# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION 

Regions Bank<br>RSSD \#: 233031<br>Birmingham, Alabama

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

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

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## Institution Rating

## INSTITUTION'S CRA RATING: SATISFACTORY.

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

| PERFORMANCE LEVELS | REGIONS BANK |  |  |
| :--- | :---: | :---: | :---: |
|  | 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:

- Lending activity reflects good responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of $\mathrm{HMDA}^{1}$ lending among borrowers reflects adequate penetration among customers of different income levels;
- The distribution of small business lending reflects adequate penetration among businesses of different revenue sizes;
- The bank makes a relatively high level of community development loans;
- The bank has a significant level of qualified investments, occasionally in a leadership position;
- Retail delivery systems are accessible to the bank’s geographies and to individuals of different income levels in its assessment areas;
- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals;
- The bank provides a relatively high level of community development services.

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## Institution

## DESCRIPTION OF INSTITUTION

Regions Bank is a multistate commercial bank operating 1,718 branch offices as of December 31, 2011. The bank operates branches in Alabama, Arkansas, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Mississippi, Missouri, North Carolina, South Carolina, Tennessee, and Texas. As of December 31, 2011, Regions Bank had total assets of $\$ 123.4$ billion. The bank received a "Satisfactory" rating at its previous evaluation dated June 14, 2010. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment areas.

For this examination, 155 assessment areas were reviewed. Total deposits for the 155 assessment areas as of June 30, 2011 were $\$ 98.3$ billion. Descriptions of the full-scope assessment areas can be found in the applicable State or Multistate sections of this report.

## Business Structure

Regions Financial Corporation (RFC), headquartered in Birmingham, Alabama is one of the top 20 US financial holding companies based on consolidated financial assets, with a focus on retail banking.. RFC is the parent of Regions Bank, which is the second largest state member bank in the Federal Reserve System. Regions Bank is a full-service provider of retail and commercial banking, trust, asset management, securities brokerage, insurance, and mortgage banking. Non-bank subsidiaries of the holding company include Morgan Keegan, a full-service regional brokerage and investment banking firm; MK Holding, Inc., a non-bank holding entity for Morgan Asset Management; and Regions Insurance Group, Inc., formed in 2004 as the corporate parent structure for all of the company's insurance operating subsidiaries. Since the previous examination dated June 14, 2010, there have been no substantive changes to the bank's structure.

## Credit Products and Loan Portfolio

Regions Bank 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, personal lines of credit, installment loans, education loans, home equity loans, mortgage loans, and student loans. The bank also offers construction and aircraft lending. Commercial loan products include loans and lines of credit, business credit card, and Small Business Administration (SBA) loans.

The following table shows the distribution of Regions Bank’s loan portfolio as of December 31, 2010 and 2011. One- to four-family dwelling loans comprised the greatest percentage by dollar volume of Regions Bank's loan portfolio in both years. The next highest volume by dollar amount was commercial and industrial loans in 2011, while non-farm non-residential loans comprised the second highest dollar volume in 2010. As the table depicts, Regions Bank originated less than $1 \%$ of small farm loans during the review period. Therefore, small farm loans are not discussed in detail in this report.

| COMPOSITION OF LOAN PORTFOLIO |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: |
| Loan Type | $\mathbf{1 2 / 3 1 / 2 0 1 1}$ | $\mathbf{1 2 / 3 1 / 2 0 1 0}$ |  |  |
|  | $\$(\mathbf{0 0 0 s})$ | Percent | $\$(000 \mathbf{s})$ | Percent |
| Construction and Development | $2,806,150$ | $3.9 \%$ | $4,923,687$ | $6.3 \%$ |
| Secured by One- to Four- Family Dwellings | $27,881,257$ | $38.7 \%$ | $30,568,210$ | $39.4 \%$ |
| Other Real Estate: Farmland | 566,530 | $0.8 \%$ | 609,451 | $0.8 \%$ |
| Multifamily | $2,710,283$ | $3.8 \%$ | $4,061,444$ | $5.2 \%$ |
| Nonfarm nonresidential | $16,805,440$ | $23.3 \%$ | $19,315,270$ | $24.9 \%$ |
| Commercial and Industrial | $16,890,553$ | $23.5 \%$ | $15,041,516$ | $19.4 \%$ |
| Loans to Individuals | $3,989,075$ | $5.5 \%$ | $2,709,490$ | $3.5 \%$ |
| Agricultural Loans | 345,538 | $0.5 \%$ | 331,100 | $0.4 \%$ |
| Total | $\$ 71,994,826$ | $100.00 \%$ | $\$ 77,560,168$ | $100.00 \%$ |

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

## SCOPE OF EXAMINATION

All assessment areas for Regions Bank were evaluated for lending, investment, and service performances. Fullscope reviews were conducted for 40 of the bank's 155 assessment areas. The assessment areas were selected for full-scope reviews based on the volume of lending, number of branches, percentage of total deposits, length of time since the last full-scope evaluation, and other nonfinancial considerations. The bank is an interstate bank; therefore, the scope of the evaluation includes a full-scope review of at least one assessment area of each state where the bank has offices. Assessment areas receiving full-scope reviews are Birmingham, Huntsville, and Mobile in the State of Alabama; Hot Springs, Little Rock and Northwest Arkansas in the State of Arkansas; Jacksonville, Orlando, Pensacola, and Tampa in the State of Florida; Atlanta and Northeast Georgia in the State of Georgia; Decatur and Peoria in the State of Illinois; Indianapolis in the State of Indiana; Des Moines and Waterloo in the State of Iowa; Southwest Kentucky in the State of Kentucky; Baton Rouge, Monroe, Shreveport and Southern Louisiana in the State of Louisiana; Central Mississippi and Jackson in the State of Mississippi; Southeast Missouri and St. Genevieve-Perry in the State of Missouri; Charlotte in the State of North Carolina; Columbia and Hampton-Jasper-Beaufort in the State of South Carolina; Eastern Tennessee and Nashville in the State of Tennessee; Austin and Houston in the State of Texas; and the Augusta, Chattanooga, Columbus, Kingsport, Memphis, St. Louis, and Texarkana Multistate assessment areas. A description of each full-scope assessment area is included in the applicable assessment area section of this report.

## Examination Review Period and Products Reviewed

The lending test performance was based upon loan data for the period of January 1, 2010, through December 31, 2011. HMDA-reportable loans and CRA-reportable small business loans were the major products included in the evaluation. CRA-reportable small farm loans and HMDA-reportable multi-family loans were generally not considered in the overall assessment due to limited activity and volume. Additionally, the analysis did not include other types of consumer loans, credit cards and commercial loans.

Community development loans and investments funded by the bank from July 1, 2010, through June 30, 2012, were reviewed for the lending and investment tests. In addition, the bank's community development services for the same time period were evaluated for the service test.

## Examination Analysis

The evaluation of the bank's record of lending in the individual assessment areas includes the use of and comparison to demographic characteristics. The primary sources for the demographic information are the 2000 US census and Dunn \& Bradstreet data. Demographic characteristics of a particular assessment area are useful

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in analyzing the bank's record of lending since they provide a means of estimating loan demand and identifying lending opportunities. To understand small business and small farm loan demand, self-reported data of revenue size and geographical location from business and farm entities are collected and published by Dunn \& 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 information is used to understand the bank's performance context and evaluate the bank accordingly.

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

The bank's borrower income distribution with respect to HMDA loans 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. Poverty level is determined by both income and family size. Generally, a larger proportion of poverty level families are in the low-income category and, to a certain extent, the moderate-income category. Borrowers at poverty level often do not qualify for real estate loans without significant financial assistance; therefore, the percentage of families below poverty level is considered when evaluating lending performance to low- and moderate-income borrowers.

The bank's borrower income distribution with respect to small business loans was assessed by comparing the percentage of loans made to businesses in each revenue category (less than or equal to $\$ 1$ million or greater than $\$ 1$ million) to the percentage of total businesses in each revenue category.

The bank's lending performance was compared to the performance of aggregate lenders in 2010 and 2011. Aggregate lenders include all lenders required to report HMDA and CRA data within the respective assessment areas. The bank's market share of lending is also discussed to give a better understanding of how Regions ranks within the respective areas.

In order to understand community credit needs, several community contacts were made with community representatives, and forums related to small businesses and community reinvestment were conducted. Community contacts and the forums were located throughout the bank's assessment areas and included representatives of community-based organizations, municipalities, and quasi-government agencies. Certain comments concerning the local economies were consistent throughout the assessment areas. The recent recession had an impact on many of the bank's assessment areas leading to job losses, business closures, and foreclosures. Based on discussions with the community contacts, common needs identified in all assessment areas that could provide opportunities for bank participation included financial literacy, affordable housing, and additional small business lending.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's overall lending test rating is High Satisfactory. The overall lending performance is adequate in all state and multistate metropolitan assessment areas except for the states of Arkansas, Florida, Georgia and Tennessee, and the multistate assessment areas of Columbus, Kingsport, Memphis, St. Louis, and Texarkana, which are considered good. Lending activity in the assessment areas is good. The bank's penetration of loans

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among borrowers of different income levels and farms and businesses of different sizes is good, as well as the geographic distribution of loans. The bank makes a relatively high level of community development loans.

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

## Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs. The following table summarizes Regions Bank's lending activity from January 1, 2010, through December 31, 2011. As the data indicates, the bank makes more small business loans than HMDA loans by number, while HMDA loans account for a larger dollar amount than small business loans. Lending activity was considered good in 12 full-scope assessment areas, adequate in 27 full-scope assessment areas and poor in the remaining 1 full-scope assessment area. Detailed information about the bank's lending activity can be found in the state and multi-state assessment area sections of this report.

## Summary of Lending Activity

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | $\mathbf{\%}$ |
| :--- | ---: | :---: | ---: | :---: |
| Total Consumer related | $\mathbf{0}$ | $\mathbf{0}$ | $\mathbf{\$ 0}$ | $\mathbf{0}$ |
| Home Improvement | 6,704 | -- | $\$ 64,289$ | -- |
| Home Purchase | 35,875 | -- | $\$ 6,114,966$ | -- |
| Refinancing | 51,674 | -- | $\$ 8,774,438$ | -- |
| Total HMDA related | $\mathbf{9 4 , 2 5 3}$ | $\mathbf{4 5}$ | $\$ \mathbf{1 4 , 9 5 3 , 6 9 3}$ | $\mathbf{6 1}$ |
| Small Business | 112,271 | -- | $\$ 9,067,822$ | -- |
| Total Small Business related | $\mathbf{1 1 2 , 2 7 1}$ | $\mathbf{5 3}$ | $\$ 9,067,822$ | $\mathbf{3 7}$ |
| Small Farm | 3,868 | -- | $\$ 531,755$ | -- |
| Total Small Farm related | $\mathbf{3 , 8 6 8}$ | $\mathbf{2}$ | $\$ 531,755$ | $\mathbf{2}$ |
| TOTAL LOANS | $\mathbf{2 1 0 , 3 9 2}$ | $\mathbf{1 0 0}$ | $\$ 24,553,270$ | $\mathbf{1 0 0}$ |

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

Regions Bank offers several programs with the specific purpose of helping to meet housing-related needs of low- and moderate-income individuals and communities. During the review period, Regions participated in the U.S. Treasury-sponsored Home Affordable Modification Program (HAMP) for loans serviced on behalf of Fannie Mae and Freddie Mac. Additionally, the bank had a Customer Assistance Program (CAP) in place. As part of the program, the bank has a dedicated staff, and also partners with housing-related community development organizations in Florida, Georgia, Louisiana, and Mississippi, to assist customers facing financial hardship. Under the program, existing borrowers impacted by a financial hardship meeting certain criteria may qualify for lower rates on mortgage and home equity loans. Borrowers are also made aware of any rate adjustments at least six months prior to the change to ensure that the borrower is able to afford the new term of that loan. During the evaluation period, over 2,000 borrowers were assisted under the program. Loan modifications are not reportable under the HMDA and are, therefore, not included in the analysis. Overall, the Customer Assistance Program is considered very responsive to borrower needs, and made a great impact throughout the assessment areas during the review period.

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The table below shows the distribution of Regions Bank’s lending inside and outside its assessment area. Affiliate loan data, in accordance with the CRA, is not included in the assessment area concentration performance review. Regions Bank originated a substantial majority of its loans within its assessment areas, reflecting excellent assessment area concentration.

## Lending Inside and Outside the Assessment Area

| Loan Types | Inside |  |  |  | Outside |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% | \$(000s) | \% | \# | \% | \$(000s) | \% |
| Home Improvement | 6,298 | 93.9 | \$59,135 | 92 | 406 | 6.1 | \$5,154 | 8 |
| Home Purchase - Conventional | 17,033 | 91.8 | \$3,423,678 | 90.6 | 1,516 | 8.2 | \$354,289 | 9.4 |
| Home Purchase - FHA | 14,477 | 93.6 | \$1,893,085 | 94.1 | 992 | 6.4 | \$119,199 | 5.9 |
| Home Purchase - VA | 1,670 | 89.9 | \$291,900 | 89.9 | 187 | 10.1 | \$32,815 | 10.1 |
| Refinancing | 47,186 | 91.3 | \$7,968,141 | 90.8 | 4,488 | 8.7 | \$806,297 | 9.2 |
| Total HMDA related | 86,664 | 91.9 | \$13,635,939 | 91.2 | 7,589 | 8.1 | \$1,317,754 | 8.8 |
| Small Business | 107,574 | 95.8 | \$8,648,288 | 95.4 | 4,697 | 4.2 | \$419,534 | 4.6 |
| Total Small Bus. related | 107,574 | 95.8 | \$8,648,288 | 95.4 | 4,697 | 4.2 | \$419,534 | 4.6 |
| Small Farm | 3,328 | 86 | \$458,839 | 86.3 | 540 | 14 | \$72,916 | 13.7 |
| Total Small Farm related | 3,328 | 86 | \$458,839 | 86.3 | 540 | 14 | \$72,916 | 13.7 |
| TOTAL LOANS | 197,566 | 93.9 | \$22,743,066 | 92.6 | 12,826 | 6.1 | \$1,810,204 | 7.4 |

Note: Affiliate loans not included

## Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

The overall geographic distribution of HMDA and small business lending reflects adequate penetration in lowand moderate-income geographies. Of the 40 full-scope assessment areas, one is considered excellent, 15 are considered good, 22 are considered adequate, and 2 are considered poor for overall geographic distribution.

The overall distribution among borrowers of different income levels and businesses of different sizes is also adequate. Of the 40 full-scope assessment areas, 14 are considered good, 25 are considered adequate, and one is considered poor for borrower distribution.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans. The bank originated or renewed 680 community development loans totaling approximately $\$ 1.4$ billion during the review period. The largest concentration of community development loans by state was in Florida with more than $\$ 250$ million, accounting for nearly $18 \%$ of bank-wide community development lending. Several assessment areas, including Miami, Tampa and Jacksonville, contributed significantly to this performance. The State of Alabama had the second largest amount of community development lending, with nearly $\$ 160$ million during the review period. The Birmingham assessment area was the largest contributor to this performance. The community development loans originated during the evaluation period were for a variety of purposes, including financing of affordable housing for

| Community Development Lending |  |  |
| :--- | :--- | :--- |
| Purpose |  | \$('000s) |
| Affordable Housing | 144 | 347,861 |
| Community Services | 76 | 146,541 |
| Economic Development | 361 | 399,886 |
| Revitalize \& Stabilize | 99 | 504,601 |
| Total | 680 | $1,398,889$ | low- and moderate-income individuals, community

services targeted to low- and moderate-income populations, promotion of economic development by financing small businesses that resulted in job creation and retention, and revitalization of targeted communities located in low- and moderate-income tracts or other qualified geographies.

## Investment Test

Regions Bank's investment performance is rated High Satisfactory based on the overall level of qualified community development investments and grants across the bank's footprint. Specifically, the bank's performance is excellent in six of the state and multistate areas and good in 11. The bank's investment performance is adequate in three states and multistate areas and poor in Illinois and Kentucky.

Regions had 662 qualified investments totaling approximately $\$ 1.2$ billion within its assessment areas. In addition, the bank had ten investments totaling $\$ 8.3$ million that benefitted the bank's entire footprint and two investments totaling \$13.1 million that positively impacted several states. Overall, the bank had 674 qualified investments totaling $\$ 1.3$ billion. Of these, 130 were current period investments totaling $\$ 590.1$ million. The majority of the bank's investments support

| Investment Purpose | $\#$ | $\mathbf{\$ ( \mathbf { \prime 0 0 s } )}$ |
| :--- | :--- | :--- |
| Affordable Housing | 602 | $\$ 1,120,065$ |
| Community Services | 12 | $\$ 24,091$ |
| Economic <br> Development | 42 | $\$ 12,671$ |
| Revitalize \& Stabilize | 18 | $\$ 108,211$ |
| Total | 674 | $\$ 1,265,038$ | affordable housing through GNMA and FNMA investment instruments, Low Income Housing Tax Credits (LIHTCs), and investments in funds that provide equity for LIHTC projects as well as economic development, through investments in SBICs and small business loan pools.

Regions is a leader in financing affordable multi-family housing through the LIHTC program. During the current review period, the bank purchased more than $\$ 277.2$ million in LIHTC investments, making 4,176 units of affordable housing available to low- and moderate-income individuals. From prior exam periods, the bank holds $\$ 583.7$ million in book value equity investments in LIHTC projects, representing another 12,555 units. Overall, the bank has helped finance over 16,700 units of affordable rental housing for low- and moderateincome individuals. Affordable housing is identified as one of the most important credit and community development needs across the bank's footprint, and the LIHTC investments demonstrate good responsiveness to this need.

Regions also made qualified grants and donations totaling $\$ 5.6$ million to organizations with a purpose of community development within the assessment areas. The majority of the donations provided support for organizations engaged in providing community services to low- and moderate-income individuals or communities, and for economic development organizations. Regions provided a $\$ 1.0$ million contribution to support disaster recovery after its home state of Alabama was devastated by tornados in April 2011. The bank also had $\$ 118,750$ in contributions to organizations that benefitted the bank's entire footprint. The bank-wide contributions supported several national organizations that provide scholarships for low-income rural Hispanic and African American students, and one organization that addresses community reinvestment issues

| Contribution Purpose | $\#$ | $\$(\mathbf{\prime 0 0 0 s})$ |
| :--- | :--- | :--- |
| Affordable Housing | 72 | $\$ 329$ |
| Community Services | 742 | $\$ 2,887$ |
| Economic <br> Development | 322 | $\$ 1,314$ |
| Revitalize \& Stabilize | 23 | $\$ 1,149$ |
| Total | 1,159 | $\$ 5,679$ | nationwide.

## Institution

## Service Test

Regions Bank's performance under the service test is rated High Satisfactory. The bank's performance is considered excellent in 2 states, good in 6 states, adequate in 11 states, and poor in the remaining 3 states (states include multistate assessment areas). Specific details of the service performance are discussed in the respective assessment area sections of this report.

## Retail Services

Retail delivery systems are accessible to the geographies and individuals of different income levels. During the exam period of January 1, 2010, through December 31, 2011, Regions opened 4branches and closed 184branches. Of the branches within low- and moderate-income geographies, twobranches were opened and 31 were closed. A specific listing of the branches opened or closed during the period may be obtained by accessing the bank's CRA public file, which is available on the bank's web site. Regions' opening and closing of branches has generally not adversely affected the accessibility of banking services to low- and moderateincome geographies. In addition, banking services and business hours do not vary in a way that inconveniences any portion of the bank's assessment areas, particularly low- and moderate-income geographies and individuals. Regions Bank has a number of branches located in low- and moderate-income geographies that have weekend and extended hours. The bank has various assessment areas with a relatively high level of branches located in low- and moderate-income geographies. For instance, the Hot Springs, Arkansas; Decatur and Peoria, Illinois; Waterloo, Iowa; Jackson, Mississippi; and Southeast Missouri assessment areas all have higher numbers of branches in low- and moderate-income geographies.

In an effort to expand access to retail banking services, Regions has launched several new retail banking products including low-cost savings accounts and check-cashing services for non-customers, as well as a prepaid debit card. These products specifically target consumers who are considered unbanked and underbanked. According to the FDIC's 2011 National Survey of Unbanked and Underbanked Households, 28\% of US households are unbanked or underbanked, and lower-income households represent a disproportionate share of those that lack access to mainstream banking services.

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## Geographic Distribution of Branches

| Tract Income Levels | BRANCHES |  |  |  |  |  |  |  | DEMOGRAPHICS |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Total Branches |  |  | Open <br> \# | Closed* <br> \# | Drive <br> Thru <br> \# | Extended Hours \# | Weekend Hours \# | Cens $\#$ | s Tracts <br> \% | Households <br> \% | Total Businesses \% |
| Low | Total | 72 | 4.2\% | 0 | 4 | 61 | 37 | 21 |  |  |  |  |
|  | $\begin{array}{r} \text { DTO } \\ \text { LS } \\ \hline \end{array}$ | $\begin{aligned} & 8 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 8 |  |  | 908 | 7.1\% | 4.4\% | 3.6\% |
| Moderate | Total | 298 | 17.4\% | 2 | 27 | 272 | 181 | 111 | 2964 | 23.3\% | 20.7\% | 17.2\% |
|  | $\begin{array}{r} \text { DTO } \\ \text { LS } \\ \hline \end{array}$ | $\begin{gathered} 16 \\ 0 \end{gathered}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 2 \\ & 0 \end{aligned}$ | 16 |  |  |  |  |  |  |
| Middle | Total | 831 | 48.4\% | 1 | 104 | 800 | 518 | 379 | 5696 | 44.7\% | 47.9\% | 44.3\% |
|  | $\begin{array}{r} \text { DTO } \\ \text { LS } \end{array}$ | $\begin{gathered} 23 \\ 0 \end{gathered}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $3$ | 23 |  |  |  |  |  |  |
| Upper | Total | 512 | 29.8\% | 1 | 48 | 483 | 361 | 253 | 3116 | 24.5\% | 27.0\% | 34.8\% |
|  | $\begin{array}{r} \text { DTO } \\ \text { LS } \end{array}$ | $\begin{aligned} & 3 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 1 \\ & 0 \end{aligned}$ | 3 |  |  |  |  |  |  |
| Unknown | Total | 5 | 0.3\% | 0 | 1 | 4 | 2 | 0 | 49 | 0.4\% | 0.0\% | 0.2\% |
|  | DTC Ls | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  |  |  |  |  |
| Totals | Total | 1718 | 100.0\% | 4 | 184 | 1620 | 1099 | 764 | 12733 | 100.0\% | 100.0\% | 100.0\% |
|  | $\begin{array}{r} \text { DTC } \\ \text { L } \end{array}$ | $\begin{gathered} 50 \\ 0 \end{gathered}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 6 \\ & 0 \end{aligned}$ | 50 |  |  |  |  |  |  |

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" columns and are not included in any other totals

## Community Development Services

The bank provides a good level of community development services throughout its assessment areas. Regions provided 49,802 hours of community development services during the review period. Community development services were considered excellent in Arkansas; good in Alabama, Georgia, Illinois, Mississippi, and Tennessee; adequate in Florida, Indiana, Iowa, Kentucky, Louisiana, Missouri, and Texas; and poor in North Carolina and South Carolina. The bank's directors, officers and staff members are involved in numerous organizations and activities that promote or facilitate affordable housing for low- and moderate-income individuals, services for low- and moderate-income individuals, economic development, and revitalization of low- and moderate-income areas, along with financial literacy outreach efforts.

The following are examples of community development services provided by the bank during the review period:

- Junior Achievement - These programs help prepare young individuals for the real world by teaching them how to generate and effectively manage wealth, how to create jobs in their communities, and how to apply entrepreneurial thinking in the work place. Regions’ employees volunteered to provide this program to students at various schools of all grade levels across the country. The majority of these schools had a high number of students on free or reduced price lunch programs. In addition, many of these schools are located in low- and moderate-income geographies.
- Volunteer Income Tax Assistance (VITA) - The Internal Revenue Service created the VITA program in order for qualified individuals to provide tax assistance to low- and moderate-income individuals that need assistance preparing their tax returns. The VITA program is designed to inform taxpayers about special tax credits they may qualify for, such as the Earned Income Tax Credit, Child Tax Credit, and


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Credit for the Elderly or Disabled. Regions’ employees volunteered several hours in various assessment areas serving individuals that qualified for VITA.

- Affordable Housing Initiatives - Regions’ employees provided services and assistance to various community organizations offering affordable housing initiatives. For instance, one initiative provided by Regions' associates was teaching a first-time homebuyer seminar to low- and moderate-income individuals in order to educate them on financing opportunities they may qualify for.


## 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 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.

## Augusta Multistate Metropolitan Area

## CRA RATING FOR AUGUSTA: Satisfactory ${ }^{2}$

## The Lending Test is rated: <br> The Investment Test is rated: <br> The Service Test is rated: <br> Low Satisfactory <br> Low Satisfactory <br> Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment area. In addition, the distribution of borrowers reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes a low level of community development loans within the assessment area.
- The bank provides an adequate level of qualified community development investments and grants in the assessment area, and is occasionally in a leadership position in response to the community development needs of the assessment area.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area.
- The bank provides an adequate level of community development services throughout the assessment area.

[^1]
## SCOPE OF EXAMINATION

The time period, products and affiliates evaluated for the Augusta multistate assessment area are consistent with the overall scope described in the Description of the Institution section of this report. Regions Bank's performance in Augusta was evaluated using full-scope examination procedures.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN AUGUSTA

The Augusta assessment area includes Burke, Columbia, McDuffie, and Richmond counties in Georgia, and Aiken and Edgefield counties in South Carolina. There are 95 census tracts in the assessment which includes10 low-income tracts and 21 moderate-income tracts. Regions Bank operates 16 branches in the assessment area, three of which are located in low- and moderate-income tracts. These branches represent $0.9 \%$ of the bank's total branches; 11 branches are in Georgia and 5 branches are in South Carolina. As of June 30, 2011, the bank had $\$ 575.9$ million in deposits in Augusta, representing $0.6 \%$ of Regions Bank's total deposits. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 1,024 (1.2\%) were in the Augusta assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 620 ( $0.6 \%$ ) were in the Augusta assessment area.

## Population and Income Characteristics

The assessment area population is growing slowly relative to the two states in which it is located. According to census data, the population of the assessment area in 2000 was 499,684, which grew to 556,877 by 2010, representing an $11.4 \%$ increase. During this same period, the population grew in South Carolina by $15.3 \%$ and $18.3 \%$ in Georgia. The only county to have a higher growth rate was Columbia County, Georgia. Richmond County, Georgia, home to the city of Augusta and US Army installation Fort Gordon, is the most populous county in the assessment area, but experienced no growth over the course of the decade. Both Burke and McDuffie counties in Georgia experienced low, single digit growth rates, while Aiken and Edgefield counties in South Carolina saw their populations grow by $12.3 \%$ and $9.7 \%$, respectively.

From 2005 to 2010, assessment area net migration was positive, but all Georgia counties with the exception of Columbia experienced consecutive years of negative net migration. Conversely, Columbia County, Georgia, and both South Carolina counties saw positive net migration over the period. Net migration is defined as the number of in-migrants less the number of out-migrants and is determined by comparing the addresses of inmigrant and out-migrant federal tax returns from the present year to the previous year. ${ }^{3}$

Food stamp usage has increased across the assessment area and statewide. As of 2009, each county in the assessment area had a higher percentage of its population receiving food stamps than its respective state, with the exception of Columbia County, Georgia. While the number of residents receiving food stamps increased by $160 \%$ from 2000 to 2009 in Columbia County, the percentage of its county's population receiving benefits in 2009 was only $6.7 \%$. The remaining Georgia counties all had food stamp usage rates greater than $24 \%$, whereas Aiken and Edgefield counties in South Carolina were at $17.2 \%$ and $19.3 \%$, respectively. Comparatively, the 2009 statewide food stamp usage rate in Georgia was $15.5 \%$, and $17 \%$ in South Carolina.
The percentage of students receiving free and reduced price lunch benefits in school districts across the assessment area is on the rise. As of 2009, each county's school district had more than $50 \%$ of its students receiving free and reduced price lunch benefits with the exception of Columbia County, Georgia, where $32 \%$ of students are eligible for the program. However, the number of Columbia County students participating in the program more than doubled from 2000 to 2009. Burke County, Georgia, had the highest percentage of free and

[^2]
## Augusta Multistate Metropolitan Area

reduced price lunch recipients at $83.6 \%$, followed by Richmond and McDuffie counties, with $73.9 \%$ and $71.6 \%$, respectively.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the Augusta-Richmond County, GA-SC MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper).

Borrower Income Levels
Augusta-Richmond County, GA-SC MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% |  | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$55,600 | 0 | - | \$27,799 | \$27,800 | - | \$44,479 | \$44,480 | - | \$66,719 | \$66,720 | - | \& above |
| 2011 | \$57,100 | 0 | - | \$28,549 | \$28,550 | - | \$45,679 | \$45,680 |  | \$68,519 | \$68,520 | - | \& above |

## Housing Characteristics

Like most housing markets across the county, the assessment area has experienced home price volatility as a result of the recent housing crisis, but median home prices are lower than statewide median values in all counties except rapidly growing Columbia County, Georgia. Columbia County reached a median home value of $\$ 168,700$ in 2010, slightly higher than the Georgia statewide median of $\$ 161,700$. Richmond County, Georgia, home to populous Augusta, saw median home values fluctuate between $\$ 80,000$ and $\$ 110,000$ in recent years, resulting in a 2010 median value of $\$ 99,300$. On the South Carolina side of the assessment area, the more densely populated Aiken County also experienced fluctuations in home prices, and its 2010 median home value of $\$ 119,000$ was below the statewide median of $\$ 134,100$. Edgefield County, South Carolina’s median value was lower at $\$ 101,600$. ${ }^{4}$

Census data show that there were 204,601 housing units in the assessment area in 2000, of which $62.9 \%$ were owner-occupied, $27.4 \%$ were rental units and $9.7 \%$ were vacant. While a majority of total units were owneroccupied, a higher percentage of housing units in low- and moderate-income tracts were rental units, indicating reduced opportunities for mortgage lending in these areas. The median age of housing stock across the assessment area was 24 years, but this figure increased to 42 years and 32 years in low-income tracts and moderate-income tracts, respectively. Additionally, housing permit activity declined from its peak years. Single-family permits across the assessment area declined $41 \%$ from 2005 to 2011, but in Columbia County, Georgia, single-family permit activity remained more robust than other areas. Since bottoming in 2008 at 804 permits, the county's permit activity spiked back to 1,257 units in 2011, accounting for $56.7 \%$ of all singlefamily housing permit activity across the assessment area. ${ }^{5}$ Multi-family development is not a significant source of housing in the assessment area.

