	33.3%	40.2%	\$49	19.1%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	28.3%	\$0	0.0%	27.8%
	<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>\$3,136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$257</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	2	50.0%	\$14	3.3%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	33.3%	6.4%	\$4	1.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.9%	\$0	0.0%	12.2%
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	22.3%	\$0	0.0%	16.7%
	Upper	2	50.0%	\$410	96.7%	39.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	66.7%	48.7%	\$410	99.0%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.8%	\$0	0.0%	9.6%
	<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$424</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$414</b>	<b>100.0%</b>	<b>100.0%</b>
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%	17.6%	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%	21.3%	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%	39.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	2	100.0%	\$3,683	100.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$3,683</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	7	14.3%	\$304	1.8%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	6	33.3%	4.8%	\$294	9.6%	2.0%
	Moderate	2	4.1%	\$208	1.3%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	11.1%	14.0%	\$208	6.8%	8.1%
	Middle	4	8.2%	\$687	4.1%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	11.1%	19.1%	\$324	10.6%	14.9%
	Upper	29	59.2%	\$10,156	61.2%	39.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	8	44.4%	42.2%	\$2,227	72.9%	53.0%
	Unknown	7	14.3%	\$5,252	31.6%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	19.8%	\$0	0.0%	22.1%
	<b>Total</b>	<b>49</b>	<b>100.0%</b>	<b>\$16,607</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,053</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	22	37.3%	\$1,633	13.0%	92.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	8	47.1%	53.9%	\$646	23.7%	35.5%
	Over \$1 Million	34	57.6%	\$9,666	77.0%	6.8%	0	0.0%					8	47.1%				
	<b>Total Rev. available</b>	<b>56</b>	<b>94.9%</b>	<b>\$11,299</b>	<b>90.0%</b>	<b>99.3%</b>	<b>0</b>	<b>0.0%</b>					<b>16</b>	<b>94.2%</b>				
	Rev. Not Known	3	5.1%	\$1,247	9.9%	0.6%	0	0.0%					1	5.9%				
<b>Total</b>	<b>59</b>	<b>100.0%</b>	<b>\$12,546</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>17</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	27	45.8%	\$898	7.2%		0	0.0%	0.0%	\$0	0.0%	0.0%	8	47.1%	94.6%	\$313	11.5%	41.5%
	\$100,001 - \$250,000	19	32.2%	\$3,316	26.4%		0	0.0%	0.0%	\$0	0.0%	0.0%	8	47.1%	2.6%	\$1,429	52.5%	13.6%
	\$250,001 - \$1 Million	13	22.0%	\$8,332	66.4%		0	0.0%	0.0%	\$0	0.0%	0.0%	1	5.9%	2.8%	\$980	36.0%	44.9%
	<b>Total</b>	<b>59</b>	<b>100.0%</b>	<b>\$12,546</b>	<b>100.0%</b>		<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,722</b>	<b>100.0%</b>	<b>100.0%</b>
	Small Farm Revenue	<b>Total Farms</b>																
\$1 Million or Less		0	0.0%	\$0	0.0%	95.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	45.8%	\$0	0.0%	29.6%
Over \$1 Million		0	0.0%	\$0	0.0%	4.1%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
<b>Total</b>		<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>0</b>	<b>0.0%</b>				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	91.7%	\$0	0.0%	60.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	8.3%	\$0	0.0%	39.6%
	\$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%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>		<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

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 Keys

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014						2015					
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	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	1	0.3%	\$810	0.8%	2.5%	0	0.0%	0.8%	\$0	0.0%	0.4%	0	0.0%	0.7%	\$0	0.0%	0.5%
	Middle	85	29.6%	\$27,985	29.2%	17.8%	22	25.6%	14.1%	\$5,977	25.0%	13.2%	37	35.6%	17.0%	\$12,228	35.6%	14.9%
	Upper	201	70.0%	\$67,154	70.0%	79.8%	64	74.4%	85.0%	\$17,970	75.0%	86.3%	67	64.4%	82.3%	\$22,126	64.4%	84.6%
	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%
	<b>Total</b>	<b>287</b>	<b>100.0%</b>	<b>\$95,949</b>	<b>100.0%</b>	<b>100.0%</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,947</b>	<b>100.0%</b>	<b>100.0%</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,354</b>	<b>100.0%</b>	<b>100.0%</b>
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%	2.5%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	1.0%	\$0	0.0%	0.6%
	Middle	35	37.2%	\$11,080	38.9%	17.8%	12	48.0%	19.9%	\$3,604	54.3%	16.8%	9	30.0%	17.0%	\$2,268	27.0%	16.9%
	Upper	59	62.8%	\$17,368	61.1%	79.8%	13	52.0%	79.7%	\$3,030	45.7%	83.0%	21	70.0%	82.1%	\$6,126	73.0%	82.4%
	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%
	<b>Total</b>	<b>94</b>	<b>100.0%</b>	<b>\$28,448</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,634</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,394</b>	<b>100.0%</b>	<b>100.0%</b>
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%	2.5%	0	0.0%	2.1%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	11.8%	\$539	14.7%	17.8%	1	20.0%	16.7%	\$10	2.8%	13.0%	0	0.0%	14.8%	\$0	0.0%	11.4%
	Upper	15	88.2%	\$3,132	85.3%	79.8%	4	80.0%	81.3%	\$347	97.2%	86.8%	8	100.0%	85.2%	\$1,468	100.0%	88.6%
	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%
	<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>\$3,671</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$357</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,468</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	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%	2.1%	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%	17.8%	0	0.0%	50.0%	\$0	0.0%	2.3%	0	0.0%	42.9%	\$0	0.0%	47.4%
	Upper	1	100.0%	\$177	100.0%	80.0%	0	0.0%	50.0%	\$0	0.0%	97.7%	1	100.0%	57.1%	\$177	100.0%	52.6%
	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%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$177</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$177</b>	<b>100.0%</b>	<b>100.0%</b>	
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	0.3%	\$810	0.6%	2.5%	0	0.0%	0.7%	\$0	0.0%	0.3%	0	0.0%	0.8%	\$0	0.0%	0.5%
	Middle	122	30.6%	\$39,604	30.9%	17.8%	35	30.2%	15.9%	\$9,591	31.0%	13.0%	46	32.2%	17.0%	\$14,496	32.7%	17.6%
	Upper	276	69.2%	\$87,831	68.5%	79.8%	81	69.8%	83.4%	\$21,347	69.0%	86.6%	97	67.8%	82.2%	\$29,897	67.3%	82.0%
	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%
	<b>Total</b>	<b>399</b>	<b>100.0%</b>	<b>\$128,245</b>	<b>100.0%</b>	<b>100.0%</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$30,938</b>	<b>100.0%</b>	<b>100.0%</b>	<b>143</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$44,393</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	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	9.4%	\$1,453	12.9%	2.2%	2	7.1%	1.4%	\$525	22.9%	1.4%	3	5.5%	1.8%	\$123	2.0%	4.0%
	Middle	28	20.1%	\$1,735	15.4%	22.6%	4	14.3%	23.3%	\$221	9.7%	27.1%	10	18.2%	24.5%	\$560	8.9%	21.0%
	Upper	98	70.5%	\$8,088	71.7%	75.1%	22	78.6%	71.8%	\$1,543	67.4%	69.5%	42	76.4%	70.7%	\$5,579	89.1%	73.5%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.5%	\$0	0.0%	2.0%	0	0.0%	3.0%	\$0	0.0%	1.5%
<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>\$11,276</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,289</b>	<b>100.0%</b>	<b>100.0%</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,262</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Small Farms</b>																	
	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%	4.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	20.0%	\$0	0.0%	3.8%
	Middle	1	20.0%	\$92	33.7%	10.0%	1	25.0%	10.0%	\$92	39.5%	14.4%	0	0.0%	20.0%	\$0	0.0%	19.2%
	Upper	4	80.0%	\$181	66.3%	86.0%	3	75.0%	90.0%	\$141	60.5%	85.6%	0	0.0%	60.0%	\$0	0.0%	76.9%
	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%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>\$273</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$233</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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 Keys

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		by Family Income			Count		Dollar			Count		Dollar				
		Count	Dollar			%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
	#	%	\$ (000s)	\$ %	%													
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	11.6%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	1	0.3%	\$138	0.1%	12.4%	1	1.2%	0.7%	\$138	0.6%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Middle	32	11.1%	\$6,705	7.0%	17.1%	8	9.3%	6.2%	\$1,312	5.5%	3.0%	16	15.4%	5.8%	\$3,650	10.6%	3.1%
	Upper	250	87.1%	\$87,480	91.2%	58.9%	77	89.5%	82.4%	\$22,497	93.9%	85.3%	85	81.7%	82.7%	\$29,253	85.2%	81.7%
	Unknown	4	1.4%	\$1,626	1.7%	0.0%	0	0.0%	10.6%	\$0	0.0%	11.4%	3	2.9%	11.1%	\$1,451	4.2%	15.1%
	<b>Total</b>	<b>287</b>	<b>100.0%</b>	<b>\$95,949</b>	<b>100.0%</b>	<b>100.0%</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,947</b>	<b>100.0%</b>	<b>100.0%</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,354</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	3	3.2%	\$203	0.7%	11.6%	3	12.0%	1.9%	\$203	3.1%	0.9%	0	0.0%	1.7%	\$0	0.0%	0.9%
	Moderate	3	3.2%	\$384	1.3%	12.4%	3	12.0%	3.4%	\$384	5.8%	1.4%	0	0.0%	1.0%	\$0	0.0%	0.4%
	Middle	8	8.5%	\$1,697	6.0%	17.1%	4	16.0%	11.6%	\$793	12.0%	6.7%	3	10.0%	7.3%	\$704	8.4%	3.5%
	Upper	80	85.1%	\$26,164	92.0%	58.9%	15	60.0%	71.7%	\$5,254	79.2%	77.1%	27	90.0%	74.7%	\$7,690	91.6%	79.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.4%	\$0	0.0%	13.9%	0	0.0%	15.4%	\$0	0.0%	15.4%
	<b>Total</b>	<b>94</b>	<b>100.0%</b>	<b>\$28,448</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,634</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,394</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	11.6%	0	0.0%	2.1%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	5.9%	\$120	3.3%	12.4%	0	0.0%	4.2%	\$0	0.0%	2.3%	1	12.5%	3.7%	\$120	8.2%	1.1%
	Middle	1	5.9%	\$285	7.8%	17.1%	1	20.0%	8.3%	\$285	79.8%	4.3%	0	0.0%	1.2%	\$0	0.0%	2.4%
	Upper	13	76.5%	\$3,104	84.6%	58.9%	3	60.0%	79.2%	\$70	19.6%	91.2%	7	87.5%	93.8%	\$1,348	91.8%	94.1%
	Unknown	2	11.8%	\$162	4.4%	0.0%	1	20.0%	6.3%	\$2	0.6%	1.5%	0	0.0%	1.2%	\$0	0.0%	2.3%
	<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>\$3,671</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$357</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,468</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	11.6%	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%	12.4%	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%	17.1%	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%	58.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$177	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$177	100.0%	100.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$177</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$177</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	3	0.8%	\$203	0.2%	11.6%	3	2.6%	0.7%	\$203	0.7%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	5	1.3%	\$642	0.5%	12.4%	4	3.4%	1.5%	\$522	1.7%	0.6%	1	0.7%	0.7%	\$120	0.3%	0.2%
	Middle	41	10.3%	\$8,687	6.8%	17.1%	13	11.2%	7.7%	\$2,390	7.7%	3.6%	19	13.3%	6.1%	\$4,354	9.8%	3.0%
	Upper	343	86.0%	\$116,748	91.0%	58.9%	95	81.9%	79.2%	\$27,821	89.9%	75.3%	119	83.2%	80.3%	\$38,291	86.3%	75.9%
	Unknown	7	1.8%	\$1,965	1.5%	0.0%	1	0.9%	10.9%	\$2	0.0%	20.3%	4	2.8%	12.4%	\$1,628	3.7%	20.6%
	<b>Total</b>	<b>399</b>	<b>100.0%</b>	<b>\$128,245</b>	<b>100.0%</b>	<b>100.0%</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$30,938</b>	<b>100.0%</b>	<b>100.0%</b>	<b>143</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$44,393</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	109	78.4%	\$5,544	49.2%	93.6%	23	82.1%	52.8%	\$1,548	67.6%	40.7%	43	78.2%	57.1%	\$2,988	47.7%	46.5%
	Over \$1 Million	28	20.1%	\$5,730	50.8%	5.6%	4	14.3%					12	21.8%				
	Total Rev. available	137	98.5%	\$11,274	100.0%	99.2%	27	96.4%					55	100.0%				
	Rev. Not Known	2	1.4%	\$2	0.0%	0.8%	1	3.6%					0	0.0%				
<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>\$11,276</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28</b>	<b>100.0%</b>					<b>55</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	114	82.0%	\$3,122	27.7%		22	78.6%	96.0%	\$652	28.5%	41.5%	42	76.4%	95.2%	\$1,291	20.6%	39.4%
	\$100,001 - \$250,000	13	9.4%	\$2,428	21.5%		3	10.7%	1.8%	\$422	18.4%	11.9%	5	9.1%	2.3%	\$1,060	16.9%	14.9%
	\$250,001 - \$1 Million	12	8.6%	\$5,726	50.8%		3	10.7%	2.2%	\$1,215	53.1%	46.6%	8	14.5%	2.5%	\$3,911	62.5%	45.7%
	Total	139	100.0%	\$11,276	100.0%		28	100.0%	100.0%	\$2,289	100.0%	100.0%	55	100.0%	100.0%	\$6,262	100.0%	100.0%
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	4	80.0%	\$181	66.3%	100.0%	3	75.0%	70.0%	\$141	60.5%	84.8%	0	0.0%	80.0%	\$0	0.0%	80.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Not Known	1	20.0%	\$92	33.7%	0.0%	1	25.0%					0	0.0%				
	<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>\$273</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>					<b>0</b>	<b>0.0%</b>				
Small Farm Loan Size	\$100,000 or Less	5	100.0%	\$273	100.0%		4	100.0%	90.0%	\$233	100.0%	41.0%	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%	10.0%	\$0	0.0%	59.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$273	100.0%		4	100.0%	100.0%	\$233	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: FL Naples

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2014				2015							
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	21	7.7%	\$1,993	3.2%	2.4%	5	5.0%	1.7%	\$361	1.7%	0.8%	11	9.7%	2.2%	\$912	3.9%	1.1%
	Moderate	43	15.7%	\$5,771	9.3%	16.4%	20	19.8%	15.2%	\$2,031	9.7%	10.1%	14	12.4%	15.0%	\$1,846	8.0%	10.8%
	Middle	158	57.7%	\$31,368	50.5%	46.0%	53	52.5%	48.4%	\$9,663	46.4%	37.2%	67	59.3%	51.8%	\$12,093	52.3%	41.2%
	Upper	52	19.0%	\$23,032	37.1%	35.2%	23	22.8%	34.7%	\$8,783	42.1%	51.8%	21	18.6%	31.1%	\$8,256	35.7%	46.9%
	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>274</i>	<i>100.0%</i>	<i>\$62,164</i>	<i>100.0%</i>	<i>100.0%</i>	<i>101</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,838</i>	<i>100.0%</i>	<i>100.0%</i>	<i>113</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23,107</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	1.1%	\$282	1.1%	2.4%	0	0.0%	1.4%	\$0	0.0%	0.6%	1	2.8%	1.3%	\$282	3.7%	0.6%
	Moderate	12	13.5%	\$3,580	14.4%	16.4%	3	11.5%	13.3%	\$1,779	17.3%	9.1%	7	19.4%	13.0%	\$1,328	17.4%	8.2%
	Middle	50	56.2%	\$10,198	40.9%	46.0%	14	53.8%	49.7%	\$2,792	27.1%	37.7%	17	47.2%	51.6%	\$3,209	42.0%	40.3%
	Upper	26	29.2%	\$10,865	43.6%	35.2%	9	34.6%	35.7%	\$5,715	55.6%	52.6%	11	30.6%	34.0%	\$2,821	36.9%	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>89</i>	<i>100.0%</i>	<i>\$24,925</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,286</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,640</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	6	9.1%	\$94	4.0%	2.4%	6	26.1%	4.7%	\$94	26.0%	0.8%	0	0.0%	0.9%	\$0	0.0%	0.3%
	Moderate	10	15.2%	\$696	29.8%	16.4%	2	8.7%	12.2%	\$7	1.9%	6.8%	7	20.6%	15.4%	\$674	53.3%	8.2%
	Middle	39	59.1%	\$1,353	57.9%	46.0%	9	39.1%	52.8%	\$155	42.9%	38.0%	22	64.7%	59.3%	\$503	39.8%	35.5%
	Upper	11	16.7%	\$192	8.2%	35.2%	6	26.1%	30.3%	\$105	29.1%	54.4%	5	14.7%	24.5%	\$87	6.9%	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>66</i>	<i>100.0%</i>	<i>\$2,335</i>	<i>100.0%</i>	<i>100.0%</i>	<i>23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$361</i>	<i>100.0%</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,264</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	15.8%	\$0	0.0%	11.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	10.7%	\$490	8.3%	13.8%	0	0.0%	21.1%	\$0	0.0%	52.2%	2	25.0%	45.8%	\$240	20.4%	47.1%
	Middle	7	25.0%	\$1,275	21.5%	39.5%	4	44.4%	36.8%	\$655	23.7%	32.8%	1	12.5%	20.8%	\$70	6.0%	42.3%
	Upper	18	64.3%	\$4,152	70.2%	43.7%	5	55.6%	26.3%	\$2,109	76.3%	3.6%	5	62.5%	33.3%	\$866	73.6%	10.6%
	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>28</i>	<i>100.0%</i>	<i>\$5,917</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,764</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,176</i>	<i>100.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	28	6.1%	\$2,369	2.5%	2.4%	11	6.9%	1.8%	\$455	1.3%	1.0%	12	6.3%	1.9%	\$1,194	3.6%	0.9%
	Moderate	68	14.9%	\$10,537	11.1%	16.4%	25	15.7%	14.7%	\$3,817	11.1%	10.6%	30	15.7%	14.4%	\$4,088	12.3%	11.2%
	Middle	254	55.6%	\$44,194	46.4%	46.0%	80	50.3%	48.8%	\$13,265	38.7%	37.3%	107	56.0%	51.9%	\$15,875	47.8%	40.9%
	Upper	107	23.4%	\$38,241	40.1%	35.2%	43	27.0%	34.8%	\$16,712	48.8%	51.2%	42	22.0%	31.8%	\$12,030	36.2%	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%
	<i>Total</i>	<i>457</i>	<i>100.0%</i>	<i>\$95,341</i>	<i>100.0%</i>	<i>100.0%</i>	<i>159</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$34,249</i>	<i>100.0%</i>	<i>100.0%</i>	<i>191</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$33,187</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	9	1.7%	\$1,155	2.8%	2.9%	3	1.7%	1.9%	\$996	6.2%	1.8%	1	0.6%	2.1%	\$150	1.0%	2.2%
	Moderate	52	9.7%	\$3,529	8.4%	13.1%	14	8.0%	10.8%	\$1,322	8.2%	10.1%	17	9.7%	10.6%	\$623	4.0%	8.7%
	Middle	214	39.8%	\$18,345	43.8%	43.6%	70	40.2%	41.5%	\$6,595	41.1%	41.0%	74	42.0%	41.5%	\$7,529	48.1%	40.9%
	Upper	263	48.9%	\$18,848	45.0%	40.4%	87	50.0%	44.7%	\$7,137	44.5%	46.4%	84	47.7%	45.0%	\$7,367	47.0%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.6%	0	0.0%	0.8%	\$0	0.0%	0.5%
<i>Total</i>	<i>538</i>	<i>100.0%</i>	<i>\$41,877</i>	<i>100.0%</i>	<i>100.0%</i>	<i>174</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,050</i>	<i>100.0%</i>	<i>100.0%</i>	<i>176</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$15,669</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	8.4%	0	0.0%	23.1%	\$0	0.0%	21.1%	0	0.0%	30.0%	\$0	0.0%	8.1%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	15.4%	\$0	0.0%	5.9%	0	0.0%	13.3%	\$0	0.0%	6.2%
	Middle	1	50.0%	\$49	12.3%	47.6%	0	0.0%	42.3%	\$0	0.0%	62.6%	1	100.0%	40.0%	\$49	100.0%	55.7%
	Upper	1	50.0%	\$350	87.7%	28.3%	0	0.0%	15.4%	\$0	0.0%	8.3%	0	0.0%	10.0%	\$0	0.0%	28.3%
	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%	3.8%	\$0	0.0%	2.1%	0	0.0%	6.7%	\$0	0.0%	1.7%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$399</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>\$49</i>	<i>100.0%</i>	<i>100.0%</i>	

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 Naples

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2014			2015								
		Count		Dollar			Bank		Agg	Bank		Agg		Bank		Agg		
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	20	7.3%	\$1,472	2.4%	21.1%	7	6.9%	2.1%	\$389	1.9%	0.7%	12	10.6%	2.4%	\$980	4.2%	0.9%
	Moderate	81	29.6%	\$9,549	15.4%	18.3%	30	29.7%	9.7%	\$2,410	11.6%	4.4%	35	31.0%	11.3%	\$4,255	18.4%	5.6%
	Middle	62	22.6%	\$10,576	17.0%	19.0%	22	21.8%	13.3%	\$3,317	15.9%	7.6%	27	23.9%	13.5%	\$4,585	19.8%	8.5%
	Upper	105	38.3%	\$37,942	61.0%	41.5%	40	39.6%	60.9%	\$14,136	67.8%	75.1%	36	31.9%	57.5%	\$11,398	49.3%	72.3%
	Unknown	6	2.2%	\$2,625	4.2%	0.0%	2	2.0%	14.0%	\$586	2.8%	12.3%	3	2.7%	15.3%	\$1,889	8.2%	12.8%
	<b>Total</b>	<b>274</b>	<b>100.0%</b>	<b>\$62,164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20,838</b>	<b>100.0%</b>	<b>100.0%</b>	<b>113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,107</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	5	5.6%	\$720	2.9%	21.1%	4	15.4%	4.8%	\$568	5.5%	2.0%	1	2.8%	4.3%	\$152	2.0%	1.7%
	Moderate	12	13.5%	\$1,910	7.7%	18.3%	3	11.5%	11.3%	\$484	4.7%	5.3%	4	11.1%	11.3%	\$492	6.4%	5.5%
	Middle	15	16.9%	\$3,288	13.2%	19.0%	2	7.7%	16.5%	\$498	4.8%	9.7%	6	16.7%	16.2%	\$1,278	16.7%	10.1%
	Upper	54	60.7%	\$18,625	74.7%	41.5%	17	65.4%	54.7%	\$8,736	84.9%	70.0%	22	61.1%	51.4%	\$5,336	69.8%	66.6%
	Unknown	3	3.4%	\$382	1.5%	0.0%	0	0.0%	12.8%	\$0	0.0%	13.1%	3	8.3%	16.9%	\$382	5.0%	16.1%
	<b>Total</b>	<b>89</b>	<b>100.0%</b>	<b>\$24,925</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,286</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,640</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	3	4.5%	\$15	0.6%	21.1%	2	8.7%	5.1%	\$10	2.8%	1.0%	0	0.0%	5.1%	\$0	0.0%	0.9%
	Moderate	5	7.6%	\$147	6.3%	18.3%	2	8.7%	18.1%	\$19	5.3%	5.8%	2	5.9%	16.2%	\$22	1.7%	6.8%
	Middle	21	31.8%	\$250	10.7%	19.0%	9	39.1%	22.4%	\$107	29.6%	12.7%	12	35.3%	23.4%	\$143	11.3%	10.8%
	Upper	31	47.0%	\$754	32.3%	41.5%	10	43.5%	47.2%	\$225	62.3%	72.4%	17	50.0%	48.7%	\$425	33.6%	47.8%
	Unknown	6	9.1%	\$1,169	50.1%	0.0%	0	0.0%	7.1%	\$0	0.0%	8.1%	3	8.8%	6.6%	\$674	53.3%	33.7%
	<b>Total</b>	<b>66</b>	<b>100.0%</b>	<b>\$2,335</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$361</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,264</b>	<b>100.0%</b>	<b>100.0%</b>
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%	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%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	28	100.0%	\$5,917	100.0%	0.0%	9	100.0%	100.0%	\$2,764	100.0%	100.0%	8	100.0%	100.0%	\$1,176	100.0%	100.0%
	<b>Total</b>	<b>28</b>	<b>100.0%</b>	<b>\$5,917</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,764</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,176</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	28	6.1%	\$2,207	2.3%	21.1%	13	8.2%	2.8%	\$967	2.8%	1.0%	13	6.8%	3.1%	\$1,132	3.4%	1.1%
	Moderate	98	21.4%	\$11,606	12.2%	18.3%	35	22.0%	10.3%	\$2,913	8.5%	4.6%	41	21.5%	11.4%	\$4,769	14.4%	5.4%
	Middle	98	21.4%	\$14,114	14.8%	19.0%	33	20.8%	14.3%	\$3,922	11.5%	8.0%	45	23.6%	14.6%	\$6,006	18.1%	8.7%
	Upper	190	41.6%	\$57,321	60.1%	41.5%	67	42.1%	58.9%	\$23,097	67.4%	72.5%	75	39.3%	55.2%	\$17,159	51.7%	68.0%
	Unknown	43	9.4%	\$10,093	10.6%	0.0%	11	6.9%	13.7%	\$3,350	9.8%	14.0%	17	8.9%	15.7%	\$4,121	12.4%	16.8%
	<b>Total</b>	<b>457</b>	<b>100.0%</b>	<b>\$95,341</b>	<b>100.0%</b>	<b>100.0%</b>	<b>159</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,249</b>	<b>100.0%</b>	<b>100.0%</b>	<b>191</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$33,187</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	354	65.8%	\$12,350	29.5%	93.4%	94	54.0%	49.3%	\$3,388	21.1%	37.1%	118	67.0%	54.2%	\$5,326	34.0%	41.1%
	Over \$1 Million	148	27.5%	\$29,335	70.1%	5.6%	58	33.3%					54	30.7%				
	<b>Total Rev. available</b>	<b>502</b>	<b>93.3%</b>	<b>\$41,685</b>	<b>99.6%</b>	<b>99.0%</b>	<b>152</b>	<b>87.3%</b>					<b>172</b>	<b>97.7%</b>				
	Rev. Not Known	36	6.7%	\$192	0.5%	1.0%	22	12.6%					4	2.3%				
<b>Total</b>	<b>538</b>	<b>100.0%</b>	<b>\$41,877</b>	<b>100.0%</b>	<b>100.0%</b>	<b>174</b>	<b>100.0%</b>					<b>176</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	454	84.4%	\$10,642	25.4%		142	81.6%	94.8%	\$3,339	20.8%	38.3%	142	80.7%	95.5%	\$3,658	23.3%	43.4%
	\$100,001 - \$250,000	49	9.1%	\$9,346	22.3%		18	10.3%	2.7%	\$3,335	20.8%	15.9%	19	10.8%	2.1%	\$3,680	23.5%	13.5%
	\$250,001 - \$1 Million	35	6.5%	\$21,889	52.3%		14	8.0%	2.5%	\$9,376	58.4%	45.7%	15	8.5%	2.4%	\$8,331	53.2%	43.1%
	<b>Total</b>	<b>538</b>	<b>100.0%</b>	<b>\$41,877</b>	<b>100.0%</b>		<b>174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,050</b>	<b>100.0%</b>	<b>100.0%</b>	<b>176</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,669</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Total Farms</b>																	
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	91.0%	0	0.0%	65.4%	\$0	0.0%	71.9%	0	0.0%	66.7%	\$0	0.0%	75.5%
	Over \$1 Million	1	50.0%	\$350	87.7%	9.0%	0	0.0%					0	0.0%				
	Not Known	1	50.0%	\$49	12.3%	0.0%	0	0.0%					1	100.0%				
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$399</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>1</b>	<b>100.0%</b>				
	<b>Total Farms</b>																	
Small Farm Loan Size	\$100,000 or Less	1	50.0%	\$49	12.3%		0	0.0%	92.3%	\$0	0.0%	36.1%	1	100.0%	93.3%	\$49	100.0%	38.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.8%	\$0	0.0%	14.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	\$250,001 - \$500,000	1	50.0%	\$350	87.7%		0	0.0%	3.8%	\$0	0.0%	49.7%	0	0.0%	6.7%	\$0	0.0%	61.1%
	<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>\$399</b>	<b>100.0%</b>		<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$49</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Total Farms</b>																	

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 Palm Beach-Broward

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014				2015							
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank #	Agg %	\$ (000s)	\$ %	\$ %	Bank #	Agg %	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	25	4.8%	\$2,851	3.0%	2.3%	8	4.6%	1.2%	\$877	3.7%	0.8%	11	5.6%	1.2%	\$1,220	3.2%	0.7%
	Moderate	166	31.6%	\$16,436	17.2%	24.9%	58	33.1%	17.3%	\$4,921	20.7%	10.4%	52	26.4%	19.0%	\$4,854	12.6%	11.7%
	Middle	204	38.9%	\$33,039	34.5%	36.7%	76	43.4%	38.0%	\$8,982	37.8%	30.4%	81	41.1%	38.6%	\$14,519	37.8%	31.8%
	Upper	130	24.8%	\$43,489	45.4%	36.1%	33	18.9%	43.5%	\$8,968	37.8%	58.4%	53	26.9%	41.2%	\$17,847	46.4%	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%
	<b>Total</b>	<b>525</b>	<b>100.0%</b>	<b>\$95,815</b>	<b>100.0%</b>	<b>100.0%</b>	<b>175</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,748</b>	<b>100.0%</b>	<b>100.0%</b>	<b>197</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$38,440</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	0.9%	\$0	0.0%	0.9%	0	0.0%	0.8%	\$0	0.0%	0.5%
	Moderate	15	17.9%	\$1,955	9.1%	24.9%	6	35.3%	15.5%	\$444	11.3%	9.9%	5	17.9%	15.2%	\$1,157	17.6%	9.2%
	Middle	32	38.1%	\$5,087	23.8%	36.7%	3	17.6%	35.3%	\$467	11.9%	27.7%	14	50.0%	35.5%	\$2,006	30.5%	28.7%
	Upper	37	44.0%	\$14,356	67.1%	36.1%	8	47.1%	48.3%	\$3,027	76.9%	61.5%	9	32.1%	48.5%	\$3,405	51.8%	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%
	<b>Total</b>	<b>84</b>	<b>100.0%</b>	<b>\$21,398</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,938</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,568</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	1.9%	\$0	0.0%	1.4%	0	0.0%	1.2%	\$0	0.0%	1.2%
	Moderate	11	19.3%	\$208	4.3%	24.9%	5	18.5%	18.8%	\$68	5.0%	8.4%	2	13.3%	17.2%	\$56	6.4%	8.0%
	Middle	20	35.1%	\$2,291	47.7%	36.7%	10	37.0%	34.0%	\$388	28.7%	26.6%	5	33.3%	36.9%	\$76	8.7%	28.3%
	Upper	26	45.6%	\$2,306	48.0%	36.1%	12	44.4%	45.3%	\$897	66.3%	63.6%	8	53.3%	44.7%	\$739	84.8%	62.6%
	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%
	<b>Total</b>	<b>57</b>	<b>100.0%</b>	<b>\$4,805</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,353</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$871</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	5.3%	0	0.0%	9.1%	\$0	0.0%	4.9%	0	0.0%	11.6%	\$0	0.0%	7.2%
	Moderate	0	0.0%	\$0	0.0%	34.4%	0	0.0%	39.9%	\$0	0.0%	28.0%	0	0.0%	33.9%	\$0	0.0%	23.3%
	Middle	1	33.3%	\$700	20.4%	38.5%	0	0.0%	30.5%	\$0	0.0%	43.6%	1	50.0%	31.8%	\$700	30.8%	39.9%
	Upper	2	66.7%	\$2,735	79.6%	21.9%	0	0.0%	20.6%	\$0	0.0%	23.5%	1	50.0%	22.6%	\$1,575	69.2%	29.5%
	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%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$3,435</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,275</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	25	3.7%	\$2,851	2.3%	2.3%	8	3.7%	1.2%	\$877	3.0%	1.1%	11	4.5%	1.1%	\$1,220	2.5%	1.1%
	Moderate	192	28.7%	\$18,599	14.8%	24.9%	69	31.5%	16.8%	\$5,433	18.7%	11.3%	59	24.4%	17.7%	\$6,067	12.6%	11.6%
	Middle	257	38.4%	\$41,117	32.8%	36.7%	89	40.6%	37.0%	\$9,837	33.9%	30.4%	101	41.7%	37.4%	\$17,301	35.9%	31.3%
	Upper	195	29.1%	\$62,886	50.1%	36.1%	53	24.2%	45.0%	\$12,892	44.4%	57.3%	71	29.3%	43.8%	\$23,566	48.9%	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%
	<b>Total</b>	<b>669</b>	<b>100.0%</b>	<b>\$125,453</b>	<b>100.0%</b>	<b>100.0%</b>	<b>219</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,039</b>	<b>100.0%</b>	<b>100.0%</b>	<b>242</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$48,154</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	Low	40	8.8%	\$3,559	8.3%	3.3%	13	10.6%	3.8%	\$1,381	10.3%	5.6%	16	10.5%	3.6%	\$1,616	10.3%	5.2%
	Moderate	111	24.3%	\$11,476	26.7%	21.4%	39	31.7%	20.3%	\$5,100	38.2%	23.9%	30	19.6%	20.3%	\$2,793	17.8%	23.2%
	Middle	180	39.5%	\$13,063	30.4%	32.8%	43	35.0%	31.1%	\$3,426	25.6%	30.4%	60	39.2%	31.4%	\$5,696	36.3%	31.1%
	Upper	124	27.2%	\$14,799	34.5%	42.3%	28	22.8%	44.1%	\$3,453	25.8%	39.3%	47	30.7%	44.0%	\$5,591	35.6%	39.8%
	Unknown	1	0.2%	\$50	0.1%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.5%	0	0.0%	0.6%	\$0	0.0%	0.5%
<b>Total</b>	<b>456</b>	<b>100.0%</b>	<b>\$42,947</b>	<b>100.0%</b>	<b>100.0%</b>	<b>123</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,360</b>	<b>100.0%</b>	<b>100.0%</b>	<b>153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,696</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Small Farms</b>																	
	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	3.5%	\$0	0.0%	7.8%	0	0.0%	3.4%	\$0	0.0%	8.6%
	Moderate	0	0.0%	\$0	0.0%	13.8%	0	0.0%	9.3%	\$0	0.0%	13.6%	0	0.0%	11.5%	\$0	0.0%	6.9%
	Middle	1	100.0%	\$85	100.0%	26.7%	1	100.0%	26.7%	\$85	100.0%	25.1%	0	0.0%	23.6%	\$0	0.0%	12.6%
	Upper	0	0.0%	\$0	0.0%	55.3%	0	0.0%	59.3%	\$0	0.0%	52.2%	0	0.0%	60.3%	\$0	0.0%	70.7%
	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%	1.2%	\$0	0.0%	1.4%	0	0.0%	1.1%	\$0	0.0%	1.3%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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 Palm Beach-Broward