Rental rates also vary across the assessment area. As of 2010, Richmond County, Georgia, had the highest percentage of renter households at $45.8 \%$ while in neighboring Columbia County, only $21 \%$ of households were renters. The Georgia statewide percentage of renter households was $34.3 \%$, which was slightly higher than

[^3]
## Augusta Multistate Metropolitan Area

Burke and McDuffie counties. On the South Carolina side, Aiken County’s rental rate was 26.9\% and Edgefield County's was $23.9 \%$, both of which were lower than the statewide rate of $30.7 \%$.

Mortgage delinquencies have had an adverse impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from 4.9\% in January 2010 to $7.4 \%$ in December 2011. ${ }^{6}$ HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to decline. After declining by nearly $50 \%$ from 2006 to 2011 across the assessment area, home purchase loan declines have been less drastic in recent years. Columbia County, Georgia, exhibited the most stability in home purchase loan demand. After declining by more than one-third between 2006 and 2008, the number of loan originations has held steady at just under 2000 loans for the past two years. As of 2010, there were 1,935 home purchase loans in Columbia County, accounting for $47.3 \%$ of all assessment area originations. Borrowers have also been actively refinancing loans, with 2011 activity back to 2005 and 2006 levels across the assessment area. Once again, Columbia County, Georgia, exhibited the greatest amount of volume and stability.

## Employment and Economic Conditions

The Augusta multi-State assessment area is an economically diverse region located approximately 145 miles east of Atlanta. It comprises Burke, Columbia, McDuffie and Richmond counties in Georgia and Aiken and Edgefield counties in South Carolina. These six counties also make up the Augusta-Richmond County MSA. The largest city in the assessment area, Augusta, Georgia, is home to the US Army Signal Center and Fort Gordon. It is also well known for hosting the annual Masters Gold Tournament at the Augusta National Golf Club during April. ${ }^{7}$

As of 2010, total employment across the assessment area was 299,782. The top private, nonfarm employment sectors were retail trade, administrative and waste management services, health care and social assistance. Government and government enterprises employ more than 60,000 people, which accounts for more than $20 \%$ of the total workforce. Local government is the largest employer in this category with 21,667 jobs. Richmond County, Georgia, is the individual county with the largest employment base at 133,864 . Employment sector breakdown is similar to the assessment area, but government jobs account for a larger proportion of the total employment base.

Major employers in the assessment area include Fort Gordon with more than 25,000 military and civilian personnel, the Washington Savannah River Company, which operates the Savannah River Site for the US Department of Energy (DOE), employing approximately 12,000 people, and the Medical College of Georgia, with more than 4,500 employees. ${ }^{8,9}$ It is estimated that Fort Gordon has a $\$ 1.1$ billion economic impact on the local economy annually. This includes but is not limited to salaries, housing assistance, construction projects, and medical services.

The city of Augusta is an economic center for the region. It is a growing metropolitan area with just over 500,000 people, but job loss has challenged the local economy. In 2011, the Savannah River Site announced that it would be trimming its workforce by about $20 \%$, equating to approximately 2,000 jobs. With an average

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## Augusta Multistate Metropolitan Area

salary of $\$ 85,000$ at the plant, these reductions have had a ripple effect on the regional economy. ${ }^{10}$ Furthermore, the US Bureau of Labor Statistics reported that Augusta lost 6,600 private sector jobs between April 2010 and April 2011, the most in the country's largest 100 cities. ${ }^{11}$ Fortunately, local economic development efforts are resulting in jobs returning to the area. A new nuclear reactor at Plant Vogtle, south of Augusta in Burke County, has been approved by regulators. Among other benefits, this project is projected to bring more than 4,000 jobs tied to construction during the peak years of 2013-2015. ${ }^{12}$ In 2012, Starbucks announced that it would build a new $\$ 180$ million manufacturing facility in Augusta, resulting in 140 manufacturing jobs when the plant opens in 2014. As part of the project, Starbucks also announced that it will invest $\$ 200,000$ in community programs to support Augusta's ongoing community engagement efforts. ${ }^{13}$

These economic developments will have a regional impact, with nearby Columbia County as one of the beneficiaries. The county has experienced strong population growth in recent years, making it one of the fastest growing counties in the nation. The 2012 Economic Assessment produced by the county estimates that $55 \%$ of county residents commute outside of the county for work. Inside the county, commercial development is active, with 97 permits issued for building projects in 2011, but recent economic issues have resulted in some local employers downsizing. Two of the county's largest employers, Club Car and Quad/Graphics, fell into this category. Conversely, other local companies are hiring, including Georgia Iron Works, which recently hired 100 people at its Grovetown-based operation. Workforce development issues have come to the forefront as a result of these changes in the local economic and employment bases. Local government is concerned about labor shortages for highly skilled, technical jobs and looking to market the area to college populations and worker populations displaced by manufacturing firms. ${ }^{14}$

The Augusta area has received several recognitions in recent years for its economic vitality. In its 2011 Metro Monitor report, the Brookings Institute named Augusta GA-SC as one of the 20 strongest performing metro areas, citing the area's strong performance in job growth since the recession. ${ }^{15}$ In 2009, Forbes rated the Augusta metro area at number five for the "Best Bang-For-The Buck Cities" due to job growth, and number 22 on the "America's Fastest-Recovering Cities" list based on five factors: unemployment rate, Gross Metropolitan Product (a measure of the size of a city's economy), foreclosures, home prices, and sales rates. ${ }^{16,17}$ The Augusta area has also been recognized by Business Week magazine in several lists, including the "Forty Strongest Metro Economies," "America’s 25 Next Recovering Job Markets," "Strongest Building Markets for Housing" and "30 Strongest Housing Markets in the United States."18

[^5]
## Augusta Multistate Metropolitan Area

Despite these accolades, unemployment remains a challenge for the assessment area. The table below shows that while the unemployment rate in the assessment area was below Georgia and South Carolina in 2010 and 2011, it remains elevated. The 2011 nationwide average unemployment rate was $8.9 \%{ }^{19}$

## Unemployment Rates

Assessment Area: Multi Augusta

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Augusta MSA | 9.3 | 9.2 |
| Georgia | $\mathbf{1 0 . 2}$ | $\mathbf{9 . 8}$ |
| South Carolina | $\mathbf{1 1 . 2}$ | $\mathbf{1 0 . 3}$ |

Not Seasonally Adjusted

## Community Contacts and Community Development Opportunities

One community contact specializing in affordable housing was interviewed to discuss local community development opportunities and challenges. The contact noted that the Augusta area has a very strong economy compared to other cities in the southeast, that the local housing market is relatively strong and that there is strong competition amongst banks. Neighborhood revitalization is currently a primary focus for the area, including, among other things, the Laney Walker-Bethlehem Revitalization Program. The contact would like see banks participate more actively in local revitalization projects as well as increase small business lending in low- and moderate-income communities. Local and small regional banks are currently being more responsive to the needs of the community than the larger national banks. Regions Bank was specifically mentioned as one of the only large banks to indicate interest in the Laney Walker-Bethlehem neighborhood revitalization project.

The Laney Walker-Bethlehem neighborhood is an historic community in Augusta's urban core that has been plagued by population decline, blight and disinvestment since the 1980s. In 2008, City leaders approved longterm funding for community development activities in the area. Led by the Augusta Housing and Community Development Department, the City is employing a multi-phased approach to guide redevelopment, growth and sustainability in this historic community. The Housing Department has developed a master plan and development guidelines for the area, set up financial incentives for developers and homebuyers, selected a team of development partners and created a marketing strategy to promote the overall effort. Efforts are funded by a citizen-approved, hotel/motel tax, and the Housing Department is now rebuilding neighborhoods in six priority development areas, including Heritage Pine, winner of the Georgia Planning Association’s 2011 Outstanding Plan Implementation award. ${ }^{20}$

For a variety of reasons, some assessment area residents are unable to access traditional banking products and services. Bank On is a national initiative focused on connecting unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $9.6 \%$ of households in the assessment area are unbanked relative to $12.2 \%$ in Georgia and $10.2 \%$ in South Carolina. Additionally, $22 \%$ of households in the assessment area are listed as underbanked, meaning they have a bank account but continue to rely on alternative financial services, like

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## Augusta Multistate Metropolitan Area

check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $19.4 \%$ of underbanked households in the state of Georgia and $24.2 \%$ in South Carolina. ${ }^{21}$

The states of Georgia and South Carolina received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP) as did local governments in the assessment area such as the City of Augusta, Georgia, and Augusta-Richmond County, Georgia. The funds are available to help stabilize communities hard hit by the foreclosure crisis. South Carolina received nearly $\$ 44.7$ million under the NSP1 allocation process, while the State of Georgia received $\$ 77.1$ million under NSP1 and $\$ 19.9$ million under NSP3. ${ }^{22}$ The City of Augusta received an allocation under NSP1 for $\$ 2.5$ million, and Augusta-Richmond County, Georgia, was awarded $\$ 1.2$ million under NSP3. None of the local governments in the South Carolina portion of the assessment area received NSP funding, but they have the potential to benefit from the statewide allocation.

There are 23 community development financial institutions (CDFIs) in the state of Georgia and 11 in South Carolina. Two CDFIs in South Carolina are located inside the assessment area but none in Georgia are. The South Carolina CDFIs include a bank and depository institution holding company. Community development opportunity also includes participation in the Low Income Housing Tax Credit (LIHTC) program. The State of South Carolina's LIHTC program provided more than $\$ 10$ million in tax credits in 2012 for the development of affordable housing for low-income families. The State of Georgia allocated $\$ 20$ million in federal tax credits for rental properties serving low-income tenants. ${ }^{23}$ Georgia also offers tax credits at the state level.

## Competition

The Augusta assessment area is an active bank market. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 21 financial institutions operating 133 branch locations with a total of $\$ 7.3$ billion in deposits. Regions Bank ranked $5^{\text {th }}$ with deposit market share of $7.9 \%$ ( $\$ 575.9$ million). Wells Fargo Bank had the largest deposit market share at $21.2 \%$, followed by Georgia Bank \& Trust Company of Augusta with $17.2 \%$, and Bank of America with $8.5 \%$. Regions Bank had the second largest number of branches of any bank in the assessment area with 17, behind Wells Fargo with 21.

HMDA and small business lending are dominated by a few large volume lenders. For HMDA lending, Regions Bank ranked $13^{\text {th }}$ in 2010 with $2.7 \%$ of all HMDA loans, and $11^{\text {th }}$ in 2011 with $2.7 \%$. Wells Fargo, Georgia Bank \& Trust of Augusta, and First Bank of Georgia were consistently the top HMDA lenders in the assessment area. In 2010, Regions ranked $11^{\text {th }}$ out of 48 small business loan reporters by originating $3.5 \%$ of all loans. In 2011, the bank ranked $4^{\text {th }}$ out of 54 small business loan reporters and increased its lending to $7.2 \%$ of all loans. From 2010 to 2011, the bank's loans increased from 179 to 474 loans, primarily through the purchase of small business loans.

## Demographic Characteristics

The following table shows selected demographic information for the Augusta multi-State assessment area.

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## Augusta Multistate Metropolitan Area

## Combined Demographics Report

Assessment Area: Multi Augusta

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 10 | 10.5 |  | 5.9 | 3,158 | 40.0 | 29,669 | 22.3 |
| Moderate-income | 21 | 22.1 |  | 15.7 | 4,448 | 21.3 | 22,087 | 16.6 |
| Middle-income | 43 | 45.3 |  | 54.2 | 7,673 | 10.7 | 27,593 | 20.8 |
| Upper-income | 21 | 22.1 |  | 24.1 | 1,064 | 3.3 | 53,515 | 40.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 95 | 100.0 |  | 100.0 | 16,343 | 12.3 | 132,864 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 14,688 |  |  | 35.6 | 7,338 | 50.0 | 2,115 | 14.4 |
| Moderate-income | 35,874 |  |  | 53.9 | 12,075 | 33.7 | 4,471 | 12.5 |
| Middle-income | 109,523 |  |  | 64.7 | 28,150 | 25.7 | 10,527 | 9.6 |
| Upper-income | 44,516 |  |  | 75.0 | 8,453 | 19.0 | 2,687 | 6.0 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 204,601 | 128,785 |  | 62.9 | 56,016 | 27.4 | 19,800 | 9.7 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,627 | 7.3 |  | 6.8 | 138 | 13.1 | 107 | 11.2 |
| Moderate-income | 3,293 | 14.8 |  | 14.9 | 154 | 14.6 | 137 | 14.4 |
| Middle-income | 10,775 | 48.5 |  | 48.7 | 475 | 45.2 | 470 | 49.4 |
| Upper-income | 6,503 | 29.3 |  | 29.6 | 285 | 27.1 | 238 | 25.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 22,198 | 100.0 |  | 100.0 | 1,052 | 100.0 | 952 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 91.0 |  | 4.7 |  | 4.3 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 25 | 5.2 |  | 5.1 | 0 | 0.0 | 1 | 100.0 |
| Moderate-income | 133 | 27.8 |  | 27.9 | 2 | 28.6 | 0 | 0.0 |
| Middle-income | 281 | 58.8 |  | 58.9 | 4 | 57.1 | 0 | 0.0 |
| Upper-income | 39 | 8.2 |  | 8.1 | 1 | 14.3 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 478 | 100.0 |  | 100.0 | 7 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 98.3 |  | 1.5 |  | . 2 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Augusta assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a low level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 620 (37.7\%) small business loans compared to 1,024 (62.3\%) HMDA loans in Augusta assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. In total, $0.8 \%$ of the bank's small business and HMDA lending by number of loans and $0.8 \%$ by dollar volume totaling $\$ 177.1$ million were originated in the Augusta assessment area. The percentage of the bank's total lending at $0.8 \%$ is comparable to the percentage of deposits at $0.6 \%$ in this area. The bank also originated three community development loans in the Augusta assessment area. Regions Bank is a major competitor in this market, ranking $11^{\text {th }}$ in HMDA loans and $4^{\text {th }}$ in small business loans in 2011.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank’s geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. The bank performed less than the aggregate in 2010, but better than the aggregate in 2011. It was also noted that the aggregate lenders had very low levels of home purchase lending compared to the percentage of owner-occupied units in these tracts, which was $4.1 \%$. This suggests limited opportunities overall for home purchase lending in low-income tracts.

Home purchase lending in moderate-income tracts is adequate. During the review period, the bank originated $9.5 \%$ of its home purchase loans in moderate-income census tracts, which contain $15.0 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was less than the aggregate in 2010, but the bank out-performed the aggregate in 2011.

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

## Home Refinance Loans

Home refinance lending in low-income census tracts is good. During the review period, Regions Bank originated $1.6 \%$ of its refinance loans in low-income census tracts, which contain $4.1 \%$ of the owner-occupied units in the assessment area. Regions Bank’s performance was similar to aggregate in 2010 and much greater than aggregate in 2011.

## Augusta Multistate Metropolitan Area

Regions Bank's home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $7.4 \%$ of its home refinance loans in moderate-income census tracts, which contain $15.0 \%$ of the owner-occupied units. Regions Bank performance was comparable to aggregate lender performance 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in low-income census tracts is adequate. Regions Bank did not originate any home improvement loans in low-income tracts, which contain $4.1 \%$ of the owner-occupied units. The bank performed less than the aggregate in 2010 and 2011. Aggregate lenders also had lower penetration in this market compared to the percentage of owner-occupied units, suggesting limited opportunities overall for home improvement lending in low-income tracts.

Regions Bank's home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts and aggregate lending performance. During the review period, Regions Bank originated $11.3 \%$ of its home improvement loans in moderate-income tracts, which contain $15.0 \%$ of the owner-occupied units in the assessment area. The bank's performance was less than aggregate in 2010, but more than aggregate lenders in 2011.

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

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is adequate. During the review period, the bank originated $5.3 \%$ of its small business loans in low-income tracts, which contain $6.8 \%$ of the small businesses in the assessment area. The bank had similar lending performance to the aggregate in 2010 and slightly less than aggregate in 2011.

Small business lending in moderate-income census tracts is adequate. Regions Bank originated 9.0\% of its small business loans in moderate-income tracts, which contain $14.9 \%$ of the small businesses in the assessment area. The bank performed slightly less than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was more than the percentage of small businesses in these tracts, while the lending in upper-income tracts was less than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects good penetration throughout the assessment area. 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, such as local economic conditions, unemployment, and poverty rates, were considered, as well as the performance of other banks.

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is excellent. Although the bank performed less than the demographic with $11.4 \%$ of its home purchase loans to low-income borrowers, while low-income

## Augusta Multistate Metropolitan Area

families make up $22.3 \%$ of total families in the assessment area, the bank performed significantly better than the aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is also excellent. At 27.6\%, the bank's percentage of home purchase lending to moderate-income borrowers was significantly greater than the percentage of moderate-income families in the assessment area at $16.6 \%$. The bank's performance was similar to the aggregate in 2010, but significantly better than the aggregate in 2011.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

Regions Bank's home refinance lending to low-income borrowers is excellent. Although the bank performed less than the demographic with $7.5 \%$ of its home refinance loans to low-income borrowers, while low-income families make up $22.3 \%$ of total families in the assessment area, the bank performed significantly better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is also excellent when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $16.1 \%$ was similar to the percentage of moderate-income families in the assessment area at $16.6 \%$. Regions Bank's performance was significantly greater than aggregate in 2010 and 2011.

The bank's refinance lending to both middle-income borrowers and upper-income borrowers was greater than the percentage of middle- and upper-income families in the Augusta assessment area.

## Home Improvement Loans

Considering the performance of the aggregate along with other lending and demographic data, home improvement lending to low-income borrowers is good. During the review period, low-income families represented $22.3 \%$ of total families and received $14.1 \%$ of the home improvement loans. The bank performed significantly better than the aggregate in both years of the review period.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $28.2 \%$ exceeded the percentage of moderate-income families in the assessment area at $16.6 \%$. The bank's home improvement lending to moderate-income borrowers was greater than the aggregate in 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than aggregate in 2011. The bank originated $31.5 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $91.0 \%$. However, of the 620 small business loans originated during the review period, 325 loans (52.4\%) did not report revenue. An analysis of only the bank's

## Augusta Multistate Metropolitan Area

small business loans reported with revenue indicates that the bank's percentage of loans originated to small businesses was $66.1 \%$, which was still below the percentage of small businesses in the assessment area. However, $81.9 \%$ of the 620 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was comparable to the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank makes a low level of community development loans in the Augusta assessment area. The bank originated three community development loans totaling $\$ 1.3$ million during the review period. All three loans promote economic development by financing small businesses and creating jobs, an activity that is responsive to local community credit needs. Other community development credit needs include affordable housing, neighborhood stability in light of elevated foreclosure rates, and financial stability for low- and moderateincome residents. Furthermore, the dollar amount of loans is poor considering the bank's presence in the market.

## Investment Test

The bank's performance in the Augusta assessment area under the investment test is adequate. The bank had three investments totaling $\$ 3.5$ million, including one current period investment for $\$ 180,770$. Direct investments in the assessment area provided support for affordable housing through LIHTCs and GNMA investment vehicles. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and community revitalization through a regional New Markets Tax Credit fund. Local community development needs include but are not limited to affordable housing for low- and moderate-income workers, neighborhood stabilization resulting from elevated foreclosure rates, economic development that includes financing for small businesses and job creation, and financial stability for low- and moderate-income residents. The dollar volume of Regions Bank's current and total investments exhibits adequate responsiveness to some of the identified community needs given the bank's presence in the assessment area.

The bank made five contributions totaling $\$ 23,025$ to organizations that provide community services for lowand moderate-income individuals. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area.

## Service Test

The bank's service test performance in the Augusta assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Augusta assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the 16 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed four branches (one in a moderate-income tract, one in a middle-income tract, and two in upper-income tracts) in the Augusta assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank has weekend hours for

## Augusta Multistate Metropolitan Area

branches in low- and moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Geographic Distribution of Branches

Assessment Area: Multi Augusta

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branc <br> \% | es <br> Open <br> \# | Closed \# | Drive <br> thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week <br> end <br> Hours <br> \# | Census Tracts |  | Households $\%$ | Total Businesses \% |
| Low | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 10 | 10.5\% | 6.8\% | 7.3\% |
| Moderate | Total | 3 | 18.8\% | 0 | 1 | 3 | 3 | 1 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 21 | 22.1\% | 17.0\% | 14.8\% |
| Middle | Total | 9 | 56.3\% | 0 | 1 | 9 | 9 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 43 | 45.3\% | 53.6\% | 48.5\% |
| Upper | Total | 4 | 25.0\% | 0 | 2 | 4 | 4 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 1 | 0 |  |  | 21 | 22.1\% | 22.6\% | 29.3\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 16 | 100.0\% | 0 | 4 | 16 | 16 | 4 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 0 | 1 0 | 0 |  |  | 95 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 318 service hours in various capacities for community development organizations, by participating in 25 community development services. Many of the community development services focused on education, affordable housing, and other community services that aided lowand moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. In addition, Regions Bank employees served on the boards and committees of various community organizations which provide services in low- and moderate-income geographies or to low- and moderateincome individuals.

## Chattanooga Multistate Metropolitan Area

## CRA RATING FOR CHATTANOOGA: Satisfactory ${ }^{24}$

The Lending Test is rated:<br>The Investment Test is rated:<br>The Service Test is rated:<br>Low Satisfactory<br>High Satisfactory<br>Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment area. In addition, the distribution of borrowers 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 within the assessment area.
- The bank provides a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position in response to the community development needs of the assessment area.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area.
- The bank provides an adequate level of community development services throughout the assessment area.

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## Chattanooga Multistate Metropolitan Area

## SCOPE OF EXAMINATION

The time period, products and affiliates evaluated for the Chattanooga multistate assessment area are consistent with the overall scope described in the Description of the Institution section of this report. Regions Bank’s performance in Chattanooga was evaluated using full-scope examination procedures.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN CHATTANOOGA

The Chattanooga assessment area includes Catoosa and Walker counties in Georgia and Hamilton County in Tennessee. There are 90 census tracts in the assessment which includes 23 low- and moderate-income tracts. Regions Bank operates 23 branches in the assessment area, two of which are located in low- and moderateincome tracts. These branches represent $1.3 \%$ of the bank's total branches. Two branches are in Georgia and 21 branches are in Tennessee. As of June 30, 2011, the bank had $\$ 1.3$ billion in deposits in Chattanooga, representing $1.3 \%$ of Regions Bank's total deposits in all the assessment areas. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 1,827 (2.1\%) were in the Chattanooga assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 2,050 (1.9\%) were in the Chattanooga assessment area.

## Population and Income Characteristics

Population in the Chattanooga assessment area grew by about $11.1 \%$ between 2000 and 2010, which was comparable to the population growth rate in Tennessee of $11.4 \%$, but below the growth rate for Georgia at $18.3 \%$. The largest population growth occurred in Catoosa County, which increased by about 20\%. The total population in the assessment area was 469,161 in 2010 and about $67 \%$ lived in Hamilton County. Chattanooga, the largest city in the assessment area, had approximately 167,675 residents, representing $7.8 \%$ growth since $2000 .{ }^{25}$

Median family income in the Chattanooga MSA is above the median family income in Tennessee but below estimates for Georgia. For the purposes of this analysis, HUD's median family income for the Chattanooga MSA for 2010 and 2011 is used. As shown, the median family income increased from \$55,900 to \$57,500. The 2011 median family income was $\$ 53,900$ in Tennessee and $\$ 59,000$ in Georgia. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels Chattanooga, TN-GA MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 - 49.99\% |  |  | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$55,900 | 0 | - | \$27,949 | \$27,950 | - | \$44,719 | \$44,720 | - | \$67,079 | \$67,080 | - | \& above |
| 2011 | \$57,000 | 0 | - | \$28,499 | \$28,500 | - | \$45,599 | \$45,600 | - | \$68,399 | \$68,400 | - | \& above |

Within the assessment area, US census estimates show that the median family income between 2006 and 2010 ranged from \$46,307 in Walker County to $\$ 58,005$ in Hamilton County. ${ }^{26}$

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## Chattanooga Multistate Metropolitan Area

The poverty rate in the Chattanooga assessment area has increased since 2000, but is below the poverty rates of both Tennessee and Georgia. The poverty rate ranges from $11.2 \%$ in Catoosa County to $15.1 \%$ in Walker County. Poverty is a bigger concern in the city of Chattanooga, where $21.3 \%$ of the population was estimated to live below the federal poverty level between 2006 and $2010 .{ }^{27}$ Food stamp usage, another indicator of financial distress, has also increased in the assessment area. In 2009, 18\% of the population in Walker County, $16 \%$ in Hamilton County, and $15 \%$ in Catoosa County relied on food stamps. ${ }^{28}$

## Housing Characteristics

The housing market in the Chattanooga assessment area weakened during the economic downturn, but to a lesser degree than in other comparable markets. The region did not experience dramatic price appreciation prior to the recession, so housing prices have remained relatively stable. According to the National Association of Realtors, the median housing price for the Chattanooga MSA declined by 1\% between 2009 and 2011, from $\$ 122,600$ to $\$ 121,400$. Nationally, home prices fell by about $3.4 \%$ over this time period. ${ }^{29}$ Home prices in Hamilton County declined between 2008 and 2009, but quickly rebounded, and the median home price in 2011 of $\$ 158,000$ exceeded the peak price seen in $2008{ }^{30}$

New home construction in the assessment area has declined significantly. Building permits issued for new single-family homes have dropped by $72 \%$ from the pre-recession peak in 2005. In 2011, 895 building permits for single-family homes were issued in the assessment area. New construction in the assessment area has fared better than in the state of Georgia, where permits have fallen by $85 \%$ since the start of the recession, and has performed on par with the state of Tennessee. ${ }^{31}$ Home sales in greater Chattanooga also declined during the recession, but started stabilizing in 2010. Sales increased by $17 \%$ between 2011 and 2012, reaching the highest level since 2007. ${ }^{32}$

While the Chattanooga area has not been as negatively impacted by high foreclosure rates as some other cities, there has been a significant rise in foreclosures over the last few years, a trend consistent with the national crisis of foreclosure. The percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) rose from $6.0 \%$ in January 2010 to $9.6 \%$ in December 2011. Walker County had the highest rate of seriously delinquent mortgages, reaching $11 \%$ of all mortgages at the end of $2011 .{ }^{33}$

The homeownership rate varies across assessment area. Hamilton County had the lowest homeownership rate in 2010 at $64.3 \%$ while the rate was higher in Catoosa and Walker counties at 73 and $74 \%$, respectively. The homeownership rate in the city of Chattanooga is only about $53 \%{ }^{34}$

Housing affordability also varies in the assessment area. Hamilton County is the least affordable, and in 2009, only $28 \%$ of homes were considered affordable to a family earning less than $80 \%$ of the area median income.

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## Chattanooga Multistate Metropolitan Area

Walker County was the most affordable, with $47 \%$ of homes considered affordable. Similar to most markets, affordable rental housing is a concern. In Hamilton County, approximately 43\% of renters were considered cost burdened, meaning they spent more than $30 \%$ of their gross income on housing expenses in $2009 .{ }^{35}$

## Employment and Economic Conditions

The Chattanooga economy is diverse and thriving, despite the national recession. Since 2008, companies including Volkswagen, Alstom, and Sanofi Aventis have invested more than $\$ 3$ billion in Chattanooga, while Wacker Chemie is investing $\$ 1$ billion in neighboring Bradley County. The economic transformation that has occurred in Chattanooga is surprising for a city that was declared to have the dirtiest air in the country in the 1980s and lost almost $10 \%$ of its population. In the past two decades, public and private investment has led to a dramatic revitalization of downtown Chattanooga and encouraged the significant investment by these multinational companies. ${ }^{36}$

Volkswagen's decision to locate the first US plant in Chattanooga was a big economic development success for the city. Volkswagen has invested $\$ 1.0$ billion in the plant, generating thousands of new jobs and attracting over 20 new auto suppliers to the area. Chattanooga is also an emerging hub for the power generation industry. For years, Chattanooga has been home to the Tennessee Valley Authority (TVA). More recently, Alstom, Schaaf Industrie AG, Westinghouse, and now Wacker Chemie have established new facilities to provide equipment and services to America's energy industry. ${ }^{37}$ In addition to these large manufacturing projects, in 2011, Amazon announced that it had selected Chattanooga for a major distribution center, generating several thousand jobs in 2011 and 2012. ${ }^{38}$ Finally, Chattanooga has several large insurance companies based in the region, contributing to the overall economic strength of the region.

Chattanooga has major employment concentrations in education and health services, manufacturing, government, leisure and hospitality, retail and business, and professional services. In addition to the employers mentioned above, the largest employers in the area include the Hamilton County Department of Education, Blue Cross-Blue Shield of Tennessee, the Tennessee Valley Authority, Erlanger Health System, Memorial Health Care System, and McKee Foods. The economic diversity is illustrated in the range of industries represented by these top employers.

The region was not immune to the economic downturn, despite the major economic development projects. Between 2007 and 2010, there was job loss in most sectors, with the largest declines in manufacturing (primarily textiles and food processing), transportation and utilities, and professional and business services. Manufacturing rebounded in 2011, though remains below the 2007 levels. The primary job growth in the region has occurred in education and health services, and government. Unemployment increased across the assessment area from 2007 to 2009, though even at the peak in 2009, the unemployment rate in the Chattanooga MSA was below the statewide rates for both Georgia and Tennessee. The unemployment picture has started to

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## Chattanooga Multistate Metropolitan Area

improve in the assessment area, with the unemployment rate falling in all counties in the assessment area between 2010 and 2011, remaining well below the statewide unemployment rates.