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income %	2014			2015									
		Count		Dollar			Bank	Agg	Dollar		Count			Dollar					
		#	%	\$ (000s)	\$ %	#			%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	60	11.4%	\$4,125	4.3%	21.8%	22	12.6%	3.0%	\$1,317	5.5%	1.0%	22	11.2%	2.8%	\$1,499	3.9%	1.1%	
	Moderate	165	31.4%	\$17,286	18.0%	17.6%	59	33.7%	14.1%	\$4,788	20.2%	7.3%	55	27.9%	13.8%	\$6,292	16.4%	7.5%	
	Middle	138	26.3%	\$20,332	21.2%	19.4%	45	25.7%	18.5%	\$4,899	20.6%	13.3%	52	26.4%	19.4%	\$7,157	18.6%	14.4%	
	Upper	160	30.5%	\$53,448	55.8%	41.2%	49	28.0%	49.5%	\$12,744	53.7%	64.3%	66	33.5%	47.1%	\$22,868	59.5%	60.8%	
	Unknown	2	0.4%	\$624	0.7%	0.0%	0	0.0%	14.9%	\$0	0.0%	14.1%	2	1.0%	16.9%	\$624	1.6%	16.2%	
	<b>Total</b>	<b>525</b>	<b>100.0%</b>	<b>\$95,815</b>	<b>100.0%</b>	<b>100.0%</b>	<b>175</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,748</b>	<b>100.0%</b>	<b>100.0%</b>	<b>197</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$38,440</b>	<b>100.0%</b>	<b>100.0%</b>	
REFINANCE	Low	12	14.3%	\$1,200	5.6%	21.8%	4	23.5%	5.7%	\$240	6.1%	2.7%	6	21.4%	3.9%	\$706	10.7%	1.8%	
	Moderate	15	17.9%	\$1,440	6.7%	17.6%	4	23.5%	10.8%	\$364	9.2%	5.8%	7	25.0%	10.0%	\$803	12.2%	5.4%	
	Middle	11	13.1%	\$1,653	7.7%	19.4%	1	5.9%	17.4%	\$199	5.1%	11.9%	4	14.3%	16.6%	\$401	6.1%	11.8%	
	Upper	43	51.2%	\$16,544	77.3%	41.2%	8	47.1%	49.4%	\$3,135	79.6%	61.7%	10	35.7%	46.5%	\$4,335	66.0%	59.0%	
	Unknown	3	3.6%	\$561	2.6%	0.0%	0	0.0%	16.6%	\$0	0.0%	17.9%	1	3.6%	23.0%	\$323	4.9%	22.0%	
	<b>Total</b>	<b>84</b>	<b>100.0%</b>	<b>\$21,398</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,938</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,568</b>	<b>100.0%</b>	<b>100.0%</b>	
HOME IMPROVEMENT	Low	4	7.0%	\$125	2.6%	21.8%	2	7.4%	5.8%	\$62	4.6%	1.1%	1	6.7%	4.8%	\$13	1.5%	0.9%	
	Moderate	10	17.5%	\$193	4.0%	17.6%	3	11.1%	14.8%	\$36	2.7%	5.9%	2	13.3%	12.6%	\$27	3.1%	6.1%	
	Middle	7	12.3%	\$216	4.5%	19.4%	5	18.5%	19.0%	\$190	14.0%	11.6%	1	6.7%	20.6%	\$10	1.1%	13.7%	
	Upper	33	57.9%	\$4,232	88.1%	41.2%	16	59.3%	51.5%	\$1,048	77.5%	66.8%	10	66.7%	56.4%	\$801	92.0%	67.8%	
	Unknown	3	5.3%	\$39	0.8%	0.0%	1	3.7%	9.0%	\$17	1.3%	14.5%	1	6.7%	5.5%	\$20	2.3%	11.5%	
	<b>Total</b>	<b>57</b>	<b>100.0%</b>	<b>\$4,805</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,353</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$871</b>	<b>100.0%</b>	<b>100.0%</b>	
MULTIFAMILY	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%	17.6%	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%	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%	41.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	3	100.0%	\$3,435	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$2,275	100.0%	100.0%	
	<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$3,435</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,275</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	76	11.4%	\$5,450	4.3%	21.8%	28	12.8%	3.9%	\$1,619	5.6%	1.4%	29	12.0%	3.3%	\$2,218	4.6%	1.2%	
	Moderate	190	28.4%	\$18,919	15.1%	17.6%	66	30.1%	13.0%	\$5,188	17.9%	6.4%	64	26.4%	12.4%	\$7,122	14.8%	6.3%	
	Middle	156	23.3%	\$22,201	17.7%	19.4%	51	23.3%	18.1%	\$5,288	18.2%	12.1%	57	23.6%	18.4%	\$7,568	15.7%	12.7%	
	Upper	236	35.3%	\$74,224	59.2%	41.2%	73	33.3%	49.3%	\$16,927	58.3%	59.8%	86	35.5%	47.0%	\$28,004	58.2%	56.6%	
	Unknown	11	1.6%	\$4,659	3.7%	0.0%	1	0.5%	15.6%	\$17	0.1%	20.3%	6	2.5%	19.0%	\$3,242	6.7%	23.2%	
	<b>Total</b>	<b>669</b>	<b>100.0%</b>	<b>\$125,453</b>	<b>100.0%</b>	<b>100.0%</b>	<b>219</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,039</b>	<b>100.0%</b>	<b>100.0%</b>	<b>242</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$48,154</b>	<b>100.0%</b>	<b>100.0%</b>	
Small Business Revenue		<b>Total Businesses</b>																	
	\$1 Million or Less	292	64.0%	\$15,825	36.8%	93.2%	74	60.2%	51.8%	\$6,082	45.5%	32.4%	92	60.1%	56.9%	\$5,762	36.7%	35.6%	
	Over \$1 Million	128	28.1%	\$24,052	56.0%	5.9%	35	28.5%					51	33.3%					
	<b>Total Rev. available</b>	<b>420</b>	<b>92.1%</b>	<b>\$39,877</b>	<b>92.8%</b>	<b>99.1%</b>	<b>109</b>	<b>88.7%</b>					<b>143</b>	<b>93.4%</b>					
	Rev. Not Known	36	7.9%	\$3,070	7.1%	1.0%	14	11.4%					10	6.5%					
<b>Total</b>	<b>456</b>	<b>100.0%</b>	<b>\$42,947</b>	<b>100.0%</b>	<b>100.0%</b>	<b>123</b>	<b>100.0%</b>					<b>153</b>	<b>100.0%</b>						
Small Business Loan Size	\$100,000 or Less	353	77.4%	\$10,493	24.4%		90	73.2%	96.1%	\$2,452	18.4%	45.9%	114	74.5%	96.6%	\$3,643	23.2%	49.5%	
	\$100,001 - \$250,000	60	13.2%	\$11,486	26.7%		19	15.4%	1.9%	\$3,530	26.4%	13.1%	21	13.7%	1.7%	\$4,148	26.4%	12.2%	
	\$250,001 - \$1 Million	43	9.4%	\$20,968	48.8%		14	11.4%	2.0%	\$7,378	55.2%	41.0%	18	11.8%	1.7%	\$7,905	50.4%	38.3%	
	<b>Total</b>	<b>456</b>	<b>100.0%</b>	<b>\$42,947</b>	<b>100.0%</b>		<b>123</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,360</b>	<b>100.0%</b>	<b>100.0%</b>	<b>153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,696</b>	<b>100.0%</b>	<b>100.0%</b>	
		<b>Total Farms</b>																	
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	94.8%	0	0.0%	50.6%	\$0	0.0%	49.4%	0	0.0%	49.4%	\$0	0.0%	42.8%	
	Over \$1 Million	1	100.0%	\$85	100.0%	5.1%	1	100.0%					0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%					0	0.0%					
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>					<b>0</b>	<b>0.0%</b>					
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$85	100.0%		1	100.0%	94.2%	\$85	100.0%	48.0%	0	0.0%	92.0%	\$0	0.0%	44.6%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	13.7%	0	0.0%	4.0%	\$0	0.0%	16.2%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	38.3%	0	0.0%	4.0%	\$0	0.0%	39.1%	
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$85</b>	<b>100.0%</b>		<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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 Sarasota

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014				2015							
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	5	1.0%	\$393	0.4%	1.3%	0	0.0%	0.3%	\$0	0.0%	0.1%	2	0.9%	0.4%	\$94	0.3%	0.1%
	Moderate	154	32.0%	\$17,869	20.4%	20.1%	27	23.1%	12.0%	\$3,267	16.1%	8.0%	72	33.6%	12.1%	\$6,853	21.3%	8.4%
	Middle	215	44.7%	\$33,565	38.3%	49.0%	49	41.9%	50.2%	\$7,841	38.7%	39.6%	101	47.2%	51.1%	\$13,494	41.9%	41.8%
	Upper	107	22.2%	\$35,746	40.8%	29.7%	41	35.0%	37.5%	\$9,136	45.1%	52.3%	39	18.2%	36.4%	\$11,798	36.6%	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>481</i>	<i>100.0%</i>	<i>\$87,573</i>	<i>100.0%</i>	<i>100.0%</i>	<i>117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$20,244</i>	<i>100.0%</i>	<i>100.0%</i>	<i>214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,239</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	3	2.0%	\$557	2.0%	1.3%	2	6.3%	0.5%	\$485	8.5%	0.2%	1	1.5%	0.4%	\$72	0.6%	0.2%
	Moderate	25	16.8%	\$3,074	11.2%	20.1%	6	18.8%	12.4%	\$469	8.2%	8.5%	11	16.4%	11.8%	\$1,366	11.9%	8.2%
	Middle	63	42.3%	\$9,787	35.8%	49.0%	13	40.6%	49.1%	\$2,277	39.9%	36.5%	27	40.3%	50.0%	\$3,999	34.8%	39.9%
	Upper	58	38.9%	\$13,944	51.0%	29.7%	11	34.4%	38.1%	\$2,470	43.3%	54.8%	28	41.8%	37.8%	\$6,054	52.7%	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>149</i>	<i>100.0%</i>	<i>\$27,362</i>	<i>100.0%</i>	<i>100.0%</i>	<i>32</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,701</i>	<i>100.0%</i>	<i>100.0%</i>	<i>67</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,491</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.9%	\$0	0.0%	0.2%	0	0.0%	0.8%	\$0	0.0%	0.1%
	Moderate	35	38.9%	\$554	10.8%	20.1%	18	54.5%	20.3%	\$200	32.6%	10.4%	9	33.3%	17.4%	\$125	16.7%	9.7%
	Middle	40	44.4%	\$1,548	30.2%	49.0%	11	33.3%	47.0%	\$203	33.1%	38.1%	15	55.6%	52.7%	\$576	76.8%	39.4%
	Upper	15	16.7%	\$3,028	59.0%	29.7%	4	12.1%	31.8%	\$210	34.3%	51.3%	3	11.1%	29.1%	\$49	6.5%	50.8%
	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>90</i>	<i>100.0%</i>	<i>\$5,130</i>	<i>100.0%</i>	<i>100.0%</i>	<i>33</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$613</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$750</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	1	25.0%	\$108	3.9%	2.2%	1	100.0%	6.1%	\$108	100.0%	0.5%	0	0.0%	2.0%	\$0	0.0%	0.0%
	Moderate	1	25.0%	\$549	19.9%	18.6%	0	0.0%	36.4%	\$0	0.0%	20.0%	1	50.0%	46.0%	\$549	26.8%	22.8%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	33.3%	\$0	0.0%	45.3%	0	0.0%	26.0%	\$0	0.0%	43.8%
	Upper	2	50.0%	\$2,100	76.2%	40.5%	0	0.0%	24.2%	\$0	0.0%	34.2%	1	50.0%	26.0%	\$1,500	73.2%	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%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$2,757</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$108</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,049</i>	<i>100.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	9	1.2%	\$1,058	0.9%	1.3%	3	1.6%	0.4%	\$593	2.2%	0.2%	3	1.0%	0.4%	\$166	0.4%	0.2%
	Moderate	215	29.7%	\$22,046	17.9%	20.1%	51	27.9%	12.4%	\$3,936	14.8%	8.9%	93	30.0%	12.3%	\$8,893	19.1%	9.2%
	Middle	318	43.9%	\$44,900	36.6%	49.0%	73	39.9%	49.7%	\$10,321	38.7%	39.2%	143	46.1%	50.8%	\$18,069	38.8%	41.3%
	Upper	182	25.1%	\$54,818	44.6%	29.7%	56	30.6%	37.5%	\$11,816	44.3%	51.7%	71	22.9%	36.5%	\$19,401	41.7%	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%
	<i>Total</i>	<i>724</i>	<i>100.0%</i>	<i>\$122,822</i>	<i>100.0%</i>	<i>100.0%</i>	<i>183</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$26,666</i>	<i>100.0%</i>	<i>100.0%</i>	<i>310</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$46,529</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	Low	17	3.8%	\$1,157	3.5%	1.4%	5	3.6%	1.5%	\$123	1.2%	1.8%	4	2.9%	1.5%	\$801	7.7%	2.2%
	Moderate	158	35.7%	\$11,757	35.7%	19.5%	46	33.3%	19.0%	\$4,197	39.3%	22.4%	52	38.0%	19.2%	\$4,655	44.8%	23.3%
	Middle	159	35.9%	\$10,399	31.6%	43.8%	50	36.2%	39.3%	\$2,762	25.8%	36.3%	51	37.2%	39.6%	\$2,796	26.9%	35.1%
	Upper	109	24.6%	\$9,593	29.2%	35.2%	37	26.8%	39.0%	\$3,603	33.7%	38.8%	30	21.9%	38.8%	\$2,143	20.6%	38.7%
	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%	1.2%	\$0	0.0%	0.7%	0	0.0%	0.9%	\$0	0.0%	0.7%
<i>Total</i>	<i>443</i>	<i>100.0%</i>	<i>\$32,906</i>	<i>100.0%</i>	<i>100.0%</i>	<i>138</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,685</i>	<i>100.0%</i>	<i>100.0%</i>	<i>137</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,395</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	<b>Small Farms</b>																	
	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%	8.4%	0	0.0%	7.9%	\$0	0.0%	1.6%	0	0.0%	4.4%	\$0	0.0%	2.9%
	Middle	0	0.0%	\$0	0.0%	40.5%	0	0.0%	44.4%	\$0	0.0%	38.4%	0	0.0%	41.2%	\$0	0.0%	50.8%
	Upper	0	0.0%	\$0	0.0%	51.1%	0	0.0%	46.0%	\$0	0.0%	58.2%	0	0.0%	52.9%	\$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%	1.6%	\$0	0.0%	1.8%	0	0.0%	1.5%	\$0	0.0%	0.4%
<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>	

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 Sarasota

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Families by Family Income %	2014			2015								
		Bank		Dollar			Count		Dollar			Count			Dollar			
		#	%	\$ (000s)	\$ %		Bank	Agg	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	78	16.2%	\$6,293	7.2%	19.6%	11	9.4%	3.1%	\$598	3.0%	1.2%	42	19.6%	4.2%	\$3,368	10.4%	1.7%
	Moderate	172	35.8%	\$18,082	20.6%	19.0%	28	23.9%	12.5%	\$2,588	12.8%	6.9%	89	41.6%	13.5%	\$8,915	27.7%	7.8%
	Middle	95	19.8%	\$13,720	15.7%	20.9%	32	27.4%	18.0%	\$4,021	19.9%	13.2%	40	18.7%	19.2%	\$6,044	18.7%	14.7%
	Upper	124	25.8%	\$38,137	43.5%	40.5%	45	38.5%	52.7%	\$12,710	62.8%	66.3%	43	20.1%	50.0%	\$13,912	43.2%	63.3%
	Unknown	12	2.5%	\$11,341	13.0%	0.0%	1	0.9%	13.6%	\$327	1.6%	12.4%	0	0.0%	13.2%	\$0	0.0%	12.5%
	<b>Total</b>	<b>481</b>	<b>100.0%</b>	<b>\$87,573</b>	<b>100.0%</b>	<b>100.0%</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20,244</b>	<b>100.0%</b>	<b>100.0%</b>	<b>214</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,239</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	21	14.1%	\$2,592	9.5%	19.6%	1	3.1%	5.9%	\$56	1.0%	2.9%	11	16.4%	5.8%	\$1,477	12.9%	2.7%
	Moderate	22	14.8%	\$3,048	11.1%	19.0%	6	18.8%	12.2%	\$729	12.8%	6.6%	9	13.4%	12.0%	\$1,223	10.6%	7.1%
	Middle	35	23.5%	\$4,884	17.8%	20.9%	5	15.6%	19.0%	\$581	10.2%	13.4%	15	22.4%	19.2%	\$1,596	13.9%	14.2%
	Upper	64	43.0%	\$13,882	50.7%	40.5%	18	56.3%	47.4%	\$3,838	67.3%	60.8%	31	46.3%	43.6%	\$7,023	61.1%	56.2%
	Unknown	7	4.7%	\$2,956	10.8%	0.0%	2	6.3%	15.5%	\$497	8.7%	16.4%	1	1.5%	19.5%	\$172	1.5%	19.8%
	<b>Total</b>	<b>149</b>	<b>100.0%</b>	<b>\$27,362</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,701</b>	<b>100.0%</b>	<b>100.0%</b>	<b>67</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,491</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	11	12.2%	\$52	1.0%	19.6%	3	9.1%	7.4%	\$20	3.3%	1.6%	4	14.8%	7.4%	\$19	2.5%	2.3%
	Moderate	15	16.7%	\$359	7.0%	19.0%	7	21.2%	17.3%	\$59	9.6%	7.9%	5	18.5%	17.9%	\$279	37.2%	9.9%
	Middle	21	23.3%	\$649	12.7%	20.9%	11	33.3%	19.7%	\$265	43.2%	15.4%	5	18.5%	24.5%	\$60	8.0%	17.5%
	Upper	34	37.8%	\$3,512	68.5%	40.5%	10	30.3%	49.1%	\$237	38.7%	67.9%	12	44.4%	45.5%	\$389	51.9%	63.9%
	Unknown	9	10.0%	\$558	10.9%	0.0%	2	6.1%	6.6%	\$32	5.2%	7.2%	1	3.7%	4.8%	\$3	0.4%	6.4%
	<b>Total</b>	<b>90</b>	<b>100.0%</b>	<b>\$5,130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$613</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$750</b>	<b>100.0%</b>	<b>100.0%</b>
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%	19.0%	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%	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%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	4	100.0%	\$2,757	100.0%	0.0%	1	100.0%	100.0%	\$108	100.0%	100.0%	2	100.0%	100.0%	\$2,049	100.0%	100.0%
	<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>\$2,757</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,049</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	110	15.2%	\$8,937	7.3%	19.6%	15	8.2%	3.9%	\$674	2.5%	1.5%	57	18.4%	4.8%	\$4,864	10.5%	1.9%
	Moderate	209	28.9%	\$21,489	17.5%	19.0%	41	22.4%	12.6%	\$3,376	12.7%	6.4%	103	33.2%	13.1%	\$10,417	22.4%	7.2%
	Middle	151	20.9%	\$19,253	15.7%	20.9%	48	26.2%	18.3%	\$4,867	18.3%	12.4%	60	19.4%	19.3%	\$7,700	16.5%	13.8%
	Upper	222	30.7%	\$55,531	45.2%	40.5%	73	39.9%	51.1%	\$16,785	62.9%	60.6%	86	27.7%	47.7%	\$21,324	45.8%	57.7%
	Unknown	32	4.4%	\$17,612	14.3%	0.0%	6	3.3%	14.1%	\$964	3.6%	19.1%	4	1.3%	15.1%	\$2,224	4.8%	19.4%
	<b>Total</b>	<b>724</b>	<b>100.0%</b>	<b>\$122,822</b>	<b>100.0%</b>	<b>100.0%</b>	<b>183</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$26,666</b>	<b>100.0%</b>	<b>100.0%</b>	<b>310</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$46,529</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	323	72.9%	\$16,094	48.9%	93.9%	100	72.5%	50.4%	\$4,880	45.7%	35.7%	102	74.5%	55.2%	\$5,192	49.9%	37.4%
	Over \$1 Million	84	19.0%	\$16,348	49.7%	5.4%	19	13.8%					30	21.9%				
	<b>Total Rev. available</b>	<b>407</b>	<b>91.9%</b>	<b>\$32,442</b>	<b>98.6%</b>	<b>99.3%</b>	<b>119</b>	<b>86.3%</b>					<b>132</b>	<b>96.4%</b>				
	Rev. Not Known	36	8.1%	\$464	1.4%	0.7%	19	13.8%					5	3.6%				
<b>Total</b>	<b>443</b>	<b>100.0%</b>	<b>\$32,906</b>	<b>100.0%</b>	<b>100.0%</b>	<b>138</b>	<b>100.0%</b>					<b>137</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	351	79.2%	\$6,004	18.2%		112	81.2%	94.9%	\$1,459	13.7%	39.4%	106	77.4%	95.1%	\$1,982	19.1%	39.5%
	\$100,001 - \$250,000	54	12.2%	\$8,786	26.7%		11	8.0%	2.5%	\$1,635	15.3%	15.6%	19	13.9%	2.4%	\$3,135	30.2%	14.3%
	\$250,001 - \$1 Million	38	8.6%	\$18,116	55.1%		15	10.9%	2.5%	\$7,591	71.0%	45.0%	12	8.8%	2.5%	\$5,278	50.8%	46.1%
	<b>Total</b>	<b>443</b>	<b>100.0%</b>	<b>\$32,906</b>	<b>100.0%</b>		<b>138</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,685</b>	<b>100.0%</b>	<b>100.0%</b>	<b>137</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,395</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Total Farms</b>																	
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	92.3%	0	0.0%	55.6%	\$0	0.0%	39.4%	0	0.0%	58.8%	\$0	0.0%	46.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	7.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>0</b>	<b>0.0%</b>				
	<b>Total Farms</b>																	
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	92.1%	\$0	0.0%	41.6%	0	0.0%	91.2%	\$0	0.0%	46.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.3%	\$0	0.0%	43.6%	0	0.0%	7.4%	\$0	0.0%	37.8%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	14.8%	0	0.0%	1.5%	\$0	0.0%	15.8%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>		<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
	<b>Total Farms</b>																	

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 Tallahassee

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2015					Bank & Aggregate Lending Comparison											
		2015				Owner Occupied Units %	2014				2015							
		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%	4.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	2.4%
	Moderate	1	100.0%	\$166	100.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	15.7%	\$166	100.0%	10.0%
	Middle	0	0.0%	\$0	0.0%	28.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	26.7%	\$0	0.0%	20.1%
	Upper	0	0.0%	\$0	0.0%	48.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	53.6%	\$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%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$166</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$166</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	4.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	2.2%
	Moderate	2	33.3%	\$89	8.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	33.3%	12.6%	\$89	8.0%	8.4%
	Middle	3	50.0%	\$230	20.6%	28.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	50.0%	26.8%	\$230	20.6%	21.2%
	Upper	1	16.7%	\$797	71.4%	48.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	16.7%	57.3%	\$797	71.4%	68.3%
	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>6</i>	<i>100.0%</i>	<i>\$1,116</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,116</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	100.0%	\$101	100.0%	4.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	5.6%	\$101	100.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	13.1%	\$0	0.0%	13.5%
	Middle	0	0.0%	\$0	0.0%	28.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	21.5%	\$0	0.0%	19.6%
	Upper	0	0.0%	\$0	0.0%	48.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	59.8%	\$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%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$101</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$101</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	42.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	27.3%	\$0	0.0%	22.5%
	Moderate	1	100.0%	\$236	100.0%	26.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	40.9%	\$236	100.0%	36.8%
	Middle	0	0.0%	\$0	0.0%	14.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	22.7%	\$0	0.0%	32.7%
	Upper	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	8.0%
	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>1</i>	<i>100.0%</i>	<i>\$236</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$236</i>	<i>100.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	1	11.1%	\$101	6.2%	4.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	11.1%	4.0%	\$101	6.2%	3.5%
	Moderate	4	44.4%	\$491	30.3%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	44.4%	14.6%	\$491	30.3%	11.2%
	Middle	3	33.3%	\$230	14.2%	28.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	33.3%	26.5%	\$230	14.2%	21.2%
	Upper	1	11.1%	\$797	49.2%	48.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	11.1%	54.9%	\$797	49.2%	64.1%
	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>9</i>	<i>100.0%</i>	<i>\$1,619</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,619</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	1	16.7%	\$811	49.5%	7.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	16.7%	7.6%	\$811	49.5%	8.9%
	Moderate	3	50.0%	\$71	4.3%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	50.0%	21.7%	\$71	4.3%	25.1%
	Middle	1	16.7%	\$113	6.9%	27.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	16.7%	25.7%	\$113	6.9%	24.6%
	Upper	1	16.7%	\$644	39.3%	43.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	16.7%	43.4%	\$644	39.3%	40.5%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.3%
	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%	0.5%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$1,639</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,639</i>	<i>100.0%</i>	<i>100.0%</i>	
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%	9.0%	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%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	14.3%	\$0	0.0%	7.8%
	Upper	0	0.0%	\$0	0.0%	69.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	71.4%	\$0	0.0%	85.7%
	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%	14.3%	\$0	0.0%	6.5%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</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>	

Originations & Purchases  
2015 FFIEC Census Data, ACS 2010 data, and 2015 D&B Information

Appendices

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL Tallahassee

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015					2014					2015						
		Bank				Families by Family Income %	Count		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%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	18.5%	\$0	0.0%	13.2%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	19.9%	\$0	0.0%	18.5%
	Upper	1	100.0%	\$166	100.0%	45.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	38.7%	\$166	100.0%	50.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.8%	\$0	0.0%	14.4%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$166</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$166</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	1	16.7%	\$49	4.4%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	16.7%	4.8%	\$49	4.4%	2.6%
	Moderate	1	16.7%	\$62	5.6%	15.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	16.7%	12.3%	\$62	5.6%	8.0%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	17.7%	\$0	0.0%	14.2%
	Upper	2	33.3%	\$894	80.1%	45.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	33.3%	42.7%	\$894	80.1%	51.8%
	Unknown	2	33.3%	\$111	9.9%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	33.3%	22.4%	\$111	9.9%	23.4%
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$1,116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,116</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	1	100.0%	\$101	100.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	6.4%	\$101	100.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	13.1%	\$0	0.0%	8.3%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	18.3%	\$0	0.0%	13.6%
	Upper	0	0.0%	\$0	0.0%	45.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	57.0%	\$0	0.0%	63.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.2%	\$0	0.0%	11.8%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$101</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.9%	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%	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%	17.3%	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%	45.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$236	100.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	100.0%	100.0%	\$236	100.0%	100.0%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$236</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$236</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	2	22.2%	\$150	9.3%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	22.2%	5.7%	\$150	9.3%	2.8%
	Moderate	1	11.1%	\$62	3.8%	15.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	11.1%	16.2%	\$62	3.8%	10.7%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	19.0%	\$0	0.0%	16.0%
	Upper	3	33.3%	\$1,060	65.5%	45.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	33.3%	40.6%	\$1,060	65.5%	48.2%
	Unknown	3	33.3%	\$347	21.4%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	33.3%	18.5%	\$347	21.4%	22.3%
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$1,619</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,619</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	5	83.3%	\$995	60.7%	94.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	5	83.3%	57.8%	\$995	60.7%	47.0%
	Over \$1 Million	1	16.7%	\$644	39.3%	5.3%	0	0.0%					1	16.7%				
	<b>Total Rev. available</b>	<b>6</b>	<b>100.0%</b>	<b>\$1,639</b>	<b>100.0%</b>	<b>99.5%</b>	<b>0</b>	<b>0.0%</b>					<b>6</b>	<b>100.0%</b>				
	Rev. Not Known	0	0.0%	\$0	0.0%	0.4%	0	0.0%					0	0.0%				
Small Business Loan Size	\$100,000 or Less	3	50.0%	\$71	4.3%		0	0.0%	0.0%	\$0	0.0%	0.0%	3	50.0%	94.2%	\$71	4.3%	37.1%
	\$100,001 - \$250,000	1	16.7%	\$113	6.9%		0	0.0%	0.0%	\$0	0.0%	0.0%	1	16.7%	2.9%	\$113	6.9%	15.4%
	\$250,001 - \$1 Million	2	33.3%	\$1,455	88.8%		0	0.0%	0.0%	\$0	0.0%	0.0%	2	33.3%	2.9%	\$1,455	88.8%	47.5%
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$1,639</b>	<b>100.0%</b>		<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,639</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	57.1%	\$0	0.0%	57.1%
	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%	0.0%	0	0.0%					0	0.0%				
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>0</b>	<b>0.0%</b>				
Small Farm Loan Size	\$100,000 or Less	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%
	\$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%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>		<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