## Unemployment Rates

Assessment Area: Multi Chattanooga

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Chattanooga MSA | 8.8 | 8.3 |
| Hamilton County | 8.6 | 8.2 |
| Tennessee | $\mathbf{9 . 8}$ | $\mathbf{9 . 2}$ |
| Catoosa County | 8.1 | 7.8 |
| Walker County | 9.5 | 8.7 |
| Georgia | $\mathbf{1 0 . 2}$ | $\mathbf{9 . 8}$ |

Not Seasonally Adjusted

Chattanooga added over 4,000 new jobs in 2012, the fastest growth rate of any metro area in Tennessee. However, there was also job loss in several sectors that employ more low- and moderate-income workers, including grocery stores, big box retailers, and several manufacturing plants. ${ }^{39}$ Therefore, while the unemployment rate is improving, challenges remain, particularly for lower-wage workers in the region.

Chattanooga has invested heavily in downtown revitalization, creating a mixed-use area for residents, businesses, and visitors. The city has received national recognition for the dramatic changes that have occurred in the downtown area, led by public and private investment. The city completed a $\$ 120$ million waterfront revitalization plan, and downtown is now home to the Tennessee Aquarium and a number of other visitor and resident attractions. In addition, there has been over $\$ 300$ million invested in new residential projects, and the downtown residential population has increased by over $10 \% .{ }^{40}$ There are revitalization plans for multiple districts throughout the urban core of Chattanooga that are in various stages of completion. However, Chattanooga consistently stands out as a model for how public, private, and philanthropic investment and leadership, combined with strong civic leadership, can lead to a dramatic reversal of a city's fortune. Despite all the positive changes, issues still persist including poverty alleviation, affordable housing, neighborhood stabilization, and workforce development. ${ }^{41}$

## Competition

Regions is ranked $3^{\text {rd }}$ in deposit market share in the Chattanooga assessment area according to the June 30, 2011 FDIC Summary of Deposits Report, with $\$ 1.3$ billion in deposits, or $16.1 \%$ of total deposits. The Chattanooga retail banking market is dominated by several large regional banks, including First Tennessee (23.2\% of

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## Chattanooga Multistate Metropolitan Area

deposits) and SunTrust (19.8\% of deposits). Overall, there were 24 banks active in the market operating 148 branches.

Regions ranked $3^{\text {rd }}$ out of 342 HMDA reporters in 2010 with $5.5 \%$ of total loans. Overall HMDA lending in the assessment area declined between 2010 and 2011, and Regions’ HMDA lending followed the same trend. However, Regions captured a greater percentage of total HMDA loans in 2011 at $5.9 \%$ and was again ranked $3^{\text {rd }}$ out of 316 HMDA lenders. Wells Fargo Bank and Bank of America are the leading HMDA lenders in the market.

Regions ranked $2^{\text {nd }}$ out of 48 small business loan reporters in 2010 with $15.7 \%$ of the loans. Regions increased small business lending between 2010 and 2011 and was again ranked $2^{\text {nd }}$ with $21.6 \%$ of loans. American Express was the leading small business lender in the market both years.

## Community Development

As discussed earlier, Chattanooga has experienced significant economic growth and has invested heavily in revitalizing the downtown area. While the downtown area is growing, it has come at a cost in terms of affordable housing. In 2012, the Chattanooga-Hamilton County Regional Planning Agency initiated a study at the request of the City Council to identify the housing needs and gaps in the region. The study looks at all housing needs, with a specific focus on affordable housing. Housing affordability, and particularly for the lowest-income residents, was identified as a significant issue. Throughout the Chattanooga MSA, the majority of low-income renters are considered cost burdened, meaning they spend more than $30 \%$ of their income on rent. Affordable single-family homes, particularly in neighborhoods zoned for better schools, are also a need. The planning commission has developed a strategy for increasing housing options in the region, with different proposals for suburban and urban areas. Within the urban core of Chattanooga, the strategy includes targeted neighborhood revitalization; increasing the number of affordable rental and homeownership units; developing incentives to encourage mixed-income developments and to increase the number of affordable units in any new development; creating a financing mechanism to help with owner-occupied rehabilitation of substandard housing units or to assist first-time homebuyers with purchasing and revitalizing homes; and increasing nonprofit capacity to develop affordable rental housing. ${ }^{42}$

Chattanooga has a history of public and private partnerships supporting affordable housing, particularly through the support of the Lyndhurst Foundation. There are several nonprofit housing and community development organizations active in the region that participate in housing development and counseling by identifying housing development opportunities for the local community, though as the affordable housing study found, additional investment in capacity is needed.

The Chattanooga market has fared better than other metropolitan areas, but in certain neighborhoods, foreclosures and abandoned homes are a concern. To address the needs of these communities, Chattanooga received about $\$ 2.3$ million from the Neighborhood Stabilization Program. As of June 2012, the City had expended $100 \%$ of the funds, and all the projects were complete. The NSP allocation of $\$ 2.3$ million leveraged over $\$ 10$ million dollars in local funds, carrying out 35 projects to produce 72 units of housing. ${ }^{43}$

Support for other types of community development projects is also needed. A community contact that provides regional planning services that cover the Chattanooga MSA indicated that parts of the region are doing very

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## Chattanooga Multistate Metropolitan Area

well, but there are still many opportunities for banks to help address some of the financing gaps for important community development projects. The contact indicated that due to fiscal constraints, some projects have lost funding or have stalled due to lack of funding. Community services programs are in particular need of funding.

There is also more need for funding for small businesses. The Southeast Tennessee Development District provides assistance through different revolving loan funds, and there are two CDFIs that provide some funding for small businesses in the Chattanooga area. However, a community contact indicated that credit is still very tight, and there is an opportunity for banks to increase financing for small businesses. The contact also mentioned that community banks were more responsive to the community development needs in the region than the larger regional institutions.

Finally, financial education and access to financial services are needed in the local market. Approximately $8.3 \%$ of households are unbanked in the Chattanooga MSA, meaning they have no type of deposit account with a mainstream financial institution. In addition, $20.5 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The number of unbanked and underbanked residents is higher in the urban areas. The unbanked are disproportionately lower income and minority households. ${ }^{44}$

There are several collaborative efforts in Chattanooga to promote financial stability. First, Tennessee Saves is an initiative led by the University of Tennessee Extension Service to encourage youth and adults to save and to promote financial education. Second, the City of Chattanooga Volunteer Income Tax Assistance (VITA) program, led by the Chattanooga Urban League in partnership with the City of Chattanooga, United Way of Greater Chattanooga, and the IRS, offers free tax assistance to low- and moderate-income taxpayers. In 2012, the VITA program helped 6,000 taxpayers and brought back $\$ 7$ million in tax refunds to the City.

## Demographic Characteristics by Census Tract

The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

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## Chattanooga Multistate Metropolitan Area

## Combined Demographics Report

Assessment Area: Multi Chattanooga

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 6 | 6.7 |  | 3.7 | 1,911 | 44.6 | 22,067 | 18.8 |
| Moderate-income | 17 | 18.9 |  | 11.6 | 2,597 | 19.0 | 20,554 | 17.5 |
| Middle-income | 46 | 51.1 |  | 56.5 | 4,850 | 7.3 | 26,421 | 22.5 |
| Upper-income | 21 | 23.3 |  | 28.2 | 1,130 | 3.4 | 48,289 | 41.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 90 | 100.0 |  | 100.0 | 10,488 | 8.9 | 117,331 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 8,796 |  | 63 | 21.2 | 5,775 | 65.7 | 1,158 | 13.2 |
| Moderate-income | 24,004 |  |  | 51.2 | 8,830 | 36.8 | 2,882 | 12.0 |
| Middle-income | 103,449 |  |  | 64.9 | 29,154 | 28.2 | 7,134 | 6.9 |
| Upper-income | 45,814 |  |  | 75.6 | 8,742 | 19.1 | 2,415 | 5.3 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 182,063 | 115,973 |  | 63.7 | 52,501 | 28.8 | 13,589 | 7.5 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 921 | 4.4 |  | 3.9 | 125 | 9.6 | 64 | 6.4 |
| Moderate-income | 2,787 | 13.2 |  | 12.6 | 282 | 21.6 | 136 | 13.7 |
| Middle-income | 12,153 | 57.5 |  | 57.3 | 738 | 56.5 | 620 | 62.4 |
| Upper-income | 5,286 | 25.0 |  | 26.3 | 162 | 12.4 | 173 | 17.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 21,147 | 100.0 |  | 100.0 | 1,307 | 100.0 | 993 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.1 |  | 6.2 |  | 4.7 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \text { \$1 Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 0.5 |  | 0.0 | 0 | 0.0 | 1 | 100.0 |
| Moderate-income | 11 | 5.3 |  | 5.4 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 141 | 68.4 |  | 69.1 | 0 | 0.0 | 0 | 0.0 |
| Upper-income | 53 | 25.7 |  | 25.5 | 1 | 100.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 206 | 100.0 |  | 100.0 | 1 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 99.0 |  | . 5 |  | . 5 |

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## Chattanooga Multistate Metropolitan Area

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in Chattanooga is adequate, and lending activity reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a low level of community development loans.

Regions Bank is both a HMDA and small business lender. During the review period, the bank reported 1,827 (47.1\%) HMDA loans compared to 2,050 ( $52.9 \%$ ) small business loans in Chattanooga assessment area. Therefore, small business lending was given slightly more weight than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $2.0 \%$ of the bank's small business and HMDA lending by number of loans and $1.9 \%$ by dollar volume totaling $\$ 414.4$ million were originated in the Chattanooga assessment area.

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

## Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs based on small business and HMDA lending. The percentage of the bank's total lending at $2.0 \%$ is comparable to the percentage of deposits at $1.3 \%$ in this area. The bank also originated five community development loans in the Chattanooga assessment area. Regions Bank is a major competitor in this market, ranking $3^{\text {rd }}$ in HMDA originations and $2^{\text {nd }}$ in small business originations in both 2010 and 2011.

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, Regions Bank originated five home purchase loans in low-income tracts. The bank's performance was below the aggregate in 2010, but comparable to the aggregate in 2011. It was also noted that the aggregate lenders had low levels of home purchase lending compared to the percentage of owner-occupied units in these tracts, which was only $1.6 \%$. This suggests limited opportunities overall for home purchase lending in low-income tracts.

Home purchase lending in moderate-income tracts is excellent. During the review period, the bank originated $10.0 \%$ of its home purchase loans in moderate-income census tracts, which was comparable to the $10.6 \%$ of the owner-occupied units contained in moderate-income tracts in the assessment area. Regions Bank's performance was also significantly more than the aggregate in 2010 and 2011.

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

## Home Refinance Loans

Home refinance lending in low-income tracts is adequate. During the review period, $0.3 \%$ of the bank's home refinance loans were originated in low-income tracts. Opportunity for HMDA lending in low-income tracts may be limited due to the low percentage (1.6\%) of owner-occupied units in these tracts. The bank's performance was lower than the aggregate in 2010 and 2011.

Regions Bank’s home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $5.2 \%$ of its home refinance loans in moderate-income census tracts, which contain $10.6 \%$ of the owner-occupied units. Regions Bank's performance was below the aggregate in 2010 and comparable to the aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending in low-income tracts is poor. During the review period, the bank did not originate any home improvement loans in low-income tracts. Opportunity for HMDA lending in low-income tracts may be limited due to the low percentage (1.6\%) of owner-occupied units in these tracts. The bank's performance was below the aggregate in 2010 and 2011.

Regions Bank’s home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts and aggregate lending performance. During the review period, Regions Bank originated $7.9 \%$ of its home improvement loans in moderate-income tracts, which contain $10.6 \%$ of the owner-occupied units in the assessment area. The bank's performance was below aggregate in 2010, but comparable to aggregate lending in 2011.

The bank's home improvement lending in both middle- and upper-income tracts was greater than the percentage of owner-occupied units in middle- and upper-income tracts.

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is adequate. During the review period, the bank's performance was comparable to the demographic. The bank originated $3.3 \%$ of its small business loans in low-income tracts, which contain $3.9 \%$ of the small businesses in the assessment area. The bank's lending performance was below the aggregate in both 2010 and 2011.

Small business lending in moderate-income census tracts is adequate. Regions Bank originated 11.9\% of small business loans in moderate-income tracts, which contain $12.6 \%$ of small businesses in the assessment area. The bank performed greater than the aggregate in 2010, and was comparable to the aggregate in 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment, and poverty rates, were considered, as well as the performance of other banks.

## Chattanooga Multistate Metropolitan Area

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is good. The bank performed less than the demographic with $11.3 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $18.8 \%$ of total families in the assessment area. The bank performed better than the aggregate in both 2010 and 2011.

Home purchase lending to moderate-income borrowers is also good. At 25.3\%, the bank's percentage of home purchase lending to moderate-income borrowers was significantly greater than the percentage of moderateincome families in the assessment area at $17.5 \%$. The bank's performance was similar to the aggregate in 2010, and better than the aggregate in 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was more than the percentage of upper-income families.

## Home Refinance Loans

Regions Bank's home refinance lending to low-income borrowers is adequate. The bank performed less than the demographic with $5.0 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $18.8 \%$ of total families in the assessment area. The bank's performance was comparable to the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $15.2 \%$ was less than the percentage of moderate-income families in the assessment area at $17.5 \%$; however, Regions Bank's performance was comparable to the aggregate in 2010 and better than the aggregate in 2011.

The bank's home refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Considering the performance of the aggregate along with other lending and demographic data, home improvement lending to low-income borrowers is adequate. During the review period, low-income families represented $18.8 \%$ of total families and received $15.7 \%$ of the home improvement loans. The bank performed below the aggregate in 2010, but greater than the aggregate in 2011.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $23.6 \%$ exceeded the percentage of moderate-income families in the assessment area at $17.5 \%$. The bank's home improvement lending to moderate-income borrowers was better than the aggregate in both 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Chattanooga Multistate Metropolitan Area

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank exceeded the aggregate in lending to small businesses in 2010 but was below aggregate in 2011. The bank originated $33.0 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.1 \%$. However, of the 2,050 small business loans originated during the review period, 1,132 loans (55.2\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $73.7 \%$, which was still below the percentage of small businesses in the assessment area. However, $88.8 \%$ of the 2,050 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of \$100,000 or less, Regions Bank's performance was comparable to the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank makes a low level of community development loans in the Chattanooga assessment area. The bank originated five community development loans totaling $\$ 2.3$ million during the review period. The majority of the loans promoted economic development by financing small businesses. Local community development credit needs include but are not limited to affordable housing for low- and moderate-income individuals, downtown revitalization, small business finance, and neighborhood revitalization. The bank's community development loan portfolio exhibits poor responsiveness to the credit needs of low- and moderateincome individuals and small businesses. Additionally, the dollar amount of community development loans is poor relative to the bank's presence in the market.

Examples of community development lending include the following:

- Multiple loans that promote economic development by financing small businesses as part of the SBA's 504 Certified Development Company program; and
- Two loans that help to revitalize low- and moderate-income geographies in a manner that is consistent with local revitalization strategies.


## Investment Test

The bank's performance in the Chattanooga assessment area under the investment test is good. The bank had five investments totaling $\$ 11.4$ million, including three current period investments for $\$ 8.3$ million. Direct investments in the assessment area provided support for affordable housing through Low Income Housing Tax Credits (LIHTCs) and GNMA investment vehicles. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and other small business funds. Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization and revitalization, economic development activities including small business finance, and financial stability for low- and moderate-income individuals. The dollar volume of Regions Bank's current and total investments exhibits responsiveness to some of the identified community needs given the bank's presence in the assessment area.

The bank also made 18 contributions totaling $\$ 124,750$. Contributions were given primarily to organizations involved in promoting economic development and providing community services targeted to low- and moderate-income individuals, with several organizations focused on financial education and household financial stability. In addition, the assessment area was positively impacted by several statewide contributions.

## Chattanooga Multistate Metropolitan Area

## Service Test

The bank's service test performance in the Chattanooga assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Chattanooga assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the 23 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed two branches (both in middle-income tracts) in the Chattanooga assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank has extended or weekend hours for branches in low- and moderateincome geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Chattanooga Multistate Metropolitan Area

## Geographic Distribution of Branches

Assessment Area: Multi Chattanooga

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branch <br> \% | es <br> Open <br> \# | Closed \# | Drive thrus \# | Extend- <br> ed <br> Hours <br> \# | Weekend Hours \# | Census <br> Tracts |  | Households <br> \% | Total Businesses <br> \% |
| Low | Total | 1 | 4.4\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 6 | 6.7\% | 4.6\% | 4.4\% |
| Moderate | Total | 1 | 4.4\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 17 | 18.9\% | 12.5\% | 13.2\% |
| Middle | Total | 14 | 60.9\% | 0 | 2 | 13 | 11 | 3 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 46 | 51.1\% | 57.1\% | 57.5\% |
| Upper | Total | 7 | 30.4\% | 0 | 0 | 7 | 7 | 4 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 21 | 23.3\% | 25.8\% | 25.0\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $0$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 23 | 100.0\% | 0 | 2 | 22 | 20 | 8 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 90 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 480 service hours in various capacities for community development organizations by participating in 47 community development services. Many of the community development services focused on education, tax assistance, affordable housing, and other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. In addition, Regions Bank employees served on the boards of directors and committees of various community organizations which provide services in low- and moderate-income geographies or to low- and moderate-income individuals.

## Columbus Multistate Metropolitan Area

## CRA RATING FOR COLUMBUS: Satisfactory ${ }^{45}$

## The Lending Test is rated: High Satisfactory <br> The Investment Test is rated: <br> The Service Test is rated: <br> High Satisfactory <br> Needs to Improve

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of borrowers reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans within the assessment area.
- The bank provides a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position in response to the community development needs of the assessment area.
- Retail services are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment area.
- The bank provides a limited level of community development services throughout the assessment area.

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## Columbus Multistate Metropolitan Area

## SCOPE OF EXAMINATION

The time period, products and affiliates evaluated for the Columbus multistate assessment area are consistent with the overall scope described in the Description of the Institution section of this report. Regions Bank's performance in Columbus was evaluated using full-scope examination procedures.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLUMBUS

The Columbus assessment area includes Russell County in Alabama, and Muscogee County in Georgia. These two counties are part of the five-county multistate Columbus MSA. Columbus, Georgia, is the principal city in the assessment area. There are 68 census tracts in the assessment area, which includes 29 low- and moderateincome tracts. Regions Bank operates five branches in the assessment area, one of which is located in a lowincome tract, and three others border at least one low- or moderate-income tract. There are no branches located in moderate-income tracts. These branches represent $0.3 \%$ of the bank's total branches. Two branches are in Alabama and three branches are in Georgia. As of June 30, 2011, the bank had $\$ 191.7$ million in deposits in Columbus, representing $0.2 \%$ of Regions Bank's total deposits in all the assessment areas. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 193 ( $0.2 \%$ ) were in the Columbus assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 186 ( $0.2 \%$ ) were in the Columbus assessment area.

Population and Income Characteristics
Population in the Columbus assessment area grew by about $3 \%$ between 2000 and 2010. Muscogee is the more populous county, but Russell grew at a significantly faster rate over the decade. Overall population in the assessment area was 242,832 in 2010, and approximately 200,000 lived in Columbus-Muscogee County. Population growth in both Muscogee and Russell counties was below the statewide averages. Columbus is the $4^{\text {th }}$ largest city in Georgia. ${ }^{46}$

Median family income in the Columbus MSA is lower than the median family income in both Alabama and Georgia. Within the assessment area, median family income in Muscogee County is much higher than in Russell County. For the purposes of this analysis, HUD's median family income for the Columbus MSA for 2010 and 2011 is used. As shown, the median family income decreased slightly between 2010 and 2011, from $\$ 51,800$ to $\$ 51,600$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

Borrower Income Levels
Columbus, GA-AL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% |  | \& above |
| 2010 | \$51,800 | 0 | - | \$25,899 | \$25,900 | - | \$41,439 | \$41,440 | - | \$62,159 | \$62,160 | - | \& above |
| 2011 | \$51,600 | 0 | - | \$25,799 | \$25,800 | - | \$41,279 | \$41,280 | - | \$61,919 | \$61,920 | - | \& above |

The number of people living in poverty in the Columbus MSA and the assessment area has increased since 2000; $23 \%$ of the population in Russell County and $18 \%$ of the population in Muscogee County was estimated to live below the federal poverty line between 2005 and 2009. Poverty rates in these counties are higher than

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## Columbus Multistate Metropolitan Area

the rates in their respective states. ${ }^{47}$ Food stamp usage, another indicator of financial distress, has also increased in the assessment area. In 2009, $26 \%$ of the population in Russell County and $20 \%$ of the population in Muscogee County received food stamps, compared to $17 \%$ of the population in Alabama and $16 \%$ of the population in Georgia. ${ }^{48}$

## Housing Characteristics

The housing market in the Columbus MSA experienced many of the same challenges as other metropolitan areas as a result of the economic downturn, though to a lesser degree. Over the past few years, the market has weakened, with falling sales prices, slower sales, and declining new construction.

Home prices in the Columbus market declined from the pre-recession peak but not as significantly as the rest of the state. Home prices fell by about $13 \%$ in the Columbus market compared to pre-recession prices ${ }^{49}$, and in December 2011, the median home price for the Columbus assessment area was $\$ 140,000 .{ }^{50}$ While sales prices in both Muscogee and Russell counties were impacted by the recession, sales prices in Russell County have been more stable.

New home construction in Columbus declined by about $50 \%$ from the pre-recession levels, but again, the decline was much greater in other metro areas across the state, where homebuilding stopped almost completely. New single-family residential building permits issued in the assessment area declined from 1,356 in 2005 to 803 in $2011^{51}$, while home sales declined by about $57 \%$ over that time period. ${ }^{52}$

The rate of foreclosures and mortgage delinquencies in the assessment area has increased significantly. The percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) rose from $5.3 \%$ in January 2010 to $8.1 \%$ in December $2011{ }^{53}$

Housing is still affordable in the Columbus metro area compared to other markets around the country. In Muscogee County, approximately $36 \%$ of the housing was considered affordable to a family earning less than $80 \%$ of the area median income in 2009, while $57 \%$ of the housing was considered affordable in Russell County. Housing affordability in Russell County relative to other parts of the metro area has driven some of the population increase in the county. The homeownership rate in the assessment area is much lower than in either Georgia or Alabama, due to the large military presence in the area. Approximately $62 \%$ of all households in Russell County and 56\% of households in Muscogee County are homeowners. ${ }^{54}$

## Employment and Economic Conditions

The economy of the Columbus, GA-AL MSA has been growing in the past few years due to the growth of Fort Benning and several major private investments. Fort Benning, located adjacent to the City of Columbus, has grown significantly as a result of the Base Realignment and Closure Program (BRAC). By the end of 2012, Fort Benning was projected to gain over 5,000 new active military personnel and 2,000 civilian employees,

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## Columbus Multistate Metropolitan Area

driven in large part by the decision to move the Armor Center and School from Fort Knox to Fort Benning in 2009. The expansion of Fort Benning has also brought in more defense contractors, and this expansion is expected to continue to impact the economic landscape of the Columbus region for the foreseeable future. Overall, the expansion of Fort Benning may bring in over 30,000 new residents to Columbus. ${ }^{55}$

At the same time, the region has seen significant new private investment, including the new Kia plant that opened in West Point, Georgia, in 2010. Kia has invested over $\$ 1.1$ billion in the plant that produces three vehicle lines and employs over 3,000 . The new Kia plant was a major economic development victory for a region that had lost much of its manufacturing base. In addition, the new plant has led to more auto suppliers locating in the region. ${ }^{56}$

Other major announcements include NCR Technologies, which relocated its headquarters from Ohio to Georgia in 2009. NCR announced it would create at least 870 production jobs at its ATM production, research, and development facility in Columbus. Given the strength of Columbus' existing industry base, these major announcements have solidified the region as an important economic center in Georgia. ${ }^{57}$

Fort Benning is the largest employer in the region with over 42,000 employees. Other major employers include the Muscogee County School District, TSYS, Columbus Regional Healthcare Systems, and AFLAC. ${ }^{58}$ The largest employment sectors in the MSA include finance, transportation, accommodation and food services, retail, health care, the military, and local government. ${ }^{59}$

While the region has experienced recent economic growth, it was not immune from the national downturn. Unemployment rates in the MSA increased from $6.3 \%$ in 2008 to $9.6 \%$ in 2010. The unemployment rate declined to $9.3 \%$ in 2011 and continued to improve into $2012 .{ }^{60}$ The MSA is performing better than the state of Georgia, where the unemployment rate was $9.8 \%$ in 2011, but underperforming Alabama, where the rate was 9.0\%.

## Unemployment Rates

Assessment Area: Multi Columbus

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Columbus MSA | 9.6 | 9.3 |
| Muscogee County | 9.7 | 9.4 |
| Georgia | $\mathbf{1 0 . 2}$ | $\mathbf{9 . 8}$ |
| Russell County | $\mathbf{1 0 . 3}$ | 10.1 |
| Alabama | $\mathbf{9 . 5}$ | $\mathbf{9 . 0}$ |

Not Seasonally Adjusted

[^19]There is a sense of optimism around the potential for continued economic growth in Columbus, fueled by the investment in Fort Benning, the expansion of the Kia plant, and other private investment. However, growth could be at risk due to the possibility of federal defense spending cuts, driven by ongoing federal deficit reduction efforts.

## Competition

The Columbus banking market is dominated by Synovus, which is headquartered in Columbus. According to the June 30, 2011 FDIC Summary of Deposits Report, Synovus held $62.4 \%$ of the deposit market share with 18 branches in the market area. Overall there were 14 financial institutions operating 64 branches in the assessment area. National and multi-regional institutions compete in the market, including BB\&T, Wells Fargo, and SunTrust. Regions Bank ranked $5^{\text {th }}$ in deposit market share with $2.3 \%$ ( $\$ 191.7$ million).

Regions ranked 9th out of 36 small business loan reporters in 2010 with $2.7 \%$ of the loans. Small business lending increased in the assessment area between 2010 and 2011, and Regions ranked $6^{\text {th }}$ in 2011 out of 39 reporters with $5.2 \%$ of all loans. Synovus was the top small business lender in the market both years.

Regions ranked $18^{\text {th }}$ out of 206 HMDA reporters in 2010 with $1.5 \%$ of total loans. Overall HMDA lending in the assessment area declined between 2010 and 2011, and Regions Bank's HMDA lending followed the same trend. Regions was ranked $19^{\text {th }}$ out of 193 lenders with $1.2 \%$ of all HMDA loans. Wells Fargo Bank, Bank of America, and PPH Mortgage Co. are the leading HMDA lenders in the market.

## Community Development

There are several efforts underway to revitalize commercial and residential areas within the city of Columbus, including the Columbus Business Development Center, which is the city's enterprise zone. Businesses that locate in this area and create or retain jobs are eligible for a number of special financing incentives. In addition, Columbus-Muscogee County has created a comprehensive plan to guide long-term planning. Eight neighborhoods in the county have been designated as redevelopment areas and are eligible for special tax incentives, dedicated planning resources, and are targeted for economic development efforts.

Affordable housing is an important issue in the community, particularly in light of the economic growth underway. Columbus-Muscogee County offers several programs to assist low- and moderate-income individuals, including an owner-occupied rehabilitation grant and down payment assistance to low- and moderate-income homebuyers. NeighborWorks® Columbus is a nonprofit housing organization and community development financial institution (CDFI) serving Columbus-Muscogee County. The organization offers a Homeownership Center, which is a one-stop shop for housing counseling, down payment assistance, and foreclosure prevention. The nonprofit also develops affordable housing and has developed an innovative employer-assisted housing model with AFLAC that provides "green" housing opportunities for AFLAC employees within walking distance of the company. NeighborWorks ${ }^{\circledR}$ Columbus has also created a homeownership program for military personnel as well as the "Columbus Cottage" campaign, which provides a new home for an elderly person who has an unsafe home and cannot afford the repairs. ${ }^{61}$ According to a community contact that specializes in housing, rising foreclosures continue to plague the Columbus area as a result of the fragile state of the local economy and elevated unemployment rates. Foreclosure counseling remains a significant need in the area.

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## Columbus Multistate Metropolitan Area

To address the foreclosure crisis, Columbus-Muscogee County received approximately $\$ 4.3$ million through the Neighborhood Stabilization Program. These funds have been used to purchase foreclosed properties in lowand moderate-income areas for resale to eligible homebuyers or for affordable rental housing.

The financial stability of low- and moderate-income individuals is a significant concern in the Columbus assessment area. Approximately $11.7 \%$ of households are unbanked in the Columbus MSA, meaning they have no type of deposit account with a mainstream financial institution. In addition, $24 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower-income and minority households. ${ }^{62}$ Given the significant concentration of military personnel in the area, targeted financial counseling and outreach are also needed given their unique financial and employment conditions.

A community contact indicated that there are many opportunities for banks to support local community development initiatives, but with the exception of one national bank, the contact thought banks were involved on a very limited basis. In addition, banks have reduced community development lending and grants, which is where the need is greatest, and instead are focused on providing community development services.

## Demographic Characteristics by Census Tract

The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

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## Columbus Multistate Metropolitan Area

## Combined Demographics Report

Assessment Area: Multi Columbus

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 10 | 14.7 |  | 8.0 | 2,468 | 50.5 | 13,981 | 22.8 |
| Moderate-income | 19 | 27.9 |  | 25.0 | 3,017 | 19.7 | 11,080 | 18.1 |
| Middle-income | 21 | 30.9 |  | 38.6 | 2,357 | 9.9 | 12,570 | 20.5 |
| Upper-income | 16 | 23.5 |  | 28.4 | 528 | 3.0 | 23,694 | 38.6 |
| Unknown-income | 2 | 2.9 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 68 | 100.0 |  | 100.0 | 8,370 | 13.6 | 61,325 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 9,985 | 1,573 |  | 15.8 | 6,724 | 67.3 | 1,688 | 16.9 |
| Moderate-income | 27,339 | 10,720 |  | 39.2 | 12,710 | 46.5 | 3,909 | 14.3 |
| Middle-income | 35,964 | 22,023 |  | 61.2 | 11,382 | 31.6 | 2,559 | 7.1 |
| Upper-income | 25,435 | 17,379 |  | 68.3 | 6,835 | 26.9 | 1,221 | 4.8 |
| Unknown-income | 290 |  | 5 | 1.7 | 209 | 72.1 | 76 | 26.2 |
| Total Assessment Area | 99,013 | 51,700 |  | 52.2 | 37,860 | 38.2 | 9,453 | 9.5 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 940 | 9.7 |  | 9.6 | 73 | 13.8 | 38 | 8.0 |
| Moderate-income | 1,922 | 19.9 |  | 20.0 | 104 | 19.7 | 88 | 18.5 |
| Middle-income | 3,182 | 33.0 |  | 33.2 | 156 | 29.5 | 154 | 32.4 |
| Upper-income | 3,238 | 33.6 |  | 33.7 | 159 | 30.1 | 164 | 34.5 |
| Unknown-income | 369 | 3.8 |  | 3.5 | 37 | 7.0 | 31 | 6.5 |
| Total Assessment Area | 9,651 | 100.0 |  | 100.0 | 529 | 100.0 | 475 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.6 |  | 5.5 |  | 4.9 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \text { \$1 Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 25 | 35.7 |  | 35.8 | 1 | 50.0 | 0 | 0.0 |
| Middle-income | 22 | 31.4 |  | 31.3 | 1 | 50.0 | 0 | 0.0 |
| Upper-income | 21 | 30.0 |  | 31.3 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 2 | 2.9 |  | 1.5 | 0 | 0.0 | 1 | 100.0 |
| Total Assessment Area | 70 | 100.0 |  | 100.0 | 2 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 95.7 |  | 2.9 |  | 1.4 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Columbus Multistate Metropolitan Area

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Columbus assessment area is good. Lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

Regions Bank is both a HMDA and small business lender. During the review period, the bank reported 193 (50.9\%) HMDA loans compared to 186 (49.1\%) small business loans in Columbus assessment area. Therefore, small business lending and HMDA lending were weighted equally in determining the bank's lending test rating in the assessment area. In total, $0.2 \%$ of the bank's small business and HMDA lending by number of loans and $0.2 \%$ by dollar volume, totaling $\$ 46.1$ million, were originated in the Columbus assessment area.

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

## Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs based on small business and HMDA lending. The percentage of the bank's total lending at $0.2 \%$ is comparable to the percentage of deposits at $0.2 \%$ in this area. The bank also originated three community development loans in the Columbus assessment area. Regions Bank is not a major competitor in this market, ranking $19^{\text {th }}$ in HMDA loans and $6^{\text {th }}$ in small business loans in 2011.

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank's geographic distribution of loans reflects good penetration throughout the assessment area.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, Regions Bank did not originate any home purchase loans in low-income tracts. The bank performed below the aggregate in 2010 and 2011. It was also noted that the aggregate lenders had very low levels of home purchase lending compared to the percentage of owner-occupied units in these tracts, which was $3.0 \%$. This suggests limited opportunities overall for home purchase lending in low-income tracts. Minimal weight was given to this area when determining the overall rating for the geographic distribution of loans.

Home purchase lending in moderate-income tracts is adequate. During the review period, the bank originated $14.3 \%$ of its home purchase loans in moderate-income tracts, which was less than the $20.7 \%$ of the owneroccupied units located in moderate-income tracts in the assessment area. Regions Bank's performance was below the aggregate in 2010; however, the bank's performance was significantly above the aggregate in 2011.

The bank's home purchase lending in both middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts in the Columbus assessment area.

## Columbus Multistate Metropolitan Area

## Home Refinance Loans

Home refinance lending in low-income tracts is adequate. During the review period, Regions Bank originated three home refinance loans in low-income tracts. The bank performed below the aggregate in 2010, but performed significantly better than the aggregate in 2011. It was also noted that the aggregate lenders had low levels of home refinance lending compared to the percentage of owner-occupied units in these tracts, which was $3.0 \%$. This suggests limited opportunities overall for home refinance lending in low-income tracts.

Regions Bank's home refinance lending in moderate-income tracts is good. During the review period, the bank originated $14.2 \%$ of its home refinance loans in moderate-income tracts, which contain $20.7 \%$ of the owneroccupied units. Regions Bank’s performance was better than the aggregate in 2010 and significantly greater than the aggregate in 2011.

The bank's home refinance lending in both middle-income and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Home Improvement Loans

Home improvement lending in low-income census tracts is very poor. Regions Bank did not originate any home improvement loans in low-income tracts, where $3.0 \%$ of the owner-occupied units are located. The bank performed significantly below the aggregate in both 2010 and 2011.

Regions Bank's home improvement lending in moderate-income census tracts is good when compared to the percentage of owner-occupied units in these tracts and aggregate lending performance. During the review period, Regions Bank originated $33.3 \%$ of its home improvement loans in moderate-income tracts, where $20.7 \%$ of the owner-occupied units in the assessment area are located. The bank outperformed the aggregate in both 2010 and 2011.

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

## Small Business Loans

Regions Bank's small business lending in low-income tracts is excellent. During the review period, the bank's performance was greater than the demographic. The bank originated $12.9 \%$ of its small business loans in lowincome tracts, where $9.6 \%$ of the small businesses in the assessment area are located. The bank's lending performance was better than the aggregate in both 2010 and 2011.

Small business lending in moderate-income tracts is good. Regions Bank originated $18.8 \%$ of its small business loans in moderate-income tracts, which is comparable to the percentage of small businesses at $20.0 \%$. The bank performed less than the aggregate in 2010, but was better than the aggregate in 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects good penetration throughout the assessment area. 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, such

## Columbus Multistate Metropolitan Area

as local economic conditions, unemployment and poverty rates, were considered, as well as the performance of other banks.

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is excellent. The bank's performance was comparable to the demographic with $22.9 \%$ of its home purchase loans to low-income borrowers, while lowincome families make up $22.8 \%$ of total families in the assessment area. The bank also performed significantly better than the aggregate in both 2010 and 2011.

Home purchase lending to moderate-income borrowers is good. At 20.0\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $18.1 \%$. The bank's performance was less than the aggregate in 2010, but better than the aggregate in 2011.

The bank's home purchase lending to middle-income borrowers was more than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

Regions Bank’s home refinance lending to low-income borrowers is good. Although the bank performed less than the demographic with $9.0 \%$ of its home refinance loans to low-income borrowers, the bank's performance was better than the aggregate in both 2010 and 2011. Low-income families make up 22.8\% of total families in the assessment area.

The bank's home refinance lending to moderate-income borrowers is excellent when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $17.2 \%$ was similar to the percentage of moderate-income families in the assessment area at 18.1\%. Regions Bank's performance was better than the aggregate in 2010 and 2011.

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

## Home Improvement Loans

Considering the performance of the aggregate along with other lending and demographic data, home improvement lending to low-income borrowers is good. During the review period, low-income families represented $22.8 \%$ of total families and received $12.5 \%$ of the home improvement loans. The bank performed better than the aggregate in 2010 and 2011.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $33.3 \%$ exceeded the percentage of moderate-income families in the assessment area at $18.1 \%$. The bank's home improvement lending to moderate-income borrowers was considerably better than the aggregate in 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Columbus Multistate Metropolitan Area

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 but was less than the aggregate in 2011. The bank originated $34.9 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.6 \%$. However, of the 186 small business loans originated during the review period, 88 loans (47.3\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $66.3 \%$, which was still below the percentage of small businesses in the assessment area. However, $72.0 \%$ of the 186 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was below the aggregate in 2010 and comparable to the aggregate in 2011.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Columbus assessment area. The bank originated three community development loans totaling $\$ 2.1$ million during the review period. Two of the loans promoted economic development by financing small businesses as part of the SBA 504 Certified Development Corporation program, and one loan revitalized a low-income census tract by financing a shopping center located in the Wynnton Road Corridor Redevelopment Area. Local community development and credit needs include but are not limited affordable housing, job growth, downtown revitalization, and neighborhood stabilization. The bank's community development loan portfolio inside the assessment exhibits adequate responsiveness to local credit needs, and the dollar amount of community development loans is adequate considering the bank's presence in the market.

## Investment Test

The bank's performance in the Columbus assessment area under the investment test is good. The bank had four investments totaling $\$ 8.2$ million, including one current period investment for $\$ 2.4$ million. Direct investments in the assessment area provided support for affordable housing through Low Income Housing Tax Credits (LIHTCs) and GNMA investment vehicles. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and community revitalization through a regional New Markets Tax Credit fund. Local community development and credit needs include but are not limited to affordable housing, job growth, downtown revitalization, and neighborhood stabilization. The dollar volume of Regions Bank's current and total investments exhibits responsiveness to some of the identified community needs given the bank's presence in the assessment area.

The bank did not make any contributions during the review period. However, the bank made several contributions to statewide and national organizations that may indirectly benefit the assessment area.

## Service Test

The bank's service test performance in the Columbus assessment area is poor. Its retail and community development services reflect poor responsiveness to the needs of the Columbus assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the five branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment

## Columbus Multistate Metropolitan Area

area. The bank did not open any branches and closed one branch in the Columbus assessment area (in an upperincome tract). The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

Geographic Distribution of Branches
Assessment Area: Multi Columbus

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | al Branc <br> \% |  | Closed <br> \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Weekend Hours \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  |  | 1 | 20.0\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 0 | 0 |  |  | 10 | 14.7\% | 9.3\% | 9.7\% |
| Moderate | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 | 0 |  |  | 19 | 27.9\% | 26.2\% | 19.9\% |
| Middle | Total | 2 | 40.0\% | 0 | 0 | 2 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 21 | 30.9\% | 37.3\% | 33.0\% |
| Upper | Total | 1 | 20.0\% | 0 | 1 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 |  | 0 | 0 0 | 0 |  |  | 16 | 23.5\% | 27.0\% | 33.6\% |
| Unknown | Total | 1 | 20.0\% | 0 | 0 | 1 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 |  | 0 | 0 | 0 |  |  | 2 | 2.9\% | 0.2\% | 3.8\% |
|  | Total | 5 | 100.0\% | 0 | 1 | 5 | 3 | 2 |  |  |  |  |
| Total | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 68 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a limited level of community development services in the assessment area, and improvement is needed. During the review period, Regions Bank employees provided 44 service hours for community development organizations by participating in eight community development services. According to information obtained from community contacts, there are opportunities for financial institutions to participate in community development services in the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

## Kingsport Multistate Metropolitan Area

## CRA RATING FOR KINGSPORT: Satisfactory ${ }^{63}$

## The Lending Test is rated: <br> The Investment Test is rated: <br> The Service Test is rated: <br> High Satisfactory <br> Outstanding <br> Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of borrowers 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 within the assessment area.
- The bank provides an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position in response to the community development needs of the assessment area.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment area.
- The bank provides an adequate level of community development services throughout the assessment area.

[^22]
## SCOPE OF EXAMINATION

The time period, products and affiliates evaluated for the Kingsport multistate assessment area are consistent with the overall scope described in the Description of the Institution section of this report. Regions Bank’s performance in Kingsport was evaluated using full-scope examination procedures.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN KINGSPORT

The Kingsport assessment area includes Hawkins and Sullivan counties in Tennessee and Bristol City in Tennessee and Virginia. The assessment area is part of the multistate Kingsport-Bristol MSA that also includes Scott and Washington counties in Virginia. The majority of the assessment area is in Tennessee, with only Bristol City, Virginia, across the state line. Kingsport, Tennessee, located in Sullivan County, is the principal city in the assessment area. There are 49 census tracts in the assessment area which includes 8 moderate-income tracts. There are no low-income tracts in the assessment area. Regions Bank operates nine branches in the assessment area, two of which are located in moderate-income tracts and four in areas that border moderateincome tracts. These branches represent $0.5 \%$ of the bank's total branches. Seven branches are in Tennessee and two branches are in Virginia. As of June 30, 2011, the bank had \$464.6 million in deposits in Kingsport, representing $0.5 \%$ of Regions Bank's total deposits in all the assessment areas. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 421 ( $0.5 \%$ ) were in the Kingsport assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 737 (0.7\%) were in the Kingsport assessment area.

## Population and Income Characteristics

Population in the Kingsport assessment area grew by about $3.3 \%$ between 2000 and 2010, which was well below the population growth rate for Tennessee of $11.4 \%$. The total population in the assessment area was 231,491 in 2010 and about $67 \%$ lived in Sullivan County. Kingsport, the largest city in the assessment area, had approximately 48,000 residents, representing $8 \%$ growth since $2000 .{ }^{64}$

Median family income in the Kingsport-Bristol MSA is lower than the median family income in both Tennessee and Virginia. For the purposes of this analysis, HUD's median family income for the Kingsport MSA for 2010 and 2011 is used. As shown, the median family income was almost unchanged between 2010 and 2011, increasing from $\$ 49,400$ to $\$ 49,500$. The 2011 median family income in Tennessee was $\$ 53,900$, and $\$ 75,800$ in Virginia. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels <br> Kingsport-Bristol-Bristol, TN-VA MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | 49.99\% | 49.99\% | 50\% - 79.99\% |  |  | 80\% | 119.99\% |  | 120\% | - | \& above |
| 2010 | \$49,400 | 0 | - | \$24,699 | \$24,700 | - | \$39,519 | \$39,520 | - | \$59,279 | \$59,280 | - | \& above |
| 2011 | \$49,500 | 0 | - | \$24,749 | \$24,750 | - | \$39,599 | \$39,600 | - | \$59,399 | \$59,400 |  | \& above |

[^23]
## Kingsport Multistate Metropolitan Area

Within the assessment area, US census estimates show that the median family income between 2006 and 2009 ranged from \$39,212 in Bristol City to \$50,677 in Sullivan County. ${ }^{65}$

The number of people living in poverty in the Kingsport assessment area has increased since 2000, particularly in Bristol City. The poverty rate ranges from $15.9 \%$ in Sullivan County to $23.4 \%$ in Bristol City. The number of people living below the federal poverty level in Bristol City increased by almost $50 \%$ between 2000 and 2010. ${ }^{66}$ Food stamp usage, another indicator of financial distress, has increased in the assessment area. In 2009, $27 \%$ of the population in Bristol City, 22\% in Hawkins County, and $16 \%$ in Sullivan County relied on food stamps. ${ }^{67}$

## Housing Characteristics

The housing market in the Kingsport assessment area weakened during the economic downturn, but to a lesser degree than in other metropolitan markets. Housing prices in the Tennessee counties rose between 2002 and 2009 and experienced some decline after 2009, but have overall remained stable. In Hawkins County, home prices fell by about $8 \%$ between 2009 and 2010, but were already rebounding in 2011. In Sullivan County, there has been very little change in the median housing price over the past five years. The median home prices in 2011 were $\$ 117,000$ in Hawkins County and $\$ 125,000$ in Sullivan County, well below the median home price in Tennessee of $\$ 150,925 .{ }^{68}$ The median home price in both Bristol, Tennessee, and Bristol, Virginia, was lower than elsewhere in the assessment area. Foreclosures in 2011 accounted for $20 \%$ of sales in Bristol, Virginia, and $19 \%$ of sales in Bristol, Tennessee, compared to $12 \%$ in Kingsport. The increased number of foreclosure sales in the two Bristols likely contributes to the lower home prices. ${ }^{69}$

New home construction in the assessment area has declined by over 73\% since the pre-recession peak in 2004. In 2011, just 222 building permits for new single-family homes were issued in the assessment area. In Sullivan County, the number of building permits issued fell from 705 in 2005 to just 173 in 2011. New construction in Bristol City and Hawkins County has been minimal since the market started to decline. ${ }^{70}$ Home sales have also fallen off significantly, declining by 65\% in Hawkins and Sullivan counties since the peak in 2005. ${ }^{71}$

The rate of foreclosures and mortgage delinquencies in the assessment area has increased significantly. The percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) rose from $4.6 \%$ in January 2010 to 7.8\% in December 2011. Hawkins County had the highest rate of seriously delinquent mortgages, reaching $10.7 \%$ of all mortgages at the end of $2011 .{ }^{72}$

The homeownership rate varies in the assessment area. Bristol City has the lowest rate at $61 \%$ while in Sullivan and Hawkins counties, the homeownership rate is $73 \%$ and $76 \%$, respectively. Housing is considered affordable in the Kingsport assessment area, particularly in Bristol City and Hawkins County. Almost 61\% of the homes in Bristol City were considered affordable to a family earning less than $80 \%$ of the area median

[^24]
## Kingsport Multistate Metropolitan Area

income in 2009. Sullivan County was less affordable, with $47 \%$ of homes affordable to the same income family. Affordable rental housing is a concern. In Sullivan and Hawkins counties, approximately 37\% of renters were considered cost burdened, meaning they spent more than $30 \%$ of their gross income on housing expenses in 2009. In Bristol City, $41 \%$ of renters were considered cost burdened. ${ }^{73}$

## Employment and Economic Conditions

The economy in the Kingsport assessment area is driven by a mix of industries, agriculture, and tourism. There are employment clusters in a number of different sectors including manufacturing, retail, administrative and waste services, construction, health care and social services, accommodation and food services, and local government. ${ }^{74}$ Sullivan County is the primary employment center in the Kingsport MSA, drawing workers from all surrounding counties. The largest employment sectors in the county are manufacturing, health care and educational services, leisure and hospitality, and local government. ${ }^{75}$

In 1917, Kingsport was the first city planned to accommodate modern industry in the United States. It has always had a significant industrial sector and today is most often recognized as the home of Eastman Chemical, a Fortune 500 company. Eastman Chemical was started in Kingsport in 1920 and today manufactures and markets chemicals, fibers and plastics worldwide. Eastman is by far the largest employer in the region, with almost 7,000 employees and 2,500 contract employees. The company continues to invest in the Kingsport operation, most recently announcing $\$ 1.3$ billion to support capacity improvements and expansion. In addition to the employment impact associated with Eastman, the company is a major supporter of the Kingsport community, including $\$ 2.2$ million in donations to United Way in 2011. However, the environmental impact of the plant on the surrounding area is a concern, and there is some risk that additional regulatory restrictions might impact the company's long-term operations in the region. ${ }^{76}$

There are a number of other large employers in both Sullivan and Hawkins counties. Kingsport is a regional center for health care, and the Holston Valley Medical Center and Wellmont Health Systems each employ more than 4,500 . Other major employers include US Fence (Hawkins County) and the Sullivan County Board of Education. There are about 8 other companies that employ more than 500 , though the majority of the businesses in the region are much smaller. ${ }^{77}$

Like the rest of the nation, the Kingsport area was impacted by the national recession, experiencing job loss and rising unemployment. The Kingsport MSA lost about 8,000 jobs between March 2008 and February 2010, with most of the job loss in the manufacturing sector. ${ }^{78}$ Unemployment in the Kingsport MSA peaked in 2009 at $9.4 \%$, but has been declining over the past two years. Overall, unemployment in the Kingsport, MSA compares favorably to the state of Tennessee unemployment rate, but is well above the unemployment rate in Virginia. ${ }^{79}$

[^25]
## Kingsport Multistate Metropolitan Area

## Unemployment Rates

| Assessment Area: Multi Kingsport |  |  |
| :--- | :---: | :---: |
| Area | Years - Annualized |  |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Kingsport MSA | 8.8 | 8.1 |
| Hawkins County | 9.5 | 8.9 |
| Sullivan County | 8.5 | 8.7 |
| Tennessee | $\mathbf{9 . 8}$ | $\mathbf{9 . 2}$ |
| Bristol City | 9.6 | 9.2 |
| Virginia | $\mathbf{6 . 9}$ | $\mathbf{6 . 2}$ |

Not Seasonally Adjusted

Since 2010, nonfarm jobs in the area have been increasing slowly. Job growth has been strongest in the education and health services, leisure and hospitality, and construction sectors. However, some sectors continue to struggle, with job loss continuing in retail, information, and government. ${ }^{80}$

## Competition

Regions holds the largest share of deposits in the Kingsport assessment area, closely followed by First Tennessee. According to the June 30, 2011 FDIC Summary of Deposits Report, Regions had $\$ 464.6$ million in deposits, or $14.8 \%$ of the market. First Tennessee had $13.6 \%$ of deposits, and eight institutions had between 5\% and $9 \%$ of deposits. Overall, there were 24 banks active in the market operating 88 branches.

Regions ranked $7^{\text {th }}$ out of 216 HMDA reporters in 2010 with $3.7 \%$ of total loans. Overall HMDA lending in the assessment area declined between 2010 and 2011, and Regions Bank's HMDA lending followed the same trend; however, Regions maintained $3.7 \%$ of all HMDA loans and was again ranked $7^{\text {th }}$ in 2011. Eastman Credit Union, Wells Fargo Bank, and Bank of America are the leading HMDA lenders in the market.

Regions ranked $2^{\text {nd }}$ out of 41 small business loan reporters in 2010 with $12.9 \%$ of the loans. Small business lending increased in the assessment area between 2010 and 2011, and Regions moved up to become the market leader in 2011 with $17.1 \%$ of all loans. American Express was the other primary small business lender in the market both years.

## Community Development

Supporting small business and increasing the supply of affordable housing are two important needs in the Kingsport area, and there is an active network of organizations working to address each of these issues. The Kingsport Office of Small Business Development and Entrepreneurship (KOSBE), an initiative under the Kingsport Chamber of Commerce, is the primary resource for small business owners, providing training and other types of assistance. KOSBE formed a partnership to serve as the local affiliate for the Small Business Development Center at East Tennessee State University, which allows the organization to assist small business owners in the surrounding counties. The Holston Business Development Center is a business incubator located

[^26]
## Kingsport Multistate Metropolitan Area

in Kingsport and is also a good resource for small businesses. Finally, there is access to alternative financing for small businesses through a Tennessee-based community development financial institution that has a presence in the Kingsport area and several revolving loan funds (operated through the City of Bristol and the First Tennessee Development District).

A community contact specializing in small business assistance noted that securing capital for small business owners was the number one challenge. Banks had tightened underwriting standards and small businesses couldn't get loans. Thus, sources of alternative financing are very important. However, the contact indicated that while banks were not as active lending, they were still very engaged in providing assistance through local intermediaries for small business owners.

There are several organizations working together to address the affordable housing needs in the area. Two of the biggest needs in the region are affordable rental housing for the lowest-income renters, as well as assistance with rehabilitating substandard housing. The Kingsport Housing and Redevelopment Authority (KHRA) is very active in developing and promoting affordable housing. The agency operates traditional public housing and received a HOPE VI grant in 2006 to redevelop a large public housing project. The agency is looking at more opportunities to redevelop public housing and recently received a grant from HUD to study revitalization options. KHRA also operates a Family Self Sufficiency program to help public housing residents become more financial stable, and eventually, possibly homeowners. There is also a nonprofit housing developer located in Johnson City that serves Sullivan County, providing both housing development and housing counseling programs. Finally, through the First Tennessee Development District, there is down payment assistance as well as grants to help the elderly with home repair.

The City of Bristol, Tennessee, serves as the lead entity for the Northeast Tennessee/Virginia HOME Consortium. Under the HOME Program of the U S Department of Housing \& Urban Development (HUD), local governments are able to join together to form a "consortium" in order to receive HOME funding for affordable housing. Forming a consortium enables local governments that would not otherwise qualify for HOME Program funding under the formula criteria to join with other units of local government to receive a direct allocation of funds. This creates an opportunity for these jurisdictions to take a more regional, collaborative approach to meeting their affordable housing needs. The Northeast Tennessee/Virginia HOME Consortium (the only HOME Consortium in the state of Tennessee) was initially funded July 1, 2003, and has grown to include seven cities and counties. The consortium works together to develop a plan for housing and community development in the region that the individual agencies will implement. The consortium has been instrumental in bringing new sources of funds for affordable housing that would not otherwise have been available in the region.

Foreclosure has not been a significant issue in the region, but Sullivan County did receive some funds to help stabilize neighborhoods impacted by foreclosures. Through the Neighborhood Stabilization Program allocation to the Tennessee Housing Development Agency (THDA), Sullivan County received about \$430,000. These funds have been used to purchase foreclosed properties in low- and moderate-income areas for resale to eligible homebuyers or for affordable rental housing.

Demographic Characteristics by Census Tract
The following table provides demographic characteristics of the bank’s assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

## Kingsport Multistate Metropolitan Area

## Combined Demographics Report

Assessment Area: Multi Kingsport


Based on 2010 D\&B information according to 2000 Census Boundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending performance in the Kingsport assessment area is good, and lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

Regions Bank is both a HMDA and small business lender. During the review period, the bank reported 421 (36.4\%) HMDA loans compared to 737 (63.6\%) small business loans in the Kingsport assessment area. Therefore, small business lending was weighted more heavily than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $0.6 \%$ of the bank's small business and HMDA lending by number of loans and $0.4 \%$ by dollar volume totaling $\$ 88.7$ million were originated in the Kingsport assessment area.

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

## Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs based on small business, HMDA, and community development lending. The percentage of the bank's total lending at $0.6 \%$ is comparable to the percentage of deposits at $0.5 \%$ in this area. The bank also originated four community development loans in the Kingsport assessment area. Regions Bank is a major competitor in this market, ranking $7^{\text {th }}$ in HMDA loans and $1^{\text {st }}$ in small business loans in 2011.

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. There are no low-income tracts in the Kingsport assessment area. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank's geographic distribution of loans reflects good penetration throughout the assessment area.

## Home Purchase Loans

Home purchase lending in moderate-income tracts is excellent. During the review period, the bank originated $11.7 \%$ of its home purchase loans in moderate-income census tracts, which was greater than the $10.6 \%$ of the owner-occupied units located in moderate-income tracts. Regions Bank's performance was better than the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

Regions Bank’s home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $6.9 \%$ of its home refinance loans in moderate-income census tracts, where $10.6 \%$ of the owner-occupied units are located. Regions Bank's performance was below the aggregate in 2010, but better than the aggregate in 2011.

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

## Home Improvement Loans

Regions Bank's home improvement lending in moderate-income census tracts is good when compared to the percentage of owner-occupied units in these tracts and aggregate lending performance. During the review period, Regions Bank originated 20.0\% of its home improvement loans in moderate-income tracts, where $10.6 \%$ of the owner-occupied units in the assessment area are located. The bank's performance was comparable to the aggregate in 2010 and was significantly better than the aggregate in 2011.

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

## Small Business Loans

Small business lending in moderate-income census tracts is good. Regions Bank originated 20.2\% of small business loans in moderate-income tracts, which was greater than the percentage of small businesses at $18.4 \%$. The bank performed better than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment, and poverty rates, were considered, as well as the performance of other banks.

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is adequate. The bank's performance was less than the demographic with $8.3 \%$ of its home purchase loans to low-income borrowers, while low-income families make up $19.3 \%$ of total families in the assessment area. The bank's performance was comparable to the aggregate in 2010 and was slightly below the aggregate in 2011.

Home purchase lending to moderate-income borrowers is good. At $26.1 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $18.1 \%$. The bank's performance was better than the aggregate in 2010 and comparable to the aggregate in 2011.

The bank's home purchase lending to middle-income borrowers was more than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

Regions Bank's home refinance lending to low-income borrowers is excellent. The bank performed less than the demographic with $11.1 \%$ of its home refinance loans to low-income borrowers. Low-income families make up $19.3 \%$ of total families in the assessment area, the bank's performance was considerably better than the aggregate in both 2010 and 2011.

Regions Bank’s home refinance lending to low-income borrowers is excellent. The bank performed less than the demographic with $11.1 \%$ of its home refinance loans to low-income borrowers. Low-income families make up $19.3 \%$ of total families in the assessment area. The bank's performance was considerably better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $18.1 \%$ was the same as the percentage of moderate-income families in the assessment area at $18.1 \%$. Regions Bank's performance was comparable to the aggregate in 2010 and better than the aggregate in 2011.

## Home Improvement Loans

Considering the performance of the aggregate along with other lending and demographic data, home improvement lending to low-income borrowers is excellent. During the review period, low-income families represented $19.3 \%$ of total families and received $36.0 \%$ of the home improvement loans. The bank performed significantly better than the aggregate in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is good. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $20.0 \%$ exceeded the percentage of moderate-income families in the assessment area at $18.1 \%$. The bank's home improvement lending to moderate-income borrowers was better than the aggregate in 2010 but less than the aggregate in 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 but was less than the aggregate in 2011. The bank originated $32.3 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.8 \%$. However, of the 737 small business loans originated during the review period, 423 loans (57.4\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $75.8 \%$, which was still below the percentage of small businesses in the assessment area. However, $94.0 \%$ of the 737 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was better than the aggregate in both 2010 and 2011.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Kingsport assessment area. The bank originated four community development loans totaling $\$ 12.6$ million during the review period. The majority of the loans financed affordable housing for low- and moderate-income individuals, which is responsive to local

## Kingsport Multistate Metropolitan Area

community development needs. Other local credit needs include but are not limited to small business development and finance, and neighborhood revitalization. The bank's community development loan portfolio inside the assessment area exhibits good responsiveness to the credit needs of low- and moderate-income individuals and geographies and small businesses. The dollar amount of community development loans is excellent relative to the bank's presence in the market.

Details of community development lending are as follows:

- Three loans totaling more than $\$ 12.5$ million in support of Low Income Housing Tax Credit (LIHTC) affordable housing projects that will provide more than 250 units restricted to tenants earning less than $80 \%$ of the area median income; and
- One loan to support the development of a daycare facility in a moderate-income census tract that services the local community and charges fees based on a sliding scale according to income.


## Investment Test

The bank's performance in the Kingsport assessment area under the investment test is excellent. The bank had six investments totaling $\$ 23.3$ million, including one current period investment for $\$ 8.4$ million. Direct investments in the assessment area provided support for affordable housing through LIHTCs and GNMA investment vehicles. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and other small business funds. Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, economic development activities including small business finance, and financial stability for low- and moderate-income individuals. The dollar volume of Regions Bank's current and total investments exhibits responsiveness to some of the identified community needs given the bank's presence in the assessment area.