Originations & Purchases

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

2015 FFIEC Census Data, ACS 2010 data, and 2015 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 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016				Owner Occupied Units %	2014				2015							
		Bank		Owner Occupied Units			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	Agg %	Bank #	Agg %	Bank \$ (000s)	Agg %	Bank \$ (000s)	Agg %		
HOME PURCHASE	Low	6	1.1%	\$1,626	1.8%	2.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	1.0%	1.4%	\$633	1.4%	1.0%
	Moderate	79	14.6%	\$10,078	11.3%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	43	14.5%	13.1%	\$5,554	12.2%	8.7%
	Middle	276	51.1%	\$32,935	36.9%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	154	51.9%	41.2%	\$18,759	41.1%	33.4%
	Upper	179	33.1%	\$44,594	50.0%	36.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	97	32.7%	44.2%	\$20,680	45.3%	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%
	<b>Total</b>	<b>540</b>	<b>100.0%</b>	<b>\$89,233</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>297</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$45,626</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	4	3.0%	\$318	1.2%	2.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	3.8%	1.3%	\$271	1.9%	0.7%
	Moderate	22	16.7%	\$2,390	9.4%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	15	19.2%	11.4%	\$1,619	11.6%	7.4%
	Middle	42	31.8%	\$6,549	25.7%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	19	24.4%	39.5%	\$1,914	13.7%	31.2%
	Upper	64	48.5%	\$16,246	63.7%	36.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	41	52.6%	47.9%	\$10,142	72.7%	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%
	<b>Total</b>	<b>132</b>	<b>100.0%</b>	<b>\$25,503</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>78</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,946</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	1.0%
	Moderate	5	29.4%	\$90	7.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	5	38.5%	13.8%	\$90	11.7%	7.0%
	Middle	8	47.1%	\$629	49.1%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	6	46.2%	40.8%	\$369	47.9%	32.6%
	Upper	4	23.5%	\$562	43.9%	36.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	15.4%	43.5%	\$312	40.5%	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%
	<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>\$1,281</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$771</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	6.4%	\$0	0.0%	2.9%
	Moderate	2	22.2%	\$410	10.0%	27.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	50.0%	26.2%	\$225	72.1%	21.3%
	Middle	3	33.3%	\$3,157	76.6%	37.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	41.1%	\$0	0.0%	39.3%
	Upper	4	44.4%	\$552	13.4%	31.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	50.0%	26.2%	\$87	27.9%	36.5%
	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%
<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$4,119</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$312</b>	<b>100.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	10	1.4%	\$1,944	1.6%	2.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	6	1.5%	1.4%	\$904	1.5%	1.1%
	Moderate	108	15.5%	\$12,968	10.8%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	64	16.4%	12.6%	\$7,488	12.3%	9.5%
	Middle	329	47.1%	\$43,270	36.0%	43.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	179	45.9%	40.7%	\$21,042	34.7%	33.3%
	Upper	251	36.0%	\$61,954	51.6%	36.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	141	36.2%	45.3%	\$31,221	51.5%	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%
	<b>Total</b>	<b>698</b>	<b>100.0%</b>	<b>\$120,136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>390</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$60,655</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	Low	12	5.4%	\$1,004	2.4%	2.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	4	5.1%	3.5%	\$560	3.6%	4.7%
	Moderate	47	21.0%	\$9,816	23.3%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	19	24.1%	17.7%	\$4,461	28.9%	21.3%
	Middle	106	47.3%	\$21,972	52.2%	38.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	39	49.4%	38.1%	\$7,652	49.6%	39.7%
	Upper	59	26.3%	\$9,326	22.1%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	17	21.5%	39.6%	\$2,758	17.9%	33.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	0.6%
<b>Total</b>	<b>224</b>	<b>100.0%</b>	<b>\$42,118</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>79</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,431</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Small Farms</b>																	
	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	15.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	15.5%	\$0	0.0%	21.7%
	Middle	0	0.0%	\$0	0.0%	43.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	33.0%	\$0	0.0%	34.9%
	Upper	0	0.0%	\$0	0.0%	39.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	48.5%	\$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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	2.3%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	

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 %	2014			2015								
		Count		Dollar			Bank	Agg	Dollar		Count			Dollar				
		#	%	\$ (000s)	\$ %				#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)
HOME PURCHASE	Low	33	6.1%	\$2,460	2.8%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	22	7.4%	3.8%	\$1,466	3.2%	1.6%
	Moderate	175	32.4%	\$15,989	17.9%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	101	34.0%	15.4%	\$9,232	20.2%	9.0%
	Middle	125	23.1%	\$16,232	18.2%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	61	20.5%	18.9%	\$8,283	18.2%	14.9%
	Upper	197	36.5%	\$51,055	57.2%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	110	37.0%	45.4%	\$26,041	57.1%	59.8%
	Unknown	10	1.9%	\$3,497	3.9%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	1.0%	16.5%	\$604	1.3%	14.8%
	<b>Total</b>	<b>540</b>	<b>100.0%</b>	<b>\$89,233</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>297</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$45,626</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	11	8.3%	\$684	2.7%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	8	10.3%	4.7%	\$537	3.9%	2.2%
	Moderate	9	6.8%	\$1,100	4.3%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	7	9.0%	10.5%	\$865	6.2%	6.0%
	Middle	24	18.2%	\$3,323	13.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	11	14.1%	15.9%	\$1,429	10.2%	11.6%
	Upper	78	59.1%	\$19,216	75.3%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	46	59.0%	43.9%	\$10,304	73.9%	54.8%
	Unknown	10	7.6%	\$1,180	4.6%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	6	7.7%	25.1%	\$811	5.8%	25.4%
	<b>Total</b>	<b>132</b>	<b>100.0%</b>	<b>\$25,503</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>78</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,946</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	2	11.8%	\$28	2.2%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	15.4%	6.7%	\$28	3.6%	2.8%
	Moderate	3	17.6%	\$131	10.2%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	3	23.1%	15.1%	\$131	17.0%	7.9%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	18.2%	\$0	0.0%	14.3%
	Upper	10	58.8%	\$787	61.4%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	7	53.8%	54.9%	\$482	62.5%	66.6%
	Unknown	2	11.8%	\$335	26.2%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	7.7%	5.1%	\$130	16.9%	8.4%
	<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>\$1,281</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$771</b>	<b>100.0%</b>	<b>100.0%</b>
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%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	9	100.0%	\$4,119	100.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	2	100.0%	100.0%	\$312	100.0%	100.0%
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$4,119</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$312</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	46	6.6%	\$3,172	2.6%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	32	8.2%	4.2%	\$2,031	3.3%	1.6%
	Moderate	187	26.8%	\$17,220	14.3%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	111	28.5%	13.8%	\$10,228	16.9%	7.3%
	Middle	149	21.3%	\$19,555	16.3%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	72	18.5%	17.9%	\$9,712	16.0%	12.5%
	Upper	285	40.8%	\$71,058	59.1%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	163	41.8%	45.2%	\$36,827	60.7%	52.7%
	Unknown	31	4.4%	\$9,131	7.6%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	12	3.1%	19.0%	\$1,857	3.1%	25.8%
	<b>Total</b>	<b>698</b>	<b>100.0%</b>	<b>\$120,136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>390</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$60,655</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	139	62.1%	\$19,685	46.7%	92.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	46	58.2%	54.6%	\$8,547	55.4%	36.9%
	Over \$1 Million	78	34.8%	\$21,014	49.9%	6.6%	0	0.0%					32	40.5%				
	<b>Total Rev. available</b>	<b>217</b>	<b>96.9%</b>	<b>\$40,699</b>	<b>96.6%</b>	<b>99.2%</b>	<b>0</b>	<b>0.0%</b>					<b>78</b>	<b>98.7%</b>				
	Rev. Not Known	7	3.1%	\$1,419	3.4%	0.8%	0	0.0%					1	1.3%				
<b>Total</b>	<b>224</b>	<b>100.0%</b>	<b>\$42,118</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>79</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	132	58.9%	\$5,339	12.7%		0	0.0%	0.0%	\$0	0.0%	0.0%	42	53.2%	94.3%	\$1,934	12.5%	36.7%
	\$100,001 - \$250,000	35	15.6%	\$6,069	14.4%		0	0.0%	0.0%	\$0	0.0%	0.0%	17	21.5%	2.7%	\$2,881	18.7%	14.4%
	\$250,001 - \$1 Million	57	25.4%	\$30,710	72.9%		0	0.0%	0.0%	\$0	0.0%	0.0%	20	25.3%	3.0%	\$10,616	68.8%	48.8%
	<b>Total</b>	<b>224</b>	<b>100.0%</b>	<b>\$42,118</b>	<b>100.0%</b>		<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>79</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,431</b>	<b>100.0%</b>	<b>100.0%</b>
	Small Farm Revenue	<b>Total Farms</b>																
\$1 Million or Less		0	0.0%	\$0	0.0%	93.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	47.4%	\$0	0.0%	65.9%
Over \$1 Million		0	0.0%	\$0	0.0%	6.2%	0	0.0%					0	0.0%				
Not Known		0	0.0%	\$0	0.0%	0.1%	0	0.0%					0	0.0%				
<b>Total</b>		<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>					<b>0</b>	<b>0.0%</b>				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	88.7%	\$0	0.0%	32.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	7.2%	\$0	0.0%	30.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	37.1%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>		<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>

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: LA Allen

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014				2015							
		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%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	12	100.0%	\$1,012	100.0%	100.0%	5	100.0%	98.0%	\$452	100.0%	98.1%	2	100.0%	100.0%	\$265	100.0%	100.0%
	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%	2.0%	\$0	0.0%	1.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$1,012</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$452</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$265</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	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	13	100.0%	\$899	100.0%	100.0%	6	100.0%	99.1%	\$435	100.0%	99.1%	4	100.0%	100.0%	\$296	100.0%	100.0%
	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%	0.9%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$899</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$435</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$296</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	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	19	100.0%	\$269	100.0%	100.0%	9	100.0%	100.0%	\$192	100.0%	100.0%	4	100.0%	100.0%	\$39	100.0%	100.0%
	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%
	<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>\$269</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$192</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$39</i>	<i>100.0%</i>	<i>100.0%</i>
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	0.0%	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%	100.0%	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%	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%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>	<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%	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	44	100.0%	\$2,180	100.0%	100.0%	20	100.0%	98.6%	\$1,079	100.0%	98.5%	10	100.0%	100.0%	\$600	100.0%	100.0%
	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%	1.4%	\$0	0.0%	1.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>44</i>	<i>100.0%</i>	<i>\$2,180</i>	<i>100.0%</i>	<i>100.0%</i>	<i>20</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,079</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$600</i>	<i>100.0%</i>	<i>100.0%</i>
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%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	83	100.0%	\$3,144	100.0%	100.0%	30	100.0%	92.6%	\$1,229	100.0%	98.4%	26	100.0%	92.1%	\$1,113	100.0%	95.8%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	7.4%	\$0	0.0%	1.6%	0	0.0%	7.9%	\$0	0.0%	4.2%
<i>Total</i>	<i>83</i>	<i>100.0%</i>	<i>\$3,144</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,229</i>	<i>100.0%</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,113</i>	<i>100.0%</i>	<i>100.0%</i>	
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	9	100.0%	\$1,667	100.0%	100.0%	2	100.0%	100.0%	\$440	100.0%	100.0%	4	100.0%	100.0%	\$817	100.0%	100.0%
	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%
	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%
<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$1,667</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$440</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$817</i>	<i>100.0%</i>	<i>100.0%</i>	

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: LA Allen

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2014			2015								
		Count		Dollar			Bank		Agg	Bank		Agg		Bank		Agg		
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	3.4%	\$0	0.0%	1.4%	0	0.0%	2.4%	\$0	0.0%	0.8%
	Moderate	2	16.7%	\$134	13.2%	17.9%	0	0.0%	8.2%	\$0	0.0%	4.1%	0	0.0%	12.4%	\$0	0.0%	7.6%
	Middle	2	16.7%	\$170	16.8%	17.9%	1	20.0%	17.7%	\$71	15.7%	16.6%	0	0.0%	26.5%	\$0	0.0%	19.8%
	Upper	6	50.0%	\$663	65.5%	42.7%	4	80.0%	53.1%	\$381	84.3%	60.2%	1	50.0%	45.9%	\$244	92.1%	56.8%
	Unknown	2	16.7%	\$45	4.4%	0.0%	0	0.0%	17.7%	\$0	0.0%	17.7%	1	50.0%	12.9%	\$21	7.9%	15.0%
	<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>\$1,012</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$265</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	1	7.7%	\$60	6.7%	21.4%	0	0.0%	5.4%	\$0	0.0%	2.8%	1	25.0%	2.5%	\$60	20.3%	0.8%
	Moderate	2	15.4%	\$148	16.5%	17.9%	2	33.3%	15.3%	\$148	34.0%	8.0%	0	0.0%	12.4%	\$0	0.0%	8.1%
	Middle	1	7.7%	\$11	1.2%	17.9%	0	0.0%	27.9%	\$0	0.0%	21.1%	1	25.0%	22.3%	\$11	3.7%	19.0%
	Upper	8	61.5%	\$588	65.4%	42.7%	3	50.0%	38.7%	\$195	44.8%	45.9%	2	50.0%	45.5%	\$225	76.0%	48.3%
	Unknown	1	7.7%	\$92	10.2%	0.0%	1	16.7%	12.6%	\$92	21.1%	22.2%	0	0.0%	17.4%	\$0	0.0%	23.8%
	<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>\$899</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$435</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$296</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	6.1%	\$0	0.0%	5.9%	0	0.0%	6.3%	\$0	0.0%	0.6%
	Moderate	5	26.3%	\$75	27.9%	17.9%	3	33.3%	18.2%	\$59	30.7%	14.2%	1	25.0%	9.4%	\$10	25.6%	6.1%
	Middle	1	5.3%	\$2	0.7%	17.9%	0	0.0%	9.1%	\$0	0.0%	10.2%	0	0.0%	18.8%	\$0	0.0%	17.1%
	Upper	8	42.1%	\$148	55.0%	42.7%	4	44.4%	57.6%	\$102	53.1%	64.8%	2	50.0%	59.4%	\$24	61.5%	73.0%
	Unknown	5	26.3%	\$44	16.4%	0.0%	2	22.2%	9.1%	\$31	16.1%	4.9%	1	25.0%	6.3%	\$5	12.8%	3.1%
	<b>Total</b>	<b>19</b>	<b>100.0%</b>	<b>\$269</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$192</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$39</b>	<b>100.0%</b>	<b>100.0%</b>
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%	17.9%	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%	17.9%	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%	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	2.3%	\$60	2.8%	21.4%	0	0.0%	4.5%	\$0	0.0%	2.0%	1	10.0%	2.8%	\$60	10.0%	0.8%
	Moderate	9	20.5%	\$357	16.4%	17.9%	5	25.0%	12.0%	\$207	19.2%	5.8%	1	10.0%	12.0%	\$10	1.7%	7.6%
	Middle	4	9.1%	\$183	8.4%	17.9%	1	5.0%	20.6%	\$71	6.6%	18.0%	1	10.0%	24.1%	\$11	1.8%	19.1%
	Upper	22	50.0%	\$1,399	64.2%	42.7%	11	55.0%	48.1%	\$678	62.8%	55.3%	5	50.0%	46.9%	\$493	82.2%	53.3%
	Unknown	8	18.2%	\$181	8.3%	0.0%	3	15.0%	14.8%	\$123	11.4%	18.9%	2	20.0%	14.2%	\$26	4.3%	19.2%
	<b>Total</b>	<b>44</b>	<b>100.0%</b>	<b>\$2,180</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,079</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$600</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	69	83.1%	\$2,383	75.8%	92.8%	25	83.3%	45.1%	\$814	66.2%	44.8%	20	76.9%	42.4%	\$905	81.3%	47.1%
	Over \$1 Million	10	12.0%	\$721	22.9%	4.0%	3	10.0%					5	19.2%				
	<b>Total Rev. available</b>	<b>79</b>	<b>95.1%</b>	<b>\$3,104</b>	<b>98.7%</b>	<b>96.8%</b>	<b>28</b>	<b>93.3%</b>					<b>25</b>	<b>96.1%</b>				
	Rev. Not Known	4	4.8%	\$40	1.3%	3.2%	2	6.7%					1	3.8%				
<b>Total</b>	<b>83</b>	<b>100.0%</b>	<b>\$3,144</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30</b>	<b>100.0%</b>					<b>26</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	78	94.0%	\$2,178	69.3%		27	90.0%	92.6%	\$690	56.1%	40.2%	24	92.3%	95.8%	\$686	61.6%	55.1%
	\$100,001 - \$250,000	3	3.6%	\$378	12.0%		2	6.7%	4.9%	\$263	21.4%	27.9%	1	3.8%	2.1%	\$115	10.3%	12.9%
	\$250,001 - \$1 Million	2	2.4%	\$588	18.7%		1	3.3%	2.5%	\$276	22.5%	31.9%	1	3.8%	2.1%	\$312	28.0%	32.0%
	<b>Total</b>	<b>83</b>	<b>100.0%</b>	<b>\$3,144</b>	<b>100.0%</b>		<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,229</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,113</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	8	88.9%	\$1,627	97.6%	97.1%	1	50.0%	57.1%	\$400	90.9%	92.0%	4	100.0%	83.3%	\$817	100.0%	98.3%
	Over \$1 Million	1	11.1%	\$40	2.4%	2.9%	1	50.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$1,667</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>					<b>4</b>	<b>100.0%</b>				
Small Farm Loan Size	\$100,000 or Less	5	55.6%	\$67	4.0%		1	50.0%	71.4%	\$40	9.1%	12.0%	2	50.0%	58.3%	\$17	2.1%	4.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	8.3%	\$0	0.0%	9.3%
	\$250,001 - \$500,000	4	44.4%	\$1,600	96.0%		1	50.0%	28.6%	\$400	90.9%	88.0%	2	50.0%	33.3%	\$800	97.9%	86.2%
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$1,667</b>	<b>100.0%</b>		<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$440</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$817</b>	<b>100.0%</b>	<b>100.0%</b>

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: LA Baton Rouge

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		2014				2015												
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar		Dollar	
		#	%		\$ (000s)	%	%	%	%	%	%	%	%	%	%	%	%	%
HOME PURCHASE	Low	24	3.7%	\$1,963	1.4%	6.7%	7	3.0%	1.9%	\$500	1.1%	1.0%	12	4.8%	2.3%	\$837	1.6%	1.2%
	Moderate	58	9.0%	\$8,625	6.3%	12.6%	20	8.7%	8.1%	\$3,008	6.8%	6.0%	23	9.2%	8.5%	\$2,908	5.7%	6.3%
	Middle	173	27.0%	\$28,628	20.7%	38.4%	76	33.0%	44.4%	\$9,024	20.3%	39.3%	64	25.5%	42.4%	\$12,091	23.6%	37.7%
	Upper	386	60.2%	\$98,765	71.6%	42.4%	127	55.2%	45.6%	\$31,900	71.8%	53.8%	152	60.6%	46.9%	\$35,350	69.1%	54.9%
	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	641	100.0%	\$137,981	100.0%	100.0%	230	100.0%	100.0%	\$44,432	100.0%	100.0%	251	100.0%	100.0%	\$51,186	100.0%	100.0%
REFINANCE	Low	5	1.5%	\$391	0.4%	6.7%	2	1.9%	3.5%	\$177	0.7%	2.0%	2	1.8%	2.7%	\$202	0.6%	1.4%
	Moderate	35	10.5%	\$6,872	7.2%	12.6%	13	12.6%	10.6%	\$1,521	5.9%	7.7%	13	11.5%	8.7%	\$3,886	11.2%	6.5%
	Middle	77	23.2%	\$19,318	20.2%	38.4%	26	25.2%	37.9%	\$7,822	30.6%	33.8%	21	18.6%	39.2%	\$4,994	14.3%	34.7%
	Upper	215	64.8%	\$69,092	72.2%	42.4%	62	60.2%	48.1%	\$16,075	62.8%	56.6%	77	68.1%	49.4%	\$25,748	73.9%	57.4%
	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	332	100.0%	\$95,673	100.0%	100.0%	103	100.0%	100.0%	\$25,595	100.0%	100.0%	113	100.0%	100.0%	\$34,830	100.0%	100.0%
HOME IMPROVEMENT	Low	5	5.1%	\$78	1.0%	6.7%	3	7.9%	6.9%	\$68	4.1%	5.1%	0	0.0%	6.2%	\$0	0.0%	2.7%
	Moderate	13	13.3%	\$143	1.9%	12.6%	5	13.2%	12.4%	\$47	2.8%	10.1%	5	16.7%	11.3%	\$57	1.6%	4.6%
	Middle	33	33.7%	\$1,660	22.1%	38.4%	12	31.6%	38.3%	\$583	35.1%	36.4%	12	40.0%	37.5%	\$490	13.8%	29.0%
	Upper	47	48.0%	\$5,626	74.9%	42.4%	18	47.4%	42.4%	\$964	58.0%	48.3%	13	43.3%	45.0%	\$3,010	84.6%	63.7%
	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	98	100.0%	\$7,507	100.0%	100.0%	38	100.0%	100.0%	\$1,662	100.0%	100.0%	30	100.0%	100.0%	\$3,557	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	8	50.0%	\$3,831	24.9%	21.9%	2	22.2%	19.0%	\$1,976	14.9%	17.2%	3	75.0%	45.7%	\$736	70.8%	11.7%
	Moderate	3	18.8%	\$5,189	33.7%	19.3%	3	33.3%	29.3%	\$5,189	39.1%	12.0%	0	0.0%	15.2%	\$0	0.0%	17.9%
	Middle	3	18.8%	\$1,623	10.5%	19.0%	2	22.2%	34.5%	\$1,320	10.0%	33.5%	1	25.0%	10.9%	\$303	29.2%	20.3%
	Upper	2	12.5%	\$4,773	31.0%	39.7%	2	22.2%	17.2%	\$4,773	36.0%	37.3%	0	0.0%	28.3%	\$0	0.0%	50.0%
	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%	\$15,416	100.0%	100.0%	9	100.0%	100.0%	\$13,258	100.0%	100.0%	4	100.0%	100.0%	\$1,039	100.0%	100.0%	
HMDA TOTALS	Low	42	3.9%	\$6,263	2.4%	6.7%	14	3.7%	2.7%	\$2,721	3.2%	2.6%	17	4.3%	2.7%	\$1,775	2.0%	2.1%
	Moderate	109	10.0%	\$20,829	8.1%	12.6%	41	10.8%	9.1%	\$9,765	11.5%	7.0%	41	10.3%	8.7%	\$6,851	7.6%	7.3%
	Middle	286	26.3%	\$51,229	20.0%	38.4%	116	30.5%	42.0%	\$18,749	22.1%	37.3%	98	24.6%	41.0%	\$17,878	19.7%	35.2%
	Upper	650	59.8%	\$178,256	69.5%	42.4%	209	55.0%	46.1%	\$53,712	63.2%	53.1%	242	60.8%	47.5%	\$64,108	70.8%	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	1,087	100.0%	\$256,577	100.0%	100.0%	380	100.0%	100.0%	\$84,947	100.0%	100.0%	398	100.0%	100.0%	\$90,612	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	67	4.9%	\$12,134	5.0%	7.6%	32	6.7%	7.1%	\$7,452	9.2%	7.1%	16	3.4%	7.5%	\$2,196	2.5%	5.7%
	Moderate	207	15.0%	\$32,705	13.6%	14.5%	54	11.4%	14.4%	\$7,949	9.9%	15.6%	71	15.3%	15.8%	\$10,035	11.6%	16.0%
	Middle	294	21.4%	\$60,135	25.0%	30.1%	113	23.8%	28.1%	\$21,956	27.2%	25.7%	107	23.1%	26.9%	\$24,515	28.3%	25.3%
	Upper	803	58.4%	\$134,956	56.2%	47.7%	275	57.9%	48.9%	\$43,233	53.6%	50.5%	268	57.8%	48.5%	\$49,760	57.4%	52.4%
	Unknown	5	0.4%	\$378	0.2%	0.1%	1	0.2%	0.1%	\$3	0.0%	0.4%	2	0.4%	0.0%	\$190	0.2%	0.1%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.7%	0	0.0%	1.4%	\$0	0.0%	0.5%
Total	1,376	100.0%	\$240,308	100.0%	100.0%	475	100.0%	100.0%	\$80,593	100.0%	100.0%	464	100.0%	100.0%	\$86,696	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	4.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	5.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	0.9%
	Middle	3	100.0%	\$72	100.0%	38.7%	2	100.0%	50.0%	\$71	100.0%	36.3%	1	100.0%	44.0%	\$1	100.0%	36.3%
	Upper	0	0.0%	\$0	0.0%	50.5%	0	0.0%	47.1%	\$0	0.0%	63.5%	0	0.0%	48.0%	\$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%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	3	100.0%	\$72	100.0%	100.0%	2	100.0%	100.0%	\$71	100.0%	100.0%	1	100.0%	100.0%	\$1	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: LA Baton Rouge

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank		Families by Family Income %	2014			2015										
		Count #	Dollar \$ (000s)		Count		Dollar		Count		Dollar							
				%	%	Bank #	Agg %	Bank \$ (000s)	Agg %	Bank #	Agg %	Bank \$ (000s)	Agg %					
HOME PURCHASE	Low	40	6.2%	\$3,132	2.3%	22.8%	17	7.4%	7.2%	\$1,384	3.1%	3.9%	19	7.6%	5.0%	\$1,260	2.5%	2.6%
	Moderate	105	16.4%	\$14,324	10.4%	16.9%	41	17.8%	20.5%	\$5,251	11.8%	15.9%	43	17.1%	19.1%	\$5,770	11.3%	14.2%
	Middle	105	16.4%	\$17,570	12.7%	18.6%	36	15.7%	19.4%	\$4,885	11.0%	18.3%	42	16.7%	20.6%	\$7,175	14.0%	18.9%
	Upper	355	55.4%	\$97,082	70.4%	41.7%	126	54.8%	31.4%	\$31,764	71.5%	42.0%	133	53.0%	34.0%	\$34,672	67.7%	45.2%
	Unknown	36	5.6%	\$5,873	4.3%	0.0%	10	4.3%	21.5%	\$1,148	2.6%	20.0%	14	5.6%	21.3%	\$2,309	4.5%	19.0%
	Total	641	100.0%	\$137,981	100.0%	100.0%	230	100.0%	100.0%	\$44,432	100.0%	100.0%	251	100.0%	100.0%	\$51,186	100.0%	100.0%
REFINANCE	Low	12	3.6%	\$1,178	1.2%	22.8%	7	6.8%	6.9%	\$774	3.0%	3.9%	2	1.8%	5.1%	\$183	0.5%	2.5%
	Moderate	30	9.0%	\$3,010	3.1%	16.9%	14	13.6%	14.8%	\$1,174	4.6%	10.1%	9	8.0%	12.7%	\$1,057	3.0%	7.9%
	Middle	34	10.2%	\$5,206	5.4%	18.6%	15	14.6%	18.1%	\$1,957	7.6%	14.8%	10	8.8%	17.5%	\$1,864	5.4%	13.6%
	Upper	211	63.6%	\$72,760	76.1%	41.7%	56	54.4%	39.2%	\$16,318	63.8%	50.7%	77	68.1%	39.9%	\$27,933	80.2%	51.3%
	Unknown	45	13.6%	\$13,519	14.1%	0.0%	11	10.7%	21.0%	\$5,372	21.0%	20.6%	15	13.3%	24.7%	\$3,793	10.9%	24.7%
	Total	332	100.0%	\$95,673	100.0%	100.0%	103	100.0%	100.0%	\$25,595	100.0%	100.0%	113	100.0%	100.0%	\$34,830	100.0%	100.0%
HOME IMPROVEMENT	Low	4	4.1%	\$17	0.2%	22.8%	2	5.3%	12.6%	\$8	0.5%	5.2%	1	3.3%	8.5%	\$4	0.1%	3.4%
	Moderate	9	9.2%	\$214	2.9%	16.9%	7	18.4%	17.7%	\$146	8.8%	8.8%	2	6.7%	17.1%	\$68	1.9%	8.8%
	Middle	21	21.4%	\$524	7.0%	18.6%	9	23.7%	22.5%	\$171	10.3%	18.3%	7	23.3%	20.2%	\$180	5.1%	12.2%
	Upper	53	54.1%	\$6,138	81.8%	41.7%	19	50.0%	40.7%	\$1,261	75.9%	55.0%	18	60.0%	44.0%	\$3,290	92.5%	64.5%
	Unknown	11	11.2%	\$614	8.2%	0.0%	1	2.6%	6.5%	\$76	4.6%	12.6%	2	6.7%	10.1%	\$15	0.4%	11.1%
	Total	98	100.0%	\$7,507	100.0%	100.0%	38	100.0%	100.0%	\$1,662	100.0%	100.0%	30	100.0%	100.0%	\$3,557	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%	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%	18.6%	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%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	16	100.0%	\$15,416	100.0%	0.0%	9	100.0%	100.0%	\$13,258	100.0%	100.0%	4	100.0%	100.0%	\$1,039	100.0%	100.0%
	Total	16	100.0%	\$15,416	100.0%	100.0%	9	100.0%	100.0%	\$13,258	100.0%	100.0%	4	100.0%	100.0%	\$1,039	100.0%	100.0%
HMDA TOTALS	Low	56	5.2%	\$4,327	1.7%	22.8%	26	6.8%	7.4%	\$2,166	2.5%	3.6%	22	5.5%	5.2%	\$1,447	1.6%	2.4%
	Moderate	144	13.2%	\$17,548	6.8%	16.9%	62	16.3%	18.6%	\$6,571	7.7%	12.9%	54	13.6%	16.9%	\$6,895	7.6%	11.0%
	Middle	160	14.7%	\$23,300	9.1%	18.6%	60	15.8%	19.1%	\$7,013	8.3%	15.8%	59	14.8%	19.6%	\$9,219	10.2%	15.7%
	Upper	619	56.9%	\$175,980	68.6%	41.7%	201	52.9%	34.1%	\$49,343	58.1%	41.2%	228	57.3%	36.3%	\$65,895	72.7%	43.6%
	Unknown	108	9.9%	\$35,422	13.8%	0.0%	31	8.2%	20.9%	\$19,854	23.4%	26.5%	35	8.8%	22.0%	\$7,156	7.9%	27.3%
	Total	1,087	100.0%	\$256,577	100.0%	100.0%	380	100.0%	100.0%	\$84,947	100.0%	100.0%	398	100.0%	100.0%	\$90,612	100.0%	100.0%
Small Business Revenue	\$1 Million or Less	708	51.5%	\$74,013	30.8%	91.1%	227	47.8%	42.5%	\$25,342	31.4%	36.0%	241	51.9%	46.1%	\$28,396	32.8%	34.4%
	Over \$1 Million	557	40.5%	\$153,340	63.8%	7.7%	188	39.6%					200	43.1%				
	Total Rev. available	1,265	92.0%	\$227,353	94.6%	98.8%	415	87.4%					441	95.0%				
	Rev. Not Known	111	8.1%	\$12,955	5.4%	1.2%	60	12.6%					23	5.0%				
	Total	1,376	100.0%	\$240,308	100.0%	100.0%	475	100.0%					464	100.0%				
Small Business Loan Size	\$100,000 or Less	804	58.4%	\$28,751	12.0%		283	59.6%	89.2%	\$9,769	12.1%	23.7%	253	54.5%	88.8%	\$8,845	10.2%	23.1%
	\$100,001 - \$250,000	274	19.9%	\$51,279	21.3%		90	18.9%	5.2%	\$16,626	20.6%	18.1%	107	23.1%	5.4%	\$20,044	23.1%	17.5%
	\$250,001 - \$1 Million	298	21.7%	\$160,278	66.7%		102	21.5%	5.6%	\$54,198	67.2%	58.2%	104	22.4%	5.8%	\$57,807	66.7%	59.4%
	Total	1,376	100.0%	\$240,308	100.0%		475	100.0%	100.0%	\$80,593	100.0%	100.0%	464	100.0%	100.0%	\$86,696	100.0%	100.0%
Small Farm Revenue	\$1 Million or Less	2	66.7%	\$71	98.6%	98.4%	2	100.0%	35.3%	\$71	100.0%	71.1%	0	0.0%	60.0%	\$0	0.0%	90.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.6%	0	0.0%					0	0.0%				
	Not Known	1	33.3%	\$1	1.4%	0.0%	0	0.0%					1	100.0%				
	Total	3	100.0%	\$72	100.0%	100.0%	2	100.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	3	100.0%	\$72	100.0%		2	100.0%	94.1%	\$71	100.0%	60.3%	1	100.0%	88.0%	\$1	100.0%	41.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	10.5%	0	0.0%	8.0%	\$0	0.0%	32.6%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	29.1%	0	0.0%	4.0%	\$0	0.0%	26.3%
	Total	3	100.0%	\$72	100.0%		2	100.0%	100.0%	\$71	100.0%	100.0%	1	100.0%	100.0%	\$1	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: LA Houma

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank		Owner Occupied Units		2014			2015										
		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	75	25.3%	\$9,622	21.6%	25.2%	32	24.4%	22.2%	\$3,761	20.4%	18.4%	26	28.0%	22.1%	\$3,595	24.9%	18.8%	
	Middle	167	56.2%	\$21,386	48.0%	54.9%	73	55.7%	52.7%	\$8,186	44.3%	47.8%	52	55.9%	50.1%	\$7,071	49.0%	44.8%	
	Upper	55	18.5%	\$13,516	30.4%	19.9%	26	19.8%	25.1%	\$6,518	35.3%	33.8%	15	16.1%	27.8%	\$3,775	26.1%	36.3%	
	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%	
	<b>Total</b>	<b>297</b>	<b>100.0%</b>	<b>\$44,524</b>	<b>100.0%</b>	<b>100.0%</b>	<b>131</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$18,465</b>	<b>100.0%</b>	<b>100.0%</b>	<b>93</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,441</b>	<b>100.0%</b>	<b>100.0%</b>	
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	22	17.6%	\$2,248	12.8%	25.2%	7	18.9%	19.7%	\$464	8.1%	14.9%	11	24.4%	21.6%	\$1,379	21.6%	16.9%	
	Middle	73	58.4%	\$9,300	52.9%	54.9%	21	56.8%	57.4%	\$3,120	54.3%	51.8%	25	55.6%	55.4%	\$3,026	47.5%	50.8%	
	Upper	30	24.0%	\$6,034	34.3%	19.9%	9	24.3%	22.9%	\$2,159	37.6%	33.3%	9	20.0%	23.0%	\$1,968	30.9%	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%	
	<b>Total</b>	<b>125</b>	<b>100.0%</b>	<b>\$17,582</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,743</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,373</b>	<b>100.0%</b>	<b>100.0%</b>	
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	25	33.3%	\$428	15.7%	25.2%	10	38.5%	25.0%	\$197	30.9%	21.3%	10	32.3%	23.9%	\$149	10.2%	17.3%	
	Middle	43	57.3%	\$1,610	59.1%	54.9%	15	57.7%	58.3%	\$333	52.2%	54.8%	18	58.1%	52.4%	\$966	65.9%	51.2%	
	Upper	7	9.3%	\$687	25.2%	19.9%	1	3.8%	16.8%	\$108	16.9%	23.9%	3	9.7%	23.7%	\$351	23.9%	31.6%	
	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%	
	<b>Total</b>	<b>75</b>	<b>100.0%</b>	<b>\$2,725</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$638</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,466</b>	<b>100.0%</b>	<b>100.0%</b>	
MULTI-FAMILY	<b>Multi-Family Units</b>																		
	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%	27.0%	0	0.0%	23.5%	\$0	0.0%	61.6%	0	0.0%	23.1%	\$0	0.0%	3.3%	
	Middle	0	0.0%	\$0	0.0%	58.7%	0	0.0%	64.7%	\$0	0.0%	34.2%	0	0.0%	69.2%	\$0	0.0%	91.8%	
	Upper	0	0.0%	\$0	0.0%	14.3%	0	0.0%	11.8%	\$0	0.0%	4.2%	0	0.0%	7.7%	\$0	0.0%	5.0%	
	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%	
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>		
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	122	24.5%	\$12,298	19.0%	25.2%	49	25.3%	21.5%	\$4,422	17.8%	19.2%	47	27.8%	22.0%	\$5,123	23.0%	17.6%	
	Middle	283	56.9%	\$32,296	49.8%	54.9%	109	56.2%	55.0%	\$11,639	46.8%	48.7%	95	56.2%	52.5%	\$11,063	49.7%	48.7%	
	Upper	92	18.5%	\$20,237	31.2%	19.9%	36	18.6%	23.5%	\$8,785	35.4%	32.1%	27	16.0%	25.4%	\$6,094	27.4%	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%	
	<b>Total</b>	<b>497</b>	<b>100.0%</b>	<b>\$64,831</b>	<b>100.0%</b>	<b>100.0%</b>	<b>194</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$24,846</b>	<b>100.0%</b>	<b>100.0%</b>	<b>169</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,280</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL BUSINESSES	<b>Small Businesses</b>																		
	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	28.8%	\$2,198	18.2%	21.6%	8	23.5%	23.7%	\$888	15.0%	30.6%	15	32.6%	23.2%	\$1,198	26.6%	28.7%	
	Middle	52	50.0%	\$6,235	51.5%	53.2%	19	55.9%	45.7%	\$2,926	49.4%	39.2%	22	47.8%	47.3%	\$1,946	43.2%	41.7%	
	Upper	22	21.2%	\$3,675	30.4%	25.1%	7	20.6%	26.4%	\$2,114	35.7%	28.9%	9	19.6%	26.3%	\$1,364	30.3%	28.7%	
	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%	4.1%	\$0	0.0%	1.3%	0	0.0%	3.2%	\$0	0.0%	0.9%	
<b>Total</b>	<b>104</b>	<b>100.0%</b>	<b>\$12,108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,928</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,508</b>	<b>100.0%</b>	<b>100.0%</b>		
SMALL FARM	<b>Small Farms</b>																		
	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%	\$24	14.1%	22.9%	1	50.0%	11.8%	\$24	15.5%	6.8%	0	0.0%	20.0%	\$0	0.0%	24.3%	
	Middle	1	33.3%	\$15	8.8%	53.0%	0	0.0%	76.5%	\$0	0.0%	60.6%	1	100.0%	55.0%	\$15	100.0%	56.9%	
	Upper	1	33.3%	\$131	77.1%	24.1%	1	50.0%	11.8%	\$131	84.5%	32.5%	0	0.0%	25.0%	\$0	0.0%	18.8%	
	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%	
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>\$170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15</b>	<b>100.0%</b>	<b>100.0%</b>		

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: LA Houma

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2014			2015								
		Count		Dollar			Count	Dollar		Count			Dollar					
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	19	6.4%	\$1,468	3.3%	25.3%	6	4.6%	2.5%	\$356	1.9%	1.1%	5	5.4%	3.5%	\$367	2.5%	1.6%
	Moderate	65	21.9%	\$6,228	14.0%	15.3%	32	24.4%	12.5%	\$2,417	13.1%	8.3%	17	18.3%	13.8%	\$1,775	12.3%	9.5%
	Middle	78	26.3%	\$10,728	24.1%	18.3%	34	26.0%	22.8%	\$4,597	24.9%	20.2%	22	23.7%	21.3%	\$3,224	22.3%	19.5%
	Upper	127	42.8%	\$25,059	56.3%	41.2%	54	41.2%	40.0%	\$10,613	57.5%	49.8%	47	50.5%	40.0%	\$8,580	59.4%	49.7%
	Unknown	8	2.7%	\$1,041	2.3%	0.0%	5	3.8%	22.2%	\$482	2.6%	20.6%	2	2.2%	21.3%	\$495	3.4%	19.6%
	Total	297	100.0%	\$44,524	100.0%	100.0%	131	100.0%	100.0%	\$18,465	100.0%	100.0%	93	100.0%	100.0%	\$14,441	100.0%	100.0%
REFINANCE	Low	9	7.2%	\$759	4.3%	25.3%	0	0.0%	6.1%	\$0	0.0%	2.5%	2	4.4%	6.6%	\$167	2.6%	2.9%
	Moderate	30	24.0%	\$3,201	18.2%	15.3%	9	24.3%	10.9%	\$729	12.7%	7.1%	10	22.2%	10.4%	\$1,335	20.9%	6.2%
	Middle	25	20.0%	\$2,385	13.6%	18.3%	3	8.1%	17.0%	\$240	4.2%	13.7%	13	28.9%	17.8%	\$1,126	17.7%	13.2%
	Upper	59	47.2%	\$11,022	62.7%	41.2%	24	64.9%	50.2%	\$4,678	81.5%	56.1%	20	44.4%	44.4%	\$3,745	58.8%	50.8%
	Unknown	2	1.6%	\$215	1.2%	0.0%	1	2.7%	15.8%	\$96	1.7%	20.6%	0	0.0%	20.8%	\$0	0.0%	26.9%
	Total	125	100.0%	\$17,582	100.0%	100.0%	37	100.0%	100.0%	\$5,743	100.0%	100.0%	45	100.0%	100.0%	\$6,373	100.0%	100.0%
HOME IMPROVEMENT	Low	12	16.0%	\$221	8.1%	25.3%	6	23.1%	8.5%	\$73	11.4%	4.3%	4	12.9%	7.3%	\$139	9.5%	2.5%
	Moderate	8	10.7%	\$251	9.2%	15.3%	3	11.5%	9.5%	\$129	20.2%	5.0%	2	6.5%	12.3%	\$15	1.0%	7.0%
	Middle	13	17.3%	\$376	13.8%	18.3%	5	19.2%	18.8%	\$86	13.5%	15.5%	8	25.8%	16.6%	\$290	19.8%	9.9%
	Upper	28	37.3%	\$1,745	64.0%	41.2%	6	23.1%	52.3%	\$279	43.7%	66.4%	14	45.2%	51.1%	\$1,001	68.3%	69.0%
	Unknown	14	18.7%	\$132	4.8%	0.0%	6	23.1%	11.0%	\$71	11.1%	8.8%	3	9.7%	12.6%	\$21	1.4%	11.6%
	Total	75	100.0%	\$2,725	100.0%	100.0%	26	100.0%	100.0%	\$638	100.0%	100.0%	31	100.0%	100.0%	\$1,466	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%	15.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.3%	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%	41.2%	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	40	8.0%	\$2,448	3.8%	25.3%	12	6.2%	4.3%	\$429	1.7%	1.6%	11	6.5%	5.1%	\$673	3.0%	2.1%
	Moderate	103	20.7%	\$9,680	14.9%	15.3%	44	22.7%	11.6%	\$3,275	13.2%	7.5%	29	17.2%	12.2%	\$3,125	14.0%	7.9%
	Middle	116	23.3%	\$13,489	20.8%	18.3%	42	21.6%	20.2%	\$4,923	19.8%	17.0%	43	25.4%	19.4%	\$4,640	20.8%	16.2%
	Upper	214	43.1%	\$37,826	58.3%	41.2%	84	43.3%	44.7%	\$15,570	62.7%	50.2%	81	47.9%	42.6%	\$13,326	59.8%	49.2%
	Unknown	24	4.8%	\$1,388	2.1%	0.0%	12	6.2%	19.1%	\$649	2.6%	23.8%	5	3.0%	20.6%	\$516	2.3%	24.6%
	Total	497	100.0%	\$64,831	100.0%	100.0%	194	100.0%	100.0%	\$24,846	100.0%	100.0%	169	100.0%	100.0%	\$22,280	100.0%	100.0%
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	73	70.2%	\$5,948	49.1%	90.3%	22	64.7%	33.3%	\$3,676	62.0%	24.1%	34	73.9%	37.0%	\$1,806	40.1%	23.5%
	Over \$1 Million	19	18.3%	\$4,447	36.7%	8.7%	4	11.8%					11	23.9%				
	Total Rev. available	92	88.5%	\$10,395	85.8%	99.0%	26	76.5%					45	97.8%				
	Rev. Not Known	12	11.5%	\$1,713	14.1%	0.9%	8	23.5%					1	2.2%				
	Total	104	100.0%	\$12,108	100.0%	100.0%	34	100.0%					46	100.0%				
Small Business Loan Size	\$100,000 or Less	82	78.8%	\$2,381	19.7%		25	73.5%	91.5%	\$731	12.3%	26.9%	37	80.4%	92.4%	\$1,286	28.5%	29.7%
	\$100,001 - \$250,000	9	8.7%	\$1,564	12.9%		2	5.9%	3.8%	\$312	5.3%	13.4%	5	10.9%	3.0%	\$839	18.6%	11.6%
	\$250,001 - \$1 Million	13	12.5%	\$8,163	67.4%		7	20.6%	4.7%	\$4,885	82.4%	59.6%	4	8.7%	4.6%	\$2,383	52.9%	58.7%
	Total	104	100.0%	\$12,108	100.0%		34	100.0%	100.0%	\$5,928	100.0%	100.0%	46	100.0%	100.0%	\$4,508	100.0%	100.0%
	Total																	
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	3	100.0%	\$170	100.0%	94.9%	2	100.0%	29.4%	\$155	100.0%	86.3%	1	100.0%	30.0%	\$15	100.0%	54.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.1%	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%	\$170	100.0%	100.0%	2	100.0%					1	100.0%				
Small Farm Loan Size	\$100,000 or Less	2	66.7%	\$39	22.9%		1	50.0%	94.1%	\$24	15.5%	68.0%	1	100.0%	100.0%	\$15	100.0%	100.0%
	\$100,001 - \$250,000	1	33.3%	\$131	77.1%		1	50.0%	5.9%	\$131	84.5%	32.0%	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	3	100.0%	\$170	100.0%		2	100.0%	100.0%	\$155	100.0%	100.0%	1	100.0%	100.0%	\$15	100.0%	100.0%
	Total																	

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 FHIC Census Data, ACS 2010 data, and 2016 D&B Information

### Appendices

#### Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: LA Lake Charles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison													
		Bank		Owner Occupied Units	2014		2015													
		Count	Dollar		Count	Dollar	Count	Dollar												
				#					%	\$ (000s)	%	%	%	\$ (000s)	%	%				
HOME PURCHASE	Low	11	4.1%	\$696	1.7%	4.9%	1	1.2%	1.4%	\$28	0.2%	0.6%	2	2.2%	1.9%	\$166	1.0%	1.0%		
	Moderate	50	18.7%	\$4,740	11.5%	17.5%	12	14.3%	13.8%	\$1,312	11.0%	9.7%	19	20.9%	14.4%	\$1,959	12.4%	9.6%		
	Middle	116	43.3%	\$18,371	44.4%	48.4%	37	44.0%	51.4%	\$3,718	31.1%	49.9%	37	40.7%	49.8%	\$7,065	44.6%	50.9%		
	Upper	91	34.0%	\$17,572	42.5%	29.2%	34	40.5%	33.5%	\$6,895	57.7%	39.9%	33	36.3%	34.0%	\$6,646	42.0%	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%		
	<b>Total</b>	<b>268</b>	<b>100.0%</b>	<b>\$41,379</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,953</b>	<b>100.0%</b>	<b>100.0%</b>	<b>91</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,836</b>	<b>100.0%</b>	<b>100.0%</b>		
REFINANCE	Low	8	4.7%	\$842	3.0%	4.9%	1	2.4%	4.5%	\$51	1.0%	2.3%	3	5.2%	3.2%	\$409	3.9%	1.7%		
	Moderate	36	20.9%	\$2,879	10.4%	17.5%	12	29.3%	14.7%	\$853	16.9%	10.4%	12	20.7%	13.7%	\$889	8.5%	9.1%		
	Middle	71	41.3%	\$10,936	39.6%	48.4%	13	31.7%	47.9%	\$1,298	25.6%	47.6%	26	44.8%	46.5%	\$3,530	33.7%	47.7%		
	Upper	57	33.1%	\$12,964	46.9%	29.2%	15	36.6%	32.8%	\$2,860	56.5%	39.6%	17	29.3%	36.6%	\$5,658	54.0%	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%		
	<b>Total</b>	<b>172</b>	<b>100.0%</b>	<b>\$27,621</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,062</b>	<b>100.0%</b>	<b>100.0%</b>	<b>58</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,486</b>	<b>100.0%</b>	<b>100.0%</b>		
HOME IMPROVEMENT	Low	6	2.8%	\$96	1.3%	4.9%	2	2.5%	3.7%	\$21	0.8%	1.5%	2	2.9%	2.9%	\$23	0.9%	3.5%		
	Moderate	54	24.9%	\$2,057	28.7%	17.5%	21	26.6%	19.1%	\$460	17.8%	12.6%	18	25.7%	17.5%	\$1,296	51.5%	15.3%		
	Middle	83	38.2%	\$2,045	28.5%	48.4%	27	34.2%	43.9%	\$342	13.2%	45.5%	29	41.4%	48.4%	\$848	33.7%	44.0%		
	Upper	74	34.1%	\$2,965	41.4%	29.2%	29	36.7%	33.3%	\$1,764	68.2%	40.4%	21	30.0%	31.2%	\$350	13.9%	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%		
	<b>Total</b>	<b>217</b>	<b>100.0%</b>	<b>\$7,163</b>	<b>100.0%</b>	<b>100.0%</b>	<b>79</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,587</b>	<b>100.0%</b>	<b>100.0%</b>	<b>70</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,517</b>	<b>100.0%</b>	<b>100.0%</b>		
MULTI FAMILY	<b>Multi-Family Units</b>						Low		0	0.0%	7.1%	\$0	0.0%	18.4%	1	25.0%	16.0%	\$174	8.6%	5.1%
	Moderate		1	16.7%	\$683	29.6%	43.6%	0	0.0%	28.6%	\$0	0.0%	9.5%	1	25.0%	16.0%	\$683	33.6%	13.2%	
	Middle		3	50.0%	\$391	16.9%	25.7%	1	100.0%	46.4%	\$250	100.0%	35.8%	1	25.0%	44.0%	\$116	5.7%	35.7%	
	Upper		1	16.7%	\$1,060	45.9%	19.1%	0	0.0%	17.9%	\$0	0.0%	36.4%	1	25.0%	24.0%	\$1,060	52.1%	46.0%	
	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%	
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$2,308</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$250</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,033</b>	<b>100.0%</b>	<b>100.0%</b>		
HMDA TOTALS	Low	26	3.9%	\$1,808	2.3%	4.9%	4	2.0%	2.5%	\$100	0.5%	2.6%	8	3.6%	2.4%	\$772	2.5%	1.4%		
	Moderate	141	21.3%	\$10,359	13.2%	17.5%	45	22.0%	14.5%	\$2,625	13.2%	9.9%	50	22.4%	14.4%	\$4,827	15.6%	9.6%		
	Middle	273	41.2%	\$31,743	40.5%	48.4%	78	38.0%	49.8%	\$5,608	28.2%	48.0%	93	41.7%	48.7%	\$11,559	37.4%	49.5%		
	Upper	223	33.6%	\$34,561	44.0%	29.2%	78	38.0%	33.2%	\$11,519	58.0%	39.5%	72	32.3%	34.6%	\$13,714	44.4%	39.5%		
	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%		
	<b>Total</b>	<b>663</b>	<b>100.0%</b>	<b>\$78,471</b>	<b>100.0%</b>	<b>100.0%</b>	<b>205</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$19,852</b>	<b>100.0%</b>	<b>100.0%</b>	<b>223</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$30,872</b>	<b>100.0%</b>	<b>100.0%</b>		
SMALL BUSINESSES	<b>Small Businesses</b>						Low		16	3.1%	7.1%	\$617	1.8%	5.4%	21	4.7%	7.5%	\$2,089	6.4%	6.3%
	Moderate		372	26.1%	\$26,438	26.1%	23.6%	125	24.3%	22.3%	\$8,583	24.8%	26.3%	120	27.1%	23.0%	\$8,255	25.3%	23.1%	
	Middle		543	38.1%	\$39,083	38.5%	43.4%	218	42.4%	38.7%	\$15,648	45.1%	41.7%	159	35.9%	40.2%	\$10,380	31.8%	39.9%	
	Upper		451	31.7%	\$30,750	30.3%	27.9%	154	30.0%	29.9%	\$9,759	28.1%	25.6%	143	32.3%	28.0%	\$11,872	36.4%	29.4%	
	Unknown		1	0.1%	\$68	0.1%	0.1%	1	0.2%	0.2%	\$68	0.2%	0.3%	0	0.0%	0.1%	\$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%	1.3%	
	<b>Total</b>	<b>1,424</b>	<b>100.0%</b>	<b>\$101,398</b>	<b>100.0%</b>	<b>100.0%</b>	<b>514</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,675</b>	<b>100.0%</b>	<b>100.0%</b>	<b>443</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,596</b>	<b>100.0%</b>	<b>100.0%</b>		
SMALL FARM	<b>Small Farms</b>						Low		3	2.3%	1.4%	\$270	5.1%	1.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate		0	0.0%	\$0	0.0%	9.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.4%	\$0	0.0%	7.4%	
	Middle		37	28.5%	\$1,553	29.5%	58.0%	16	34.8%	55.2%	\$668	44.9%	63.3%	12	25.0%	44.6%	\$370	17.7%	44.1%	
	Upper		90	69.2%	\$3,445	65.4%	31.5%	30	65.2%	44.8%	\$821	55.1%	36.7%	34	70.8%	50.6%	\$1,582	75.6%	46.3%	
	Unknown		0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown		0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>Total</b>	<b>130</b>	<b>100.0%</b>	<b>\$5,268</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,489</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,092</b>	<b>100.0%</b>	<b>100.0%</b>		

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: LA Lake Charles

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Families by Family Income %	Count		Dollar		Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	\$ %	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	\$ (000s)	\$ %
HOME PURCHASE	Low	22	8.2%	\$1,331	3.2%	23.3%	7	8.3%	3.5%	\$323	2.7%	1.4%	7	7.7%	4.6%	\$514	3.2%	2.1%
	Moderate	40	14.9%	\$3,962	9.6%	17.5%	15	17.9%	13.7%	\$1,414	11.8%	9.1%	12	13.2%	14.3%	\$1,327	8.4%	9.8%
	Middle	48	17.9%	\$5,718	13.8%	17.6%	14	16.7%	21.3%	\$1,822	15.2%	19.0%	16	17.6%	22.7%	\$1,911	12.1%	20.3%
	Upper	131	48.9%	\$26,854	64.9%	41.6%	45	53.6%	43.2%	\$8,237	68.9%	53.0%	43	47.3%	40.6%	\$10,328	65.2%	51.2%
	Unknown	27	10.1%	\$3,514	8.5%	0.0%	3	3.6%	18.3%	\$157	1.3%	17.5%	13	14.3%	17.7%	\$1,756	11.1%	16.6%
	<b>Total</b>	<b>268</b>	<b>100.0%</b>	<b>\$41,379</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,953</b>	<b>100.0%</b>	<b>100.0%</b>	<b>91</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,836</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	9	5.2%	\$456	1.7%	23.3%	4	9.8%	4.9%	\$150	3.0%	2.4%	3	5.2%	4.3%	\$162	1.5%	2.1%
	Moderate	15	8.7%	\$882	3.2%	17.5%	4	9.8%	10.5%	\$228	4.5%	7.0%	3	5.2%	9.7%	\$119	1.1%	5.9%
	Middle	28	16.3%	\$2,688	9.7%	17.6%	15	36.6%	18.5%	\$1,413	27.9%	15.3%	4	6.9%	16.4%	\$263	2.5%	12.9%
	Upper	86	50.0%	\$17,429	63.1%	41.6%	16	39.0%	47.0%	\$3,050	60.3%	53.2%	30	51.7%	46.1%	\$7,434	70.9%	53.1%
	Unknown	34	19.8%	\$6,166	22.3%	0.0%	2	4.9%	19.1%	\$221	4.4%	22.0%	18	31.0%	23.5%	\$2,508	23.9%	26.0%
	<b>Total</b>	<b>172</b>	<b>100.0%</b>	<b>\$27,621</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,062</b>	<b>100.0%</b>	<b>100.0%</b>	<b>58</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,486</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	23	10.6%	\$160	2.2%	23.3%	7	8.9%	7.4%	\$34	1.3%	3.3%	7	10.0%	7.3%	\$32	1.3%	3.8%
	Moderate	39	18.0%	\$396	5.5%	17.5%	14	17.7%	16.5%	\$81	3.1%	9.6%	14	20.0%	15.5%	\$230	9.1%	9.1%
	Middle	54	24.9%	\$887	12.4%	17.6%	16	20.3%	20.2%	\$130	5.0%	10.7%	20	28.6%	20.1%	\$364	14.5%	16.2%
	Upper	74	34.1%	\$4,789	66.9%	41.6%	31	39.2%	47.0%	\$2,008	77.6%	67.1%	21	30.0%	46.6%	\$1,587	63.1%	54.1%
	Unknown	27	12.4%	\$931	13.0%	0.0%	11	13.9%	8.8%	\$334	12.9%	9.2%	8	11.4%	10.5%	\$304	12.1%	16.8%
	<b>Total</b>	<b>217</b>	<b>100.0%</b>	<b>\$7,163</b>	<b>100.0%</b>	<b>100.0%</b>	<b>79</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,587</b>	<b>100.0%</b>	<b>100.0%</b>	<b>70</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,517</b>	<b>100.0%</b>	<b>100.0%</b>
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%	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%	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%	41.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	6	100.0%	\$2,308	100.0%	0.0%	1	100.0%	100.0%	\$250	100.0%	100.0%	4	100.0%	100.0%	\$2,033	100.0%	100.0%
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$2,308</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$250</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,033</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	54	8.1%	\$1,947	2.5%	23.3%	18	8.8%	4.2%	\$507	2.6%	1.6%	17	7.6%	4.7%	\$708	2.3%	2.1%
	Moderate	94	14.2%	\$5,240	6.7%	17.5%	33	16.1%	12.9%	\$1,723	8.7%	7.8%	29	13.0%	12.9%	\$1,676	5.4%	8.4%
	Middle	130	19.6%	\$9,293	11.8%	17.6%	45	22.0%	20.3%	\$3,365	17.0%	16.2%	40	17.9%	20.5%	\$2,538	8.2%	17.6%
	Upper	291	43.9%	\$49,072	62.5%	41.6%	92	44.9%	44.3%	\$13,295	67.0%	48.6%	94	42.2%	42.5%	\$19,349	62.7%	51.0%
	Unknown	94	14.2%	\$12,919	16.5%	0.0%	17	8.3%	18.4%	\$962	4.8%	25.8%	43	19.3%	19.4%	\$6,601	21.4%	20.8%
	<b>Total</b>	<b>663</b>	<b>100.0%</b>	<b>\$78,471</b>	<b>100.0%</b>	<b>100.0%</b>	<b>205</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$19,852</b>	<b>100.0%</b>	<b>100.0%</b>	<b>223</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$30,872</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	964	67.7%	\$44,383	43.8%	91.9%	309	60.1%	38.8%	\$14,838	42.8%	37.3%	331	74.7%	42.1%	\$14,823	45.5%	37.6%
	Over \$1 Million	303	21.3%	\$50,998	50.3%	7.3%	122	23.7%					79	17.8%				
	Total Rev. available	1,267	89.0%	\$95,381	94.1%	99.2%	431	83.8%					410	92.5%				
	Rev. Not Known	157	11.0%	\$6,017	5.9%	0.8%	83	16.1%					33	7.4%				
<b>Total</b>	<b>1,424</b>	<b>100.0%</b>	<b>\$101,398</b>	<b>100.0%</b>	<b>100.0%</b>	<b>514</b>	<b>100.0%</b>					<b>443</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	1,194	83.8%	\$33,089	32.6%		436	84.8%	91.0%	\$11,338	32.7%	32.2%	372	84.0%	90.9%	\$10,481	32.2%	31.0%
	\$100,001 - \$250,000	137	9.6%	\$23,726	23.4%		48	9.3%	4.6%	\$8,543	24.6%	18.5%	40	9.0%	4.3%	\$7,009	21.5%	16.5%
	\$250,001 - \$1 Million	93	6.5%	\$44,583	44.0%		30	5.8%	4.4%	\$14,794	42.7%	49.3%	31	7.0%	4.8%	\$15,106	46.3%	52.5%
	Total	1,424	100.0%	\$101,398	100.0%		514	100.0%	100.0%	\$34,675	100.0%	100.0%	443	100.0%	100.0%	\$32,596	100.0%	100.0%
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	123	94.6%	\$4,840	91.9%	99.3%	44	95.7%	76.0%	\$1,470	98.7%	89.2%	45	93.8%	79.5%	\$1,898	90.7%	89.3%
	Over \$1 Million	1	0.8%	\$130	2.5%	0.7%	0	0.0%					1	2.1%				
	Not Known	6	4.6%	\$298	5.7%	0.0%	2	4.3%					2	4.2%				
	<b>Total</b>	<b>130</b>	<b>100.0%</b>	<b>\$5,268</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46</b>	<b>100.0%</b>					<b>48</b>	<b>100.0%</b>				
Small Farm Loan Size	\$100,000 or Less	115	88.5%	\$2,757	52.3%		42	91.3%	84.4%	\$829	55.7%	27.0%	42	87.5%	79.5%	\$978	46.7%	23.5%
	\$100,001 - \$250,000	14	10.8%	\$2,101	39.9%		4	8.7%	8.3%	\$660	44.3%	27.4%	5	10.4%	9.6%	\$704	33.7%	19.5%
	\$250,001 - \$500,000	1	0.8%	\$410	7.8%		0	0.0%	7.3%	\$0	0.0%	45.6%	1	2.1%	10.8%	\$410	19.6%	57.1%
	Total	130	100.0%	\$5,268	100.0%		46	100.0%	100.0%	\$1,489	100.0%	100.0%	48	100.0%	100.0%	\$2,092	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: LA Lincoln