The bank also made 11 contributions totaling $\$ 14,000$. Contributions were given primarily to organizations involved in promoting economic development and providing community services targeted to low- and moderate-income individuals. In addition, the assessment area was positively impacted by several statewide contributions.

## Service Test

The bank's service test performance in the Kingsport assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Kingsport assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the nine branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed one branch (in a moderate-income tract) in the Kingsport assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in moderate-income geographies or to low- and moderate-income individuals. The bank has extended hours for branches in moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Kingsport Multistate Metropolitan Area

Geographic Distribution of Branches
Assessment Area: Multi Kingsport

\begin{tabular}{|c|c|c|c|c|c|c|c|c|c|c|c|c|}
\hline \multirow[b]{2}{*}{Tract Category} \& \multicolumn{8}{|c|}{Branches} \& \multicolumn{4}{|c|}{Demographics} <br>
\hline \& \& \# \& al Branc

$\%$ \& | es |
| :--- |
| Open |
| \# | \& Closed \# \& Drive thrus \# \& | Extend |
| :--- |
| ed |
| Hours |
| \# | \& | Week- |
| :--- |
| end |
| Hours |
| \# | \& \multicolumn{2}{|r|}{Census Tracts} \& | Households |
| :--- |
| \% | \& Total Businesses \% <br>

\hline \multirow[b]{2}{*}{Low} \& Total \& 0 \& 0.0\% \& 0 \& 0 \& 0 \& 0 \& 0 \& \& \& \& <br>

\hline \& $$
\begin{aligned}
& \text { DTO } \\
& \text { LS }
\end{aligned}
$$ \& 0 \& \& \[

$$
\begin{aligned}
& 0 \\
& 0
\end{aligned}
$$

\] \& \[

$$
\begin{aligned}
& 0 \\
& 0
\end{aligned}
$$
\] \& 0 \& \& \& 0 \& 0.0\% \& 0.0\% \& 0.0\% <br>

\hline \multirow[b]{2}{*}{Moderate} \& Total \& 2 \& 22.2\% \& 0 \& 1 \& 1 \& 2 \& 0 \& \& \& \& <br>

\hline \& $$
\begin{aligned}
& \text { DTO } \\
& \text { LS }
\end{aligned}
$$ \& 0 \& \& \[

$$
\begin{aligned}
& 0 \\
& 0
\end{aligned}
$$

\] \& \[

$$
\begin{aligned}
& 0 \\
& 0
\end{aligned}
$$
\] \& 0 \& \& \& 8 \& 16.3\% \& 13.7\% \& 18.9\% <br>

\hline \multirow[b]{2}{*}{Middle} \& Total \& 6 \& 66.7\% \& 0 \& 0 \& 6 \& 6 \& 1 \& \& \& \& <br>

\hline \& $$
\begin{aligned}
& \text { DTO } \\
& \text { LS }
\end{aligned}
$$ \& 0 \& \& 0 \& \[

$$
\begin{aligned}
& 0 \\
& 0
\end{aligned}
$$
\] \& 0 \& \& \& 30 \& 61.2\% \& 66.8\% \& 61.9\% <br>

\hline \multirow[b]{2}{*}{Upper} \& Total \& 1 \& 11.1\% \& 0 \& 0 \& 1 \& 1 \& 0 \& \& \& \& <br>

\hline \& $$
\begin{aligned}
& \text { DTO } \\
& \text { LS }
\end{aligned}
$$ \& 0 \& \& 0 \& \[

$$
\begin{aligned}
& 0 \\
& 0
\end{aligned}
$$
\] \& 0 \& \& \& 11 \& 22.4\% \& 19.6\% \& 19.2\% <br>

\hline \multirow[b]{2}{*}{Unknown} \& Total \& 0 \& 0.0\% \& 0 \& 0 \& 0 \& 0 \& 0 \& \& \& \& <br>

\hline \& $$
\begin{aligned}
& \text { DTO } \\
& \text { LS }
\end{aligned}
$$ \& 0 \& \& \[

0

\] \& \[

0
\] \& 0 \& \& \& 0 \& 0.0\% \& 0.0\% \& 0.0\% <br>

\hline \multirow[b]{2}{*}{Total} \& Total \& 9 \& 100.0\% \& 0 \& 1 \& 8 \& 9 \& 1 \& \& \& \& <br>

\hline \& $$
\begin{aligned}
& \text { DTO } \\
& \text { LS }
\end{aligned}
$$ \& 0 \& \& \[

$$
\begin{aligned}
& 0 \\
& 0
\end{aligned}
$$

\] \& \[

$$
\begin{aligned}
& 0 \\
& 0
\end{aligned}
$$
\] \& 0 \& \& \& 49 \& 100.0\% \& 100.0\% \& 100.0\% <br>

\hline \multicolumn{13}{|c|}{DTO - Drive Thru Only} <br>
\hline
\end{tabular}

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 161 service hours in various capacities for community development organizations by participating in 24 community development services. Many of the community development services focused on education and service on the boards of directors of community organizations that aided moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs

## Memphis Multistate Metropolitan Area

## CRA RATING FOR MEMPHIS: Satisfactory ${ }^{81}$

## The Lending Test is rated: High Satisfactory <br> The Investment Test is rated: <br> The Service Test is rated: <br> High Satisfactory <br> High Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas and is often in a leadership position in response to the community development needs of the assessment areas.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides a relatively high level of community development services throughout the assessment areas.

[^27]
## SCOPE OF EXAMINATION

The time period, products and affiliates evaluated for the Memphis multistate assessment area are consistent with the overall scope described in the Description of the Institution section of this report. Regions Bank’s performance in Memphis was evaluated using full-scope examination procedures.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN MEMPHIS

The Memphis assessment area includes Crittenden County in Arkansas, DeSoto and Tate counties in Mississippi, and Fayette, Shelby and Tipton counties in Tennessee. The assessment area represents the majority of the eight-county Memphis TN-MS-AR MSA. Memphis is the primary city in the assessment area. The assessment area has 278 census tracts, with 48 low-income and 66 moderate-income tracts. FEMA declared all the counties as a federal disaster area on May 4, 2010, due to tornadoes, straight-line winds, severe storms, and flooding. Regions operates 55 branches in the Memphis assessment area, including three in low-income tracts, 10 in moderate-income tracts, and a total of 14 bordering at least one low- or moderate-income tract. These branches represent $3.2 \%$ of the bank's total branches. Four of the branches are in Arkansas, six branches are located in Mississippi, and 45 branches are in Tennessee. As of June 30, 2011, the bank had $\$ 3.8$ billion in deposits in Memphis, representing 3.9\% of Regions Bank's total deposits in all the assessment areas. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 2,841 (3.3\%) were in the Memphis assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 2,920 (2.7\%) were in the Memphis assessment area.

## Population and Income Characteristics

Population in the Memphis assessment area grew by about $9.2 \%$ between 2000 and 2010, which was less than the population growth rate in Tennessee of $11.4 \%$, but slightly above the growth rate for Arkansas at 9\%, and well above the growth rate in Mississippi at $4.3 \%$. The growth was very uneven across the assessment area. The most dramatic increase occurred in DeSoto County, Mississippi, which grew by over $50 \%$ to a population in 2010 of $161,252 .{ }^{82}$

Shelby County is the largest county in the assessment area, with approximately 928,000 residents, or $74 \%$ of the total population in the assessment area. Shelby experienced modest growth of about $3.4 \%$ between 2000 and 2010. Memphis is the largest city in the assessment area and in the state of Tennessee, with 647,000 residents. The growth in Shelby County occurred outside the city of Memphis, which actually lost less than $1 \%$ of its population. Bartlett and Collierville, two suburbs of Memphis in Shelby County, experienced significant growth of more than $35 \%$ between 2000 and 2010. Southaven, another suburb of Memphis in DeSoto County, Mississippi, grew by $68 \%$ over the past decade to 48,982 residents, making it the fourth largest city in Mississippi. The population figures demonstrate the sprawl that is occurring as the population moves away from the city of Memphis to newer suburban locations. ${ }^{83}$

Median family income in the Memphis MSA is above the median family income in Tennessee, Arkansas and Mississippi. For the purposes of this analysis, HUD's median family income for the Memphis TN-MS-AR MSA for 2010 and 2011 is used. As shown, the median family income barely increased from $\$ 58,100$ to $\$ 58,300$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

[^28]
## Borrower Income Levels <br> Memphis, TN-MS-AR MSA



Within the assessment area, US census estimates show that the median family income between 2006 and 2010 ranged from $\$ 42,042$ in Crittenden County to $\$ 66,061$ in DeSoto County. The income variation is even greater between the cities in the assessment area, ranging from $\$ 42,578$ in Memphis to $\$ 127,212$ in Germantown. ${ }^{84}$

Memphis ranked as the poorest large metro area (defined as a region with more than one million residents) in the country according to 2010 census estimates. The poverty rate in the MSA was $19.1 \%$, and in the Memphis city limits, the poverty rate exceeded $26 \%$. Memphis has long been plagued with high poverty, but the conditions worsened significantly during the economic downturn. ${ }^{85}$ Crittenden County has the highest poverty rate in the MSA with $27.4 \%$ of residents estimated to live below the federal poverty level between 2006 and 2010. ${ }^{86}$ Food stamp usage, another indicator of financial distress, has also increased in the assessment area. In 2009, $27.9 \%$ of the population in Crittenden and $25.8 \%$ of the population in Shelby County received food stamps. Across the MSA, almost $19 \%$ of the population received food stamps. ${ }^{87}$

## Housing Characteristics

The housing market in the Memphis assessment area declined substantially during the economic downturn. According to the National Association of Realtors, the median housing price for the Memphis MSA declined by about $6 \%$ between 2009 and 2011, from $\$ 119,200$ to $\$ 112,300$. Nationally, home prices fell by about $3.4 \%$ over this time period. ${ }^{88}$ In the Tennessee portion of the assessment area, the median home prices are much lower. According to the Memphis Area Association of Realtors, the median home price in the Greater Memphis Area (Shelby, Fayette and Tipton counties) declined from \$93,500 to \$87,570 between 2010 and $2011 .{ }^{89}$

The home sales market in the region is soft, though showed some signs of improvement in 2012. The Memphis Area Association of Realtors notes that sales declined by $10 \%$ between 2010 and 2011. The market started to recover in 2012 with sales up by 17\% over 2011. However, foreclosures are still a big issue in the market, and in 2012, bank sales represented $28 \%$ of all home sales. ${ }^{90}$

[^29]
## Memphis Multistate Metropolitan Area

New home construction in the assessment area peaked in 2005 with 9,427 new single-family permits and declined by $83 \%$ by 2011. Shelby, Fayette, and Tate counties have seen construction activity pick up again, though new permits remain far below the peak levels. Elsewhere in the assessment area, building permits have continued to decline. ${ }^{91}$ The new activity in Shelby County is occurring primarily in new subdivisions outside the city of Memphis. ${ }^{92}$

The Memphis housing market has been severely impacted by the foreclosure crisis, particularly in certain submarkets. The percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) rose from $8.0 \%$ in January 2010 to $12.1 \%$ in December 2011. Tate County, Mississippi, had the highest rate of seriously delinquent mortgages at $16 \%$ at the end of 2011, followed by Tipton County, Tennessee, at $14.6 \% .^{93}$ Foreclosures have long been an issue in Memphis, first due to the high concentration of subprime mortgages, and then as a result of rising unemployment.

The homeownership rate varies across assessment area, from a low of $58 \%$ in Crittenden County to a high of $82 \%$ in Fayette County. In all counties the homeownership rate declined between 2000 and 2010. The homeownership rate in Shelby County in 2010 was about 60\%; however, in Memphis, just over 50\% of households are homeowners. ${ }^{94}$

Housing affordability also varies in the assessment area. DeSoto County is the least affordable, and in 2009, only $24 \%$ of the homes were considered affordable to a family earning less than $80 \%$ of the area median income. Tate and Crittenden counties are the most affordable, with $54 \%$ and $50 \%$ of homes in each county, respectively, considered affordable. Similar to most markets, affordable housing is a concern throughout the Memphis MSA. In 2009, $50 \%$ of renters were considered cost burdened, meaning they spent more than $30 \%$ of their gross income on housing expenses. In Shelby County, $52 \%$ of all renters are considered cost burdened and $28 \%$ are considered severely cost burdened, meaning they spend more than $50 \%$ of their income on rent. In addition, over $30 \%$ of homeowners in Shelby County were considered cost burdened. ${ }^{95}$

## Employment and Economic Conditions

Memphis is located on the Mississippi River, accessible by two US Interstates and close to numerous rail lines. The centralized location makes it easier to get from Memphis to more major metropolitan markets than any other city in the central US. As a result, the Memphis area has become a center for distribution and logistics, and "America's Aerotropolis." According to the Greater Memphis Chamber, an aerotropolis is a city or an economic hub that extends out from a large airport into a surrounding area that consists mostly of distribution centers, office buildings, light manufacturing firms, convention centers, and hotels, all linked to the airport via roads, expressways, and rail lines. ${ }^{96}$ The Memphis Airport is the world's busiest airport in terms of cargo tonnage, and $98 \%$ of the cargo is handled by Fed Ex, the region's largest employer with 31,000 employees. The

[^30]
## Memphis Multistate Metropolitan Area

airport is a significant economic engine for the region, and according to a 2007 study, the airport had an economic impact of $\$ 28.6$ billion and 220,000 jobs in the Memphis MSA. ${ }^{97}$

While Memphis is known as a center for distribution and logistics, the economy is fairly diverse, and the city is home to three Fortune 500 companies with Fed Ex, International Paper and AutoZone. ${ }^{98}$ The area is also home to First Tennessee, giving it a significant banking presence. There are employment concentrations in multiple sectors in the assessment area, including wholesale and retail trade, government, education and health services, professional and business services, and transportation and utilities. In addition to the three Fortune 500 companies, other major employers include Methodist Healthcare, Baptist Memorial Health Care Corporation, Wal-Mart, University of Tennessee Health Science Center, Harrah's Entertainment, St. Jude Children’s Research Hospital, and First Horizon National Corporation. The school districts in each county are also significant employers. ${ }^{99}$

The Memphis area was hit hard by the recession, and recovery has been slow. Between 2007 and 2009, there was job loss in many sectors, with the largest declines in manufacturing, construction, financial, and information services. However, several sectors were already rebounding by 2011, including construction and professional services.

The only sector that has not lost employment is education and health services, which steadily grew even during the recession. ${ }^{100}$ Several of the anchor institutions in this sector include the University of Memphis, which employs 2,500 faculty and staff and enrolls more than 22,725 students, and the University of Tennessee Health Science Center in Shelby County, which employs 3,550 people. Finally, in 2011, Methodist Healthcare began constructing a $\$ 137$ million, 100-bed hospital in Olive Branch, DeSoto County, Mississippi, which is expected to create 500 jobs in the Memphis MSA.

While the number of jobs in the MSA is increasing again, nonfarm payrolls remain 42,500 jobs below the peak of 640,800 recorded in 2007. ${ }^{101}$ Since 2007, unemployment has increased across the assessment area, peaking at $10.1 \%$ in 2010. The unemployment rate in the MSA was well above all states represented in the MSA, with the exception of Mississippi. Since 2010, unemployment has started to improve across the assessment area. The unemployment rate was highest in Crittenden County in 2011 at $12.6 \%$ and lowest in DeSoto County at $8.0 \%$. In Shelby County, the unemployment rate in 2011 was $9.9 \%$, higher than the unemployment rate in Tennessee at $9.2 \%$.

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## Memphis Multistate Metropolitan Area

## Unemployment Rates

Assessment Area: Multi Memphis

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Memphis MSA | 10.1 | 9.9 |
| Crittiden County | 11.4 | 12.6 |
| Arkansas | $\mathbf{7 . 9}$ | $\mathbf{8 . 0}$ |
| Desota County | 7.9 | 8.0 |
| Tate County | 11.3 | 11.2 |
| Mississippi | $\mathbf{1 0 . 5}$ | $\mathbf{1 0 . 7}$ |
| Fayette County | 10.7 | 10.5 |
| Shelby County | 10.1 | 9.9 |
| Tipton County | 10.8 | 9.8 |
| Tennessee | $\mathbf{9 . 8}$ | $\mathbf{9 . 2}$ |

Not Seasonally Adjusted

Overall, the Memphis region is rebounding, but it is happening slowly. In December 2012, Memphis was ranked $54^{\text {th }}$ in the Brookings Institute Metro Monitor index of economic recovery, which ranks the pace of recovery in the 100 largest metro economies based on job creation, unemployment rate, metro economic output and housing prices. ${ }^{102}$ The combination of the foreclosure crisis and elevated unemployment rates continues to limit economic growth in the region, particularly in lower income communities.

There have been several significant economic development events in the region in the past few years. First, Electrolux announced that it would build a new $\$ 266$ million plant to produce ovens and ranges. The plant construction is underway, and production will start in 2013. Electrolux anticipates employing about 250 at full capacity. ${ }^{103}$ Second, International Paper announced in late 2012 that it would build a fourth office tower, which will enhance its commitment to Memphis as the corporate headquarters location. ${ }^{104}$

## Competition

Regions was ranked $2^{\text {nd }}$ in deposit market share in the Memphis multistate assessment area according to the June 30, 2011 FDIC Summary of Deposits Report, with $\$ 3.8$ billion, or $17.1 \%$ of total deposits. First Tennessee Bank, based in Memphis, had the largest share of deposits with almost $33 \%$. SunTrust Bank was ranked $3^{\text {rd }}$ with $8.3 \%$ of deposits, and the remainder of the retail banking market is primarily community banks. Overall, there were 58 banks active in the market operating 390 branches.

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## Memphis Multistate Metropolitan Area

Regions ranked $8^{\text {th }}$ of 342 HMDA reporters in 2010 with $3.5 \%$ of total loans and $4^{\text {th }}$ out of 401 reporters with $4.0 \%$ of loans in 2011. Regions' HMDA lending declined by $4 \%$ between 2010 and 2011, but the bank performed better than the overall market where lending declined by $16 \%$. Wells Fargo Bank, Bank of America, and JPMorgan Chase are the leading HMDA lenders in the market.

Regions ranked $3^{\text {rd }}$ out of 82 small business loan reporters in 2010 with $8.5 \%$ of the loans and $2^{\text {nd }}$ out of 78 reporters in 2011 with $13.2 \%$ of loans. Regions increased its lending between 2010 and 2011 by almost $89 \%$, primarily through loan purchases. Overall, small business lending in the market increased by 22\%. American Express and Citibank are the other leading small business lenders in the market.

## Community Development

The recession, coupled with the continuing housing and foreclosure crisis, has had a significant impact on lowand moderate-income communities in the Memphis region. Memphis has long struggled with concentrated poverty, particularly in majority minority neighborhoods. In these communities, the impact of the recession has been hardest and the recovery has been the slowest. It is estimated that African-American households have lost two decades of economic gains as a result of subprime lending, the foreclosure crisis and job loss due to the recession. Black middle-class neighborhoods that were beginning to stabilize have seen home prices plummet and housing vacancies increase, leading to increases in crime and other challenges. Memphis is a city of neighborhoods, with many active community development organizations that have been working to revitalize these neighborhoods for years. However, the recession has created a crisis of an entirely different magnitude, and it may take years, if ever, for these neighborhoods to recover. ${ }^{105}$

Memphis has a very well established network of community-based organizations that are engaged in affordable housing, neighborhood stabilization and small business initiatives. There are nine Community Housing Development Organizations (CHDOs) in the city working on affordable housing development and rehabilitation. Many of these organizations also provide financing and homeownership counseling. ${ }^{106}$ There are also several community development financial institutions (CDFIs) in the area that provide microenterprise and small business financing support. Finally, the City has a strong interest in neighborhood revitalization and has launched Livable Memphis, which is an initiative designed to combat urban sprawl but encourage new capital improvements and investments in Memphis neighborhoods. According to one community contact that works with community development organizations in the city, while there is much work to be done, there is a new energy for neighborhood revitalization in the city.

The community development organizations in the city have struggled through the recession. Many have lost funding and are having to change their business strategy if they previously focused on homeownership. A community contact noted that operating support for nonprofits was one of the biggest needs in the community. The contact also noted that alternative sources of financing, like CDFIs, might be better able to bridge the funding gap for nonprofits, since some may not be considered good credit risks for a bank. The contact did indicate that, overall, banks were good partners for community development activities, though rarely took a leadership role and were not very creative in developing solutions to meet community needs.

Affordable housing is one of the biggest issues in the Memphis area. According to the Tennessee Housing Development Agency's 2012 Tennessee Housing Needs Assessment, over one-third of the households in Memphis have a serious housing problem (substandard housing or paying more than $35 \%$ of their income). In

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## Memphis Multistate Metropolitan Area

addition, Shelby County had the second highest percentage of households (homeowners and renters) in the state that were considered cost burdened. Finally, foreclosures have increased significantly and almost $30 \%$ of the foreclosure filings in Tennessee in the past three years have occurred in Shelby County. ${ }^{107}$

To aid communities that have been impacted by foreclosures, the federal government created the Neighborhood Stabilization Program (NSP) in late 2008. To date, through two rounds of NSP funding, $\$ 20.8$ million has been awarded to the City of Memphis and Shelby County, with additional funds in the surrounding counties through the NSP allocations to the states of Tennessee, Mississippi and Arkansas. In Shelby County, the funds have been used to purchase and renovate foreclosed homes for rental or resale, to rehabilitate multi-family housing, and for the removal of blighted properties. ${ }^{108}$

There is a great need for more financial education and other household financial stability efforts targeting lowand moderate-income households and those that have gone through a foreclosure or bankruptcy. According to the FDIC's 2009 National Survey of Unbanked and Underbanked Households, $15.7 \%$ of households in the city of Memphis are unbanked, meaning they have no type of deposit account with a mainstream financial institution. In addition, $28.1 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. In the Memphis MSA, 17.3\% are unbanked and $17.4 \%$ are underbanked. The unbanked are disproportionately lower income and minority households. ${ }^{109}$ There are several initiatives underway to address the financial stability of low- and moderateincome individuals. First, there is an active network of volunteer income tax assistance (VITA) sites coordinated by the United Way of the MidSouth in Shelby County. Second, Bank On Memphis was launched in 2011 to focus on increasing access to mainstream financial services. Twelve financial institutions, including Regions, are participating in this initiative by providing low-cost basic transaction accounts.

## Demographic Characteristics by Census Tract

The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

[^34]
## Memphis Multistate Metropolitan Area

## Combined Demographics Report

Assessment Area: Multi Memphis

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 48 | 17.3 |  | 8.2 | 10,328 | 41.6 | 67,574 | 22.3 |
| Moderate-income | 66 | 23.7 |  | 23.4 | 15,467 | 21.8 | 49,830 | 16.4 |
| Middle-income | 82 | 29.5 |  | 34.4 | 8,605 | 8.2 | 59,824 | 19.7 |
| Upper-income | 79 | 28.4 |  | 34.0 | 2,876 | 2.8 | 126,030 | 41.6 |
| Unknown-income | 3 | 1.1 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 278 | 100.0 |  | 100.0 | 37,276 | 12.3 | 303,258 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 45,258 | 16,044 |  | 35.5 | 23,250 | 51.4 | 5,964 | 13.2 |
| Moderate-income | 113,256 | 56,292 |  | 49.7 | 47,738 | 42.2 | 9,226 | 8.1 |
| Middle-income | 158,014 | 100,448 |  | 63.6 | 48,451 | 30.7 | 9,115 | 5.8 |
| Upper-income | 147,358 | 111,662 |  | 75.8 | 29,165 | 19.8 | 6,531 | 4.4 |
| Unknown-income | 2 |  | 2 | 100.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 463,888 | 284,448 |  | 61.3 | 148,604 | 32.0 | 30,836 | 6.6 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3,735 | 7.4 |  | 7.0 | 388 | 12.1 | 228 | 8.7 |
| Moderate-income | 8,766 | 17.4 |  | 17.3 | 600 | 18.7 | 498 | 18.9 |
| Middle-income | 15,520 | 30.9 |  | 31.5 | 792 | 24.7 | 732 | 27.8 |
| Upper-income | 22,071 | 43.9 |  | 44.0 | 1,389 | 43.2 | 1,155 | 43.9 |
| Unknown-income | 156 | 0.3 |  | 0.2 | 43 | 1.3 | 19 | 0.7 |
| Total Assessment Area | 50,248 | 100.0 |  | 100.0 | 3,212 | 100.0 | 2,632 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 88.4 |  | 6.4 |  | 5.2 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 14 | 2.0 |  | 1.8 | 2 | 7.4 | 0 | 0.0 |
| Moderate-income | 75 | 10.7 |  | 10.7 | 3 | 11.1 | 1 | 11.1 |
| Middle-income | 442 | 63.2 |  | 63.3 | 16 | 59.3 | 6 | 66.7 |
| Upper-income | 165 | 23.6 |  | 23.8 | 5 | 18.5 | 2 | 22.2 |
| Unknown-income | 3 | 0.4 |  | 0.3 | 1 | 3.7 | 0 | 0.0 |
| Total Assessment Area | 699 | 100.0 |  | 100.0 | 27 | 100.0 | 9 | 100.0 |
|  | Percentage of Total Farms: |  |  | 94.8 |  | 3.9 |  | 1.3 |

[^35]
## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending performance in the Memphis assessment area is good, and lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

Regions Bank is both a HMDA and small business lender. During the review period, the bank reported 2,841 (49.3\%) HMDA loans compared to 2,920 ( $50.7 \%$ ) small business loans in the Memphis assessment area. Therefore, small business and HMDA lending were weighted equally in determining the bank's lending test rating in the assessment area. In total, $3.0 \%$ of the bank's small business and HMDA lending by number of loans and $3.0 \%$ by dollar volume totaling $\$ 669.2$ million were originated in the Memphis assessment area.

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

## Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs based on small business and HMDA lending. The percentage of the bank's total lending at $3.0 \%$ is comparable to the percentage of deposits at $3.9 \%$ in this area. The bank also originated nine community development loans in the Memphis assessment area. Regions Bank is a major competitor in this market, ranking $4^{\text {th }}$ in HMDA loans and $2^{\text {nd }}$ in small business loans in 2011.

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank’s geographic distribution of loans reflects excellent penetration throughout the assessment area.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, the bank originated $1.0 \%$ of its home purchase loans in low-income census tracts, which was less than the $5.6 \%$ of the owner-occupied units located in low-income tracts in the assessment area. Regions Bank's performance was slightly greater than the aggregate in both 2010 and 2011.

Home purchase lending in moderate-income tracts is adequate. During the review period, the bank originated $7.8 \%$ of its home purchase loans in moderate-income census tracts, which was less than the $19.8 \%$ of the owner-occupied units located in moderate-income tracts in the assessment area. Regions Bank’s performance was greater than the aggregate in both 2010 and 2011.

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

## Memphis Multistate Metropolitan Area

## Home Refinance Loans

Home refinance lending in low-income tracts is good. During the review period, the bank originated $0.9 \%$ of its home refinance loans in low-income census tracts, which was less than the $5.6 \%$ of the owner-occupied units located in low-income tracts in the assessment area. Although the bank's performance was less than the demographic in Memphis, Regions' performance was significantly greater than the aggregate in both 2010 and 2011.

Regions Bank's home refinance lending in moderate-income census tracts is good. During the review period, the bank originated $6.6 \%$ of its home refinance loans in moderate-income census tracts, which contain $19.8 \%$ of the owner-occupied units. Regions Bank’s performance was greater than the aggregate in 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in low-income tracts is excellent. During the review period, the bank originated $10.5 \%$ of its home improvement loans in low-income census tracts, which was considerably greater than the $5.6 \%$ of the owner-occupied units located in low-income tracts in the assessment area. Regions Bank's performance was significantly greater than the aggregate in both 2010 and 2011.

Regions Bank's home improvement lending in moderate-income census tracts is also excellent when compared to the percentage of owner-occupied units in these tracts and to aggregate lending performance. During the review period, Regions Bank originated $19.3 \%$ of its home improvement loans in moderate-income tracts, where $19.8 \%$ of the owner-occupied units in the assessment area are located. The bank's performance was significantly greater than the aggregate in 2010 and 2011.

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

## Small Business Loans

Small business lending in low-income census tracts is excellent. Regions Bank originated $7.9 \%$ of small business loans in low-income tracts, which was greater than the percentage of small businesses in low-income tracts at $7.0 \%$. The bank performed better than the aggregate in both 2010 and 2011.

Small business lending in moderate-income census tracts is also excellent. Regions Bank originated 19.4\% of small business loans in moderate-income tracts, which was greater than the percentage of small businesses in these tracts at 17.3\%. The bank performed better than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while the lending in upper-income tracts was greater than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects good penetration throughout the assessment area. 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, such as local economic conditions, unemployment, and poverty rates, were considered, as well as the performance of other banks.

## Memphis Multistate Metropolitan Area

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is good. The bank's performance was less than the demographic with $12.6 \%$ of its home purchase loans to low-income borrowers, while low-income families make up $22.3 \%$ of total families in the assessment area. The bank's performance was better than the aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is excellent. At 27.0\%, the bank's percentage of home purchase lending to moderate-income borrowers was much greater than the percentage of moderate-income families in the assessment area at $16.4 \%$. The bank's performance was also better than the aggregate in 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

Regions Bank's home refinance lending to low-income borrowers is good. At 7.4\%, the bank's home refinance lending to low-income borrowers was much less than the percentage of low-income families in the assessment area at $22.3 \%$, however the bank's performance was considerably better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area and to aggregate performance. The bank's percentage of home refinance lending to moderate-income borrowers at $13.8 \%$ was less than the percentage of moderate-income families in the assessment area at $16.4 \%$; however, Regions Bank’s performance was better than the aggregate in 2010 and 2011.

The bank's home refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Considering the performance of the aggregate along with other lending and demographic data, home improvement lending to low-income borrowers is good. During the review period, low-income families represented $22.3 \%$ of total families and received $16.5 \%$ of the home improvement loans. The bank performed better than the aggregate in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $25.6 \%$ exceeded the percentage of moderate-income families in the assessment area at $16.4 \%$. The bank's home improvement lending to moderate-income borrowers was better than the aggregate in 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Memphis Multistate Metropolitan Area

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was slightly less than the aggregate in 2011. The bank originated $38.6 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $88.4 \%$. However, of the 2,920 small business loans originated during the review period, 1,276 loans ( $43.7 \%$ ) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $68.6 \%$, which was still below the percentage of small businesses in the assessment area. However, $81.0 \%$ of the 2,920 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank’s performance was comparable to the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Memphis assessment area. The bank originated nine community development loans totaling $\$ 76.7$ million during the review period. The majority of loans financed activities that helped stabilize or revitalize low- and moderate-income geographies. Local community development and credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization due to elevated foreclosure rates, small business development and finance, and financial stability for residents. The bank's community development loan portfolio exhibits good responsiveness to the credit needs of low- and moderate-income individuals and geographies and small businesses. The dollar amount of community development loans is excellent considering the bank's presence in the market.

Examples of community development lending include the following:

- Nearly $\$ 4$ million in financing for a commercial development in downtown Memphis that benefited from community development financing sources such as New Markets Tax Credits (NMTC) and the Brownfields Economic Development Initiative program with HUD;
- Nearly $\$ 3.5$ million to support the development of more than 150 income-restricted affordable housing units in conjunction with the Low Income Housing Tax Credit (LIHTC) program;
- A loan to a nonprofit organization that provides free and low-cost drug and alcohol treatment services; and
- A $\$ 15$ million revitalization loan to a business that is creating jobs in a geography adjacent to the Memphis Renewal Zone and an SBA Historically Underutilized Business Zone (HUBZone).


## Investment Test

The bank's performance in the Memphis assessment area under the investment test is good. The bank had 18 investments totaling $\$ 17.8$ million, including one current period investment for $\$ 3.3$ million. Direct investments in the assessment area provided support for affordable housing through FNMA and GNMA investment instruments and LIHTCs. The bank has also provided support for economic development and community revitalization through community development program investments in CDFIs as well as investments in economic development bonds and small business funds. The broader regional investments primarily funded small businesses and startup companies through SBICs and small business loans funds. Community development needs identified in the community include, but are not limited to, neighborhood stabilization due to elevated foreclosure and unemployment rates, affordable housing for low- and moderate-income individuals, financial stability for low- and moderate-income individuals, workforce development, and small business financing and technical assistance.

## Memphis Multistate Metropolitan Area

The bank also made 30 contributions totaling $\$ 230,900$. Contributions were given primarily to organizations involved in provision of community services targeted to low- and moderate-income individuals and communities, affordable housing and economic development. In addition, the bank made several statewide contributions, primarily to support affordable housing, that positively impact the assessment area.

Regions Bank's investment portfolio and contributions exhibit good responsiveness to several of the identified community development needs. Examples include the following:

- The bank is a leader in financing affordable housing with LIHTCs. The bank has invested $\$ 10.4$ million in LIHTC projects, which has supported seven projects and over 1,350 units of housing affordable to low- and moderate-income individuals in Memphis. Affordable rental housing is one of the most critical needs in Memphis.
- The bank provided more than $\$ 55,000$ in general operating grants to nonprofits engaged in housing, community development, financial education and social services. Operating support was important for nonprofits struggling to survive the economic downturn and the decline in public and private funding sources.


## Service Test

The bank's service test performance in the Memphis assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Memphis assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the 55 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed six branches (one in a low-income tract, one in a moderate-income tract, three in middle-income tracts, and one in an upper-income tract) in the Memphis assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank has extended and weekend hours for branches in low- and moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Memphis Multistate Metropolitan Area

## Geographic Distribution of Branches

Assessment Area: Multi Memphis

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branc $\%$ | Open | Closed \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 3 | 5.5\% | 0 | 1 | 2 | 2 | 1 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 48 | 17.3\% | 9.1\% | 7.4\% |
| Moderate | Total | 10 | 18.2\% | 0 | 1 | 8 | 9 | 4 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 66 | 23.7\% | 24.0\% | 17.4\% |
| Middle | Total | 17 | 30.9\% | 0 | 3 | 17 | 13 | 12 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 82 | 29.5\% | 34.4\% | 30.9\% |
| Upper | Total | 25 | 45.5\% | 0 | 1 | 20 | 19 | 13 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 79 | 28.4\% | 32.5\% | 43.9\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 3 | 1.1\% | 0.0\% | 0.3\% |
| Total | Total | 55 | 100.0\% | 0 | 6 | 47 | 43 | 30 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 278 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 1,806 service hours in various capacities for community development organizations by participating in 342 community development services. Many of the community development services focused on education, affordable housing, youth involvement, tax assistance, and other community services that aided low- and moderate-income geographies and low- and moderateincome individuals. In particular, Regions Bank employees volunteered several hours by providing counsel to a community organization whose purpose is to rehabilitate the homes of low- and moderate-income individuals. In addition, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. Furthermore, the majority of these schools are located in low- and moderate-income geographies.

## St. Louis Multistate Metropolitan Area

## CRA RATING FOR ST. LOUIS: Satisfactory ${ }^{110}$

## The Lending Test is rated: The Investment Test is rated: The Service Test is rated: <br> High Satisfactory <br> High Satisfactory <br> Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of borrowers reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans within the assessment area.
- The bank provides a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position in response to the community development needs of the assessment area.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area.
- The bank provides an adequate level of community development services throughout the assessment area.

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## SCOPE OF EXAMINATION

The time period, products and affiliates evaluated for the St. Louis multistate assessment area are consistent with the overall scope described in the Description of the Institution section of this report. Regions Bank's performance in St. Louis was evaluated using full-scope examination procedures.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN ST. LOUIS

The St. Louis assessment area includes Clinton, Madison, Monroe and St. Clair counties in Illinois and St. Charles and St. Louis counties as well as the City of St. Louis in Missouri. There are 466 census tracts in the assessment area, which includes 55 low-income tracts and 116 moderate-income tracts. Regions Bank operates 70 branches in the assessment area, 16 of which are located in low- or moderate-income tracts; 21 of the branches in middle- and upper-income tracts border a low- or moderate-income tract. These branches represent 4.1\% of the bank's total branches; 36 branches are in Illinois, and 34 branches are in Missouri. As of June 30, 2011, the bank had $\$ 3.0$ billion in deposits in St. Louis, representing $3.0 \%$ of Regions Bank's total deposits in all the assessment areas. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 2,443 (2.8\%) were in the St. Louis assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 2,905 (2.7\%) were in the St. Louis assessment area.

## Population and Income Characteristics

Much of the assessment area's population growth from 2000 to 2010 occurred in the suburbs of the St. Louis metro area, while the inner-city urban core experienced population declines. As of 2010 the total population for the assessment area was $2,288,790$, representing a $2.8 \%$ increase from 2000. This growth rate was slightly less than the state of Illinois and less than half the state of Missouri. St. Charles County, Missouri, and Monroe County, Illinois, saw the largest population increases during this time period, with growth rates of $27 \%$ and $9.3 \%$, respectively. Conversely, the City of St. Louis and St. Louis County, Missouri, experienced population declines during the course of the decade, with the City of St. Louis losing more than $8 \%$ of its population, although St. Louis County remained the most populous county in the assessment area with just under 1 million people in 2010. ${ }^{111}$ Population decline together with negative in-migration puts pressure on existing businesses and the education system to continuously redevelop skills within the existing talent pool, while home grown knowledge is potentially exiting the area for other markets.

The percentage of assessment area residents receiving food stamps is on the rise. From 2000 to 2009, all counties inside the assessment area, with the exception of St. Clair County, Illinois, saw a $100 \%$ or more increase in food stamp recipients. The largest increase was in St. Charles County, Missouri. Food stamp recipient data was not available for the City of St. Louis. Poverty rates remained relatively flat from 2000 to 2009. The City of St. Louis had the largest proportion of its population living in poverty at $24 \%$. Many of the suburban areas such as Monroe County, Illinois, and St. Charles County, Missouri, had much lower poverty rates, typically in single digits.
Free and reduced price lunch program participation can also be used to understand the income characteristics of a community. There are 50 school districts in the assessment area. As of 2010, 12 of the 50 school districts in the assessment area ( $24 \%$ ) had more than $50 \%$ of students receiving free and reduced price lunch benefits. The school districts with the largest percentage of students receiving these benefits reside in the urban core of the City of St. Louis and East St. Louis. Because many of the school districts in the assessment area did not report this data in 2000, a year-to-year comparison is not possible.

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## St. Louis Multistate Metropolitan Area

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the St. Louis Missouri-Illinois MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper) and shows that the estimated median family income rose $\$ 1,200$, or $1.8 \%$, from 2010 to 2011.

## Borrower Income Levels

St. Louis, MO-IL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | 0-49.99\% |  | 50\% | - 79.99\% |  | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$68,300 | 0 | - | \$34,149 | \$34,150 | - | \$54,639 | \$54,640 | - | \$81,959 | \$81,960 | - | \& above |
| 2011 | \$69,500 | 0 | - | \$34,749 | \$34,750 | - | \$55,599 | \$55,600 | - | \$83,399 | \$83,400 | - | \& above |

## Housing Characteristics

While home prices in the St. Louis MSA did not increase as significantly as other major metropolitan areas during the housing boom, prices still fell significantly from their 2006 peak, and the housing market remains soft. Census data shows that the median value of homes generally increased less inside the assessment area than nationwide over the course of the last decade. Nationwide the median value of an owner-occupied, singlefamily home increased by $66 \%$ whereas the assessment area increases ranged from a low of $48 \%$ in Clinton County, Illinois, to a high of $58 \%$ in St. Charles County, Missouri. The exception was the City of St. Louis, where home values increased by $89 \%$ and then experienced a more drastic decline in the latter part of the decade.

Census data also show that there were 943,559 housing units in the assessment area in 2000, of which $64.7 \%$ were owner-occupied, $28.0 \%$ were rental units, and $7.3 \%$ were vacant. While a majority of units were owneroccupied, a disproportionately higher percentage of housing units in low- and moderate-income tracts were rental units or vacant, indicating reduced opportunities for mortgage origination in these geographies. The median age of housing stock across the assessment area was 37 years, but this figure increased to 54 years and 50 years in low-income tracts and moderate-income tracts, respectively. Additionally, housing permit activity declined significantly from its peak years. Single-family permits declined by $76 \%$ from 2004 and 2011, while multi-family residential permits experienced a less severe decline of $63 \%$ from 2003 to 2011. Both categories saw an increase in activity during 2010 that declined in 2011, an indicator of the fragile state of the housing market inside the MSA. ${ }^{112}$

The rental market in the MSA is also soft but improving. As of November 2012, the rental vacancy rate (which includes renter-occupied single-family homes, mobile homes and apartment units) is estimated to be $10.3 \%$, which is down from $10.8 \%$ in April 2010. The renter vacancy rate is significantly higher in the City of St. Louis, where it is estimated to be $14.9 \%$, which is down from $15.2 \%$ in 2011 . The apartment rental market in particular has shown more improvement and is currently balanced with a vacancy rate of $6.2 \%$ for the second quarter of 2012 , down from $6.9 \%$ in the second quarter of $2011 .{ }^{113}$

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## St. Louis Multistate Metropolitan Area

Mortgage delinquencies and reduced loan demand have also had an impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $5.3 \%$ in January 2010 to $8.5 \%$ in December 2011. ${ }^{114}$ Distressed mortgages are primarily concentrated in North St. Louis and on the Illinois side of the state border. But while mortgage defaults and foreclosures are at very high levels historically, the region has not seen the same levels of distress as other areas of the country.

HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to be weak, declining from a high of 43,393 loans in 2005 to 19,198 in 2010, a reduction of nearly $56 \%$. Refinance activity was much less volatile, only decreasing by $2.5 \%$ from its 2004 peak of 66,960 loans. With the exception of St. Louis County, Missouri, and the City of St. Louis, all counties in the assessment area experienced an increase in refinance activity during this period. ${ }^{115}$ These statistics further indicate that while the recent recession adversely impacted the assessment area, it did so to a lesser degree than other major metropolitan areas across the United States.

## Employment and Economic Conditions

St. Louis is a moderate-growth Midwestern economy that is slowly moving toward a postindustrial status. The area has had trouble accelerating its level of economic growth since the recent recession. Employment grew in 2011 at a rate of $0.7 \%$, less than the national rate of $1.2 \%$. The same held true in the period from 2003 to 2008, when US employment grew by $1 \%$ annually but the St. Louis area employment only grew by $0.5 \%$. Manufacturing is a key component of the local economy, but outsourcing of manufacturing jobs to foreign countries with cheaper labor has continued to present challenges. The military and defense-related industries also play an important role in the local economic outlook. With Boeing as one of its key employers, and the military an important component of the region's economic framework with Scott Air Force Base, occupations such as high-tech aviation manufacturing and research and development are central to this diversifying economy. ${ }^{116}$

As of 2010, total employment in the St. Louis MO-IL MSA was approximately 1.65 million jobs with employment concentrated in the following industries: health care and social assistance, manufacturing and professional, scientific, and technical services. Major employers with more than 10,000 employees include Boeing, Scott Air Force Base, BJC HealthCare, SSM Health Care and Wal-Mart. Scott Air Force Base, with 10,000 active duty and civilian personnel, provides stability to the local economy with its estimated impact of $\$ 3$ billion annually. Furthermore, housing stipends provided to military families amount to approximately $\$ 75$ million annually, which also helps to stabilize the local housing market. ${ }^{117}$ Additionally, there are numerous institutions of higher learning located in the St. Louis area, including but not limited to Washington University in St. Louis, St. Louis University, University of Missouri-St. Louis, Maryville University and Webster University.

The assessment area is also home to numerous enterprise zones designed to attract businesses to the area. Governing entities offer tax incentives to businesses that invest in the enterprise zone and have requirements for capital investment and job creation. The City of St. Louis in particular offers real estate tax abatement incentives to businesses that meet its requirements, while states offer various benefits including job credits,

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## St. Louis Multistate Metropolitan Area

investment tax credits, corporate income tax exemption, and personal property tax incentives to qualifying businesses. ${ }^{118}$

Job loss is arguably the most pervasive problem facing the local economy. Between the first quarter of 2008 and the first quarter of 2010, the area lost 78,400 jobs, or $5.7 \%$ of the area's total employment base. Among the St. Louis area employers shedding 250 or more workers were DaimlerChrysler, Anheuser-Busch/InBev, Federal Mogal, Integram, Spartech, General Motors, Lear, Metro Transit, the City of St. Louis Board of Education, Monsanto, Pfizer, KV Pharmaceuticals, Hyatt Hotels, US Fidelis, Western Union, Aramark, Wachovia, and Macy's. ${ }^{119}$ According to data from the US Bureau of Labor Statistics, the metro area labor force grew by 7,000 between April 2010 and April 2011, and the number of unemployed individuals decreased by 15,240. The counties comprising the assessment area generally have lower unemployment rates than their respective states. The City of St. Louis is the notable exception, with an unemployment rate that far exceeds the state and the nation. The national average unemployment rates for 2010 and 2011 were $9.6 \%$ and $8.9 \%$, respectively.

The following table illustrates the unemployment rates for the assessment area and the States of Illinois and Missouri.

## Unemployment Rates

Assessment Area: Multi St. Louis

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Clinton County | 8.2 | 8.0 |
| Madison County | 9.9 | 9.0 |
| Monroe County | 7.9 | 7.4 |
| St. Clair County | 10.9 | 10.3 |
| Illinois | $\mathbf{1 0 . 5}$ | $\mathbf{9 . 8}$ |
| St. Charles County | 8.3 | 7.3 |
| St. Louis County | 9.1 | 8.2 |
| St. Louis City | 12.8 | 11.7 |
| Missouri | $\mathbf{9 . 4}$ | $\mathbf{8 . 6}$ |

Not Seasonally Adjusted

## Community Contacts and Community Development Opportunities

Several community development and affordable housing specialists were contacted regarding the local economy and community development opportunities in the St. Louis MSA. All of the contacts indicated that the St. Louis economy continues to be challenged but has stabilized recently. Affordable housing was discussed as a primary community development need. The general consensus was that banks are lending to qualified borrowers but due to tightened lending standards, it is very difficult for many low- to moderate-income

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## St. Louis Multistate Metropolitan Area

applicants to qualify. As a result, multiple contacts noted the proliferation of payday lenders throughout the region, and were of the opinion that these entities are often prey on unbanked and underbanked individuals with high-cost financial services. One contact noted that more creativity is needed from financial institutions in responding to the banking needs of low- and moderate-income individuals, particularly via partnerships with community development financial institutions (CDFIs) and community-based organizations.

The City of St. Louis is the most densely populated and industrial jurisdiction in the metropolitan area. While manufacturing and corporations have a strong presence in the city, this area also presents some of the greatest economic challenges for the region. Census data show that the median income of city residents from 2005 to 2009 was $\$ 41,349$. Median incomes during this period for the surrounding counties in the assessment area ranged between $\$ 57,000$ and $\$ 81,000$; the Illinois and Missouri median figures were $\$ 67,660$ and $\$ 57,008$, respectively. Poverty in the city is much higher than the surrounding areas, with nearly one in four residents living below the poverty line. Of the 113 census tracts inside the City of St. Louis, $78 \%$ qualify as low- to moderate-income based on CRA definitions. Combined with population loss and aging housing structures, the community and economic development challenges facing the city are immense.

The City of St. Louis Community Development Administration is in the process of implementing its 2013 Program Year Action Plan to combat these challenges. One of the primary drivers of the plan is the continued support and development of affordable rental and ownership housing. This is accomplished through multiple avenues, including but not limited to Low Income Housing Tax Credits (LIHTCs), second-mortgage financing for income-qualified applicants, increased dollars for home rehabilitation and hazard remediation, and the targeted allocation of Neighborhood Stabilization Program (NSP) dollars to stabilize neighborhoods hard-hit by the foreclosure crisis. The plan includes various other community and economic development priorities, such as capacity-building support for community-based organizations and providing assistance and incentives to retain and attract businesses to the city. ${ }^{120}$
Financial stability is also an area of community development need in the assessment area. Bank On is a national initiative focused on connecting unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. Bank On presents an opportunity for banks and service providers to collaborate in order to provide financial products and services that are responsive to the unbanked and underbanked residents in the area. The organization estimates that $13.7 \%$ of households in St. Louis are unbanked and $22.3 \%$ of households in the assessment area are underbanked, meaning they have a bank account but continue to rely on alternative financial services such as check-cashing services, payday loans, rent-to-own agreements, or pawn shops. Both of these statistics are higher than the national rate. Additionally, over 44\% of low- and moderate-income households in St. Louis are at risk of being underbanked. ${ }^{121}$

Both Missouri and Illinois received allocations of federal NSP funds. Multiple jurisdictions within the assessment area also received NSP funding. These funds are available to help stabilize communities hard hit by the foreclosure crisis. There are six registered CDFIs located in St. Louis comprised of credit unions and loan funds. CDFIs are specialized financial institutions that work in market niches that are underserved by traditional financial institutions. They provide a unique range of financial products and services in economically distressed target markets, such as mortgage financing for low-income and first-time homebuyers and not-for-

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## St. Louis Multistate Metropolitan Area

profit developers; flexible underwriting and risk capital for needed community facilities; and technical assistance, commercial loans and investments to small start-up or expanding businesses in low-income areas. ${ }^{122}$

## Competition

The St. Louis MSA is a very active banking market dominated by a small number of large institutions, and Regions Bank has an active presence in the market. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 105 financial institutions operating 776 branch locations across the assessment area with a total of $\$ 64.5$ billion in deposits. Regions Bank ranked $5^{\text {th }}$ with deposit market share of $4.6 \%$ ( $\$ 3.0$ billion). US Bank had the largest deposit market share at $16.9 \%$, followed by Bank of America with $13.3 \%$, and Scottrade Bank with 11.3\%.

Regions Bank increased its small business lending market share during the review period. In 2010, the bank ranked $11^{\text {th }}$ out of 115 small business reporters by originating $2.7 \%$ of all loans. In 2011, the bank moved up to $5^{\text {th }}$ out of 123 reporters, increasing its lending performance to $5.8 \%$ of all loans. From 2010 to 2011, the bank's loan production increased from 812 loans to 2,147 loans, primarily through the purchase of small business loans. For HMDA lending, Regions Bank ranked $22^{\text {nd }}$ in 2010 with $1.1 \%$ of all HMDA loans and $21^{\text {st }}$ in 2011 with less than 1\%. HMDA loan production decreased from 1,438 loans in 2010 to 1,005 loan in 2011. Bank of America, Wells Fargo, JPMorgan Chase and US Bank were the dominant HMDA lenders in the market.

## Demographic Characteristics

The following table illustrates selected demographic information for the St. Louis multistate assessment area.

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## St. Louis Multistate Metropolitan Area

## Combined Demographics Report

Assessment Area: Multi St. Louis

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 55 | 11.8 |  | 5.8 | 12,171 | 36.0 | 112,183 | 19.3 |
| Moderate-income | 116 | 24.9 |  | 19.9 | 18,298 | 15.7 | 102,465 | 17.6 |
| Middle-income | 177 | 38.0 |  | 43.1 | 11,806 | 4.7 | 127,479 | 21.9 |
| Upper-income | 114 | 24.5 |  | 31.1 | 3,464 | 1.9 | 240,630 | 41.3 |
| Unknown-income | 4 | 0.9 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 466 | 100.0 |  | 100.0 | 45,739 | 7.8 | 582,757 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 71,010 | 21,735 |  | 30.6 | 33,078 | 46.6 | 16,197 | 22.8 |
| Moderate-income | 212,859 | 109,971 |  | 51.7 | 78,803 | 37.0 | 24,085 | 11.3 |
| Middle-income | 406,677 | 276,941 |  | 68.1 | 109,913 | 27.0 | 19,823 | 4.9 |
| Upper-income | 252,874 | 201,972 |  | 79.9 | 42,345 | 16.7 | 8,557 | 3.4 |
| Unknown-income | 139 |  | 6 | 4.3 | 79 | 56.8 | 54 | 38.8 |
| Total Assessment Area | 943,559 | 610,625 |  | 64.7 | 264,218 | 28.0 | 68,716 | 7.3 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 4,652 | 4.9 |  | 4.6 | 420 | 5.9 | 398 | 7.3 |
| Moderate-income | 16,665 | 17.4 |  | 17.2 | 1,252 | 17.7 | 1,086 | 19.9 |
| Middle-income | 39,326 | 41.0 |  | 41.2 | 2,919 | 41.4 | 2,117 | 38.8 |
| Upper-income | 34,832 | 36.4 |  | 36.8 | 2,394 | 33.9 | 1,807 | 33.2 |
| Unknown-income | 336 | 0.4 |  | 0.3 | 74 | 1.0 | 42 | 0.8 |
| Total Assessment Area | 95,811 | 100.0 |  | 100.0 | 7,059 | 100.0 | 5,450 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 86.9 |  | 7.4 |  | 5.7 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 11 | 0.6 |  | 0.5 | 1 | 5.9 | 1 | 8.3 |
| Moderate-income | 78 | 3.9 |  | 3.8 | 1 | 5.9 | 2 | 16.7 |
| Middle-income | 1,526 | 76.3 |  | 77.0 | 5 | 29.4 | 3 | 25.0 |
| Upper-income | 385 | 19.3 |  | 18.7 | 10 | 58.8 | 6 | 50.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 2,000 | 100.0 |  | 100.0 | 17 | 100.0 | 12 | 100.0 |
|  | Percentage of Total Farms: |  |  | 98.6 |  | . 9 |  | . 6 |

[^43]
## St. Louis Multistate Metropolitan Area

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the St. Louis assessment area is good, and lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

Regions Bank is both a HMDA and small business lender. During the review period, the bank reported 2,443 ( $45.7 \%$ ) HMDA loans compared to 2,905 (54.3\%) small business loans in the St. Louis assessment area. Therefore, small business lending was weighted more heavily than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $2.8 \%$ of the bank's small business and HMDA lending by number of loans and $2.7 \%$ by dollar volume totaling $\$ 603.4$ million were originated in the St. Louis assessment area.

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

## Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs based on small business and HMDA lending. The percentage of the bank's total lending at $2.8 \%$ is comparable to the percentage of deposits at $3.0 \%$ in this area. The bank also originated six community development loans in the St. Louis assessment area. Regions Bank is not a major competitor in this market, ranking $21^{\text {st }}$ in HMDA loans and $5^{\text {th }}$ in small business loans in 2011.

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank's geographic distribution of loans reflects good penetration throughout the assessment area.

## Small Business Loans

Small business lending in low-income census tracts is excellent. Regions Bank originated 4.4\% of small business loans in low-income tracts, which was comparable to the percentage of small businesses in those tracts at $4.6 \%$. The bank performed better than the aggregate in both 2010 and 2011.

Small business lending in moderate-income census tracts is excellent. Regions Bank originated 19.6\% of small business loans in moderate-income tracts, which was greater than the percentage of small businesses at $17.2 \%$. The bank performed considerably better than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was greater than the percentage of small businesses in these tracts, while lending in upper-income tracts was less than the percentage of small businesses.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, the bank originated 1.2\% of its home purchase loans in low-income census tracts, which was less than the $3.6 \%$ of the owner-occupied units

## St. Louis Multistate Metropolitan Area

located in low-income tracts in the assessment area. Regions Bank's performance was below aggregate in 2010, but better than aggregate in 2011.

Home purchase lending in moderate-income tracts is excellent. During the review period, the bank originated $16.9 \%$ of its home purchase loans in moderate-income census tracts, which was less than the $18.0 \%$ of the owner-occupied units located in these. However, Regions Bank's performance was significantly better than the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

Home refinance lending in low-income tracts is adequate. During the review period, the bank originated $0.5 \%$ of its home refinance loans in low-income census tracts, which was less than the $3.6 \%$ of the owner-occupied units located in these tracts. Although the bank's performance was less than the demographic in St. Louis, Regions’ performance was comparable to the aggregate in both 2010 and 2011.

Regions Bank’s home refinance lending in moderate-income census tracts is good. During the review period, the bank originated $9.5 \%$ of its home refinance loans in moderate-income census tracts, where $18.0 \%$ of the owner-occupied units are located. Although the bank's performance was less than the demographic, Regions’ performance was better than the aggregate in both 2010 and 2011.

The bank’s home refinance lending in both middle- and upper-income tracts was greater than the percentage of owner-occupied units in middle- and upper-income tracts, respectively.

## Home Improvement Loans

Home improvement lending in low-income tracts is adequate. During the review period, the bank originated $1.8 \%$ of its home improvement loans in low-income census tracts, which was less than the $3.6 \%$ of the owneroccupied units located in low-income tracts in the assessment area. Regions Bank's performance was below the aggregate in 2010, but greater than the aggregate in 2011.

Regions Bank's home improvement lending in moderate-income census tracts is excellent when compared to the percentage of owner-occupied units in these tracts and to aggregate lending performance. During the review period, Regions Bank originated 20.0\% of its home improvement loans in moderate-income tracts, where 18.0\% of the owner-occupied units are located. The bank's performance was significantly better than the aggregate in 2010 and 2011.

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

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects good penetration throughout the assessment area. 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, such as local economic conditions, unemployment, and poverty rates, were considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 but was below the aggregate in 2011. The bank originated $31.3 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $86.9 \%$. However, of the 2,905 small business loans originated during the review period, 1,447 loans (49.8\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $62.3 \%$, which was still below the percentage of small businesses in the assessment area. However, 80.5\% of the 2,905 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was below the aggregate in 2010 and comparable to the aggregate in 2011.

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is excellent. The bank's performance was greater than the demographic with $20.4 \%$ of its home purchase loans to low-income borrowers, while lowincome families make up $19.3 \%$ of total families in the assessment area. The bank's performance was significantly better than the aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is also excellent. At 23.4\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $17.6 \%$. The bank's performance was comparable to the aggregate in 2010 and better than the aggregate in 2011.

The bank's home purchase lending to both middle-income and upper-income borrowers was less than the percentage of middle- and upper-income families, respectively, in the assessment area.

## Home Refinance Loans

Regions Bank's home refinance lending to low-income borrowers is good. The bank performed less than the demographic with $8.7 \%$ of its home refinance loans to low-income borrowers. Low-income families make up $19.3 \%$ of total families in the assessment area. The bank's performance was considerably better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is excellent when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $16.7 \%$ was slightly less than the percentage of moderate-income families in the assessment area at 17.6\%. Regions Bank's performance was better than the aggregate in 2010 and 2011.

The bank's home refinance lending to both middle-income and upper-income borrowers was greater than the percentage of middle- and upper-income families, respectively, in the assessment area.

## Home Improvement Loans

Considering the performance of the aggregate along with other lending and demographic data, home improvement lending to low-income borrowers is good. During the review period, low-income families represented $19.3 \%$ of total families and received $16.4 \%$ of the home improvement loans. The bank performed better than the aggregate in both 2010 and 2011.

## St. Louis Multistate Metropolitan Area

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $23.6 \%$ exceeded the percentage of moderate-income families in the assessment area at $17.6 \%$. The bank's home improvement lending to moderate-income borrowers was better than the aggregate in 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the St. Louis assessment area. The bank originated six community development loans totaling $\$ 4.5$ million during the review period. The majority of the loans revitalize or stabilize low- and moderate-income geographies. Local community development needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization in light of elevated foreclosure rates, downtown revitalization, and economic development activities such as small business finance that result in job creation. The bank's community development loan portfolio inside the assessment area exhibits adequate responsiveness to these credit needs of low- and moderate-income individuals and geographies, and small businesses. While the number and dollar amount of loans is somewhat low given the bank's presence in the market, the qualitative aspects of the loan portfolio indicate innovative measures to respond to the challenging credit needs of the market.

Examples of community development lending include:

- A $\$ 1.7$ million loan to renovate an abandoned building contaminated with lead paint and asbestos in order to open a full-service restaurant that includes a separate bakery, banquet facility and meeting space. The renovation is expected to create 59 jobs and includes the use of Brownfield Redevelopment incentives;
- Multiple loans to faith-based institutions to construct food pantries located in moderate-income census tracts that will serve the broader community; and
- One loan to a municipal government in response to a natural disaster that facilitates the construction of a new manufacturing facility and will result in the creation of 40 full-time jobs in a low-income geography. Federal disaster assistance funds were included in this project.