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014				2015							
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	1	4.2%	\$20	0.5%	4.7%	0	0.0%	1.1%	\$0	0.0%	0.6%	0	0.0%	1.7%	\$0	0.0%	0.7%
	Moderate	5	20.8%	\$690	18.2%	20.1%	2	20.0%	22.9%	\$327	21.9%	19.8%	2	25.0%	17.1%	\$181	15.0%	25.6%
	Middle	7	29.2%	\$1,168	30.8%	23.6%	3	30.0%	20.7%	\$497	33.2%	16.4%	3	37.5%	19.9%	\$406	33.6%	13.2%
	Upper	11	45.8%	\$1,917	50.5%	51.5%	5	50.0%	55.2%	\$671	44.9%	63.1%	3	37.5%	61.4%	\$620	51.4%	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	24	100.0%	\$3,795	100.0%	100.0%	10	100.0%	100.0%	\$1,495	100.0%	100.0%	8	100.0%	100.0%	\$1,207	100.0%	100.0%
REFINANCE	Low	1	7.1%	\$100	6.6%	4.7%	1	25.0%	2.9%	\$100	21.8%	1.7%	0	0.0%	3.3%	\$0	0.0%	2.1%
	Moderate	2	14.3%	\$67	4.4%	20.1%	1	25.0%	16.6%	\$13	2.8%	14.1%	0	0.0%	12.1%	\$0	0.0%	9.5%
	Middle	2	14.3%	\$72	4.8%	23.6%	0	0.0%	20.5%	\$0	0.0%	15.6%	1	33.3%	20.4%	\$31	11.9%	14.6%
	Upper	9	64.3%	\$1,273	84.2%	51.5%	2	50.0%	60.0%	\$346	75.4%	68.6%	2	66.7%	64.2%	\$230	88.1%	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	14	100.0%	\$1,512	100.0%	100.0%	4	100.0%	100.0%	\$459	100.0%	100.0%	3	100.0%	100.0%	\$261	100.0%	100.0%
HOME IMPROVEMENT	Low	4	7.8%	\$16	2.5%	4.7%	1	5.6%	4.1%	\$4	2.7%	3.5%	0	0.0%	2.9%	\$0	0.0%	0.5%
	Moderate	21	41.2%	\$266	41.4%	20.1%	7	38.9%	21.6%	\$55	37.2%	19.6%	8	53.3%	21.7%	\$151	42.3%	11.3%
	Middle	9	17.6%	\$208	32.4%	23.6%	3	16.7%	20.3%	\$17	11.5%	21.2%	5	33.3%	24.6%	\$189	52.9%	21.4%
	Upper	17	33.3%	\$152	23.7%	51.5%	7	38.9%	54.1%	\$72	48.6%	55.6%	2	13.3%	50.7%	\$17	4.8%	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	51	100.0%	\$642	100.0%	100.0%	18	100.0%	100.0%	\$148	100.0%	100.0%	15	100.0%	100.0%	\$357	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	50.0%	\$0	0.0%	96.7%	0	0.0%	9.1%	\$0	0.0%	8.5%
	Moderate	0	0.0%	\$0	0.0%	38.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	63.6%	\$0	0.0%	65.0%
	Middle	0	0.0%	\$0	0.0%	12.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	9.1%	\$0	0.0%	6.3%
	Upper	0	0.0%	\$0	0.0%	34.0%	0	0.0%	50.0%	\$0	0.0%	3.3%	0	0.0%	18.2%	\$0	0.0%	20.2%
	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	6	6.7%	\$136	2.3%	4.7%	2	6.3%	2.2%	\$104	4.9%	12.0%	0	0.0%	2.5%	\$0	0.0%	2.0%
	Moderate	28	31.5%	\$1,023	17.2%	20.1%	10	31.3%	20.1%	\$395	18.8%	15.5%	10	38.5%	16.1%	\$332	18.2%	23.5%
	Middle	18	20.2%	\$1,448	24.3%	23.6%	6	18.8%	20.6%	\$514	24.5%	14.3%	9	34.6%	20.4%	\$626	34.3%	13.2%
	Upper	37	41.6%	\$3,342	56.2%	51.5%	14	43.8%	57.1%	\$1,089	51.8%	58.2%	7	26.9%	61.1%	\$867	47.5%	61.3%
	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	89	100.0%	\$5,949	100.0%	100.0%	32	100.0%	100.0%	\$2,102	100.0%	100.0%	26	100.0%	100.0%	\$1,825	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	3	3.2%	\$3	0.0%	8.8%	1	4.3%	1.7%	\$1	0.1%	3.3%	1	2.7%	2.2%	\$1	0.1%	0.6%
	Moderate	12	12.6%	\$165	2.7%	18.4%	2	8.7%	10.8%	\$51	3.8%	4.7%	5	13.5%	14.8%	\$101	7.2%	5.6%
	Middle	9	9.5%	\$644	10.4%	17.5%	1	4.3%	17.1%	\$1	0.1%	27.2%	5	13.5%	16.8%	\$117	8.3%	20.2%
	Upper	71	74.7%	\$5,394	86.9%	55.2%	19	82.6%	68.8%	\$1,285	96.0%	64.6%	26	70.3%	65.6%	\$1,192	84.5%	73.5%
	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%	1.6%	\$0	0.0%	0.2%	0	0.0%	0.7%	\$0	0.0%	0.1%
Total	95	100.0%	\$6,206	100.0%	100.0%	23	100.0%	100.0%	\$1,338	100.0%	100.0%	37	100.0%	100.0%	\$1,411	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	4.2%	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%	6.3%	0	0.0%	5.3%	\$0	0.0%	1.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	10.0%	\$1,000	37.1%	20.8%	1	20.0%	10.5%	\$500	51.3%	31.6%	1	12.5%	26.3%	\$500	43.4%	43.6%
	Upper	18	90.0%	\$1,692	62.9%	68.8%	4	80.0%	84.2%	\$475	48.7%	66.9%	7	87.5%	73.7%	\$651	56.6%	56.4%
	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%
Total	20	100.0%	\$2,692	100.0%	100.0%	5	100.0%	100.0%	\$975	100.0%	100.0%	8	100.0%	100.0%	\$1,151	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: LA Lincoln

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2014			2015								
		Count #	% %	Dollar \$ (000s) \$ %			Bank #	Agg %	Dollar \$ (000s) \$ %		Bank #	Agg %	Dollar \$ (000s) \$ %					
				Bank %	Agg %				Bank %	Agg %			Bank %	Agg %				
HOME PURCHASE	Low	1	4.2%	\$77	2.0%	24.1%	1	10.0%	2.2%	\$77	5.2%	1.1%	0	0.0%	0.5%	\$0	0.0%	0.1%
	Moderate	4	16.7%	\$443	11.7%	13.4%	2	20.0%	6.3%	\$192	12.8%	3.3%	2	25.0%	11.6%	\$251	20.8%	5.0%
	Middle	8	33.3%	\$1,057	27.9%	17.3%	4	40.0%	18.3%	\$685	45.8%	14.1%	3	37.5%	15.2%	\$272	22.5%	9.6%
	Upper	11	45.8%	\$2,218	58.4%	45.1%	3	30.0%	51.1%	\$541	36.2%	60.7%	3	37.5%	55.5%	\$684	56.7%	58.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.1%	\$0	0.0%	20.8%	0	0.0%	17.3%	\$0	0.0%	26.6%
	<b>Total</b>	<b>24</b>	<b>100.0%</b>	<b>\$3,795</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,495</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,207</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	1	7.1%	\$193	12.8%	24.1%	0	0.0%	2.3%	\$0	0.0%	0.7%	0	0.0%	3.3%	\$0	0.0%	1.4%
	Moderate	3	21.4%	\$317	21.0%	13.4%	0	0.0%	7.8%	\$0	0.0%	5.1%	2	66.7%	7.4%	\$199	76.2%	3.6%
	Middle	5	35.7%	\$377	24.9%	17.3%	2	50.0%	15.6%	\$205	44.7%	10.3%	1	33.3%	10.9%	\$62	23.8%	8.5%
	Upper	5	35.7%	\$625	41.3%	45.1%	2	50.0%	50.6%	\$254	55.3%	59.8%	0	0.0%	53.0%	\$0	0.0%	59.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.6%	\$0	0.0%	24.2%	0	0.0%	25.4%	\$0	0.0%	27.4%
	<b>Total</b>	<b>14</b>	<b>100.0%</b>	<b>\$1,512</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$459</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$261</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	9	17.6%	\$38	5.9%	24.1%	5	27.8%	10.8%	\$17	11.5%	1.8%	2	13.3%	5.8%	\$14	3.9%	0.8%
	Moderate	12	23.5%	\$134	20.9%	13.4%	3	16.7%	13.5%	\$22	14.9%	10.0%	2	13.3%	17.4%	\$90	25.2%	11.8%
	Middle	12	23.5%	\$97	15.1%	17.3%	5	27.8%	20.3%	\$34	23.0%	23.9%	4	26.7%	20.3%	\$42	11.8%	9.6%
	Upper	14	27.5%	\$316	49.2%	45.1%	4	22.2%	52.7%	\$64	43.2%	59.9%	6	40.0%	43.5%	\$209	58.5%	52.5%
	Unknown	4	7.8%	\$57	8.9%	0.0%	1	5.6%	2.7%	\$11	7.4%	4.4%	1	6.7%	13.0%	\$2	0.6%	25.3%
	<b>Total</b>	<b>51</b>	<b>100.0%</b>	<b>\$642</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$148</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$357</b>	<b>100.0%</b>	<b>100.0%</b>
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%	13.4%	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%	17.3%	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%	45.1%	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%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	11	12.4%	\$308	5.2%	24.1%	6	18.8%	2.9%	\$94	4.5%	0.8%	2	7.7%	2.0%	\$14	0.8%	0.6%
	Moderate	19	21.3%	\$894	15.0%	13.4%	5	15.6%	7.5%	\$214	10.2%	3.7%	6	23.1%	10.2%	\$540	29.6%	4.2%
	Middle	25	28.1%	\$1,531	25.7%	17.3%	11	34.4%	17.3%	\$924	44.0%	11.2%	8	30.8%	13.7%	\$376	20.6%	8.3%
	Upper	30	33.7%	\$3,159	53.1%	45.1%	9	28.1%	50.9%	\$859	40.9%	53.4%	9	34.6%	52.7%	\$893	48.9%	52.9%
	Unknown	4	4.5%	\$57	1.0%	0.0%	1	3.1%	21.3%	\$11	0.5%	30.9%	1	3.8%	21.3%	\$2	0.1%	34.1%
	<b>Total</b>	<b>89</b>	<b>100.0%</b>	<b>\$5,949</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,825</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	75	78.9%	\$4,684	75.5%	91.3%	16	69.6%	44.3%	\$1,140	85.2%	52.9%	28	75.7%	43.2%	\$978	69.3%	54.2%
	Over \$1 Million	10	10.5%	\$1,344	21.7%	7.7%	2	8.7%					5	13.5%				
	Total Rev. available	85	89.4%	\$6,028	97.2%	99.0%	18	78.3%					33	89.2%				
	Rev. Not Known	10	10.5%	\$178	2.9%	1.0%	5	21.7%					4	10.8%				
<b>Total</b>	<b>95</b>	<b>100.0%</b>	<b>\$6,206</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>					<b>37</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	86	90.5%	\$1,968	31.7%		20	87.0%	87.7%	\$429	32.1%	24.4%	35	94.6%	89.3%	\$936	66.3%	30.6%
	\$100,001 - \$250,000	3	3.2%	\$481	7.8%		2	8.7%	6.4%	\$306	22.9%	20.0%	1	2.7%	5.8%	\$175	12.4%	20.0%
	\$250,001 - \$1 Million	6	6.3%	\$3,757	60.5%		1	4.3%	5.9%	\$603	45.1%	55.6%	1	2.7%	4.9%	\$300	21.3%	49.4%
	<b>Total</b>	<b>95</b>	<b>100.0%</b>	<b>\$6,206</b>	<b>100.0%</b>		<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,338</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,411</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	3	15.0%	\$1,085	40.3%	94.1%	1	20.0%	52.6%	\$500	51.3%	57.2%	1	12.5%	31.6%	\$500	43.4%	49.1%
	Over \$1 Million	17	85.0%	\$1,607	59.7%	5.9%	4	80.0%					7	87.5%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>\$2,692</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>					<b>8</b>	<b>100.0%</b>					
Small Farm Loan Size	\$100,000 or Less	13	65.0%	\$883	32.8%		2	40.0%	73.7%	\$135	13.8%	33.4%	5	62.5%	84.2%	\$301	26.2%	41.1%
	\$100,001 - \$250,000	5	25.0%	\$809	30.1%		2	40.0%	21.1%	\$340	34.9%	36.2%	2	25.0%	10.5%	\$350	30.4%	24.3%
	\$250,001 - \$500,000	2	10.0%	\$1,000	37.1%		1	20.0%	5.3%	\$500	51.3%	30.4%	1	12.5%	5.3%	\$500	43.4%	34.7%
	<b>Total</b>	<b>20</b>	<b>100.0%</b>	<b>\$2,692</b>	<b>100.0%</b>		<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$975</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,151</b>	<b>100.0%</b>	<b>100.0%</b>

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: LA Monroe

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014						2015					
		Bank		Dollar			Count		Dollar		Count		Dollar					
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	\$ (000s)	\$ %	\$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	15	1.8%	\$1,028	0.7%	6.3%	2	0.8%	0.6%	\$161	0.4%	0.6%	10	3.4%	1.6%	\$642	1.2%	1.2%
	Moderate	43	5.2%	\$4,493	3.2%	15.6%	15	5.6%	6.6%	\$1,301	3.0%	3.9%	16	5.5%	6.9%	\$2,166	4.2%	4.4%
	Middle	380	45.6%	\$59,974	42.2%	42.2%	120	45.1%	45.3%	\$17,424	39.8%	42.1%	131	45.0%	44.9%	\$22,112	42.6%	40.8%
	Upper	396	47.5%	\$76,742	54.0%	35.9%	129	48.5%	47.6%	\$24,863	56.8%	53.3%	134	46.0%	46.7%	\$27,015	52.0%	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%
	<b>Total</b>	<b>834</b>	<b>100.0%</b>	<b>\$142,237</b>	<b>100.0%</b>	<b>100.0%</b>	<b>266</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$43,749</b>	<b>100.0%</b>	<b>100.0%</b>	<b>291</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$51,935</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	3	1.9%	\$373	1.3%	6.3%	1	2.4%	2.3%	\$58	0.7%	1.3%	2	3.6%	2.4%	\$315	3.6%	1.3%
	Moderate	9	5.7%	\$600	2.2%	15.6%	0	0.0%	11.9%	\$0	0.0%	6.8%	6	10.7%	10.2%	\$406	4.7%	6.7%
	Middle	72	45.9%	\$12,430	45.0%	42.2%	22	52.4%	44.7%	\$3,868	48.5%	41.6%	19	33.9%	41.3%	\$3,319	38.4%	39.8%
	Upper	73	46.5%	\$14,242	51.5%	35.9%	19	45.2%	41.1%	\$4,051	50.8%	50.3%	29	51.8%	46.2%	\$4,604	53.3%	52.3%
	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%
	<b>Total</b>	<b>157</b>	<b>100.0%</b>	<b>\$27,645</b>	<b>100.0%</b>	<b>100.0%</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,977</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,644</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	9	8.7%	\$49	2.1%	6.3%	4	9.8%	6.7%	\$16	3.9%	3.9%	2	7.1%	4.4%	\$9	2.7%	2.3%
	Moderate	23	22.1%	\$1,196	50.4%	15.6%	11	26.8%	13.3%	\$118	28.9%	7.2%	5	17.9%	11.2%	\$70	20.9%	9.0%
	Middle	42	40.4%	\$726	30.6%	42.2%	16	39.0%	48.1%	\$153	37.5%	52.3%	13	46.4%	49.0%	\$137	40.9%	38.3%
	Upper	30	28.8%	\$403	17.0%	35.9%	10	24.4%	31.9%	\$121	29.7%	36.7%	8	28.6%	35.4%	\$119	35.5%	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%
	<b>Total</b>	<b>104</b>	<b>100.0%</b>	<b>\$2,374</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$335</b>	<b>100.0%</b>	<b>100.0%</b>
MULTI-FAMILY	<b>Multi-Family Units</b>																	
	Low	0	0.0%	\$0	0.0%	9.7%	0	0.0%	7.4%	\$0	0.0%	5.3%	0	0.0%	5.3%	\$0	0.0%	0.2%
	Moderate	2	33.3%	\$5,408	52.4%	21.3%	1	50.0%	44.4%	\$5,135	75.3%	39.5%	0	0.0%	26.3%	\$0	0.0%	14.6%
	Middle	2	33.3%	\$2,163	20.9%	32.8%	1	50.0%	25.9%	\$1,683	24.7%	25.8%	0	0.0%	36.8%	\$0	0.0%	30.5%
	Upper	2	33.3%	\$2,755	26.7%	36.2%	0	0.0%	22.2%	\$0	0.0%	29.4%	0	0.0%	31.6%	\$0	0.0%	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%
<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$10,326</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,818</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	
HMDA TOTALS	Low	27	2.5%	\$1,450	0.8%	6.3%	7	2.0%	1.5%	\$235	0.4%	1.1%	14	3.7%	2.0%	\$966	1.6%	1.2%
	Moderate	77	7.0%	\$11,697	6.4%	15.6%	27	7.7%	9.0%	\$6,554	11.1%	6.5%	27	7.2%	8.4%	\$2,642	4.3%	5.6%
	Middle	496	45.0%	\$75,293	41.2%	42.2%	159	45.3%	45.1%	\$23,128	39.2%	41.4%	163	43.5%	43.8%	\$25,568	42.0%	40.1%
	Upper	501	45.5%	\$94,142	51.6%	35.9%	158	45.0%	44.4%	\$29,035	49.3%	51.0%	171	45.6%	45.9%	\$31,738	52.1%	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%
	<b>Total</b>	<b>1,101</b>	<b>100.0%</b>	<b>\$182,582</b>	<b>100.0%</b>	<b>100.0%</b>	<b>351</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58,952</b>	<b>100.0%</b>	<b>100.0%</b>	<b>375</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$60,914</b>	<b>100.0%</b>	<b>100.0%</b>
SMALL BUSINESSES	<b>Small Businesses</b>																	
	Low	164	22.7%	\$23,483	38.1%	11.9%	62	23.6%	16.7%	\$7,495	35.3%	33.6%	65	26.5%	13.8%	\$9,745	42.5%	26.6%
	Moderate	110	15.2%	\$5,419	8.8%	19.5%	32	12.2%	16.5%	\$2,414	11.4%	11.7%	37	15.1%	14.3%	\$1,727	7.5%	13.5%
	Middle	229	31.6%	\$15,540	25.2%	33.7%	91	34.6%	32.1%	\$5,487	25.8%	25.9%	70	28.6%	30.6%	\$4,505	19.6%	30.8%
	Upper	221	30.5%	\$17,209	27.9%	34.8%	78	29.7%	33.1%	\$5,865	27.6%	27.1%	73	29.8%	38.3%	\$6,968	30.4%	27.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.6%	\$0	0.0%	1.4%	0	0.0%	1.7%	\$0	0.0%	1.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.2%	0	0.0%	1.3%	\$0	0.0%	0.5%
<b>Total</b>	<b>724</b>	<b>100.0%</b>	<b>\$61,651</b>	<b>100.0%</b>	<b>100.0%</b>	<b>263</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,261</b>	<b>100.0%</b>	<b>100.0%</b>	<b>245</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,945</b>	<b>100.0%</b>	<b>100.0%</b>	
SMALL FARM	<b>Small Farms</b>																	
	Low	0	0.0%	\$0	0.0%	0.8%	0	0.0%	6.7%	\$0	0.0%	7.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	12.5%	\$409	67.9%	4.5%	1	20.0%	11.1%	\$409	77.5%	26.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	7	87.5%	\$193	32.1%	49.6%	4	80.0%	46.7%	\$119	22.5%	39.5%	3	100.0%	67.6%	\$74	100.0%	62.1%
	Upper	0	0.0%	\$0	0.0%	44.4%	0	0.0%	35.6%	\$0	0.0%	27.2%	0	0.0%	32.4%	\$0	0.0%	37.9%
	Unknown	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%
	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%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>\$602</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$528</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$74</b>	<b>100.0%</b>	<b>100.0%</b>	

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: LA Monroe

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		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	34	4.1%	\$2,580	1.8%	23.9%	8	3.0%	2.1%	\$762	1.7%	0.9%	19	6.5%	2.7%	\$1,212	2.3%	1.0%
	Moderate	125	15.0%	\$13,979	9.8%	16.0%	39	14.7%	10.0%	\$4,058	9.3%	5.9%	34	11.7%	11.5%	\$3,842	7.4%	7.4%
	Middle	203	24.3%	\$29,016	20.4%	18.5%	72	27.1%	18.5%	\$9,830	22.5%	14.8%	57	19.6%	19.6%	\$8,032	15.5%	15.4%
	Upper	454	54.4%	\$91,701	64.5%	41.5%	140	52.6%	47.5%	\$26,274	60.1%	57.0%	172	59.1%	47.0%	\$36,800	70.9%	58.6%
	Unknown	18	2.2%	\$4,961	3.5%	0.0%	7	2.6%	21.9%	\$2,825	6.5%	21.4%	9	3.1%	19.2%	\$2,049	3.9%	17.6%
	<b>Total</b>	<b>834</b>	<b>100.0%</b>	<b>\$142,237</b>	<b>100.0%</b>	<b>100.0%</b>	<b>266</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$43,749</b>	<b>100.0%</b>	<b>100.0%</b>	<b>291</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$51,935</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	3	1.9%	\$207	0.7%	23.9%	2	4.8%	3.2%	\$102	1.3%	1.2%	1	1.8%	3.2%	\$105	1.2%	1.3%
	Moderate	20	12.7%	\$1,830	6.6%	16.0%	6	14.3%	6.9%	\$555	7.0%	3.6%	9	16.1%	8.1%	\$859	9.9%	4.4%
	Middle	26	16.6%	\$3,598	13.0%	18.5%	4	9.5%	15.3%	\$482	6.0%	10.9%	10	17.9%	14.4%	\$1,447	16.7%	10.1%
	Upper	102	65.0%	\$21,283	77.0%	41.5%	27	64.3%	52.0%	\$6,289	78.8%	58.9%	33	58.9%	47.4%	\$6,055	70.0%	55.5%
	Unknown	6	3.8%	\$727	2.6%	0.0%	3	7.1%	22.6%	\$549	6.9%	25.4%	3	5.4%	26.9%	\$178	2.1%	28.7%
	<b>Total</b>	<b>157</b>	<b>100.0%</b>	<b>\$27,645</b>	<b>100.0%</b>	<b>100.0%</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,977</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,644</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	8	7.7%	\$34	1.4%	23.9%	4	9.8%	6.7%	\$17	4.2%	1.7%	3	10.7%	5.8%	\$13	3.9%	1.3%
	Moderate	18	17.3%	\$118	5.0%	16.0%	4	9.8%	14.3%	\$27	6.6%	8.0%	4	14.3%	10.7%	\$25	7.5%	5.5%
	Middle	21	20.2%	\$217	9.1%	18.5%	11	26.8%	21.9%	\$125	30.6%	18.1%	5	17.9%	15.5%	\$42	12.5%	10.8%
	Upper	39	37.5%	\$691	29.1%	41.5%	16	39.0%	49.0%	\$188	46.1%	62.6%	12	42.9%	52.4%	\$208	62.1%	65.9%
	Unknown	18	17.3%	\$1,314	55.3%	0.0%	6	14.6%	8.1%	\$51	12.5%	9.5%	4	14.3%	15.5%	\$47	14.0%	16.6%
	<b>Total</b>	<b>104</b>	<b>100.0%</b>	<b>\$2,374</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$335</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.9%	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%	16.0%	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%	18.5%	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%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	6	100.0%	\$10,326	100.0%	0.0%	2	100.0%	100.0%	\$6,818	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$10,326</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,818</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	45	4.1%	\$2,821	1.5%	23.9%	14	4.0%	2.7%	\$881	1.5%	1.0%	23	6.1%	3.0%	\$1,330	2.2%	1.0%
	Moderate	163	14.8%	\$15,927	8.7%	16.0%	49	14.0%	9.1%	\$4,640	7.9%	4.9%	47	12.5%	10.2%	\$4,726	7.8%	6.1%
	Middle	250	22.7%	\$32,831	18.0%	18.5%	87	24.8%	17.5%	\$10,437	17.7%	13.0%	72	19.2%	17.4%	\$9,521	15.6%	13.0%
	Upper	595	54.0%	\$113,675	62.3%	41.5%	183	52.1%	48.7%	\$32,751	55.6%	55.1%	217	57.9%	47.2%	\$43,063	70.7%	55.8%
	Unknown	48	4.4%	\$17,328	9.5%	0.0%	18	5.1%	21.9%	\$10,243	17.4%	26.0%	16	4.3%	22.2%	\$2,274	3.7%	24.1%
	<b>Total</b>	<b>1,101</b>	<b>100.0%</b>	<b>\$182,582</b>	<b>100.0%</b>	<b>100.0%</b>	<b>351</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$58,952</b>	<b>100.0%</b>	<b>100.0%</b>	<b>375</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$60,914</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	450	62.2%	\$21,154	34.3%	91.0%	143	54.4%	36.5%	\$7,640	35.9%	33.3%	155	63.3%	36.3%	\$7,005	30.5%	36.5%
	Over \$1 Million	216	29.8%	\$39,099	63.4%	8.4%	81	30.8%					82	33.5%				
	<b>Total Rev. available</b>	<b>666</b>	<b>92.0%</b>	<b>\$60,253</b>	<b>97.7%</b>	<b>99.4%</b>	<b>224</b>	<b>85.2%</b>					<b>237</b>	<b>96.8%</b>				
	Rev. Not Known	58	8.0%	\$1,398	2.3%	0.6%	39	14.8%					8	3.3%				
<b>Total</b>	<b>724</b>	<b>100.0%</b>	<b>\$61,651</b>	<b>100.0%</b>	<b>100.0%</b>	<b>263</b>	<b>100.0%</b>					<b>245</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	568	78.5%	\$15,519	25.2%		202	76.8%	86.0%	\$4,714	22.2%	23.4%	190	77.6%	90.4%	\$6,006	26.2%	30.8%
	\$100,001 - \$250,000	96	13.3%	\$15,253	24.7%		38	14.4%	7.1%	\$6,021	28.3%	20.7%	33	13.5%	4.8%	\$5,262	22.9%	16.8%
	\$250,001 - \$1 Million	60	8.3%	\$30,879	50.1%		23	8.7%	6.9%	\$10,526	49.5%	55.9%	22	9.0%	4.8%	\$11,677	50.9%	52.5%
	<b>Total</b>	<b>724</b>	<b>100.0%</b>	<b>\$61,651</b>	<b>100.0%</b>		<b>263</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,261</b>	<b>100.0%</b>	<b>100.0%</b>	<b>245</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,945</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	7	87.5%	\$601	99.8%	99.3%	4	80.0%	37.8%	\$527	99.8%	60.5%	3	100.0%	47.1%	\$74	100.0%	69.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.7%	0	0.0%					0	0.0%				
	Not Known	1	12.5%	\$1	0.2%	0.0%	1	20.0%					0	0.0%				
	<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>\$602</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>					<b>3</b>	<b>100.0%</b>				
Small Farm Loan Size	\$100,000 or Less	7	87.5%	\$193	32.1%		4	80.0%	66.7%	\$119	22.5%	14.4%	3	100.0%	67.6%	\$74	100.0%	15.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	17.8%	\$0	0.0%	27.7%	0	0.0%	8.8%	\$0	0.0%	13.1%
	\$250,001 - \$500,000	1	12.5%	\$409	67.9%		1	20.0%	15.6%	\$409	77.5%	57.9%	0	0.0%	23.5%	\$0	0.0%	71.3%
	<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>\$602</b>	<b>100.0%</b>		<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$528</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$74</b>	<b>100.0%</b>	<b>100.0%</b>

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: LA Morehouse

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014						2015					
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
						#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	2	2.5%	\$323	3.1%	9.7%	1	2.5%	4.3%	\$140	2.8%	3.5%	0	0.0%	6.3%	\$0	0.0%	4.9%
	Moderate	9	11.1%	\$751	7.1%	23.8%	3	7.5%	19.4%	\$298	5.9%	14.8%	2	9.5%	16.7%	\$68	2.3%	11.4%
	Middle	70	86.4%	\$9,435	89.8%	66.5%	36	90.0%	76.1%	\$4,604	91.3%	81.6%	19	90.5%	77.0%	\$2,826	97.7%	83.7%
	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%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	81	100.0%	\$10,509	100.0%	100.0%	40	100.0%	100.0%	\$5,042	100.0%	100.0%	21	100.0%	100.0%	\$2,894	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	9.7%	0	0.0%	5.8%	\$0	0.0%	3.8%	0	0.0%	6.2%	\$0	0.0%	4.0%
	Moderate	3	14.3%	\$113	4.5%	23.8%	3	37.5%	19.0%	\$113	12.9%	11.3%	0	0.0%	19.4%	\$0	0.0%	8.4%
	Middle	18	85.7%	\$2,386	95.5%	66.5%	5	62.5%	75.2%	\$761	87.1%	84.9%	6	100.0%	74.4%	\$748	100.0%	87.7%
	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	21	100.0%	\$2,499	100.0%	100.0%	8	100.0%	100.0%	\$874	100.0%	100.0%	6	100.0%	100.0%	\$748	100.0%	100.0%
HOME IMPROVEMENT	Low	3	5.2%	\$31	4.1%	9.7%	2	6.9%	8.9%	\$28	6.6%	8.5%	0	0.0%	8.2%	\$0	0.0%	6.6%
	Moderate	15	25.9%	\$258	34.2%	23.8%	9	31.0%	26.8%	\$93	21.9%	21.8%	5	25.0%	22.4%	\$154	56.0%	28.5%
	Middle	40	69.0%	\$466	61.7%	66.5%	18	62.1%	64.3%	\$303	71.5%	69.7%	15	75.0%	69.4%	\$121	44.0%	64.9%
	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	58	100.0%	\$755	100.0%	100.0%	29	100.0%	100.0%	\$424	100.0%	100.0%	20	100.0%	100.0%	\$275	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	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%	29.5%	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%	46.8%	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%	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	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	5	3.1%	\$354	2.6%	9.7%	3	3.9%	5.1%	\$168	2.6%	3.7%	0	0.0%	6.5%	\$0	0.0%	4.6%
	Moderate	27	16.9%	\$1,122	8.2%	23.8%	15	19.5%	20.0%	\$504	7.9%	14.0%	7	14.9%	18.1%	\$222	5.7%	10.7%
	Middle	128	80.0%	\$12,287	89.3%	66.5%	59	76.6%	74.6%	\$5,668	89.4%	82.2%	40	85.1%	75.5%	\$3,695	94.3%	84.7%
	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%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	160	100.0%	\$13,763	100.0%	100.0%	77	100.0%	100.0%	\$6,340	100.0%	100.0%	47	100.0%	100.0%	\$3,917	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	15	17.0%	\$1,080	24.4%	8.2%	5	13.5%	8.9%	\$365	26.3%	4.0%	7	21.9%	12.0%	\$391	19.0%	6.1%
	Moderate	25	28.4%	\$1,694	38.2%	32.8%	13	35.1%	31.0%	\$617	44.5%	33.9%	9	28.1%	27.1%	\$757	36.8%	34.4%
	Middle	48	54.5%	\$1,655	37.4%	58.9%	19	51.4%	55.0%	\$404	29.1%	61.0%	16	50.0%	59.0%	\$910	44.2%	56.8%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	5.0%	\$0	0.0%	1.0%	0	0.0%	1.9%	\$0	0.0%	2.7%
Total	88	100.0%	\$4,429	100.0%	100.0%	37	100.0%	100.0%	\$1,386	100.0%	100.0%	32	100.0%	100.0%	\$2,058	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%	4.4%	0	0.0%	5.0%	\$0	0.0%	19.5%	0	0.0%	2.8%	\$0	0.0%	10.5%
	Middle	6	100.0%	\$273	100.0%	95.6%	2	100.0%	87.5%	\$91	100.0%	74.0%	2	100.0%	97.2%	\$91	100.0%	89.5%
	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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	7.5%	\$0	0.0%	6.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	6	100.0%	\$273	100.0%	100.0%	2	100.0%	100.0%	\$91	100.0%	100.0%	2	100.0%	100.0%	\$91	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: LA Morehouse

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Families by Family Income		Count	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	%		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
					#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	7	8.6%	\$536	5.1%	27.6%	3	7.5%	5.7%	\$204	4.0%	3.3%	2	9.5%	15.7%	\$139	4.8%	10.0%
	Moderate	13	16.0%	\$1,119	10.6%	16.8%	8	20.0%	15.4%	\$726	14.4%	11.0%	3	14.3%	13.2%	\$219	7.6%	10.6%
	Middle	16	19.8%	\$1,699	16.2%	20.7%	9	22.5%	19.1%	\$961	19.1%	17.9%	4	19.0%	16.4%	\$468	16.2%	16.7%
	Upper	43	53.1%	\$7,066	67.2%	35.0%	20	50.0%	30.8%	\$3,151	62.5%	42.6%	10	47.6%	31.7%	\$1,979	68.4%	42.3%
	Unknown	2	2.5%	\$89	0.8%	0.0%	0	0.0%	29.1%	\$0	0.0%	25.3%	2	9.5%	23.0%	\$89	3.1%	20.5%
	<b>Total</b>	<b>81</b>	<b>100.0%</b>	<b>\$10,509</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,042</b>	<b>100.0%</b>	<b>100.0%</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,894</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	2	9.5%	\$98	3.9%	27.6%	1	12.5%	2.9%	\$71	8.1%	1.3%	1	16.7%	1.6%	\$27	3.6%	0.4%
	Moderate	1	4.8%	\$62	2.5%	16.8%	1	12.5%	18.2%	\$62	7.1%	9.3%	0	0.0%	6.2%	\$0	0.0%	3.3%
	Middle	3	14.3%	\$58	2.3%	20.7%	0	0.0%	16.1%	\$0	0.0%	13.4%	2	33.3%	20.9%	\$39	5.2%	12.0%
	Upper	14	66.7%	\$2,151	86.1%	35.0%	6	75.0%	51.8%	\$741	84.8%	60.7%	3	50.0%	46.5%	\$682	91.2%	35.5%
	Unknown	1	4.8%	\$130	5.2%	0.0%	0	0.0%	10.9%	\$0	0.0%	15.3%	0	0.0%	24.8%	\$0	0.0%	48.9%
	<b>Total</b>	<b>21</b>	<b>100.0%</b>	<b>\$2,499</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$874</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$748</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	3	5.2%	\$12	1.6%	27.6%	2	6.9%	8.9%	\$7	1.7%	4.7%	1	5.0%	6.1%	\$5	1.8%	0.9%
	Moderate	6	10.3%	\$50	6.6%	16.8%	3	10.3%	17.9%	\$30	7.1%	23.2%	1	5.0%	14.3%	\$8	2.9%	13.0%
	Middle	10	17.2%	\$89	11.8%	20.7%	6	20.7%	16.1%	\$59	13.9%	7.2%	3	15.0%	20.4%	\$23	8.4%	20.6%
	Upper	38	65.5%	\$543	71.9%	35.0%	18	62.1%	50.0%	\$328	77.4%	50.0%	14	70.0%	55.1%	\$178	64.7%	59.6%
	Unknown	1	1.7%	\$61	8.1%	0.0%	0	0.0%	7.1%	\$0	0.0%	15.0%	1	5.0%	4.1%	\$61	22.2%	6.0%
	<b>Total</b>	<b>58</b>	<b>100.0%</b>	<b>\$755</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$424</b>	<b>100.0%</b>	<b>100.0%</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$275</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	27.6%	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%	16.8%	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%	20.7%	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%	35.0%	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%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>
HMDA TOTALS	Low	12	7.5%	\$646	4.7%	27.6%	6	7.8%	5.3%	\$282	4.4%	2.8%	4	8.5%	10.8%	\$171	4.4%	6.4%
	Moderate	20	12.5%	\$1,231	8.9%	16.8%	12	15.6%	16.4%	\$818	12.9%	10.8%	4	8.5%	11.4%	\$227	5.8%	8.0%
	Middle	29	18.1%	\$1,846	13.4%	20.7%	15	19.5%	18.0%	\$1,020	16.1%	16.5%	9	19.1%	18.1%	\$530	13.5%	15.1%
	Upper	95	59.4%	\$9,760	70.9%	35.0%	44	57.1%	38.1%	\$4,220	66.6%	47.6%	27	57.4%	38.3%	\$2,839	72.5%	40.2%
	Unknown	4	2.5%	\$280	2.0%	0.0%	0	0.0%	22.2%	\$0	0.0%	22.4%	3	6.4%	21.5%	\$150	3.8%	30.3%
	<b>Total</b>	<b>160</b>	<b>100.0%</b>	<b>\$13,763</b>	<b>100.0%</b>	<b>100.0%</b>	<b>77</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,340</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,917</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	64	72.7%	\$2,035	45.9%	91.8%	26	70.3%	43.0%	\$689	49.7%	27.8%	23	71.9%	45.9%	\$986	47.9%	32.8%
	Over \$1 Million	16	18.2%	\$2,337	52.8%	6.5%	6	16.2%					6	18.8%				
	<b>Total Rev. available</b>	<b>80</b>	<b>90.9%</b>	<b>\$4,372</b>	<b>98.7%</b>	<b>98.3%</b>	<b>32</b>	<b>86.5%</b>					<b>29</b>	<b>90.7%</b>				
	Rev. Not Known	8	9.1%	\$57	1.3%	1.7%	5	13.5%					3	9.4%				
<b>Total</b>	<b>88</b>	<b>100.0%</b>	<b>\$4,429</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37</b>	<b>100.0%</b>					<b>32</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	78	88.6%	\$1,746	39.4%		34	91.9%	91.5%	\$686	49.5%	24.3%	27	84.4%	93.2%	\$625	30.4%	33.7%
	\$100,001 - \$250,000	6	6.8%	\$1,319	29.8%		2	5.4%	3.1%	\$400	28.9%	11.0%	3	9.4%	3.0%	\$669	32.5%	15.6%
	\$250,001 - \$1 Million	4	4.5%	\$1,364	30.8%		1	2.7%	5.4%	\$300	21.6%	64.7%	2	6.3%	3.8%	\$764	37.1%	50.7%
	<b>Total</b>	<b>88</b>	<b>100.0%</b>	<b>\$4,429</b>	<b>100.0%</b>		<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,386</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,058</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	6	100.0%	\$273	100.0%	97.8%	2	100.0%	30.0%	\$91	100.0%	41.4%	2	100.0%	47.2%	\$91	100.0%	58.0%
	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%				
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$273</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>					<b>2</b>	<b>100.0%</b>				
Small Farm Loan Size	\$100,000 or Less	6	100.0%	\$273	100.0%		2	100.0%	75.0%	\$91	100.0%	15.2%	2	100.0%	66.7%	\$91	100.0%	11.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.5%	\$0	0.0%	12.8%	0	0.0%	5.6%	\$0	0.0%	7.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	17.5%	\$0	0.0%	72.0%	0	0.0%	27.8%	\$0	0.0%	82.0%
	<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>\$273</b>	<b>100.0%</b>		<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$91</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$91</b>	<b>100.0%</b>	<b>100.0%</b>

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: LA Shreveport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2014						2015					
		Bank		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	\$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	2.0%	\$0	0.0%	0.7%	0	0.0%	1.4%	\$0	0.0%	0.4%
	Moderate	13	7.3%	\$1,033	3.7%	21.1%	10	12.3%	9.7%	\$700	5.7%	5.1%	2	3.6%	9.2%	\$238	2.6%	5.4%
	Middle	75	42.1%	\$11,780	42.4%	43.2%	33	40.7%	43.9%	\$5,198	42.4%	39.3%	26	47.3%	44.4%	\$4,573	50.9%	40.5%
	Upper	90	50.6%	\$14,981	53.9%	30.5%	38	46.9%	44.5%	\$6,347	51.8%	54.9%	27	49.1%	45.0%	\$4,179	46.5%	53.7%
	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>178</i>	<i>100.0%</i>	<i>\$27,794</i>	<i>100.0%</i>	<i>100.0%</i>	<i>81</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$12,245</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,990</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	2.3%	\$285	2.5%	5.2%	1	5.3%	2.7%	\$285	7.8%	2.6%	0	0.0%	1.1%	\$0	0.0%	0.8%
	Moderate	1	2.3%	\$84	0.7%	21.1%	1	5.3%	12.5%	\$84	2.3%	6.5%	0	0.0%	9.6%	\$0	0.0%	6.1%
	Middle	14	31.8%	\$2,424	21.3%	43.2%	6	31.6%	45.8%	\$579	15.8%	40.8%	3	23.1%	45.0%	\$916	17.7%	40.2%
	Upper	28	63.6%	\$8,586	75.5%	30.5%	11	57.9%	39.1%	\$2,719	74.1%	50.1%	10	76.9%	44.2%	\$4,257	82.3%	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%
	<i>Total</i>	<i>44</i>	<i>100.0%</i>	<i>\$11,379</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,667</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,173</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	6.1%	\$0	0.0%	1.1%	0	0.0%	4.2%	\$0	0.0%	1.0%
	Moderate	2	22.2%	\$13	2.1%	21.1%	2	66.7%	22.1%	\$13	56.5%	11.0%	0	0.0%	15.2%	\$0	0.0%	5.4%
	Middle	3	33.3%	\$25	4.0%	43.2%	1	33.3%	47.2%	\$10	43.5%	42.8%	0	0.0%	46.3%	\$0	0.0%	43.4%
	Upper	4	44.4%	\$591	94.0%	30.5%	0	0.0%	24.6%	\$0	0.0%	45.1%	3	100.0%	34.3%	\$546	100.0%	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>9</i>	<i>100.0%</i>	<i>\$629</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$546</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	8.7%	0	0.0%	16.7%	\$0	0.0%	10.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	24.5%	0	0.0%	41.7%	\$0	0.0%	39.8%	0	0.0%	25.0%	\$0	0.0%	11.6%
	Middle	0	0.0%	\$0	0.0%	42.6%	0	0.0%	8.3%	\$0	0.0%	5.1%	0	0.0%	62.5%	\$0	0.0%	66.8%
	Upper	0	0.0%	\$0	0.0%	24.2%	0	0.0%	33.3%	\$0	0.0%	44.3%	0	0.0%	12.5%	\$0	0.0%	21.5%
	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	1	0.4%	\$285	0.7%	5.2%	1	1.0%	2.5%	\$285	1.8%	2.0%	0	0.0%	1.4%	\$0	0.0%	0.6%
	Moderate	16	6.9%	\$1,130	2.8%	21.1%	13	12.6%	11.6%	\$797	5.0%	8.0%	2	2.8%	9.7%	\$238	1.6%	5.9%
	Middle	92	39.8%	\$14,229	35.7%	43.2%	40	38.8%	44.7%	\$5,787	36.3%	37.5%	29	40.8%	44.8%	\$5,489	37.3%	41.3%
	Upper	122	52.8%	\$24,158	60.7%	30.5%	49	47.6%	41.3%	\$9,066	56.9%	52.4%	40	56.3%	44.1%	\$8,982	61.1%	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%
	<i>Total</i>	<i>231</i>	<i>100.0%</i>	<i>\$39,802</i>	<i>100.0%</i>	<i>100.0%</i>	<i>103</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$15,935</i>	<i>100.0%</i>	<i>100.0%</i>	<i>71</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$14,709</i>	<i>100.0%</i>	<i>100.0%</i>
SMALL BUSINESSES	Small Businesses																	
	Low	108	20.9%	\$27,068	28.3%	14.3%	37	19.9%	16.1%	\$9,868	28.5%	26.7%	44	25.3%	15.8%	\$10,571	30.5%	23.9%
	Moderate	13	2.5%	\$3,082	3.2%	18.3%	5	2.7%	13.5%	\$931	2.7%	11.0%	4	2.3%	14.0%	\$1,090	3.1%	11.8%
	Middle	147	28.4%	\$24,284	25.4%	36.7%	54	29.0%	36.7%	\$7,353	21.2%	32.6%	47	27.0%	37.7%	\$10,165	29.3%	34.3%
	Upper	249	48.2%	\$41,126	43.0%	30.6%	90	48.4%	32.1%	\$16,492	47.6%	29.3%	79	45.4%	31.1%	\$12,863	37.1%	29.3%
	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%	0.3%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.4%	0	0.0%	1.4%	\$0	0.0%	0.4%
<i>Total</i>	<i>517</i>	<i>100.0%</i>	<i>\$95,560</i>	<i>100.0%</i>	<i>100.0%</i>	<i>186</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$34,644</i>	<i>100.0%</i>	<i>100.0%</i>	<i>174</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$34,689</i>	<i>100.0%</i>	<i>100.0%</i>	
SMALL FARM	Small Farms																	
	Low	6	50.0%	\$500	68.5%	4.2%	2	40.0%	7.1%	\$150	65.8%	4.6%	2	40.0%	12.9%	\$150	49.7%	26.6%
	Moderate	1	8.3%	\$51	7.0%	11.9%	1	20.0%	10.7%	\$51	22.4%	2.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	2	16.7%	\$27	3.7%	49.7%	2	40.0%	53.6%	\$27	11.8%	73.0%	0	0.0%	61.3%	\$0	0.0%	63.7%
	Upper	3	25.0%	\$152	20.8%	34.3%	0	0.0%	26.8%	\$0	0.0%	20.3%	3	60.0%	25.8%	\$152	50.3%	9.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$730</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$228</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$302</i>	<i>100.0%</i>	<i>100.0%</i>	

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: LA Shreveport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		Bank		Families by Family Income %	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	\$ %	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
					#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	22	12.4%	\$1,737	6.2%	25.7%	15	18.5%	5.8%	\$1,079	8.8%	2.8%	3	5.5%	5.6%	\$296	3.3%	2.9%
	Moderate	38	21.3%	\$4,355	15.7%	17.0%	16	19.8%	16.6%	\$1,688	13.8%	11.9%	14	25.5%	18.8%	\$1,675	18.6%	13.7%
	Middle	50	28.1%	\$7,733	27.8%	18.5%	21	25.9%	20.1%	\$3,248	26.5%	19.0%	20	36.4%	20.0%	\$3,296	36.7%	18.8%
	Upper	67	37.6%	\$13,769	49.5%	38.7%	29	35.8%	34.1%	\$6,230	50.9%	46.8%	17	30.9%	32.3%	\$3,523	39.2%	44.2%
	Unknown	1	0.6%	\$200	0.7%	0.0%	0	0.0%	23.4%	\$0	0.0%	19.5%	1	1.8%	23.4%	\$200	2.2%	20.4%
	<b>Total</b>	<b>178</b>	<b>100.0%</b>	<b>\$27,794</b>	<b>100.0%</b>	<b>100.0%</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,245</b>	<b>100.0%</b>	<b>100.0%</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,990</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	1	2.3%	\$53	0.5%	25.7%	1	5.3%	6.5%	\$53	1.4%	2.7%	0	0.0%	5.1%	\$0	0.0%	2.5%
	Moderate	4	9.1%	\$358	3.1%	17.0%	4	21.1%	13.1%	\$358	9.8%	8.4%	0	0.0%	11.0%	\$0	0.0%	6.9%
	Middle	4	9.1%	\$542	4.8%	18.5%	2	10.5%	16.8%	\$253	6.9%	12.7%	0	0.0%	15.4%	\$0	0.0%	11.4%
	Upper	35	79.5%	\$10,426	91.6%	38.7%	12	63.2%	39.8%	\$3,003	81.9%	52.0%	13	100.0%	40.6%	\$5,173	100.0%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.9%	\$0	0.0%	24.1%	0	0.0%	27.8%	\$0	0.0%	27.9%
	<b>Total</b>	<b>44</b>	<b>100.0%</b>	<b>\$11,379</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,667</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,173</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	1	11.1%	\$11	1.7%	25.7%	0	0.0%	10.2%	\$0	0.0%	3.1%	1	33.3%	9.9%	\$11	2.0%	3.6%
	Moderate	1	11.1%	\$8	1.3%	17.0%	1	33.3%	20.4%	\$8	34.8%	11.1%	0	0.0%	20.5%	\$0	0.0%	9.6%
	Middle	1	11.1%	\$8	1.3%	18.5%	0	0.0%	24.6%	\$0	0.0%	22.4%	0	0.0%	19.8%	\$0	0.0%	12.4%
	Upper	2	22.2%	\$545	86.6%	38.7%	0	0.0%	36.5%	\$0	0.0%	57.5%	1	33.3%	39.9%	\$500	91.6%	59.2%
	Unknown	4	44.4%	\$57	9.1%	0.0%	2	66.7%	8.3%	\$15	65.2%	5.9%	1	33.3%	9.9%	\$35	6.4%	15.1%
	<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>\$629</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$546</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	25.7%	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%	17.0%	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%	18.5%	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%	38.7%	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%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	24	10.4%	\$1,801	4.5%	25.7%	16	15.5%	6.3%	\$1,132	7.1%	2.6%	4	5.6%	5.6%	\$307	2.1%	2.6%
	Moderate	43	18.6%	\$4,721	11.9%	17.0%	21	20.4%	15.6%	\$2,054	12.9%	9.9%	14	19.7%	16.0%	\$1,675	11.4%	10.6%
	Middle	55	23.8%	\$8,283	20.8%	18.5%	23	22.3%	19.2%	\$3,501	22.0%	15.7%	20	28.2%	18.3%	\$3,296	22.4%	15.4%
	Upper	104	45.0%	\$24,740	62.2%	38.7%	41	39.8%	36.1%	\$9,233	57.9%	45.5%	31	43.7%	35.7%	\$9,196	62.5%	45.6%
	Unknown	5	2.2%	\$257	0.6%	0.0%	2	1.9%	22.7%	\$15	0.1%	26.2%	2	2.8%	24.4%	\$235	1.6%	25.8%
	<b>Total</b>	<b>231</b>	<b>100.0%</b>	<b>\$39,802</b>	<b>100.0%</b>	<b>100.0%</b>	<b>103</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,935</b>	<b>100.0%</b>	<b>100.0%</b>	<b>71</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,709</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	271	52.4%	\$38,972	40.8%	91.4%	87	46.8%	41.6%	\$14,446	41.7%	37.9%	99	56.9%	44.9%	\$14,873	42.9%	36.5%
	Over \$1 Million	174	33.7%	\$39,843	41.7%	7.9%	63	33.9%					61	35.1%				
	<b>Total Rev. available</b>	<b>445</b>	<b>86.1%</b>	<b>\$78,815</b>	<b>82.5%</b>	<b>99.3%</b>	<b>150</b>	<b>80.7%</b>					<b>160</b>	<b>92.0%</b>				
	Rev. Not Known	72	13.9%	\$16,745	17.5%	0.7%	36	19.4%					14	8.0%				
<b>Total</b>	<b>517</b>	<b>100.0%</b>	<b>\$95,560</b>	<b>100.0%</b>	<b>100.0%</b>	<b>186</b>	<b>100.0%</b>					<b>174</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	255	49.3%	\$12,498	13.1%		88	47.3%	88.9%	\$4,098	11.8%	26.9%	83	47.7%	88.7%	\$4,160	12.0%	27.1%
	\$100,001 - \$250,000	153	29.6%	\$30,091	31.5%		56	30.1%	5.9%	\$10,866	31.4%	20.9%	48	27.6%	6.0%	\$9,622	27.7%	20.6%
	\$250,001 - \$1 Million	109	21.1%	\$52,971	55.4%		42	22.6%	5.1%	\$19,680	56.8%	52.2%	43	24.7%	5.4%	\$20,907	60.3%	52.3%
	<b>Total</b>	<b>517</b>	<b>100.0%</b>	<b>\$95,560</b>	<b>100.0%</b>		<b>186</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,644</b>	<b>100.0%</b>	<b>100.0%</b>	<b>174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$34,689</b>	<b>100.0%</b>	<b>100.0%</b>
Small Farm Revenue	<b>Total Farms</b>																	
	\$1 Million or Less	10	83.3%	\$558	76.4%	94.7%	4	80.0%	39.3%	\$206	90.4%	64.7%	4	80.0%	67.7%	\$152	50.3%	74.6%
	Over \$1 Million	1	8.3%	\$150	20.5%	5.3%	0	0.0%					1	20.0%				
	Not Known	1	8.3%	\$22	3.0%	0.0%	1	20.0%					0	0.0%				
	<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>\$730</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>					<b>5</b>	<b>100.0%</b>				
Small Farm Loan Size	\$100,000 or Less	10	83.3%	\$455	62.3%		5	100.0%	73.2%	\$228	100.0%	17.6%	4	80.0%	64.5%	\$152	50.3%	19.8%
	\$100,001 - \$250,000	2	16.7%	\$275	37.7%		0	0.0%	21.4%	\$0	0.0%	50.2%	1	20.0%	25.8%	\$150	49.7%	43.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.4%	\$0	0.0%	32.2%	0	0.0%	9.7%	\$0	0.0%	36.9%
	<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>\$730</b>	<b>100.0%</b>		<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$228</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$302</b>	<b>100.0%</b>	<b>100.0%</b>

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: LA St. Landry

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank		Owner Occupied Units	2014			2015										
		Count	Dollar		Count	Dollar	Count	Dollar	Count	Dollar								
				#							%	\$ (000s)	%	%	%	%	%	%
HOME PURCHASE	Low	1	1.3%	\$42	0.4%	7.0%	0	0.0%	3.8%	\$0	0.0%	3.4%	0	0.0%	4.8%	\$0	0.0%	2.8%
	Moderate	15	19.0%	\$1,049	10.6%	18.4%	7	16.7%	14.4%	\$365	8.6%	11.6%	4	18.2%	16.3%	\$311	8.7%	11.5%
	Middle	33	41.8%	\$4,295	43.5%	50.2%	21	50.0%	50.3%	\$2,449	57.5%	48.6%	9	40.9%	46.4%	\$1,549	43.4%	45.8%
	Upper	30	38.0%	\$4,481	45.4%	24.4%	14	33.3%	31.5%	\$1,444	33.9%	36.5%	9	40.9%	32.5%	\$1,710	47.9%	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	79	100.0%	\$9,867	100.0%	100.0%	42	100.0%	100.0%	\$4,258	100.0%	100.0%	22	100.0%	100.0%	\$3,570	100.0%	100.0%
REFINANCE	Low	1	2.0%	\$8	0.1%	7.0%	0	0.0%	2.8%	\$0	0.0%	2.0%	1	5.3%	3.9%	\$8	0.5%	3.0%
	Moderate	12	23.5%	\$814	14.7%	18.4%	6	46.2%	12.6%	\$173	14.3%	9.8%	3	15.8%	17.5%	\$140	8.0%	13.5%
	Middle	18	35.3%	\$2,137	38.6%	50.2%	2	15.4%	51.1%	\$308	25.5%	53.3%	5	26.3%	42.5%	\$175	10.0%	40.4%
	Upper	20	39.2%	\$2,581	46.6%	24.4%	5	38.5%	33.5%	\$728	60.2%	34.9%	10	52.6%	36.1%	\$1,433	81.6%	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	51	100.0%	\$5,540	100.0%	100.0%	13	100.0%	100.0%	\$1,209	100.0%	100.0%	19	100.0%	100.0%	\$1,756	100.0%	100.0%
HOME IMPROVEMENT	Low	2	2.8%	\$34	1.9%	7.0%	1	2.9%	2.6%	\$32	3.3%	0.9%	1	4.3%	4.4%	\$2	0.3%	14.4%
	Moderate	14	19.4%	\$99	5.4%	18.4%	10	29.4%	19.9%	\$54	5.5%	8.3%	2	8.7%	15.5%	\$31	5.0%	11.7%
	Middle	31	43.1%	\$757	41.3%	50.2%	14	41.2%	51.5%	\$635	65.3%	62.3%	10	43.5%	50.8%	\$78	12.6%	45.5%
	Upper	25	34.7%	\$943	51.4%	24.4%	9	26.5%	26.0%	\$252	25.9%	28.5%	10	43.5%	29.3%	\$508	82.1%	28.3%
	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	72	100.0%	\$1,833	100.0%	100.0%	34	100.0%	100.0%	\$973	100.0%	100.0%	23	100.0%	100.0%	\$619	100.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	12.2%	0	0.0%	33.3%	\$0	0.0%	3.3%	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%	42.0%	0	0.0%	33.3%	\$0	0.0%	91.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	25.2%	0	0.0%	33.3%	\$0	0.0%	5.5%	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%	0.0%	\$0	0.0%	0.0%	
HMDA TOTALS	Low	4	2.0%	\$84	0.5%	7.0%	1	1.1%	3.4%	\$32	0.5%	2.8%	2	3.1%	4.4%	\$10	0.2%	3.4%
	Moderate	41	20.3%	\$1,962	11.4%	18.4%	23	25.8%	14.6%	\$592	9.2%	10.4%	9	14.1%	16.6%	\$482	8.1%	12.3%
	Middle	82	40.6%	\$7,189	41.7%	50.2%	37	41.6%	50.6%	\$3,392	52.7%	52.6%	24	37.5%	45.6%	\$1,802	30.3%	43.7%
	Upper	75	37.1%	\$8,005	46.4%	24.4%	28	31.5%	31.4%	\$2,424	37.6%	34.3%	29	45.3%	33.3%	\$3,651	61.4%	40.6%
	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	202	100.0%	\$17,240	100.0%	100.0%	89	100.0%	100.0%	\$6,440	100.0%	100.0%	64	100.0%	100.0%	\$5,945	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	13	9.9%	\$712	9.0%	10.7%	8	13.8%	8.8%	\$192	6.3%	13.5%	4	9.3%	7.9%	\$500	19.7%	11.4%
	Moderate	20	15.3%	\$1,322	16.6%	21.1%	6	10.3%	18.5%	\$197	6.5%	16.7%	6	14.0%	15.6%	\$314	12.4%	12.1%
	Middle	50	38.2%	\$3,103	39.0%	45.0%	27	46.6%	42.6%	\$2,217	72.8%	52.4%	14	32.6%	45.7%	\$490	19.3%	41.5%
	Upper	48	36.6%	\$2,814	35.4%	23.1%	17	29.3%	26.2%	\$439	14.4%	14.0%	19	44.2%	28.6%	\$1,234	48.6%	33.2%
	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%	4.0%	\$0	0.0%	3.4%	0	0.0%	2.2%	\$0	0.0%	1.8%
Total	131	100.0%	\$7,951	100.0%	100.0%	58	100.0%	100.0%	\$3,045	100.0%	100.0%	43	100.0%	100.0%	\$2,538	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%	2.9%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	22.8%	0	0.0%	20.9%	\$0	0.0%	50.8%	0	0.0%	38.2%	\$0	0.0%	43.2%
	Middle	6	85.7%	\$204	80.0%	52.5%	2	66.7%	55.8%	\$44	46.3%	33.8%	2	100.0%	44.1%	\$80	100.0%	51.7%
	Upper	1	14.3%	\$51	20.0%	23.4%	1	33.3%	20.9%	\$51	53.7%	15.3%	0	0.0%	11.8%	\$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%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.3%	\$0	0.0%	0.1%	0	0.0%	2.9%	\$0	0.0%	0.2%
Total	7	100.0%	\$255	100.0%	100.0%	3	100.0%	100.0%	\$95	100.0%	100.0%	2	100.0%	100.0%	\$80	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: LA St. Landry

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		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	1	1.3%	\$35	0.4%	28.9%	0	0.0%	2.7%	\$0	0.0%	1.1%	0	0.0%	2.3%	\$0	0.0%	1.0%
	Moderate	4	5.1%	\$269	2.7%	14.2%	3	7.1%	11.8%	\$193	4.5%	7.3%	1	4.5%	13.1%	\$76	2.1%	8.4%
	Middle	20	25.3%	\$1,785	18.1%	16.5%	11	26.2%	23.6%	\$843	19.8%	20.4%	4	18.2%	20.3%	\$446	12.5%	16.8%
	Upper	49	62.0%	\$7,357	74.6%	40.4%	26	61.9%	38.5%	\$3,012	70.7%	48.7%	15	68.2%	42.3%	\$2,879	80.6%	54.1%
	Unknown	5	6.3%	\$421	4.3%	0.0%	2	4.8%	23.4%	\$210	4.9%	22.5%	2	9.1%	22.1%	\$169	4.7%	19.7%
	<b>Total</b>	<b>79</b>	<b>100.0%</b>	<b>\$9,867</b>	<b>100.0%</b>	<b>100.0%</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,258</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,570</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	4	7.8%	\$291	5.3%	28.9%	1	7.7%	6.8%	\$83	6.9%	2.2%	2	10.5%	5.2%	\$102	5.8%	1.8%
	Moderate	6	11.8%	\$313	5.6%	14.2%	2	15.4%	7.0%	\$85	7.0%	3.5%	2	10.5%	7.6%	\$56	3.2%	3.8%
	Middle	10	19.6%	\$733	13.2%	16.5%	2	15.4%	14.5%	\$48	4.0%	8.4%	4	21.1%	16.5%	\$354	20.2%	10.8%
	Upper	27	52.9%	\$4,105	74.1%	40.4%	6	46.2%	53.4%	\$940	77.8%	59.7%	10	52.6%	55.1%	\$1,226	69.8%	64.1%
	Unknown	4	7.8%	\$98	1.8%	0.0%	2	15.4%	18.3%	\$53	4.4%	26.2%	1	5.3%	15.7%	\$18	1.0%	19.5%
	<b>Total</b>	<b>51</b>	<b>100.0%</b>	<b>\$5,540</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,756</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	3	4.2%	\$10	0.5%	28.9%	1	2.9%	8.2%	\$5	0.5%	1.0%	1	4.3%	9.9%	\$2	0.3%	1.0%
	Moderate	8	11.1%	\$33	1.8%	14.2%	3	8.8%	13.8%	\$10	1.0%	6.2%	2	8.7%	9.9%	\$7	1.1%	2.0%
	Middle	12	16.7%	\$329	17.9%	16.5%	5	14.7%	17.3%	\$238	24.5%	15.8%	7	30.4%	18.8%	\$91	14.7%	9.4%
	Upper	34	47.2%	\$1,272	69.4%	40.4%	16	47.1%	52.0%	\$578	59.4%	66.7%	11	47.8%	50.8%	\$499	80.6%	68.0%
	Unknown	15	20.8%	\$189	10.3%	0.0%	9	26.5%	8.7%	\$142	14.6%	10.2%	2	8.7%	10.5%	\$20	3.2%	19.6%
	<b>Total</b>	<b>72</b>	<b>100.0%</b>	<b>\$1,833</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$973</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$619</b>	<b>100.0%</b>	<b>100.0%</b>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	28.9%	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%	14.2%	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%	16.5%	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%	0.0%	\$0	0.0%	0.0%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>0.0%</b>
HMDA TOTALS	Low	8	4.0%	\$336	1.9%	28.9%	2	2.2%	4.7%	\$88	1.4%	1.4%	3	4.7%	4.3%	\$104	1.7%	1.3%
	Moderate	18	8.9%	\$615	3.6%	14.2%	8	9.0%	10.6%	\$288	4.5%	5.6%	5	7.8%	10.7%	\$139	2.3%	6.3%
	Middle	42	20.8%	\$2,847	16.5%	16.5%	18	20.2%	19.9%	\$1,129	17.5%	15.2%	15	23.4%	18.7%	\$891	15.0%	14.2%
	Upper	110	54.5%	\$12,734	73.9%	40.4%	48	53.9%	44.9%	\$4,530	70.3%	51.0%	36	56.3%	47.9%	\$4,604	77.4%	58.5%
	Unknown	24	11.9%	\$708	4.1%	0.0%	13	14.6%	19.9%	\$405	6.3%	26.8%	5	7.8%	18.3%	\$207	3.5%	19.6%
	<b>Total</b>	<b>202</b>	<b>100.0%</b>	<b>\$17,240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>89</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,440</b>	<b>100.0%</b>	<b>100.0%</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,945</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	82	62.6%	\$3,747	47.1%	91.8%	27	46.6%	33.9%	\$1,068	35.1%	36.2%	30	69.8%	35.3%	\$1,032	40.7%	40.8%
	Over \$1 Million	28	21.4%	\$3,651	45.9%	6.9%	14	24.1%					11	25.6%				
	<b>Total Rev. available</b>	<b>110</b>	<b>84.0%</b>	<b>\$7,398</b>	<b>93.0%</b>	<b>98.7%</b>	<b>41</b>	<b>70.7%</b>					<b>41</b>	<b>95.4%</b>				
	Rev. Not Known	21	16.0%	\$553	7.0%	1.4%	17	29.3%					2	4.7%				
<b>Total</b>	<b>131</b>	<b>100.0%</b>	<b>\$7,951</b>	<b>100.0%</b>	<b>100.0%</b>	<b>58</b>	<b>100.0%</b>					<b>43</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	109	83.2%	\$2,804	35.3%		52	89.7%	95.4%	\$1,389	45.6%	42.6%	37	86.0%	94.5%	\$1,034	40.7%	39.9%
	\$100,001 - \$250,000	15	11.5%	\$2,680	33.7%		4	6.9%	2.5%	\$771	25.3%	16.7%	4	9.3%	3.4%	\$802	31.6%	20.1%
	\$250,001 - \$1 Million	7	5.3%	\$2,467	31.0%		2	3.4%	2.1%	\$885	29.1%	40.7%	2	4.7%	2.2%	\$702	27.7%	40.0%
	<b>Total</b>	<b>131</b>	<b>100.0%</b>	<b>\$7,951</b>	<b>100.0%</b>		<b>58</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,045</b>	<b>100.0%</b>	<b>100.0%</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,538</b>	<b>100.0%</b>	<b>100.0%</b>
	Small Farm Revenue	<b>Total Farms</b>																
\$1 Million or Less		6	85.7%	\$226	88.6%	99.4%	2	66.7%	46.5%	\$66	69.5%	94.6%	2	100.0%	32.4%	\$80	100.0%	86.8%
Over \$1 Million		0	0.0%	\$0	0.0%	0.6%	0	0.0%					0	0.0%				
Not Known		1	14.3%	\$29	11.4%	0.0%	1	33.3%					0	0.0%				
<b>Total</b>		<b>7</b>	<b>100.0%</b>	<b>\$255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>					<b>2</b>	<b>100.0%</b>				
Small Farm Loan Size	\$100,000 or Less	7	100.0%	\$255	100.0%		3	100.0%	79.1%	\$95	100.0%	22.0%	2	100.0%	85.3%	\$80	100.0%	23.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	11.6%	\$0	0.0%	32.0%	0	0.0%	5.9%	\$0	0.0%	18.2%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	9.3%	\$0	0.0%	46.0%	0	0.0%	8.8%	\$0	0.0%	58.8%
	<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>\$255</b>	<b>100.0%</b>		<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$95</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80</b>	<b>100.0%</b>	<b>100.0%</b>