## Investment Test

The bank's performance in the St. Louis assessment area under the investment test is good. The bank had 10 investments totaling $\$ 11.1$ million and four current period investments for $\$ 8.3$ million. Direct investments in the assessment area provided support for affordable housing through FNMA and GNMA investment vehicles and LIHTC investment funds. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs. Local community development needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization in light of elevated foreclosure rates, financial stability for low- and moderate-income individuals, downtown revitalization, and economic development activities such as small business finance that result in job creation.

The bank also made 27 contributions totaling $\$ 70,740$. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals.

## St. Louis Multistate Metropolitan Area

Regions investment portfolio and contributions exhibit responsiveness to several of the identified community development needs. Examples include:

- Sponsorship of a program through a national financial education provider to provide online and inperson financial education to students at public schools located in low- and moderate-income neighborhoods in St. Louis;
- Support for a local coalition that promotes the Earned Income Tax Credit (EITC) and access to free tax assistance and other financial stability programs.


## Service Test

The bank's service test performance in the St. Louis assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the St. Louis Multistate assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 70 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank opened one branch (located in an upper-income tract) and closed two branches (one middle-income tract, and one upper-income tract) in the St. Louis assessment area. The bank's record of closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank has extended and weekend hours for branches in low- and moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Geographic Distribution of Branches

Assessment Area: Multi St. Louis

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Total Branches |  |  |  |  | Drive thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  |  | \# | \% | \# | \# |  |  |  | \# | \% |  |  |
| Low | Total | 1 | 1.4\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 55 | 11.8\% | 6.3\% | 4.9\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Moderate | Total | 15 | 21.4\% | 0 | 0 | 12 | 12 | 11 |  |  |  |  |
|  | DTO | 1 |  | 0 | 0 | 1 |  |  | 116 | 24.9\% | 21.6\% | 17.4\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Middle | Total | 41 | 58.6\% | 0 | 1 | 38 | 36 | 39 |  |  |  |  |
|  | DTO | 2 |  | 0 | 0 | 2 |  |  | 177 | 38.0\% | 44.2\% | 41.0\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Upper | Total | 13 | 18.6\% | 1 | 1 | 11 | 10 | 12 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 114 | 24.5\% | 27.9\% | 36.4\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 4 | 0.9\% | 0.0\% | 0.4\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Total | Total | 70 | 100.0\% | 1 | 2 | 62 | 59 | 63 |  |  |  |  |
|  | DTO | 3 |  | 0 | 0 | 3 |  |  | 466 | 100.0\% | 100.0\% | 100.0\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 1,273 service hours in various capacities for community development organizations by participating in 164 community development services. Many of the community development services focused on education, affordable housing, tax assistance, and other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by providing counsel to a community organization whose purpose is to promote self-sufficiency among the economically challenged residents of low- and moderateincome geographies. In addition, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. Furthermore, the majority of these schools are located in low- and moderateincome geographies.

## Texarkana Multistate Metropolitan Area

## CRA RATING FOR TEXARKANA: Outstanding ${ }^{123}$

## The Lending Test is rated: <br> The Investment Test is rated: <br> The Service Test is rated: <br> High Satisfactory <br> Outstanding <br> Outstanding

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of borrowers 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 within the assessment area.
- The bank provides an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position in response to the community development needs of the assessment area.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment area.
- The bank is a leader in providing community development services throughout the assessment area.

[^44]
## SCOPE OF EXAMINATION

The time period, products and affiliates evaluated for the Texarkana multistate assessment area are consistent with the overall scope described in the Description of the Institution section of this report. Regions Bank’s performance in Texarkana was evaluated using full-scope examination procedures.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXARKANA

The Texarkana assessment area includes Miller County in Arkansas and Bowie County in Texas. There are 26 census tracts in the assessment area which includes three low-income tracts and four moderate-income tracts. Regions Bank operates five branches in the assessment area, two of which are located in moderate-income tracts. The five branches represent $0.3 \%$ of the bank's total branches. Three branches are in Arkansas, and two branches are in Texas. As of June 30, 2011, the bank had $\$ 234.4$ million in deposits in Texarkana, representing $0.2 \%$ of Regions Bank's total deposits in all the assessment areas. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 118 ( $0.1 \%$ ) were in the Texarkana assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 332 ( $0.3 \%$ ) were in the Texarkana assessment area.

## Population and Income Characteristics

The assessment area population is growing at a relatively slow rate. According to census data, the population of the assessment area in 2000 was 129,749 people and grew to 136,027 by 2010, a growth rate of $4.8 \%$. The 2010 populations of Miller County, Arkansas, and Bowie County, Texas, were 43,462 and 93,565, respectively. Miller County experienced the highest growth rate of the two counties from 2000 to 2010 at $7.5 \%$, compared to Bowie County, where the population grew by only $3.7 \%$. This higher growth rate is due, in part, to the lower cost of living in Arkansas, where property taxes and home values are lower. During this same period, the state of Arkansas's population grew by $9.1 \%$ while Texas saw its population increase by $20.6 \%$. Net migration in the assessment area has been positive since 2005, but declining in recent years due to decreasing in-migration for Miller County, indicating that the majority of the growth came in the first half of the decade. Net migration is defined as the number of in-migrants less the number of out-migrants and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns from the present year to the previous year. ${ }^{124}$

Food stamp usage has increased across the assessment and statewide. As of 2009, each county in the assessment area had a higher percentage of its population receiving food stamps than its respective state. Miller County had the highest participation rate with $18.2 \%$ of its residents receiving food stamps followed by Bowie County at $17.3 \%$. Comparatively, the 2009 statewide food stamps usage rate was $15.8 \%$ in Arkansas and $13.6 \%$ in Texas. ${ }^{125}$

Free and reduced price lunch program usage is also increasing. Of the 16 school districts in the assessment area, all but two experienced an increase in the percentage of students receiving free and reduced price lunch benefits from 2000 to 2010. Four of the five school districts with the highest percentage of students receiving these benefits are in Bowie County, all of which had more than $60 \%$ participation. The three school districts with the lowest percentage of students receiving free and reduced price lunch benefits are also in Bowie County.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the

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## Texarkana Multistate Metropolitan Area

estimated median family income for the years 2010 through 2011 for the Texarkana MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper).

## Borrower Income Levels

Texarkana, AR-TX MSA


## Housing Characteristics

The assessment area housing market has remained relatively strong throughout the recent housing crisis, with annual median prices experiencing less volatility than many other housing markets across the country. Median home prices across the assessment area increased in 2008 and 2009, but then fell in 2010 and 2011. ${ }^{126}$ Census data indicates that the 2010 median home value in Miller County, Arkansas, was $\$ 86,400$, and in Bowie, Texas, was $\$ 88,600$. This compares to the 2010 statewide median home value in Arkansas of $\$ 102,300$ and Texas of \$123,500. ${ }^{127}$

Generally speaking, the north Texas and statewide housing markets have performed well in recent years and are showing signs of sustained recovery. Home sales and construction are back to pre-recession levels. Historically low interest rates and home prices are driving a rebound in single-family homes, but shrinking inventories across the state will likely result in higher home prices. Apartment leasing is also strong as a result of employment and population gains. ${ }^{128}$

Census data show that there were 54,190 housing units in the assessment area in 2000, of which $62.9 \%$ were owner-occupied, $27.0 \%$ were rental units, and $10.1 \%$ were vacant. While the majority of housing units across the combined assessment area were owner-occupied, more than half of housing units in low- and moderateincome census tracts were rentals or vacant, indicating limited lending opportunity in these areas. The median age of housing stock across the assessment area was 28 years, but this figure increased to 43 years in lowincome tracts and 37 years in moderate-income tracts. ${ }^{129}$ Housing permits have declined, with only 81 singlefamily permits issued in 2011 compared to 232 in 2007, a $65.1 \%$ decrease. Multi-family development is not a significant source of housing inside the assessment area. ${ }^{130}$

Mortgage delinquencies have had an adverse impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $4.1 \%$ in January 2010 to $7.1 \%$ in December 2011. HMDA data for the assessment area show that demand for home purchase loans of

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## Texarkana Multistate Metropolitan Area

owner-occupied, one- to four-family dwellings continues to decline. Both counties in the assessment area have seen continuous year-over-year reductions in the number of originated home purchase loans from 2005 to 2011, with annual loan volume declining by $48.7 \%$ in Miller County, Arkansas, and $45.8 \%$ in Bowie County, Texas. Conversely, refinance activity has remained constant during this time period.

## Employment and Economic Conditions

The Texarkana assessment area is in the extreme northeastern corner of Texas on the Texas-Arkansas border and is less than 30 miles from the Louisiana border. The name Texarkana is a combination of all three states, and the city of Texarkana exists on both sides of the Texas-Arkansas border. While commercially one city, there are two separate municipalities with separate governments. The city is a transportation, commercial and industrial center for the Texas-Arkansas area as well as portions of Oklahoma and Louisiana. ${ }^{131}$

There are two institutions of higher learning inside the assessment area: Texarkana College and Texas A\&M University-Texarkana, both of which are located in Texas. Texarkana College is a community college that enrolls more than 5,000 students. ${ }^{132}$ Texas A\&M University-Texarkana is one of the newest members of the Texas A\&M University System and enrolls approximately 1,900 students in undergraduate and graduate fields of study. ${ }^{133}$

As of 2010, total employment in the Texarkana assessment area was 73,041 . The largest private sector employment industries included health care and social assistance, accommodation and food services, and retail trade. Combined, these sectors accounted for $34 \%$ of private sector employment and $26 \%$ of total employment. Government and government enterprises was also a large employment sector in the assessment area with more than 14,000 jobs accounting for nearly $20 \%$ of total employment. ${ }^{134}$ Major employers include the Red River Army Depot and its tenants, Christus St. Michael Health System, Cooper Tire and Rubber, and Wal-Mart/Sam's Club. ${ }^{135}$ The Red River Army Depot provides the Army's only facility for rubber products associated with track vehicles. This defense complex is capable of rebuilding/recapitalizing over 30 HMMV’s (i.e., Humvee) each day. The region's timber industry supports two paper mills. Cooper Tire and Rubber and Alcoa are two of the area's major manufacturers. Approximately $80 \%$ of new jobs have come from expansions of existing industry; the remaining $20 \%$ have come from new plants. ${ }^{136}$

Job growth in recent years has been a strong point for the assessment area. From July 2011 to July 2012, the Texarkana MSA led the state of Texas in job growth. During this time period, the rate of job growth inside the MSA was $7 \%$ compared to the state of Texas at $2.2 \%$. In 2010, Texarkana was ranked $22^{\text {nd }}$ by Moody's on its "America’s 25 Next Reviving Markets" list. The Milken Institute’s report titled "Best Performing Cities 2009 Where America's Jobs Are Created and Sustained" ranked Texarkana $17^{\text {th }}$ in its list of small metro areas as compared to $81^{\text {st }}$ in 2008. This accounted for the second largest positive jump in the nation. ${ }^{137}$

Economic development is a primary focus on both sides of the state line. In Arkansas, the city manager has seven goals for economic growth development focused on partnerships with private industry to facilitate sustainable and transparent economic growth that improves quality of life issues for residents. Construction

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## Texarkana Multistate Metropolitan Area

was recently begun on the Texarkana Arkansas Convention Center, which will have space for 1,000 people and meeting rooms. A hotel will be built next to the convention center, with a water park planned for the second phase of development. The total cost of the facility is $\$ 18$ million. ${ }^{138}$ On the Texas side of the border, the 25,000-square-foot Texarkana Convention Center was recently opened in 2011 along with an adjoining hotel. The entire project cost was $\$ 24$ million and funded through hotel taxes. The Texas facility provided 65 new jobs and increased sales tax revenue. ${ }^{139}$

Due to relatively strong job growth, the assessment area's unemployment rate is lower than both Arkansas and Texas. The table below shows that the assessment area unemployment rate rose to $7.5 \%$ in 2011 from $7.4 \%$ in 2010. The 2011 nationwide average unemployment rate was $8.9 \% .{ }^{140}$

## Unemployment Rates

Assessment Area: Multi Texarkana

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Texarkana MSA | 7.4 | 7.5 |
| Arkansas | 7.9 | $\mathbf{8 . 0}$ |
| Texas | $\mathbf{8 . 2}$ | $\mathbf{7 . 9}$ |

Not Seasonally Adjusted
While unemployment rose slightly in 2011, it is below both statewide rates and continues to remain below the national average. Job growth is strong across the assessment area, and economic development projects such as the two convention centers are benefiting the local economy. Combined with the relative affordability of housing inside the assessment area, the local economy seems to be in recovery mode.

## Community Contacts and Community Development Opportunities

One community contact specializing in agricultural and consumer education was interviewed. The contact indicated that economic conditions in the assessment area are stagnant. The city of Texarkana experienced a mild recession but is currently outpacing the national recovery due to job growth in the private sector, although additional job growth is needed for lower-income and lower-skilled workers. The contact discussed an economic development project that is having a positive impact on the area: the extension of Interstate 49. When finalized, the interstate will connect Texarkana to New Orleans, thereby expanding opportunities for local warehousing and transportation facilities. The contact added that, generally speaking, financial institutions are meeting community credit needs.

In its 2012 Consolidated Action Plan, the City of Texarkana, Texas, outlines, among other things, the area's challenges and opportunities with respect to affordable housing. The plan discusses several demonstrated housing needs, which include various types of housing. Housing for low- and moderate-income elderly residents is one of the city's greatest housing needs since this population lives in the oldest housing stock in the city. Additionally, new affordable housing stock, reconstructed/rehabilitated affordable housing units, and

[^48]
## Texarkana Multistate Metropolitan Area

financing alternatives such as grants, forgivable loans, loans and Section 8 voucher home purchase assistance, are listed as significant needs for the local area. The action plan also lists several proposed objectives, including the establishment of a revolving loan fund to be used for residential and commercial development for job creation and housing for low- to moderate-income individuals in low- to moderate-income areas and to serve as leverage for private investment. ${ }^{141}$

For a variety of reasons, some assessment area residents are unable to access traditional banking product and services. Bank On is a national initiative focused on connecting unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $10.9 \%$ of households in the assessment area are unbanked relative to $11.7 \%$ in Texas and $10.1 \%$ in Arkansas. Additionally, $24.6 \%$ of households in the assessment area are listed as underbanked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $24.1 \%$ of underbanked households in Texas and 22.3\% in Arkansas. ${ }^{142}$

The State of Texas received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. The Texas allocation under NSP was more than $\$ 100$ million for housing-related projects. Arkansas received $\$ 19.6$ million under the NSP1 allocation process and $\$ 5$ million under NSP3 for the affordable housing activities in areas hard hit by the foreclosure crisis.

There are 42 community development financial institutions (CDFIs) in the state of Texas and seven in the state of Arkansas, but none are located inside the assessment area. Other community development opportunities include participation in the Low Income Housing Tax Credit (LIHTC) program. In 2011, the State of Texas allocated approximately $\$ 52$ million in federal LIHTCs. ${ }^{143}$ These tax credits are managed locally by the Housing Authority of Texarkana, Texas. Arkansas allocated approximately $\$ 8.7$ million in federal LIHTCs annually. ${ }^{144}$ The state also provides resources such as a housing trust fund and below-market financing to promote the development of affordable housing for low- and moderate-income individuals and families.

## Competition

The Texarkana MSA is a relatively small banking market dominated by a small number of large financial institutions. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 15 financial institutions operating 57 branch locations with a total of $\$ 2.2$ billion in deposits. Regions Bank ranked $4^{\text {th }}$ in deposit market share with $10.6 \%$ ( $\$ 234.4$ million) of all deposits. Wells Fargo Bank had the largest deposit market share at $35.1 \%$, followed by Capital One Bank with $11.9 \%$, and BankcorpSouth Bank with $10.9 \%$.

Regions Bank is an active HMDA and small business lender in the assessment area. In 2010, the bank ranked $5^{\text {th }}$ out of 34 small business loan reporters by originating $8.7 \%$ of all loans. In 2011, the bank ranked $3^{\text {rd }}$ out of 41 reporters with $14.1 \%$ of all loans. From 2010 to 2011, the bank's loans increased from 126 to 233 loans. For HMDA lending, Regions Bank ranked $12^{\text {th }}$ in 2010 with $2.2 \%$ of all HMDA loans, and $14^{\text {th }}$ in 2011 with

[^49]
## Texarkana Multistate Metropolitan Area

1.5\%. Guaranty Bond Bank, Wells Fargo Bank, Bank of America and JPMorgan Chase Bank were consistently the top HMDA lenders in the assessment area.

Demographic Characteristics
The following table shows selected demographic information for the Texarkana multistate assessment area.

## Texarkana Multistate Metropolitan Area

## Combined Demographics Report

Assessment Area: Multi Texarkana


[^50]
# Texarkana Multistate Metropolitan Area 

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Texarkana assessment area is good, and lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

Regions Bank is both a HMDA and small business lender. During the review period, the bank reported 118 (26.2\%) HMDA loans compared to 332 ( $73.8 \%$ ) small business loans in the Texarkana assessment area. Therefore, small business lending was weighted more heavily than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $0.2 \%$ of the bank's small business and HMDA lending by number of loans and $0.1 \%$ by dollar volume, totaling $\$ 33.0$ million, were originated in the Texarkana assessment area.

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

## Lending Activity

Based on strong community development lending performance, lending levels reflect good responsiveness to assessment area credit needs. The percentage of the bank's total lending at $0.2 \%$ is comparable to the percentage of deposits at $0.2 \%$ in this area. The bank also originated six community development loans in the Texarkana assessment area. Regions Bank is a relatively major competitor in this market, ranking fourteenth in HMDA loans and third in small business loans in 2011.

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank's geographic distribution of loans reflects good penetration throughout the assessment area.

## Small Business Loans

Small business lending in low-income tracts is excellent. Regions Bank originated 9.3\% of small business loans in low-income tracts, which was greater than the percentage of small businesses in these tracts at $7.4 \%$. The bank performed better than the aggregate in both 2010 and 2011.

Small business lending in moderate-income tracts is excellent. Regions Bank originated 14.8\% of small business loans in moderate-income tracts, which was greater than the percentage of small businesses at $11.7 \%$. The bank performed better than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while the lending in upper-income tracts was greater than the percentage of small businesses.

## Home Purchase Loans

During the review period, the bank did not originate any of its home purchase loans in low-income tracts, where only $3.5 \%$ of owner-occupied units in the assessment area are located. It should also be noted that the aggregate had very low lending levels in both 2010 and 2011, which may suggest a lack of lending opportunity in low-

## Texarkana Multistate Metropolitan Area

income tracts. Due to the low level of owner-occupied units, as well as limited aggregate activity, the bank's performance is adequate, with minimal weighting given to home purchase lending in low-income tracts.

Home purchase lending in moderate-income tracts is adequate. During the review period, the bank originated $6.7 \%$ of its home purchase loans in moderate-income census tracts, which was less than the $8.8 \%$ of the owneroccupied units located in moderate-income tracts in the assessment area. Regions Bank's performance was comparable to the aggregate in 2010 and was significantly better than the aggregate in 2011.

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

## Home Refinance Loans

During the review period, the bank did not originate any of its home refinance loans in low-income tracts, where only $3.5 \%$ of owner-occupied units in the assessment area are located. It should also be noted that the aggregate had very low lending levels in both 2010 and 2011, which may suggest a lack of lending opportunity in low-income tracts. Due to the low level of owner-occupied units, as well as limited aggregate activity, the bank's performance is adequate, with minimal weighting given to home refinance lending in low-income tracts.

Regions Bank’s home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $4.7 \%$ of its home refinance loans in moderate-income census tracts, where $8.8 \%$ of the owner-occupied units are located. Regions' performance was below the aggregate in 2010, but significantly above the aggregate in 2011.

The bank’s home refinance lending in both middle- and upper-income tracts was greater than the percentage of owner-occupied units in middle- and upper-income tracts, respectively.

## Home Improvement Loans

During the review period, the bank originated one home improvement loan in a low-income tract. It should also be noted that the aggregate had very low lending levels in both 2010 and 2011, which may suggest a lack of lending opportunity in low-income tracts. Due to the low level of owner-occupied units, as well as limited aggregate activity, the bank's performance is adequate, with minimal weighting given to home improvement lending in low-income tracts.

Regions Bank’s home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts and aggregate lending performance. During the review period, Regions Bank originated $12.5 \%$ of its home improvement loans in moderate-income tracts, where $8.8 \%$ of the owner-occupied units in the assessment area are located. The bank's performance was better than the aggregate in 2010 and 2011.

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

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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

## Texarkana Multistate Metropolitan Area

issues, such as local economic conditions, unemployment and poverty rates, were considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank’s lending to small businesses was comparable to the aggregate in 2010 but was below aggregate in 2011. The bank originated $30.7 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $90.2 \%$. However, of the 332 small business loans originated during the review period, 176 loans (53.0\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the bank's percentage of loans originated to small businesses was $65.4 \%$, which was still below the percentage of small businesses in the assessment area. However, $85.8 \%$ of the 332 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was below the aggregate in 2010 and comparable to the aggregate in 2011.

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is poor. The bank's performance was less than the demographic with $3.3 \%$ of its home purchase loans to low-income borrowers, while low-income families make up $23.2 \%$ of total families in the assessment area. The bank's performance was comparable to the aggregate in 2010 and less than the aggregate in 2011.

Home purchase lending to moderate-income borrowers is excellent. At 33.3\%, the bank's percentage of home purchase lending to moderate-income borrowers was much greater than the percentage of moderate-income families in the assessment area at $16.5 \%$. The bank's performance was well above the aggregate in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

Regions Bank's home refinance lending to low-income borrowers is good. The bank performed less than the demographic with $12.5 \%$ of its home refinance loans to low-income borrowers. Low-income families make up $23.2 \%$ of total families in the assessment area. The bank's performance was considerably better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is adequate when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $9.4 \%$ was less than the percentage of moderate-income families in the assessment area at $16.5 \%$. Regions Bank's performance was comparable to the aggregate in 2010 and better than the aggregate in 2011.

The bank's home refinance lending to both middle-income and upper-income borrowers was greater than the percentage of middle- and upper-income families, respectively, in the assessment area.

## Home Improvement Loans

Considering the performance of the aggregate, along with other lending and demographic data, home improvement lending to low-income borrowers is excellent. During the review period, low-income families represented $23.2 \%$ of total families and received $37.5 \%$ of the home improvement loans. The bank performed significantly greater than the aggregate in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is good. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $16.7 \%$ was comparable to the percentage of moderateincome families in the assessment area at $16.5 \%$. The bank's home improvement lending to moderate-income borrowers was better than the aggregate in both 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Texarkana assessment area. The bank originated six community development loans totaling $\$ 7.6$ million during the review period. All loans either financed affordable housing for low- and moderate-income individuals or promoted economic development by financing small businesses as part of the SBA's 504 Certified Development Company program. The affordable housing loans financed the construction of a multi-family affordable housing development that is utilizing LIHTCs. Local community development credit needs include but are not limited to affordable housing for lowand moderate-income individuals, neighborhood stabilization resulting from elevated foreclosure rates, and economic development activities including small business finance. The bank's community development loan portfolio exhibits good responsiveness to these credit needs of low- and moderate-income individuals and geographies and small businesses. Furthermore, the dollar amount of community development loans is excellent given the bank's presence in the market.

## Investment Test

The bank's performance in the Texarkana assessment area under the investment test is excellent. The bank had four investments totaling $\$ 14.4$ million, including one current period investment for $\$ 4.6$ million. Direct investments in the assessment area provided support for community services and for affordable housing through LIHTCs and GNMA investment vehicles. During the review period, the bank invested in one LIHTC project that provided 51 units of housing affordable to low- and moderate-income individuals. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and an investment in a statewide CDFI, as well as provided support for community revitalization though an investment in a New Markets Tax Credit fund. Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization resulting from elevated foreclosure rates, and economic development activities including small business finance. The dollar volume of Regions Bank's current and total investments exhibits responsiveness to some of the identified community needs given the bank's presence in the assessment area.

The bank also made three contributions totaling $\$ 2,000$ to organizations that provide community services to low- and moderate-income individuals and communities. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area.

## Texarkana Multistate Metropolitan Area

## Service Test

The bank's service test performance in the Texarkana assessment area is excellent. Its retail and community development services reflect excellent responsiveness to the needs of the Texarkana assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the five branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed one branch (in a moderate-income tract) in the Texarkana assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank has extended hours for branches in low- and moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Geographic Distribution of Branches

Assessment Area: Multi Texarkana

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | l Branch <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census Tracts |  | House holds \% | Total Businesses $\%$ |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 3 | 11.5\% | 5.6\% | 7.5\% |
| Moderate | Total | 2 | 40.0\% | 0 | 1 | 1 | 1 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ |  |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 4 | 15.4\% | 11.6\% | 12.2\% |
| Middle | Total | 2 | 40.0\% | 0 | 0 | 2 | 2 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 16 | 61.5\% | 68.5\% | 62.7\% |
| Upper | Total | 1 | 20.0\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 3 | 11.5\% | 14.3\% | 17.6\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 5 | 100.0\% | 0 | 1 | 4 | 4 | 3 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 26 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank is a leader in providing community development services in the assessment area. During the review period, Regions Bank employees provided 248 service hours in various capacities for community

## Texarkana Multistate Metropolitan Area

development organizations by participating in 14 community development services. Many of the community development services focused on education, affordable housing, service on boards of directors of community organizations, and other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours on the board of directors for a community organization that provides low- and moderate-income individuals with safe, decent, and quality affordable housing and support services.

## Alabama

## CRA RATING FOR ALABAMA: Satisfactory ${ }^{145}$

## The Lending Test is rated: <br> The Investment Test is rated: <br> The Service Test is rated: <br> Low Satisfactory <br> High Satisfactory <br> High Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas and is occasionally in a leadership position in response to the community development needs of the assessment areas.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides a relatively high level of community development services throughout the assessment areas.

[^51]
## SCOPE OF EXAMINATION

Full scope reviews were conducted for three assessment areas in the State of Alabama:

- Birmingham
- Huntsville
- Mobile

Limited scope reviews were conducted for the remaining 13 assessment areas:

- Anniston
- Auburn
- Baldwin-Coffee-Covington-Escambia (nonMSA)
- Decatur
- Dothan
- Fayette (non-MSA)
- Florence
- Gadsden
- Montgomery
- Northern Alabama (non-MSA)
- Southern Alabama (non-MSA)
- Tallapoosa-Talladega (non-MSA)
- Tuscaloosa

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

Lending activity in Alabama accounted for $17.4 \%$ of the bank's total lending activity. HMDA-reportable lending in Alabama represented $17.1 \%$ of the bank’s total HMDA-reportable lending, while small business and small farm lending represented $17.8 \%$ of the bank's total small business and small farm lending. As of June 30, 2011, the bank had $\$ 22.0$ billion in deposits in Alabama accounting for $22.4 \%$ of Regions Bank's total deposits. Additionally, as of June 30, 2011, the bank ranked ${ }^{\text {st }}$, among 173 insured institutions, in deposit market share with $26.2 \%$ of the deposits within the state. As of December 31, 2011, Regions Bank operated 241 branch offices in Alabama representing $14.0 \%$ of the bank’s total branches.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating in the State of Alabama is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs in all three full-scope assessment areas. The bank's performance with regard to the geographic distribution of loans reflects good penetration throughout the assessment areas. Also, the distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes. The bank makes an adequate level of community development loans.

Although Regions Bank is both a small business and HMDA lender, small business lending was given greater consideration in determining the lending test rating for Alabama because the bank originated more small business loans by number than HMDA loans. Additionally, the Birmingham assessment area received greater consideration when determining the rating because it holds a greater percentage of the bank's deposits, loans, and branches in the state of Alabama than the other full-scope assessment areas. Furthermore, Regions Bank originated a relatively low number of small farm loans in Alabama during the review period (251); therefore, no detailed discussion of these loans is included in this section of the report.

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

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Alabama assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

Statewide Summary of Lending Activity
Assessment Areas Located in
Alabama

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | \% |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 4,354 | $12.6 \%$ | $\$ 737,062$ | $19.2 \%$ |
| HMDA Refinance | 8,855 | $25.7 \%$ | $\$ 1,472,519$ | $38.3 \%$ |
| HMDA Home Improvement | 1,573 | $4.6 \%$ | $\$ 13,348$ | $0.3 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{1 4 , 7 8 2}$ | $\mathbf{4 2 . 9 \%}$ | $\$ 2,222,929$ | $\mathbf{5 7 . 8} \%$ |
| Total Small Business | $\mathbf{1 9 , 4 4 1}$ | $\mathbf{5 6 . 4} \%$ | $\mathbf{\$ 1 , 5 9 3 , 2 6 2}$ | $\mathbf{4 1 . 4 \%}$ |
| Total Farm | $\mathbf{2 5 1}$ | $\mathbf{0 . 7 \%}$ | $\$ 30,489$ | $\mathbf{0 . 8 \%}$ |
| TOTAL LOANS | $\mathbf{3 4 , 4 7 4}$ | $\mathbf{1 0 0 . 0} \%$ | $\$ 3,846,680$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank’s HMDA and small business loans is good. The geographic distribution was good in all three full-scope assessment areas in the state. Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered adequate in all three full-scope assessment areas in the state. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Alabama assessment areas. The bank made 92 community development loans totaling $\$ 159.6$ million during the review period, which represented $13.5 \%$ by number and $11.4 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the purpose of affordable housing. While a relatively high level of community development lending was noted in Mobile, the Birmingham and Huntsville assessment areas had adequate levels of community development lending. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating is High Satisfactory when considering the bank's statewide performance in Alabama. The bank made significant use of qualified investments and contributions. The bank exhibited excellent responsiveness to credit and community development needs through its investment activities in the Huntsville assessment area, while performance was good in Mobile and adequate in Birmingham.