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 Dallas

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016					Bank & Aggregate Lending Comparison																		
		2014				2015				2014						2015									
		Bank		Owner Occupied Units		Count		Dollar		Count		Dollar		Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	118	10.8%	\$9,224	2.5%	5.4%	19	7.7%	2.2%	\$1,764	1.9%	1.3%	49	11.8%	2.3%	\$4,786	3.4%	1.5%							
	Moderate	145	13.3%	\$22,836	6.2%	19.4%	33	13.3%	10.1%	\$4,802	5.2%	6.1%	41	9.9%	10.3%	\$6,264	4.5%	6.3%							
	Middle	204	18.7%	\$43,264	11.7%	27.6%	46	18.5%	28.6%	\$7,683	8.3%	21.4%	79	19.0%	27.8%	\$16,282	11.6%	20.7%							
	Upper	624	57.2%	\$295,135	79.7%	47.6%	150	60.5%	59.2%	\$77,916	84.5%	71.2%	246	59.3%	59.6%	\$112,477	80.5%	71.5%							
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%							
	<b>Total</b>		<b>1,091</b>	<b>100.0%</b>	<b>\$370,459</b>	<b>100.0%</b>	<b>100.0%</b>	<b>248</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,165</b>	<b>100.0%</b>	<b>100.0%</b>	<b>415</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$139,809</b>	<b>100.0%</b>	<b>100.0%</b>						
REFINANCE	Low	9	3.0%	\$3,637	3.5%	5.4%	3	6.3%	2.3%	\$3,022	14.3%	1.4%	5	3.7%	1.6%	\$548	1.3%	0.9%							
	Moderate	37	12.3%	\$5,473	5.3%	19.4%	6	12.5%	11.5%	\$1,035	4.9%	6.7%	19	14.0%	8.8%	\$2,241	5.4%	5.2%							
	Middle	41	13.6%	\$7,389	7.2%	27.6%	4	8.3%	26.5%	\$837	4.0%	19.0%	15	11.0%	24.9%	\$3,021	7.3%	17.6%							
	Upper	214	71.1%	\$86,096	83.9%	47.6%	35	72.9%	59.7%	\$16,182	76.8%	72.9%	97	71.3%	64.7%	\$35,690	86.0%	76.3%							
	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%							
	<b>Total</b>		<b>301</b>	<b>100.0%</b>	<b>\$102,595</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,076</b>	<b>100.0%</b>	<b>100.0%</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$41,500</b>	<b>100.0%</b>	<b>100.0%</b>						
HOME IMPROVEMENT	Low	1	2.6%	\$70	0.5%	5.4%	0	0.0%	2.3%	\$0	0.0%	1.0%	1	5.9%	2.3%	\$70	1.2%	0.9%							
	Moderate	1	2.6%	\$60	0.4%	19.4%	0	0.0%	10.7%	\$0	0.0%	5.3%	1	5.9%	10.0%	\$60	1.0%	5.7%							
	Middle	5	13.2%	\$2,647	17.9%	27.6%	1	8.3%	20.7%	\$100	2.6%	14.1%	2	11.8%	21.4%	\$233	3.8%	14.4%							
	Upper	31	81.6%	\$12,013	81.2%	47.6%	11	91.7%	66.2%	\$3,719	97.4%	79.6%	13	76.5%	66.3%	\$5,699	94.0%	79.1%							
	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%							
	<b>Total</b>		<b>38</b>	<b>100.0%</b>	<b>\$14,790</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,819</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,062</b>	<b>100.0%</b>	<b>100.0%</b>						
MULTI FAMILY	Multi-Family Units																								
	Low	0	0.0%	\$0	0.0%	24.2%	0	0.0%	30.4%	\$0	0.0%	15.5%	0	0.0%	30.9%	\$0	0.0%	22.2%							
	Moderate	0	0.0%	\$0	0.0%	27.8%	0	0.0%	31.0%	\$0	0.0%	20.4%	0	0.0%	28.8%	\$0	0.0%	21.8%							
	Middle	0	0.0%	\$0	0.0%	25.4%	0	0.0%	18.6%	\$0	0.0%	24.6%	0	0.0%	21.8%	\$0	0.0%	20.5%							
	Upper	0	0.0%	\$0	0.0%	22.6%	0	0.0%	20.0%	\$0	0.0%	39.5%	0	0.0%	18.5%	\$0	0.0%	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%							
<b>Total</b>		<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>							
HMDA TOTALS	Low	128	9.0%	\$12,931	2.7%	5.4%	22	7.1%	2.3%	\$4,786	4.1%	2.5%	55	9.7%	2.1%	\$5,404	2.9%	3.0%							
	Moderate	183	12.8%	\$28,369	5.8%	19.4%	39	12.7%	10.6%	\$5,837	5.0%	7.5%	61	10.7%	9.8%	\$8,565	4.6%	7.2%							
	Middle	250	17.5%	\$53,300	10.9%	27.6%	51	16.6%	27.6%	\$8,620	7.4%	21.0%	96	16.9%	26.6%	\$19,536	10.4%	19.7%							
	Upper	869	60.8%	\$393,244	80.6%	47.6%	196	63.6%	59.5%	\$97,817	83.6%	69.0%	356	62.7%	61.5%	\$153,866	82.1%	70.0%							
	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%							
	<b>Total</b>		<b>1,430</b>	<b>100.0%</b>	<b>\$487,844</b>	<b>100.0%</b>	<b>100.0%</b>	<b>308</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$117,060</b>	<b>100.0%</b>	<b>100.0%</b>	<b>568</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$187,371</b>	<b>100.0%</b>	<b>100.0%</b>						
SMALL BUSINESSES	Small Businesses																								
	Low	13	4.3%	\$3,394	3.9%	7.6%	3	6.1%	8.4%	\$275	1.8%	10.5%	5	4.1%	8.6%	\$1,074	3.2%	11.2%							
	Moderate	29	9.7%	\$10,216	11.8%	17.2%	2	4.1%	17.1%	\$688	4.6%	20.0%	16	13.1%	17.1%	\$5,636	17.0%	19.5%							
	Middle	44	14.7%	\$10,731	12.4%	25.1%	6	12.2%	22.2%	\$1,403	9.4%	21.6%	18	14.8%	22.1%	\$2,941	8.9%	21.1%							
	Upper	210	70.0%	\$59,694	69.0%	50.0%	37	75.5%	50.7%	\$12,105	80.9%	46.7%	81	66.4%	50.8%	\$22,005	66.4%	47.2%							
	Unknown	4	1.3%	\$2,500	2.9%	0.1%	1	2.0%	0.2%	\$500	3.3%	0.4%	2	1.6%	0.2%	\$1,500	4.5%	0.5%							
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.7%	0	0.0%	1.2%	\$0	0.0%	0.6%							
<b>Total</b>		<b>300</b>	<b>100.0%</b>	<b>\$86,535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,971</b>	<b>100.0%</b>	<b>100.0%</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$33,156</b>	<b>100.0%</b>	<b>100.0%</b>							
SMALL FARM	Small Farms																								
	Low	0	0.0%	\$0	0.0%	3.6%	0	0.0%	2.8%	\$0	0.0%	4.4%	0	0.0%	2.1%	\$0	0.0%	5.9%							
	Moderate	0	0.0%	\$0	0.0%	9.0%	0	0.0%	7.5%	\$0	0.0%	8.7%	0	0.0%	6.1%	\$0	0.0%	4.4%							
	Middle	0	0.0%	\$0	0.0%	33.5%	0	0.0%	40.8%	\$0	0.0%	38.6%	0	0.0%	43.3%	\$0	0.0%	44.1%							
	Upper	1	100.0%	\$20	100.0%	53.9%	1	100.0%	47.3%	\$20	100.0%	47.3%	0	0.0%	46.7%	\$0	0.0%	44.8%							
	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%	0.0%							
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	1.1%	0	0.0%	1.8%	\$0	0.0%	0.8%							
<b>Total</b>		<b>1</b>	<b>100.0%</b>	<b>\$20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>							

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 Dallas

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2014, 2015, 2016					2014					2015						
		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	166	15.2%	\$7,913	2.1%	23.3%	37	14.9%	3.6%	\$1,973	2.1%	1.5%	52	12.5%	3.4%	\$3,925	2.8%	1.4%
	Moderate	74	6.8%	\$10,143	2.7%	16.5%	16	6.5%	12.0%	\$1,946	2.1%	7.1%	34	8.2%	11.4%	\$4,305	3.1%	6.7%
	Middle	136	12.5%	\$29,564	8.0%	17.9%	32	12.9%	16.0%	\$6,763	7.3%	12.6%	49	11.8%	16.4%	\$10,327	7.4%	12.8%
	Upper	685	62.8%	\$307,825	83.1%	42.3%	150	60.5%	49.7%	\$70,843	76.9%	62.5%	275	66.3%	51.0%	\$120,214	86.0%	63.3%
	Unknown	30	2.7%	\$15,014	4.1%	0.0%	13	5.2%	18.7%	\$10,640	11.5%	16.4%	5	1.2%	17.8%	\$1,038	0.7%	15.8%
	<b>Total</b>	<b>1,091</b>	<b>100.0%</b>	<b>\$370,459</b>	<b>100.0%</b>	<b>100.0%</b>	<b>248</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,165</b>	<b>100.0%</b>	<b>100.0%</b>	<b>415</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$139,809</b>	<b>100.0%</b>	<b>100.0%</b>
REFINANCE	Low	10	3.3%	\$896	0.9%	23.3%	0	0.0%	4.7%	\$0	0.0%	2.1%	7	5.1%	3.2%	\$573	1.4%	1.4%
	Moderate	30	10.0%	\$3,400	3.3%	16.5%	5	10.4%	10.5%	\$578	2.7%	5.9%	13	9.6%	8.8%	\$1,463	3.5%	4.7%
	Middle	40	13.3%	\$7,109	6.9%	17.9%	4	8.3%	14.8%	\$600	2.8%	10.4%	19	14.0%	14.8%	\$3,374	8.1%	10.4%
	Upper	215	71.4%	\$83,459	81.3%	42.3%	37	77.1%	46.0%	\$16,635	78.9%	59.7%	94	69.1%	50.2%	\$34,922	84.1%	62.0%
	Unknown	6	2.0%	\$7,731	7.5%	0.0%	2	4.2%	23.8%	\$3,263	15.5%	21.8%	3	2.2%	22.9%	\$1,168	2.8%	21.6%
	<b>Total</b>	<b>301</b>	<b>100.0%</b>	<b>\$102,595</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,076</b>	<b>100.0%</b>	<b>100.0%</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$41,500</b>	<b>100.0%</b>	<b>100.0%</b>
HOME IMPROVEMENT	Low	1	2.6%	\$60	0.4%	23.3%	0	0.0%	3.5%	\$0	0.0%	1.0%	1	5.9%	4.4%	\$60	1.0%	1.2%
	Moderate	1	2.6%	\$70	0.5%	16.5%	0	0.0%	9.0%	\$0	0.0%	4.0%	1	5.9%	10.2%	\$70	1.2%	4.4%
	Middle	2	5.3%	\$431	2.9%	17.9%	0	0.0%	13.0%	\$0	0.0%	9.2%	1	5.9%	14.5%	\$81	1.3%	9.0%
	Upper	34	89.5%	\$14,229	96.2%	42.3%	12	100.0%	62.3%	\$3,819	100.0%	78.7%	14	82.4%	66.5%	\$5,851	96.5%	77.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.3%	\$0	0.0%	7.0%	0	0.0%	4.5%	\$0	0.0%	7.9%
	<b>Total</b>	<b>38</b>	<b>100.0%</b>	<b>\$14,790</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,819</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,062</b>	<b>100.0%</b>	<b>100.0%</b>
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%	16.5%	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%	17.9%	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%
	<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	177	12.4%	\$8,869	1.8%	23.3%	37	12.0%	3.9%	\$1,973	1.7%	1.5%	60	10.6%	3.4%	\$4,558	2.4%	1.3%
	Moderate	105	7.3%	\$13,613	2.8%	16.5%	21	6.8%	11.4%	\$2,524	2.2%	6.2%	48	8.5%	10.4%	\$5,838	3.1%	5.5%
	Middle	178	12.4%	\$37,104	7.6%	17.9%	36	11.7%	15.5%	\$7,363	6.3%	10.9%	69	12.1%	15.7%	\$13,782	7.4%	11.0%
	Upper	934	65.3%	\$405,513	83.1%	42.3%	199	64.6%	49.0%	\$91,297	78.0%	56.8%	383	67.4%	51.2%	\$160,987	85.9%	57.8%
	Unknown	36	2.5%	\$22,745	4.7%	0.0%	15	4.9%	20.2%	\$13,903	11.9%	24.6%	8	1.4%	19.3%	\$2,206	1.2%	24.4%
	<b>Total</b>	<b>1,430</b>	<b>100.0%</b>	<b>\$487,844</b>	<b>100.0%</b>	<b>100.0%</b>	<b>308</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$117,060</b>	<b>100.0%</b>	<b>100.0%</b>	<b>568</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$187,371</b>	<b>100.0%</b>	<b>100.0%</b>
Small Business Revenue	<b>Total Businesses</b>																	
	\$1 Million or Less	99	33.0%	\$25,424	29.4%	90.8%	14	28.6%	46.1%	\$5,070	33.9%	33.9%	39	32.0%	49.2%	\$9,068	27.3%	34.2%
	Over \$1 Million	85	28.3%	\$25,684	29.7%	8.3%	7	14.3%					45	36.9%				
	<b>Total Rev. available</b>	<b>184</b>	<b>61.3%</b>	<b>\$51,108</b>	<b>59.1%</b>	<b>99.1%</b>	<b>21</b>	<b>42.9%</b>					<b>84</b>	<b>68.9%</b>				
	Rev. Not Known	116	38.7%	\$35,427	40.9%	0.9%	28	57.1%					38	31.1%				
<b>Total</b>	<b>300</b>	<b>100.0%</b>	<b>\$86,535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49</b>	<b>100.0%</b>					<b>122</b>	<b>100.0%</b>					
Small Business Loan Size	\$100,000 or Less	97	32.3%	\$5,136	5.9%		18	36.7%	93.4%	\$932	6.2%	35.0%	43	35.2%	93.3%	\$2,240	6.8%	35.3%
	\$100,001 - \$250,000	84	28.0%	\$16,147	18.7%		10	20.4%	3.2%	\$1,823	12.2%	14.7%	33	27.0%	3.1%	\$6,156	18.6%	14.0%
	\$250,001 - \$1 Million	119	39.7%	\$65,252	75.4%		21	42.9%	3.4%	\$12,216	81.6%	50.3%	46	37.7%	3.6%	\$24,760	74.7%	50.6%
	<b>Total</b>	<b>300</b>	<b>100.0%</b>	<b>\$86,535</b>	<b>100.0%</b>		<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,971</b>	<b>100.0%</b>	<b>100.0%</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$33,156</b>	<b>100.0%</b>	<b>100.0%</b>
						<b>Total Farms</b>												
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	98.4%	0	0.0%	58.9%	\$0	0.0%	61.3%	0	0.0%	55.5%	\$0	0.0%	67.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.5%	0	0.0%					0	0.0%				
	Not Known	1	100.0%	\$20	100.0%	0.1%	1	100.0%					0	0.0%				
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>					<b>0</b>	<b>0.0%</b>				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$20	100.0%		1	100.0%	90.9%	\$20	100.0%	46.3%	0	0.0%	88.2%	\$0	0.0%	38.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.0%	\$0	0.0%	25.3%	0	0.0%	6.7%	\$0	0.0%	23.6%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	28.4%	0	0.0%	5.2%	\$0	0.0%	37.7%
	<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>\$20</b>	<b>100.0%</b>		<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>
						<b>Total Farms</b>												

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

APPENDIX I – LIMITED SCOPE DEMOGRAPHIC TABLES

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	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
<b>Total Assessment Area</b>	<b>32</b>	<b>100.0</b>	<b>50,195</b>	<b>100.0</b>	<b>4,583</b>	<b>9.1</b>	<b>50,195</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	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
<b>Total Assessment Area</b>	<b>101,093</b>	<b>53,309</b>	<b>100.0</b>	<b>52.7</b>	<b>16,167</b>	<b>16.0</b>	<b>31,617</b>	<b>31.3</b>
	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
Moderate-income	901	10.1	825	10	60	9	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
<b>Total Assessment Area</b>	<b>8,951</b>	<b>100.0</b>	<b>8,210</b>	<b>100.0</b>	<b>664</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.7</b>		<b>7.4</b>		<b>.9</b>	
	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
Moderate-income	54	27.1	51	27.3	3	25	0	0
Middle-income	118	59.3	113	60.4	5	41.7	0	0
Upper-income	27	13.6	23	12.3	4	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>199</b>	<b>100.0</b>	<b>187</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>94.0</b>		<b>6.0</b>		<b>.0</b>	

## Appendices

### 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	10	13.7	6,300	7.5	2,141	34	18,180	21.7
Moderate-income	17	23.3	14,686	17.5	2,197	15	13,012	15.5
Middle-income	23	31.5	29,890	35.6	2,100	7	15,353	18.3
Upper-income	23	31.5	33,011	39.4	814	2.5	37,342	44.5
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>73</b>	<b>100.0</b>	<b>83,887</b>	<b>100.0</b>	<b>7,252</b>	<b>8.6</b>	<b>83,887</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	15,844	3,771	4.2	23.8	8,901	56.2	3,172	20
Moderate-income	30,113	14,429	16.2	47.9	11,573	38.4	4,111	13.7
Middle-income	48,379	33,478	37.5	69.2	10,484	21.7	4,417	9.1
Upper-income	47,147	37,484	42	79.5	6,444	13.7	3,219	6.8
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>141,483</b>	<b>89,162</b>	<b>100.0</b>	<b>63.0</b>	<b>37,402</b>	<b>26.4</b>	<b>14,919</b>	<b>10.5</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	1,717	12.1	1,433	11.2	277	21.8	7	7.4
Moderate-income	2,763	19.5	2,402	18.8	348	27.4	13	13.8
Middle-income	4,393	31.1	4,089	32	276	21.7	28	29.8
Upper-income	5,272	37.3	4,855	38	371	29.2	46	48.9
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>14,145</b>	<b>100.0</b>	<b>12,779</b>	<b>100.0</b>	<b>1,272</b>	<b>100.0</b>	<b>94</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>9.0</b>		<b>.7</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	3	1.6	3	1.7	0	0	0	0
Moderate-income	27	14.4	26	14.4	1	14.3	0	0
Middle-income	104	55.3	101	55.8	3	42.9	0	0
Upper-income	54	28.7	51	28.2	3	42.9	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>188</b>	<b>100.0</b>	<b>181</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>96.3</b>		<b>3.7</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### 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	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
<b>Total Assessment Area</b>	<b>115</b>	<b>100.0</b>	<b>104,324</b>	<b>100.0</b>	<b>16,339</b>	<b>15.7</b>	<b>104,324</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	12,220	4,212	4	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
<b>Total Assessment Area</b>	<b>175,753</b>	<b>104,815</b>	<b>100.0</b>	<b>59.6</b>	<b>48,487</b>	<b>27.6</b>	<b>22,451</b>	<b>12.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	899	6.3	733	5.8	155	10	11	10.7
Moderate-income	2,792	19.6	2,399	19	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	35	34
Unknown-income	16	0.1	9	0.1	7	0.5	0	0
<b>Total Assessment Area</b>	<b>14,256</b>	<b>100.0</b>	<b>12,605</b>	<b>100.0</b>	<b>1,548</b>	<b>100.0</b>	<b>103</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.4</b>		<b>10.9</b>		<b>.7</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	6	3.8	5	3.5	1	6.3	0	0
Moderate-income	16	10.1	13	9.1	3	18.8	0	0
Middle-income	78	49.1	72	50.3	6	37.5	0	0
Upper-income	59	37.1	53	37.1	6	37.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>159</b>	<b>100.0</b>	<b>143</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>89.9</b>		<b>10.1</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information



## Appendices

### 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	15	15.6	8,479	8.9	3,904	46	22,555	23.6
Moderate-income	18	18.8	18,460	19.3	3,805	20.6	15,751	16.5
Middle-income	34	35.4	37,568	39.3	3,641	9.7	17,747	18.6
Upper-income	29	30.2	31,133	32.6	1,316	4.2	39,587	41.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>96</b>	<b>100.0</b>	<b>95,640</b>	<b>100.0</b>	<b>12,666</b>	<b>13.2</b>	<b>95,640</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	17,504	5,908	6.1	33.8	8,090	46.2	3,506	20
Moderate-income	31,587	16,877	17.6	53.4	10,482	33.2	4,228	13.4
Middle-income	61,042	38,907	40.5	63.7	14,540	23.8	7,595	12.4
Upper-income	49,687	34,391	35.8	69.2	11,262	22.7	4,034	8.1
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>159,820</b>	<b>96,083</b>	<b>100.0</b>	<b>60.1</b>	<b>44,374</b>	<b>27.8</b>	<b>19,363</b>	<b>12.1</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2,228	14.4	1,822	13	309	24	97	45.8
Moderate-income	2,462	15.9	2,205	15.7	230	17.9	27	12.7
Middle-income	5,042	32.5	4,666	33.3	323	25.1	53	25
Upper-income	5,767	37.2	5,309	37.9	423	32.9	35	16.5
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>15,499</b>	<b>100.0</b>	<b>14,002</b>	<b>100.0</b>	<b>1,285</b>	<b>100.0</b>	<b>212</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>8.3</b>		<b>1.4</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	11	3.4	9	2.9	2	13.3	0	0
Moderate-income	52	16	48	15.5	4	26.7	0	0
Middle-income	186	57.2	180	58.1	6	40	0	0
Upper-income	76	23.4	73	23.5	3	20	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>325</b>	<b>100.0</b>	<b>310</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>95.4</b>		<b>4.6</b>		<b>.0</b>

2015 FFIEC Census Data and 2015 D&B Information

## Appendices

### Combined Demographics Report

**Assessment Area: AR Fayetteville**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	3.7	3,082	2.9	1,045	33.9	20,777	19.6
Moderate-income	11	13.6	12,710	12	2,282	18	19,113	18
Middle-income	44	54.3	59,840	56.3	5,977	10	21,786	20.5
Upper-income	23	28.4	30,594	28.8	1,626	5.3	44,550	41.9
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>81</b>	<b>100.0</b>	<b>106,226</b>	<b>100.0</b>	<b>10,930</b>	<b>10.3</b>	<b>106,226</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	8,662	1,671	1.7	19.3	5,535	63.9	1,456	16.8
Moderate-income	22,440	8,499	8.7	37.9	10,976	48.9	2,965	13.2
Middle-income	95,537	55,978	57.2	58.6	29,444	30.8	10,115	10.6
Upper-income	48,045	31,707	32.4	66	10,701	22.3	5,637	11.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>174,684</b>	<b>97,855</b>	<b>100.0</b>	<b>56.0</b>	<b>56,656</b>	<b>32.4</b>	<b>20,173</b>	<b>11.5</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	565	3.7	500	3.7	64	4.9	1	0.7
Moderate-income	2,810	18.6	2,447	17.9	334	25.6	29	20.1
Middle-income	7,337	48.5	6,649	48.6	617	47.3	71	49.3
Upper-income	4,418	29.2	4,085	29.9	290	22.2	43	29.9
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>15,130</b>	<b>100.0</b>	<b>13,681</b>	<b>100.0</b>	<b>1,305</b>	<b>100.0</b>	<b>144</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.4</b>		<b>8.6</b>		<b>1.0</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	6	1.7	6	1.7	0	0	0	0
Moderate-income	13	3.6	13	3.7	0	0	0	0
Middle-income	264	73.1	253	72.3	11	100	0	0
Upper-income	78	21.6	78	22.3	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>361</b>	<b>100.0</b>	<b>350</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>97.0</b>		<b>3.0</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Combined Demographics Report

Assessment Area: AR Jonesboro

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	8.3	1,845	6	909	49.3	7,496	24.2
Moderate-income	7	29.2	8,515	27.5	2,170	25.5	5,258	17
Middle-income	10	41.7	12,598	40.6	1,587	12.6	5,860	18.9
Upper-income	5	20.8	8,037	25.9	413	5.1	12,381	39.9
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>24</b>	<b>100.0</b>	<b>30,995</b>	<b>100.0</b>	<b>5,079</b>	<b>16.4</b>	<b>30,995</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	3,830	765	2.7	20	2,392	62.5	673	17.6
Moderate-income	15,541	7,207	25.5	46.4	6,434	41.4	1,900	12.2
Middle-income	19,558	12,206	43.1	62.4	5,284	27	2,068	10.6
Upper-income	11,755	8,126	28.7	69.1	2,995	25.5	634	5.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>50,684</b>	<b>28,304</b>	<b>100.0</b>	<b>55.8</b>	<b>17,105</b>	<b>33.7</b>	<b>5,275</b>	<b>10.4</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	139	3.2	120	3.1	16	3.6	3	4.6
Moderate-income	1,645	37.9	1,415	36.9	204	46.4	26	40
Middle-income	1,198	27.6	1,057	27.5	115	26.1	26	40
Upper-income	1,362	31.4	1,247	32.5	105	23.9	10	15.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>4,344</b>	<b>100.0</b>	<b>3,839</b>	<b>100.0</b>	<b>440</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>88.4</b>		<b>10.1</b>		<b>1.5</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	8	1.5	7	1.4	1	7.7	0	0
Moderate-income	137	26.3	134	26.4	3	23.1	0	0
Middle-income	258	49.6	250	49.3	8	61.5	0	0
Upper-income	117	22.5	116	22.9	1	7.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>520</b>	<b>100.0</b>	<b>507</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>			<b>97.5</b>		<b>2.5</b>		<b>.0</b>	

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Combined Demographics Report

Assessment Area: AR Northeast AR

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	7,347	21.3
Moderate-income	3	8.8	2,872	8.3	633	22	6,195	17.9
Middle-income	29	85.3	29,044	84.1	4,519	15.6	7,470	21.6
Upper-income	2	5.9	2,637	7.6	104	3.9	13,541	39.2
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>34</b>	<b>100.0</b>	<b>34,553</b>	<b>100.0</b>	<b>5,256</b>	<b>15.2</b>	<b>34,553</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	5,241	2,961	8.2	56.5	1,375	26.2	905	17.3
Middle-income	50,734	30,150	83.7	59.4	12,515	24.7	8,069	15.9
Upper-income	3,930	2,898	8	73.7	645	16.4	387	9.8
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>59,905</b>	<b>36,009</b>	<b>100.0</b>	<b>60.1</b>	<b>14,535</b>	<b>24.3</b>	<b>9,361</b>	<b>15.6</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	300	8.3	258	7.9	31	11	11	11.8
Middle-income	3,139	86.6	2,822	86.8	237	84.3	80	86
Upper-income	187	5.2	172	5.3	13	4.6	2	2.2
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>3,626</b>	<b>100.0</b>	<b>3,252</b>	<b>100.0</b>	<b>281</b>	<b>100.0</b>	<b>93</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.7</b>		<b>7.7</b>		<b>2.6</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	48	7.6	46	7.4	2	16.7	0	0
Middle-income	575	90.6	565	90.7	10	83.3	0	0
Upper-income	12	1.9	12	1.9	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>635</b>	<b>100.0</b>	<b>623</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>98.1</b>		<b>1.9</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### 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	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
<b>Total Assessment Area</b>	<b>28</b>	<b>100.0</b>	<b>39,799</b>	<b>100.0</b>	<b>3,819</b>	<b>9.6</b>	<b>39,799</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6,541	4,120	8.1	63	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
<b>Total Assessment Area</b>	<b>76,813</b>	<b>50,720</b>	<b>100.0</b>	<b>66.0</b>	<b>9,254</b>	<b>12.0</b>	<b>16,839</b>	<b>21.9</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
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
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>7,748</b>	<b>100.0</b>	<b>7,407</b>	<b>100.0</b>	<b>305</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>		<b>95.6</b>		<b>3.9</b>		<b>.5</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	13	12	13	12	0	0	0	0
Middle-income	72	66.7	72	66.7	0	0	0	0
Upper-income	23	21.3	23	21.3	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>108</b>	<b>100.0</b>	<b>108</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>		<b>100.0</b>		<b>.0</b>		<b>.0</b>	

2016 FFIEC Census Data and 2016 D&B Information

Appendices

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	7.9	13,392	5.2	4,572	34.1	55,408	21.6
Moderate-income	55	25.6	54,752	21.3	8,755	16	45,050	17.6
Middle-income	80	37.2	103,047	40.2	8,455	8.2	54,589	21.3
Upper-income	60	27.9	85,306	33.3	2,825	3.3	101,450	39.6
Unknown-income	3	1.4	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>215</b>	<b>100.0</b>	<b>256,497</b>	<b>100.0</b>	<b>24,607</b>	<b>9.6</b>	<b>256,497</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	29,546	9,912	3.8	33.5	13,742	46.5	5,892	19.9
Moderate-income	111,914	48,385	18.4	43.2	44,801	40	18,728	16.7
Middle-income	184,754	107,540	41	58.2	50,452	27.3	26,762	14.5
Upper-income	144,019	96,754	36.8	67.2	29,014	20.1	18,251	12.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>470,233</b>	<b>262,591</b>	<b>100.0</b>	<b>55.8</b>	<b>138,009</b>	<b>29.3</b>	<b>69,633</b>	<b>14.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2,906	4.3	2,524	4	363	7.8	19	4.5
Moderate-income	14,221	20.9	12,794	20.4	1,351	29.1	76	18.1
Middle-income	25,957	38.2	24,293	38.6	1,534	33	130	30.9
Upper-income	24,845	36.6	23,254	37	1,395	30	196	46.6
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>67,929</b>	<b>100.0</b>	<b>62,865</b>	<b>100.0</b>	<b>4,643</b>	<b>100.0</b>	<b>421</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.5</b>		<b>6.8</b>		<b>.6</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	3	0.9	2	0.6	1	7.1	0	0
Moderate-income	47	13.8	41	12.5	6	42.9	0	0
Middle-income	133	39	130	39.8	3	21.4	0	0
Upper-income	158	46.3	154	47.1	4	28.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>341</b>	<b>100.0</b>	<b>327</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>95.9</b>		<b>4.1</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Combined Demographics Report

Assessment Area: FL Keys

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	2,018	11.6
Moderate-income	1	3.2	381	2.2	48	12.6	2,149	12.4
Middle-income	5	16.1	4,392	25.3	461	10.5	2,976	17.1
Upper-income	22	71	12,596	72.5	693	5.5	10,226	58.9
Unknown-income	3	9.7	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>31</b>	<b>100.0</b>	<b>17,369</b>	<b>100.0</b>	<b>1,202</b>	<b>6.9</b>	<b>17,369</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,371	472	2.5	34.4	347	25.3	552	40.3
Middle-income	10,561	3,411	17.8	32.3	3,956	37.5	3,194	30.2
Upper-income	40,897	15,327	79.8	37.5	6,278	15.4	19,292	47.2
Unknown-income	18	0	0	0	0	0	18	100
<b>Total Assessment Area</b>	<b>52,847</b>	<b>19,210</b>	<b>100.0</b>	<b>36.4</b>	<b>10,581</b>	<b>20.0</b>	<b>23,056</b>	<b>43.6</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	178	2.3	159	2.2	17	4	2	3.2
Middle-income	1,743	22.8	1,616	22.6	113	26.4	14	22.6
Upper-income	5,725	74.8	5,383	75.1	297	69.4	45	72.6
Unknown-income	8	0.1	6	0.1	1	0.2	1	1.6
<b>Total Assessment Area</b>	<b>7,654</b>	<b>100.0</b>	<b>7,164</b>	<b>100.0</b>	<b>428</b>	<b>100.0</b>	<b>62</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.6</b>		<b>5.6</b>		<b>.8</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	2	4	2	4	0	0	0	0
Middle-income	5	10	5	10	0	0	0	0
Upper-income	43	86	43	86	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>50</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>.0</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

Appendices

Combined Demographics Report

Assessment Area: FL Naples

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	8.1	4,181	5.2	1,603	38.3	17,150	21.1
Moderate-income	15	20.3	15,305	18.9	1,780	11.6	14,862	18.3
Middle-income	28	37.8	35,999	44.4	1,934	5.4	15,449	19
Upper-income	24	32.4	25,650	31.6	1,070	4.2	33,674	41.5
Unknown-income	1	1.4	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>74</b>	<b>100.0</b>	<b>81,135</b>	<b>100.0</b>	<b>6,387</b>	<b>7.9</b>	<b>81,135</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	8,154	2,191	2.4	26.9	3,532	43.3	2,431	29.8
Moderate-income	33,145	15,007	16.4	45.3	7,875	23.8	10,263	31
Middle-income	84,139	42,071	46	50	10,889	12.9	31,179	37.1
Upper-income	69,091	32,128	35.2	46.5	5,824	8.4	31,139	45.1
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>194,529</b>	<b>91,397</b>	<b>100.0</b>	<b>47.0</b>	<b>28,120</b>	<b>14.5</b>	<b>75,012</b>	<b>38.6</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	800	2.9	754	2.9	38	2.5	8	2.9
Moderate-income	3,552	12.9	3,379	13.1	141	9.2	32	11.6
Middle-income	11,931	43.2	11,248	43.6	586	38.2	97	35.3
Upper-income	11,311	41	10,405	40.4	768	50.1	138	50.2
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>27,594</b>	<b>100.0</b>	<b>25,786</b>	<b>100.0</b>	<b>1,533</b>	<b>100.0</b>	<b>275</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.4</b>		<b>5.6</b>		<b>1.0</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	22	10.5	16	8.4	6	31.6	0	0
Moderate-income	35	16.7	30	15.7	5	26.3	0	0
Middle-income	96	45.7	91	47.6	5	26.3	0	0
Upper-income	57	27.1	54	28.3	3	15.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>210</b>	<b>100.0</b>	<b>191</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>91.0</b>		<b>9.0</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information



## Appendices

### Combined Demographics Report

Assessment Area: FL Palm Beach-Broward

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	40	5.7	29,972	4	9,304	31	162,530	21.8	
Moderate-income	183	26.1	190,974	25.6	28,300	14.8	131,313	17.6	
Middle-income	239	34.1	260,728	35	18,502	7.1	144,751	19.4	
Upper-income	227	32.4	263,797	35.4	9,887	3.7	306,894	41.2	
Unknown-income	11	1.6	17	0	0	0	0	0	
<b>Total Assessment Area</b>	<b>700</b>	<b>100.0</b>	<b>745,488</b>	<b>100.0</b>	<b>65,993</b>	<b>8.9</b>	<b>745,488</b>	<b>100.0</b>	
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>							
		<b>Owner-Occupied</b>				<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%	
Low-income	65,334	19,412	2.3	29.7	30,611	46.9	15,311	23.4	
Moderate-income	412,193	211,622	24.9	51.3	121,881	29.6	78,690	19.1	
Middle-income	531,297	311,097	36.7	58.6	123,127	23.2	97,073	18.3	
Upper-income	455,123	306,366	36.1	67.3	67,915	14.9	80,842	17.8	
Unknown-income	17	9	0	52.9	8	47.1	0	0	
<b>Total Assessment Area</b>	<b>1,463,964</b>	<b>848,506</b>	<b>100.0</b>	<b>58.0</b>	<b>343,542</b>	<b>23.5</b>	<b>271,916</b>	<b>18.6</b>	
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>				<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#	%
Low-income	9,097	3.5	8,030	3.3	999	6.6	68	2.8	
Moderate-income	55,962	21.7	51,303	21.4	4,297	28.3	362	14.7	
Middle-income	84,154	32.7	78,797	32.8	4,671	30.8	686	27.8	
Upper-income	108,108	42	101,614	42.3	5,150	34	1,344	54.4	
Unknown-income	313	0.1	252	0.1	52	0.3	9	0.4	
<b>Total Assessment Area</b>	<b>257,634</b>	<b>100.0</b>	<b>239,996</b>	<b>100.0</b>	<b>15,169</b>	<b>100.0</b>	<b>2,469</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>93.2</b>		<b>5.9</b>		<b>1.0</b>	
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>							
		<b>Less Than or = \$1 Million</b>				<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	#	%	#	%	#	%
Low-income	52	4.5	46	4.2	6	10	0	0	
Moderate-income	165	14.2	152	13.8	13	21.7	0	0	
Middle-income	305	26.2	295	26.7	10	16.7	0	0	
Upper-income	643	55.1	611	55.3	31	51.7	1	100	
Unknown-income	1	0.1	1	0.1	0	0	0	0	
<b>Total Assessment Area</b>	<b>1,166</b>	<b>100.0</b>	<b>1,105</b>	<b>100.0</b>	<b>60</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	
<b>Percentage of Total Farms:</b>				<b>94.8</b>		<b>5.1</b>		<b>.1</b>	

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Combined Demographics Report

Assessment Area: FL Sarasota

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.3	4,053	2.2	1,275	31.5	36,809	19.6
Moderate-income	42	24.1	38,939	20.7	5,818	14.9	35,850	19
Middle-income	78	44.8	90,137	47.9	5,461	6.1	39,390	20.9
Upper-income	48	27.6	55,100	29.3	1,927	3.5	76,180	40.5
Unknown-income	2	1.1	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>174</b>	<b>100.0</b>	<b>188,229</b>	<b>100.0</b>	<b>14,481</b>	<b>7.7</b>	<b>188,229</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	7,714	2,871	1.3	37.2	3,716	48.2	1,127	14.6
Moderate-income	90,078	45,769	20.1	50.8	22,421	24.9	21,888	24.3
Middle-income	181,215	111,729	49	61.7	31,818	17.6	37,668	20.8
Upper-income	117,625	67,681	29.7	57.5	14,204	12.1	35,740	30.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>396,632</b>	<b>228,050</b>	<b>100.0</b>	<b>57.5</b>	<b>72,159</b>	<b>18.2</b>	<b>96,423</b>	<b>24.3</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	786	1.5	709	1.4	72	2.5	5	1.3
Moderate-income	10,670	19.9	9,807	19.5	798	27.6	65	16.9
Middle-income	23,196	43.3	22,053	43.8	1,008	34.8	135	35.1
Upper-income	18,928	35.3	17,730	35.2	1,018	35.2	180	46.8
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>53,580</b>	<b>100.0</b>	<b>50,299</b>	<b>100.0</b>	<b>2,896</b>	<b>100.0</b>	<b>385</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.9</b>		<b>5.4</b>		<b>.7</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	38	8.9	33	8.4	5	15.2	0	0
Middle-income	174	40.7	160	40.5	14	42.4	0	0
Upper-income	216	50.5	202	51.1	14	42.4	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>428</b>	<b>100.0</b>	<b>395</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>92.3</b>		<b>7.7</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Combined Demographics Report

Assessment Area: FL Tallahassee

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	17.6	5,847	9.7	2,312	39.5	13,246	21.9
Moderate-income	17	25	12,719	21	2,476	19.5	9,368	15.5
Middle-income	17	25	15,431	25.5	1,409	9.1	10,473	17.3
Upper-income	21	30.9	26,457	43.8	765	2.9	27,367	45.3
Unknown-income	1	1.5	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>68</b>	<b>100.0</b>	<b>60,454</b>	<b>100.0</b>	<b>6,962</b>	<b>11.5</b>	<b>60,454</b>	<b>100.0</b>
	<b>Housing</b>	<b>Housing Types by Tract</b>						
	<b>Units by Tract</b>	<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%
Low-income	21,319	2,783	4.6	13.1	15,671	73.5	2,865	13.4
Moderate-income	30,470	10,716	17.7	35.2	15,577	51.1	4,177	13.7
Middle-income	30,414	17,481	28.9	57.5	9,602	31.6	3,331	11
Upper-income	40,297	29,608	48.9	73.5	7,876	19.5	2,813	7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>122,500</b>	<b>60,588</b>	<b>100.0</b>	<b>49.5</b>	<b>48,726</b>	<b>39.8</b>	<b>13,186</b>	<b>10.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
	#	%	#	%	#	%	#	%
Low-income	1,421	7.1	1,335	7.1	82	7.7	4	4.4
Moderate-income	4,327	21.6	4,017	21.3	296	27.7	14	15.6
Middle-income	5,571	27.9	5,179	27.5	342	32	50	55.6
Upper-income	8,636	43.2	8,273	43.9	341	31.9	22	24.4
Unknown-income	46	0.2	37	0.2	9	0.8	0	0
<b>Total Assessment Area</b>	<b>20,001</b>	<b>100.0</b>	<b>18,841</b>	<b>100.0</b>	<b>1,070</b>	<b>100.0</b>	<b>90</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>94.2</b>		<b>5.3</b>		<b>.4</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
	#	%	#	%	#	%	#	%
Low-income	1	0.7	1	0.7	0	0	0	0
Moderate-income	13	8.8	13	9	0	0	0	0
Middle-income	30	20.4	30	20.7	0	0	0	0
Upper-income	103	70.1	101	69.7	2	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>147</b>	<b>100.0</b>	<b>145</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>98.6</b>		<b>1.4</b>		<b>.0</b>

2015 FFIEC Census Data and 2015 D&B Information

## Appendices

### Combined Demographics Report

Assessment Area: FL Tampa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	5.3	19,583	3.7	7,161	36.6	105,850	20.1
Moderate-income	124	21.9	109,511	20.8	18,240	16.7	93,400	17.8
Middle-income	230	40.6	215,857	41	17,779	8.2	102,582	19.5
Upper-income	172	30.3	180,927	34.4	7,134	3.9	224,056	42.6
Unknown-income	11	1.9	10	0	0	0	0	0
<b>Total Assessment Area</b>	<b>567</b>	<b>100.0</b>	<b>525,888</b>	<b>100.0</b>	<b>50,314</b>	<b>9.6</b>	<b>525,888</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	40,450	12,122	2.1	30	21,456	53	6,872	17
Moderate-income	231,605	103,153	17.8	44.5	88,971	38.4	39,481	17
Middle-income	429,357	249,535	43.2	58.1	117,133	27.3	62,689	14.6
Upper-income	327,629	213,405	36.9	65.1	62,268	19	51,956	15.9
Unknown-income	53	0	0	0	53	100	0	0
<b>Total Assessment Area</b>	<b>1,029,094</b>	<b>578,215</b>	<b>100.0</b>	<b>56.2</b>	<b>289,881</b>	<b>28.2</b>	<b>160,998</b>	<b>15.6</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	4,267	3	3,722	2.8	518	5.6	27	2.4
Moderate-income	26,184	18.5	23,653	18.1	2,364	25.4	167	15.1
Middle-income	54,642	38.7	50,475	38.6	3,847	41.3	320	29
Upper-income	56,075	39.7	52,926	40.4	2,558	27.4	591	53.5
Unknown-income	189	0.1	151	0.1	38	0.4	0	0
<b>Total Assessment Area</b>	<b>141,357</b>	<b>100.0</b>	<b>130,927</b>	<b>100.0</b>	<b>9,325</b>	<b>100.0</b>	<b>1,105</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.6</b>		<b>6.6</b>		<b>.8</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	21	2.3	20	2.4	1	1.8	0	0
Moderate-income	141	15.6	130	15.3	11	19.6	0	0
Middle-income	389	42.9	365	43	23	41.1	1	100
Upper-income	355	39.2	334	39.3	21	37.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>906</b>	<b>100.0</b>	<b>849</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>93.7</b>		<b>6.2</b>		<b>.1</b>

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Combined Demographics Report

Assessment Area: LA Allen

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	1,288	21.4
Moderate-income	0	0	0	0	0	0	1,076	17.9
Middle-income	5	100	6,012	100	976	16.2	1,078	17.9
Upper-income	0	0	0	0	0	0	2,570	42.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>5</b>	<b>100.0</b>	<b>6,012</b>	<b>100.0</b>	<b>976</b>	<b>16.2</b>	<b>6,012</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	9,659	6,043	100	62.6	2,345	24.3	1,271	13.2
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>9,659</b>	<b>6,043</b>	<b>100.0</b>	<b>62.6</b>	<b>2,345</b>	<b>24.3</b>	<b>1,271</b>	<b>13.2</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	629	100	584	100	25	100	20	100
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>629</b>	<b>100.0</b>	<b>584</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.8</b>		<b>4.0</b>		<b>3.2</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	34	100	33	100	1	100	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>34</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>97.1</b>		<b>2.9</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Combined Demographics Report

#### Assessment Area: LA Baton Rouge

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	19	17.4	14,341	10.5	5,369	37.4	31,040	22.8
Moderate-income	23	21.1	20,598	15.1	3,801	18.5	23,051	16.9
Middle-income	32	29.4	50,237	36.9	4,501	9	25,266	18.6
Upper-income	34	31.2	50,841	37.4	1,872	3.7	56,660	41.7
Unknown-income	1	0.9	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>109</b>	<b>100.0</b>	<b>136,017</b>	<b>100.0</b>	<b>15,543</b>	<b>11.4</b>	<b>136,017</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	29,928	9,118	6.7	30.5	16,106	53.8	4,704	15.7
Moderate-income	38,477	17,281	12.6	44.9	16,422	42.7	4,774	12.4
Middle-income	78,975	52,590	38.4	66.6	19,108	24.2	7,277	9.2
Upper-income	85,014	58,080	42.4	68.3	20,800	24.5	6,134	7.2
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>232,394</b>	<b>137,069</b>	<b>100.0</b>	<b>59.0</b>	<b>72,436</b>	<b>31.2</b>	<b>22,889</b>	<b>9.8</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2,322	7.7	2,107	7.6	183	7.8	32	9.1
Moderate-income	4,504	14.9	3,997	14.5	408	17.4	99	28.1
Middle-income	8,981	29.6	8,320	30.1	595	25.3	66	18.8
Upper-income	14,484	47.8	13,169	47.7	1,160	49.4	155	44
Unknown-income	19	0.1	16	0.1	3	0.1	0	0
<b>Total Assessment Area</b>	<b>30,310</b>	<b>100.0</b>	<b>27,609</b>	<b>100.0</b>	<b>2,349</b>	<b>100.0</b>	<b>352</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.1</b>		<b>7.7</b>		<b>1.2</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	9	4.8	9	4.8	0	0	0	0
Moderate-income	11	5.8	11	5.9	0	0	0	0
Middle-income	74	39.2	72	38.7	2	66.7	0	0
Upper-income	95	50.3	94	50.5	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>189</b>	<b>100.0</b>	<b>186</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>98.4</b>		<b>1.6</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: LA Houma

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	13,333	25.3
Moderate-income	13	28.3	13,915	26.4	3,204	23	8,037	15.3
Middle-income	23	50	28,803	54.7	3,159	11	9,620	18.3
Upper-income	8	17.4	9,955	18.9	452	4.5	21,683	41.2
Unknown-income	2	4.3	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>46</b>	<b>100.0</b>	<b>52,673</b>	<b>100.0</b>	<b>6,815</b>	<b>12.9</b>	<b>52,673</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	23,202	13,717	25.2	59.1	6,000	25.9	3,485	15
Middle-income	44,520	29,894	54.9	67.1	10,031	22.5	4,595	10.3
Upper-income	13,662	10,841	19.9	79.4	1,703	12.5	1,118	8.2
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>81,384</b>	<b>54,452</b>	<b>100.0</b>	<b>66.9</b>	<b>17,734</b>	<b>21.8</b>	<b>9,198</b>	<b>11.3</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	2,193	22.4	1,913	21.6	260	30.4	20	21.5
Middle-income	5,166	52.7	4,713	53.2	396	46.3	57	61.3
Upper-income	2,441	24.9	2,225	25.1	200	23.4	16	17.2
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>9,800</b>	<b>100.0</b>	<b>8,851</b>	<b>100.0</b>	<b>856</b>	<b>100.0</b>	<b>93</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>8.7</b>		<b>.9</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	41	23.4	38	22.9	3	33.3	0	0
Middle-income	91	52	88	53	3	33.3	0	0
Upper-income	43	24.6	40	24.1	3	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>175</b>	<b>100.0</b>	<b>166</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>94.9</b>		<b>5.1</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

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Combined Demographics Report

Assessment Area: LA Lake Charles

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	10.6	3,700	7.2	1,373	37.1	12,005	23.3
Moderate-income	10	21.3	10,211	19.8	1,812	17.7	9,020	17.5
Middle-income	19	40.4	23,422	45.5	2,409	10.3	9,065	17.6
Upper-income	10	21.3	14,150	27.5	672	4.7	21,393	41.6
Unknown-income	3	6.4	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>47</b>	<b>100.0</b>	<b>51,483</b>	<b>100.0</b>	<b>6,266</b>	<b>12.2</b>	<b>51,483</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	7,047	2,638	4.9	37.4	3,003	42.6	1,406	20
Moderate-income	19,437	9,378	17.5	48.2	7,087	36.5	2,972	15.3
Middle-income	36,977	26,014	48.4	70.4	7,160	19.4	3,803	10.3
Upper-income	21,264	15,674	29.2	73.7	3,310	15.6	2,280	10.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>84,725</b>	<b>53,704</b>	<b>100.0</b>	<b>63.4</b>	<b>20,560</b>	<b>24.3</b>	<b>10,461</b>	<b>12.3</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	467	5.1	425	5	42	6.3	0	0
Moderate-income	2,248	24.4	1,998	23.6	224	33.4	26	36.1
Middle-income	3,979	43.3	3,668	43.4	281	41.9	30	41.7
Upper-income	2,488	27.1	2,355	27.9	117	17.5	16	22.2
Unknown-income	14	0.2	8	0.1	6	0.9	0	0
<b>Total Assessment Area</b>	<b>9,196</b>	<b>100.0</b>	<b>8,454</b>	<b>100.0</b>	<b>670</b>	<b>100.0</b>	<b>72</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.9</b>		<b>7.3</b>		<b>.8</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2	1.4	2	1.4	0	0	0	0
Moderate-income	13	9	13	9.1	0	0	0	0
Middle-income	84	58.3	83	58	1	100	0	0
Upper-income	45	31.3	45	31.5	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>144</b>	<b>100.0</b>	<b>143</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>99.3</b>		<b>.7</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information



## Appendices

### Combined Demographics Report

Assessment Area: LA Lincoln

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	10	820	8.3	346	42.2	2,371	24.1
Moderate-income	3	30	2,580	26.2	902	35	1,321	13.4
Middle-income	2	20	2,072	21.1	203	9.8	1,707	17.3
Upper-income	4	40	4,371	44.4	373	8.5	4,444	45.1
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>10</b>	<b>100.0</b>	<b>9,843</b>	<b>100.0</b>	<b>1,824</b>	<b>18.5</b>	<b>9,843</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	1,637	449	4.7	27.4	859	52.5	329	20.1
Moderate-income	5,598	1,914	20.1	34.2	2,615	46.7	1,069	19.1
Middle-income	3,831	2,244	23.6	58.6	1,121	29.3	466	12.2
Upper-income	8,053	4,901	51.5	60.9	2,145	26.6	1,007	12.5
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>19,119</b>	<b>9,508</b>	<b>100.0</b>	<b>49.7</b>	<b>6,740</b>	<b>35.3</b>	<b>2,871</b>	<b>15.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	171	8.8	156	8.8	15	10.1	0	0
Moderate-income	349	18	326	18.4	19	12.8	4	20
Middle-income	354	18.3	309	17.5	43	28.9	2	10
Upper-income	1,062	54.9	976	55.2	72	48.3	14	70
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>1,936</b>	<b>100.0</b>	<b>1,767</b>	<b>100.0</b>	<b>149</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.3</b>		<b>7.7</b>		<b>1.0</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2	3.9	2	4.2	0	0	0	0
Moderate-income	3	5.9	3	6.3	0	0	0	0
Middle-income	12	23.5	10	20.8	2	66.7	0	0
Upper-income	34	66.7	33	68.8	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>51</b>	<b>100.0</b>	<b>48</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>94.1</b>		<b>5.9</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

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### Combined Demographics Report

Assessment Area: LA Monroe

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	12.5	3,476	9.2	1,618	46.5	9,018	23.9
Moderate-income	11	27.5	7,536	20	2,248	29.8	6,049	16
Middle-income	13	32.5	14,623	38.8	1,647	11.3	6,975	18.5
Upper-income	10	25	12,056	32	956	7.9	15,649	41.5
Unknown-income	1	2.5	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>40</b>	<b>100.0</b>	<b>37,691</b>	<b>100.0</b>	<b>6,469</b>	<b>17.2</b>	<b>37,691</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	6,347	2,247	6.3	35.4	2,928	46.1	1,172	18.5
Moderate-income	14,378	5,518	15.6	38.4	6,148	42.8	2,712	18.9
Middle-income	24,073	14,987	42.2	62.3	6,581	27.3	2,505	10.4
Upper-income	19,145	12,723	35.9	66.5	5,060	26.4	1,362	7.1
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>63,943</b>	<b>35,475</b>	<b>100.0</b>	<b>55.5</b>	<b>20,717</b>	<b>32.4</b>	<b>7,751</b>	<b>12.1</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	994	12.5	859	11.9	124	18.6	11	23.9
Moderate-income	1,568	19.7	1,416	19.5	144	21.6	8	17.4
Middle-income	2,652	33.3	2,441	33.7	201	30.1	10	21.7
Upper-income	2,735	34.4	2,522	34.8	196	29.3	17	37
Unknown-income	13	0.2	10	0.1	3	0.4	0	0
<b>Total Assessment Area</b>	<b>7,962</b>	<b>100.0</b>	<b>7,248</b>	<b>100.0</b>	<b>668</b>	<b>100.0</b>	<b>46</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.0</b>		<b>8.4</b>		<b>.6</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	1	0.7	1	0.8	0	0	0	0
Moderate-income	6	4.5	6	4.5	0	0	0	0
Middle-income	66	49.3	66	49.6	0	0	0	0
Upper-income	60	44.8	59	44.4	1	100	0	0
Unknown-income	1	0.7	1	0.8	0	0	0	0
<b>Total Assessment Area</b>	<b>134</b>	<b>100.0</b>	<b>133</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>99.3</b>		<b>.7</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Appendices

### Combined Demographics Report

Assessment Area: LA Morehouse

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	12.5	806	11.4	312	38.7	1,951	27.6
Moderate-income	2	25	1,819	25.7	602	33.1	1,186	16.8
Middle-income	5	62.5	4,451	62.9	631	14.2	1,462	20.7
Upper-income	0	0	0	0	0	0	2,477	35
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>8</b>	<b>100.0</b>	<b>7,076</b>	<b>100.0</b>	<b>1,545</b>	<b>21.8</b>	<b>7,076</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	1,529	715	9.7	46.8	465	30.4	349	22.8
Moderate-income	3,600	1,747	23.8	48.5	1,192	33.1	661	18.4
Middle-income	7,408	4,880	66.5	65.9	1,283	17.3	1,245	16.8
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>12,537</b>	<b>7,342</b>	<b>100.0</b>	<b>58.6</b>	<b>2,940</b>	<b>23.5</b>	<b>2,255</b>	<b>18.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	81	7.8	78	8.2	2	3	1	5.6
Moderate-income	351	33.9	312	32.8	31	46.3	8	44.4
Middle-income	603	58.3	560	58.9	34	50.7	9	50
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>1,035</b>	<b>100.0</b>	<b>950</b>	<b>100.0</b>	<b>67</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.8</b>		<b>6.5</b>		<b>1.7</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6	4.3	6	4.4	0	0	0	0
Middle-income	132	95.7	129	95.6	3	100	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>138</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>97.8</b>		<b>2.2</b>		<b>.0</b>

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### Combined Demographics Report

Assessment Area: LA Shreveport

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	15.6	4,358	7.1	1,906	43.7	15,697	25.7
Moderate-income	16	25	15,428	25.3	4,281	27.7	10,387	17
Middle-income	23	35.9	25,226	41.3	2,412	9.6	11,302	18.5
Upper-income	14	21.9	16,023	26.3	769	4.8	23,649	38.7
Unknown-income	1	1.6	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>64</b>	<b>100.0</b>	<b>61,035</b>	<b>100.0</b>	<b>9,368</b>	<b>15.3</b>	<b>61,035</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	10,544	3,185	5.2	30.2	4,813	45.6	2,546	24.1
Moderate-income	29,287	13,030	21.1	44.5	11,580	39.5	4,677	16
Middle-income	44,903	26,691	43.2	59.4	12,779	28.5	5,433	12.1
Upper-income	27,032	18,838	30.5	69.7	6,377	23.6	1,817	6.7
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>111,766</b>	<b>61,744</b>	<b>100.0</b>	<b>55.2</b>	<b>35,549</b>	<b>31.8</b>	<b>14,473</b>	<b>12.9</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2,018	15.4	1,712	14.3	287	27.7	19	21.8
Moderate-income	2,393	18.3	2,190	18.3	192	18.6	11	12.6
Middle-income	4,786	36.5	4,400	36.7	355	34.3	31	35.6
Upper-income	3,892	29.7	3,665	30.6	201	19.4	26	29.9
Unknown-income	9	0.1	9	0.1	0	0	0	0
<b>Total Assessment Area</b>	<b>13,098</b>	<b>100.0</b>	<b>11,976</b>	<b>100.0</b>	<b>1,035</b>	<b>100.0</b>	<b>87</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.4</b>		<b>7.9</b>		<b>.7</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	7	4.6	6	4.2	1	12.5	0	0
Moderate-income	19	12.6	17	11.9	2	25	0	0
Middle-income	72	47.7	71	49.7	1	12.5	0	0
Upper-income	53	35.1	49	34.3	4	50	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>151</b>	<b>100.0</b>	<b>143</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>94.7</b>		<b>5.3</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

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### Combined Demographics Report

Assessment Area: LA St. Landry

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	10.5	1,911	9.1	933	48.8	6,039	28.9
Moderate-income	4	21.1	3,885	18.6	1,287	33.1	2,967	14.2
Middle-income	9	47.4	9,940	47.6	1,986	20	3,454	16.5
Upper-income	4	21.1	5,166	24.7	767	14.8	8,442	40.4
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>19</b>	<b>100.0</b>	<b>20,902</b>	<b>100.0</b>	<b>4,973</b>	<b>23.8</b>	<b>20,902</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	3,608	1,507	7	41.8	1,529	42.4	572	15.9
Moderate-income	7,199	3,932	18.4	54.6	1,874	26	1,393	19.3
Middle-income	16,959	10,739	50.2	63.3	3,626	21.4	2,594	15.3
Upper-income	8,166	5,229	24.4	64	1,646	20.2	1,291	15.8
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>35,932</b>	<b>21,407</b>	<b>100.0</b>	<b>59.6</b>	<b>8,675</b>	<b>24.1</b>	<b>5,850</b>	<b>16.3</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	342	10.9	309	10.7	26	12	7	16.3
Moderate-income	664	21.1	609	21.1	49	22.7	6	14
Middle-income	1,418	45.1	1,298	45	101	46.8	19	44.2
Upper-income	718	22.9	667	23.1	40	18.5	11	25.6
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>3,142</b>	<b>100.0</b>	<b>2,883</b>	<b>100.0</b>	<b>216</b>	<b>100.0</b>	<b>43</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.8</b>		<b>6.9</b>		<b>1.4</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	2	1.3	2	1.3	0	0	0	0
Moderate-income	37	23.3	36	22.8	1	100	0	0
Middle-income	83	52.2	83	52.5	0	0	0	0
Upper-income	37	23.3	37	23.4	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>159</b>	<b>100.0</b>	<b>158</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
<b>Percentage of Total Farms:</b>				<b>99.4</b>		<b>.6</b>		<b>.0</b>

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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	109	13.3	93,990	10.5	30,518	32.5	209,770	23.3
Moderate-income	205	25.1	207,916	23.1	36,526	17.6	148,586	16.5
Middle-income	202	24.7	241,607	26.9	18,438	7.6	160,522	17.9
Upper-income	299	36.6	355,209	39.5	9,819	2.8	379,853	42.3
Unknown-income	3	0.4	9	0	0	0	0	0
<b>Total Assessment Area</b>	<b>818</b>	<b>100.0</b>	<b>898,731</b>	<b>100.0</b>	<b>95,301</b>	<b>10.6</b>	<b>898,731</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	185,303	43,236	5.4	23.3	112,679	60.8	29,388	15.9
Moderate-income	352,615	153,894	19.4	43.6	158,536	45	40,185	11.4
Middle-income	397,732	218,753	27.6	55	144,783	36.4	34,196	8.6
Upper-income	526,308	377,547	47.6	71.7	115,796	22	32,965	6.3
Unknown-income	18	18	0	100	0	0	0	0
<b>Total Assessment Area</b>	<b>1,461,976</b>	<b>793,448</b>	<b>100.0</b>	<b>54.3</b>	<b>531,794</b>	<b>36.4</b>	<b>136,734</b>	<b>9.4</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	17,467	8	14,885	7.6	2,477	13.7	105	5.4
Moderate-income	38,502	17.7	33,988	17.2	4,295	23.8	219	11.3
Middle-income	53,976	24.9	49,397	25.1	4,196	23.2	383	19.7
Upper-income	106,712	49.2	98,489	50	6,994	38.7	1,229	63.2
Unknown-income	420	0.2	293	0.1	117	0.6	10	0.5
<b>Total Assessment Area</b>	<b>217,077</b>	<b>100.0</b>	<b>197,052</b>	<b>100.0</b>	<b>18,079</b>	<b>100.0</b>	<b>1,946</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.8</b>		<b>8.3</b>		<b>.9</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	64	3.8	59	3.6	5	19.2	0	0
Moderate-income	155	9.2	150	9	5	19.2	0	0
Middle-income	559	33.1	556	33.5	3	11.5	0	0
Upper-income	908	53.8	894	53.9	13	50	1	100
Unknown-income	1	0.1	1	0.1	0	0	0	0
<b>Total Assessment Area</b>	<b>1,687</b>	<b>100.0</b>	<b>1,660</b>	<b>100.0</b>	<b>26</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.4</b>		<b>1.5</b>		<b>.1</b>

2016 FFIEC Census Data and 2016 D&B Information