## Alabama

The bank made 118 qualified investments of approximately $\$ 202.4$ million and contributions of $\$ 2.7$ million within the Alabama assessment areas. Of the 118 investments, 18 totaling $\$ 86.0$ million were current period investments. Most of the investments provided support for affordable housing, through GNMA and FNMA investment instruments and the purchase of low-income housing tax credits. During the current review period, the bank invested in 14 LIHTC projects that created 761 units of housing affordable to LMI individuals. In addition, the bank two prior period community development project investments totaling $\$ 2.25$ million in a statewide community development financial institution (CDFI). The bank also had investments that benefitted its footprint or a broader regional area that includes Alabama. The broader regional investments primarily funded small businesses, startup companies, and community revitalization.

Contributions of note outside the full-scope assessment areas in Alabama include a donation to support the design and construction of the $\$ 20 \mathrm{~K}$ House, which is being developed by a nonprofit and a local university to create a new model for energy efficient, affordable housing for low-income families in rural communities. Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections.

## Service Test

The service test rating is High Satisfactory when considering the bank's statewide performance. As stated earlier, Regions Bank's performance in Alabama was evaluated by reviewing the Birmingham, Huntsville, and Mobile assessment areas using full-scope examination procedures.

## Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or to low- and moderate-income individuals. The record of opening and closing of offices has not affected the accessibility of its delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

## Community Development Services

The bank provides a relatively high level of community development services that benefit residents and small businesses of the assessment areas. Out of the three full-scope assessment areas, community development services were good in two assessment areas and adequate in one assessment area.

METROPOLITAN AREA<br>(Full-scope Review)

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

The Birmingham, Alabama assessment area includes six of the seven counties in the Birmingham, Alabama MSA: Blount, Chilton, Jefferson, St. Claire, Walker, and Shelby Counties. Region's Bank is headquartered in Birmingham, Alabama. Birmingham is located in Jefferson County and is the largest city in the assessment area, although there are a number of large suburban population centers. As of December 31, 2011, Regions Bank operated 73 branch offices in the assessment area representing $30.3 \%$ of its branches in Alabama. 11 branches are in low-income tracts, 9 branches are in moderate-income tracts, 23 branches are in middle-income tracts, and 30 branches are in upper-income tracts. The majority of the branches are located in Jefferson and Shelby counties. As of June 30, 2011, the bank had $\$ 11.0$ billion in deposits in the Birmingham, Alabama assessment area representing 49.9\% of Regions Bank's total deposits in Alabama.

The banking market in the assessment area is competitive but dominated by several national and multi-regional banks. Nonetheless, competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 48 financial institutions operating 345 branch locations in the Birmingham MSA. Regions Bank was ranked ${ }^{\text {st }}$ with a deposit market share of $37.9 \%$ ( $\$ 11.0$ billion). Compass Bank had $15.3 \%$ of the market share followed by Wells Fargo Bank with 13.0\%.

Regions Bank is consistently one of the top small business and HMDA reporters in Birmingham. The bank originated 7,351 small business loans in this market in 2010 and 2011, which represented $6.8 \%$ of its total small business lending. In 2010, Regions ranked $2^{\text {nd }}$ of 75 small business reporters with $19.1 \%$ of the small business loans. By 2011, Regions was the top ranked small business reporter, with $25.0 \%$ of all loans. Overall, CRA lending by all lenders in the market increased significantly between 2010 and 2011, from 14,280 to 18,909 loans. The bank originated 3,965 HMDA-reportable loans in the Birmingham market in 2010 and 2011, which represented $4.6 \%$ of its total HMDA lending. For HMDA lending, Regions ranked $3^{\text {rd }}$ in 2010 with $5.6 \%$ of total HMDA loans and fell to $4^{\text {th }}$ in 2011 with $4.9 \%$ of all loans. Bank of America and Wells Fargo were consistently the top HMDA lenders in the assessment area, and JP Morgan Chase surpassed Regions to be the $3^{\text {rd }}$ ranked lender in 2011.

## Demographic Characteristics

2000 census data indicates that the assessment area population was $1,031,412$. The assessment area experienced faster growth between 2000 and 2010 than elsewhere in the state, but the growth was uneven. New suburban jurisdictions that did not even exist several decades ago grew the fastest, while the city of Birmingham experienced a population loss of approximately $12.7 \%$ between 2000 and 2010. Much of this population change has been driven by shifting demographics, and the city of Birmingham is now majority African American. Overall, the assessment areas grew by about 7\% to 1,105,132 in 2010. ${ }^{146}$

The Birmingham assessment area contains 223 census tracts; census data from 2000 indicates that there were 16 (7.2\%) low-income census tracts, 63 (28.3\%) moderate-income tracts, 84 ( $37.7 \%$ ) middle-income tracts and 60 (26.9\%) upper-income tracts. The following table provides demographic characteristics of the bank's assessment area based on the 2000 U.S. census data used to analyze the bank’s CRA performance.

[^52]
## 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 | 16 | 7.2 |  | 4.4 | 5,203 | 41.7 | 60,832 | 21.5 |
| Moderate-income | 63 | 28.3 |  | 23.3 | 12,528 | 19.0 | 49,302 | 17.4 |
| Middle-income | 84 | 37.7 |  | 41.0 | 9,723 | 8.4 | 57,529 | 20.3 |
| Upper-income | 60 | 26.9 |  | 31.3 | 2,281 | 2.6 | 115,661 | 40.8 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 223 | 100.0 |  | 100.0 | 29,735 | 10.5 | 283,324 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 25,276 | 6,654 |  | 26.3 | 14,136 | 55.9 | 4,486 | 17.7 |
| Moderate-income | 111,236 | 63,407 |  | 57.0 | 34,912 | 31.4 | 12,917 | 11.6 |
| Middle-income | 180,416 | 124,287 |  | 68.9 | 39,423 | 21.9 | 16,706 | 9.3 |
| Upper-income | 129,065 | 96,408 |  | 74.7 | 25,728 | 19.9 | 6,929 | 5.4 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 445,993 | 290,756 |  | 65.2 | 114,199 | 25.6 | 41,038 | 9.2 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 4,663 | 9.0 |  | 8.3 | 531 | 16.4 | 319 | 12.8 |
| Moderate-income | 8,174 | 15.8 |  | 15.8 | 490 | 15.2 | 397 | 15.9 |
| Middle-income | 19,321 | 37.3 |  | 37.9 | 995 | 30.8 | 896 | 35.9 |
| Upper-income | 19,581 | 37.8 |  | 38.0 | 1,217 | 37.6 | 883 | 35.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 51,739 | 100.0 |  | 100.0 | 3,233 | 100.0 | 2,495 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 88.9 |  | 6.2 |  | 4.8 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3 | 0.6 |  | 0.6 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 92 | 17.6 |  | 17.7 | 4 | 20.0 | 0 | 0.0 |
| Middle-income | 331 | 63.4 |  | 63.5 | 12 | 60.0 | 4 | 66.7 |
| Upper-income | 96 | 18.4 |  | 18.1 | 4 | 20.0 | 2 | 33.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 522 | 100.0 |  | 100.0 | 20 | 100.0 | 6 | 100.0 |
|  | Percentage of Total Farms: |  |  | 95.0 |  | 3.8 |  | 1.1 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

Income in the assessment area rose in the last decade, but there is significant variation in median family income among the counties. Data from the 2010 American Community Survey indicates that median family income ranged from a low of $\$ 45,788$ in Walker County to a high of $\$ 81,406$ in Shelby County. Median family income in Birmingham was only $\$ 38,460$, indicating that the urban center of the region also has the lowest income and is where many of the community development opportunities exist. Overall, median family income in the assessment area compares favorably to the state where median family income was $\$ 51,989 .{ }^{147}$

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following table shows that the median family income in the MSA increased slightly between 2010 and 2011, from $\$ 61,700$ to $\$ 62,000$. Additionally, the table shows a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels <br> Birmingham-Hoover, AL MSA



Poverty and financial instability are concerns throughout the assessment area. The percentage of people living in poverty increased between 2000 and 2009 in all counties in the assessment area, with the exception of Walker County. More than $15 \%$ of the people living in Jefferson, Chilton and Walker counties were living in poverty between 2005 and 2009. Alabama is considered one of the poorer states in the country, and statewide, $16.8 \%$ of the population was living in poverty between 2005 and 2009. Food stamp usage, another indicator of financial distress, has also been rising. In 2009, $15.4 \%$ of the population in Jefferson County was receiving food stamps; Shelby County had the lowest percentage of people receiving food stamps at $5.6 \%{ }^{148}$

Eligibility for free and reduced price lunch is also evidence of financial instability. Birmingham schools have a higher level of economically disadvantaged students than surrounding school systems, with $85 \%$ of Birmingham students eligible for the free and reduced price lunch program compared to $40 \%$ in Jefferson County schools, $25 \%$ in Shelby County schools, and $15 \%$ in Hoover city schools, three other large school systems in the area. ${ }^{149}$

## Housing Characteristics

The housing market in the assessment area experienced many of the challenges seen nationwide as result of the economic downturn, including declining housing prices, rising unemployment rates and increasing foreclosures.

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## Birmingham, Alabama

The housing market hit bottom in mid-2010 and since that time, home sales and median home prices have started to increase.

Home sales in Birmingham, while still significantly below the peak sales in 2006, have increased by almost 50\% since August 2010 according to the Alabama Center for Real Estate at the University of Alabama. Median home prices have also declined from the peak, but have been increasing since 2009. In August 2012, the median home price in the area was $\$ 155,000 .{ }^{150}$ The housing market in the assessment area mirrors the trends at the state level, where home sales and median prices have also dropped significantly since peak levels, but have shown signs of stabilizing in the last two years. For the state, the median sales price was $\$ 127,383$ in August 2012. ${ }^{151}$

New home construction in the assessment area slowed significantly with single-family building permits down $77 \%$ from 6,870 in 2005 to 1,555 in 2010. Since 2010, new residential activity has been increasing, but at 1,784 in 2011, building permits remain well below the peak. ${ }^{152}$ Most of the new construction is occurring in a handful of subdivisions in Jefferson County (outside the city of Birmingham) and in Shelby County.

Mortgage delinquencies and foreclosures are a significant concern in the assessment area. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) increased from $5.9 \%$ in January 2010 to $8.6 \%$ in December 2011. Statewide, just $1.2 \%$ of mortgages were seriously delinquent at the end of 2011. Jefferson County consistently has one of the higher foreclosure rates in the state, and at the end of $2011,9.1 \%$ of mortgages in the county were seriously delinquent. ${ }^{153} 2000$ census data indicates that there were 445,993 housing units in the assessment area, 290,756 of which (65.2\%), were owneroccupied, while $25.6 \%$ were classified as rental units, and $9.2 \%$ of the available housing was vacant. Although a majority of the assessment area's housing units are owner-occupied, low- and moderate-income tracts have a high percentage of rental units. This could limit the opportunities for mortgage origination in these tracts. Additionally, housing vacancies are rising as a result of the foreclosure crisis, particularly in Birmingham. Birmingham city officials estimate that there are more than 10,000 vacant and abandoned lots in the city and more than 12,000 state-tax-foreclosed properties. ${ }^{154}$ The presence of these vacant and abandoned properties has a destabilizing effect on the surrounding communities, and many are concentrated in the city's low- and moderate-income communities.

The homeownership rate varies across the assessment area from a low of $64.9 \%$ in Jefferson County to a high of $80.7 \%$ in St. Clair County. Housing is still considered relatively affordable throughout the assessment area, and in Jefferson, Walker, St. Clair and Blount counties, more than $50 \%$ of the housing was considered affordable to a family earning less than $80 \%$ of the area median income in 2009. ${ }^{155}$ The median housing value for the Birmingham, Alabama assessment area in 2011 was $\$ 88,918$, which was approximately $15.9 \%$ higher than the median housing value for the state of Alabama at $\$ 76,700$. The median age of housing in the assessment area was 28 years, which indicates there may be a need for home improvement loans.

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## Birmingham, Alabama

Overall, the housing market in the assessment area shows signs of stabilization and remains relatively affordable. However, mortgage delinquency is a serious concern that could jeopardize the region's recovery; therefore, continued support of foreclosure prevention efforts is critical.

## Employment and Economic Conditions

Birmingham was historically an industrial city, dominated by the steel industry. However, the economy in the Birmingham MSA has become much more diverse. The manufacturing sector now accounts for $7.3 \%$ of total employment and has been replaced by the service sector as the dominant source of jobs. Auto suppliers are among the strongest employers within the region's manufacturing sector. Government agencies also provide stable employment in the region, and despite changes in the financial services landscape, Birmingham remains one of the financial centers in the Southeast. ${ }^{156}$ The University of Alabama at Birmingham is the largest employer in the region with almost 19,000 employees. Other employers include Regions Bank, AT\&T, St. Vincent's Health System, Honda Manufacturing of Alabama, Baptist Health System, Inc., the City of Birmingham, and the Birmingham and Jefferson County Boards of Education. ${ }^{157}$

Economic conditions across the Birmingham MSA have been in steady decline since 2008. Nonfarm employment in the MSA continues to decline though the region has seen job growth in several sectors, including trade, professional and business services; education and health services; transportation and utilities; and financial services. Job gains have been offset by losses in construction, government and manufacturing sectors. Despite the loss of jobs, the unemployment picture in the MSA has started to improve. As shown in the following table, unemployment fell from $8.9 \%$ to $8.3 \%$ between 2010 and 2011, and is well below the unemployment rate for the state at $9.0 \%{ }^{158}$

## Unemployment Rates

Assessment Area: AL Birmingham

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Birmingham MSA | 8.9 | 8.3 |
| Blount County | 9.0 | 8.3 |
| Chilton County | 9.2 | 8.6 |
| Jefferson County | 9.4 | 8.7 |
| St. Clair County | 9.1 | 8.3 |
| Shelby County | 6.9 | 6.3 |
| Walker County | 10.7 | 9.5 |
| Alabama | $\mathbf{9 . 5}$ | $\mathbf{9 . 0}$ |

Not Seasonally Adjusted

[^55]The Birmingham MSA has had a particularly challenging few years. The region was impacted by the national economic downturn, but also faced several significant local challenges. Jefferson County has been experiencing political and financial turmoil largely because a major county tax that provided about $25 \%$ of the county's operating revenue was declared unconstitutional, forcing layoffs and changes in county services. In addition, the County owed $\$ 3.2$ billion in debt for repairs to the sewer system and did not have the revenue to pay it off. 159 These issues together resulted in a significant fiscal crisis that forced the county to declare bankruptcy in November 2011, the largest municipal bankruptcy in history. ${ }^{160}$ As a result of the bankruptcy, more layoffs are expected.

The region was hit by a series of deadly tornados in April 2011 that claimed the lives of at least 46 people and destroyed or heavily damaged thousands of homes, primarily in Jefferson, St. Clair, and Walker counties. ${ }^{161}$ Most of the rebuilding efforts were expected to start in 2012.

While the past few years have been difficult, there are a number of new projects underway across the MSA. Norfolk Southern broke ground on the $\$ 97.5$ million Birmingham Regional Intermodal Facility last summer and upon completion, it is expected the facility will employ over 230 . This development is also expected to boost Birmingham's position as a center for logistics and draw additional distribution and manufacturing companies. The entrepreneurial community is also growing. Innovation Depot, which was recognized as the nation's top technology incubator in 2011, is expanding to serve about 90 companies. There are also a number of projects underway to help revitalize downtown Birmingham, including Railroad Park, a new minor league stadium and a number of other civic, residential, office and retail-oriented projects.

## Community Contacts and Community Development Opportunities

Low- and moderate-income communities in the Birmingham market have many different needs, and there are numerous opportunities for banks to engage in community development initiatives. First, as mentioned earlier, Birmingham was hit by a series of tornados in April 2011. This disaster was particularly devastating for lowand moderate-income areas. Government, business and nonprofit leaders came together immediately to provide assistance to the impacted communities and individuals. In September 2012, HUD approved $\$ 14$ million in tornado recovery plans for Jefferson County and Birmingham. These funds will support long-term disaster recovery efforts and be used to confront unmet housing, business and infrastructure needs. ${ }^{162}$ One community contact indicated that there was a great opportunity for local banks to help develop a program that would assist people displaced by the tornados and other natural disasters in the future.

Foreclosure prevention and neighborhood stabilization is also a significant concern. In 2009, the city of Birmingham received about $\$ 2.9$ million from the U.S. Department of Housing and Urban Development as part of the Neighborhood Stabilization Program (NSP). These funds are available to support several neighborhood stabilization activities, and Birmingham has chosen to focus on the acquisition and rehabilitation of foreclosed properties in communities particularly hard hit by foreclosure. Homes that are sold through this program will

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## Birmingham, Alabama

be available to homeowners earning up to $115 \%$ of median family income, and access to first mortgage financing is an important component associated with the success of the program.

Affordable housing is an ongoing need in Birmingham; specifically affordable rental housing, according to one community contact. Low-income individuals who have lost their homes through foreclosure are not able to afford current market rental rates. To assist with the overall community stabilization, there is a great need for more mortgage lending to low- and moderate-income individuals and a need for more home improvement loans targeting homeowners in blighted neighborhoods. The City of Birmingham Consolidated Report 2010-2015 also states that housing affordability and the quality of aging existing housing stock are the top issues for the city.

Small business credit access and technical assistance are also identified needs in Birmingham. One community contact indicated that business owners needed more workshops and training sessions to help position them for traditional bank financing. In addition, the Federal Reserve Bank of Atlanta Community and Economic Development Department held several forums in Birmingham in 2009 and 2010 with local small business lenders and technical assistance providers to learn more about the small business environment in the region. Meeting participants felt that there was a significant gap in the credit market for loans under $\$ 100,000$. These loans are not being made by large financial institutions, and there are limited alternatives available. Meeting participants also confirmed that there is a need for more technical assistance for small business owners and alternative financing providers. Important sources of alternative financing for small businesses are community development financial institutions (CDFIs). The state of Alabama has a number of credit unions that have become certified CDFIs but only one CDFI that focuses specifically on small business. The Birmingham MSA has recently adopted "Blueprint Birmingham," which is a regional economic development strategy that includes a specific focus on supporting small and minority-owned businesses in the region. ${ }^{163}$

Access to healthy food was noted as an important need in low- and moderate-income communities in Birmingham. One community contact mentioned that there are a number of "food deserts" in the area, and there is an opportunity for banks to support efforts to increase access to healthy foods in these areas through small farm and small business lending.

Finally, addressing the needs of the unbanked and underbanked individuals in the Birmingham MSA is a focus for community development work in the region. According to the FDIC's 2011 National Survey of Unbanked and Underbanked Households, $12.1 \%$ of households are unbanked, meaning they have no type of deposit account with a mainstream financial institution. In addition, $33 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower income and minority households. ${ }^{164}$ There are a number of efforts in Birmingham to address the needs of these households, including Bank On Alabama and Bank On Birmingham. In addition, the Alabama Asset Building Coalition has been working to increase access to Individual Development Account (IDAs), financial education and free tax assistance programs and to address policy issues related to predatory lending.

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## Birmingham, Alabama

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Regions Bank's lending performance in the Birmingham assessment area is adequate. Lending activity reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank makes an adequate level of community development loans.

During the review period, the bank reported 7,351 (65.0\%) small business loans compared to 3,965 (35.0\%) HMDA loans in the Birmingham, Alabama assessment area. Therefore, evaluation and rating of the assessment area focuses on the performance of small business lending more heavily than HMDA lending in determining the bank's lending test rating in the assessment area.

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

## Geographic Distribution of Loans

For this analysis the geographic distribution of small business and HMDA lending, 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, the unemployment and poverty rates and the level of owner-occupied units and the number of small businesses in low- and moderate-income census tracts were issues considered when assessing the bank's performance with regard to HMDA and small business lending. Considering all of these factors, Regions Bank's geographic distribution of loans reflects good penetration throughout the assessment area.

## Small Business Loans

Regions Bank’s small business lending in low-income census tracts is excellent. During the review period, Regions Bank originated $10.7 \%$ of its small business loans in low-income tracts, which contain $8.3 \%$ of the small businesses in the assessment area. In comparison to aggregate data, the bank performed greater than the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $10.8 \%$ of its small business loans in moderate-income census tracts, which contain $15.8 \%$ of the small businesses in the assessment area. The bank's performance was similar to aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts while the lending in upper-income tracts was greater than the percentage of small businesses.

## Home Purchase Loans

Home purchase lending in low-income census tracts is good. Regions Bank originated $0.9 \%$ of its home purchase loans in low-income tracts, which contain $2.3 \%$ of the owner-occupied units. However, it appears that the aggregate had low penetration of home purchase loans in low-income census tracts as well. Nonetheless, the bank's performance was greater than the aggregate in both 2010 and 2011.

Home purchase lending in moderate-income tracts is poor. During the review period, Regions Bank originated $4.3 \%$ of its home purchase loans in moderate-income census tracts, which contain $21.8 \%$ of the owner-occupied
units in the assessment area. Although the aggregate did not originate home purchase loans at a level comparable to the percentage of owner-occupied units in moderate-income census tracts, Regions Bank's performance was less than the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

Home refinance lending in low-income census tracts is adequate. During the review period, Regions Bank originated $0.6 \%$ of its refinance loans in low-income census tracts, which contain $2.3 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was similar to aggregate in both 2010 and 2011.

Regions Bank’s home refinance lending in moderate-income census tracts is also adequate. During the review period, the bank originated $5.6 \%$ of its home refinance loans in moderate-income census tracts, which contain $21.8 \%$ of the owner-occupied units. Regions Bank's performance was slightly less than the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in low-income census tracts is good. Regions Bank originated 1.8\% of its home improvement loans in low-income tracts, which contain $2.3 \%$ of the owner-occupied units. The bank performed slightly greater than the aggregate in both 2010 and 2011.

Regions Bank's home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated $16.8 \%$ of its home improvement loans in moderate-income tracts, which contain $21.8 \%$ of the owner-occupied units in the assessment area. Regions Bank’s performance was less than aggregate in 2010 and greater than aggregate in 2011.

The bank's home improvement lending in both middle-income and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than aggregate in 2011. The bank originated $29.4 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $88.9 \%$. However, of the 7,351 small business loans originated during the review period, 3,968 loans (54.0\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $63.8 \%$, which is still below the percentage of small businesses in the assessment area. However, $86.6 \%$ of

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the 7,351 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and comparable to the aggregate in 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is poor. The bank made $9.0 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $21.5 \%$ of total families in the assessment area. Regions Bank performed less than the aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is good. At 20.2\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $17.4 \%$. The bank's performance was less than aggregate in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made 6.3\% of its refinance loans to low-income borrowers. Low-income families make up 21.5\% of total families in the assessment area. The bank’s performance was slightly greater than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is adequate when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $13.4 \%$ was less than the percentage of moderate-income families in the assessment area at 17.4\%. Regions Bank's performance was less than aggregate in 2010 and comparable to aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of loans at $17.4 \%$ was less than the percentage of low-income families in the assessment area at $21.5 \%$. However, the bank's lending to low-income borrowers was greater than the aggregate performance in 2010 and less than aggregate in 2011.

Home improvement lending to moderate-income borrowers is good. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $26.1 \%$ far exceeded the percentage of moderate-income families in the assessment area at $17.4 \%$. Additionally, the bank's performance was greater than the aggregate in both 2010 and 2011.

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

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Birmingham assessment area. The bank originated 22 community development loans totaling $\$ 56.7$ million during the review period. The majority of the loans promoted economic development by financing small businesses or financed community

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services targeted to low- and moderate-income individuals. Other area of community development need in the assessment area include but are not limited to affordable housing for low- or moderate-income individuals, disaster recovery and neighborhood revitalization resulting from elevated foreclosure rates. The bank's community development loan portfolio inside the assessment area exhibits an adequate level of responsiveness to these credit needs of low- and moderate-income individuals and communities and small businesses. The number and the dollar amount of community development loans are adequate given the bank's presence in the local market and these loans helped several local businesses create and/or retain jobs and provided local nonprofit organizations with credit needed to fulfill their community development missions.

Examples of community development lending include the following:

- Several loans that promote economic development by financing small businesses as part of the SBA's 504 Certified Development Company program;
- One loan to a nonprofit organization that provides community services targeted to low- and moderateincome individuals through activities focused on children's issues, safe communities and supporting atrisk populations;
- One loan to a nonprofit organization that provides community service targeted to low- and moderateincome individuals that includes the homeless and people addicted to drugs and alcohol; and
- One loan to an educational institution located in a low-income tract and the City of Birmingham’s Downtown Commercial Development District that helps revitalize the area.


## Investment Test

The bank's investment test performance in the Birmingham assessment area is adequate. The bank had 15 investments totaling $\$ 11.6$ million, including one current period investment of $\$ 2.6$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through FNMA investment instruments and Low Income Housing Tax Credits (LIHTCs). Regional investments primarily funded small businesses and startup companies through SBICs and community revitalization through a New Markets Tax Credit fund. Identified community development needs include, but are not limited to, affordable housing, neighborhood revitalization, disaster recovery, foreclosure prevention, financial education, and small business development. The dollar volume of Regions Bank's current and total investments is adequate given the bank's presence in the assessment area.

The bank made 95 contributions totaling $\$ 1.7$ million. In addition, the bank made contributions to national organizations that may provide an indirect benefit to low- and moderate-income individuals and communities in the assessment area. Contributions were given primarily to organizations involved in providing disaster recovery assistance, community services targeted to low- and moderate-income individuals and communities, and economic development.

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include the following:

- Low Income Housing Tax Credits for a 48-unit project that provides housing affordable to low- and moderate-income individuals;
- Contribution to an organization that provided disaster recovery assistance to communities impacted by the tornados in Alabama in April 2011;
- A grant to support a summer fellowship program for eight college interns from across the bank's footprint that exposes them to careers in banking while also involves them in community outreach by


## Birmingham, Alabama

providing financial education to low- and moderate-income students in the Birmingham City School System in conjunction with the Mayor's Summer Quest Challenge;

- A contribution to support a business incubator in Birmingham; and
- A contribution to support a nonprofit organization that provides free vision screening for low- and moderate-income individuals and free tax assistance.


## Service Test

The bank's service test performance in the Birmingham assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Birmingham assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 73 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open or close any branches in the Birmingham, Alabama assessment area. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderateincome geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in low- or moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

## Birmingham, Alabama

## Geographic Distribution of Branches

Assessment Area: AL Birmingham


DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 2,942 service hours in various capacities for community development organizations, by participating in 331 different community development services. Many of the community development services focused on education, affordable housing, youth services, and various other community services that aided low- and moderate-income geographies and low- and moderateincome individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. In addition, Regions Bank employees served on the boards of directors and committees of various community organizations which provide services in low- and moderate-income geographies or to low- and moderate-income individuals.

METROPOLITAN AREA<br>(Full-scope Review)

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

The Huntsville assessment area is the Huntsville MSA, which includes Limestone and Madison counties. As of December 31, 2011, Region’s Bank operated 21 branches in the assessment area, with six in moderate-income, ten in middle-income, and five in upper-income census tracts. The branch offices represent $8.7 \%$ of the bank's branches in Alabama. As of June 30, 2011, the bank had $\$ 1.7$ billion in deposits in the Huntsville assessment area representing $7.8 \%$ of Regions Bank's total deposits in the state of Alabama.

The banking market in the Huntsville assessment area is competitive, with 26 financial institutions operating 115 branches in the MSA. According to the June 30, 2011 FDIC Summary of Deposits Report, Regions Bank was ranked $1^{\text {st }}$ with a deposit market share of $25 \%$ ( $\$ 1.7$ billion). Compass Bank had $12.8 \%$ of deposits followed by Wells Fargo Bank with $10.9 \%$ and BB\&T with $8.3 \%$. Many of the bank's competitors are statewide and multi-regional banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area.

Regions Bank is consistently one of the top small business reporters in the Huntsville assessment area. The bank originated 1,832 small business loans in this market in 2010 and 2011, which represented $1.7 \%$ of its total small business lending. In 2010, Regions ranked $2^{\text {nd }}$ of 51 small business reporters with $12.8 \%$ of the small business loans. Regions significantly increased its number of small business loans in 2011, primarily by purchasing loans. In 2011, Regions was again the $2^{\text {nd }}$ ranked small business lender with $19.7 \%$ of all loans. American Express Bank was the leading small business lender in both years.

The bank originated 1,469 HMDA-reportable loans in the Huntsville market in 2010 and 2011, which represented $1.7 \%$ of its total HMDA lending. For HMDA lending, Regions ranked $6^{\text {th }}$ out of 270 HMDA reporters in 2010 with $3.3 \%$ of total loans. Regions ranked $6^{\text {th }}$ again in 2011 out of 269 HMDA lenders with $3.1 \%$ of all HMDA loans. Wells Fargo, Redstone Federal Credit Union, Bank of America and JP Morgan Chase are the largest HMDA lenders in the market.

## Demographic Characteristics

2000 census data indicates that the assessment area population was 342,376 . Population in the assessment area increased by $22 \%$ between 2000 and 2010, which significantly exceeded the $7.5 \%$ population growth statewide. In 2010, the population in the Huntsville assessment area was $417,593.43 \%$ of the population in the MSA lives in the city of Huntsville where the population was just over 180,000 in 2010. Athens and Madison are the only other cities in the assessment area with a population greater than $10,000 .{ }^{165}$

The Huntsville assessment area contained 87 census tracts; 2000 census data indicates that there were 6 ( $6.9 \%$ ) low-income census tracts, 24 (27.6\%) moderate-income tracts, 35 (40.2\%) middle-income tracts and 22 (25.3\%) upper-income tracts. The following table provides demographic characteristics of the bank’s assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

[^58]
## Huntsville, Alabama

## Combined Demographics Report

Assessment Area: AL Huntsville

| Income Categories | Tract Distribution |  | Families by Tract Income |  | $\begin{aligned} & \text { Families < Poverty } \\ & \text { Level as \% of } \\ & \text { Families by Tract } \end{aligned}$ |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 6 | 6.9 |  | 3.1 | 1,309 | 45.1 | 19,747 | 21.0 |
| Moderate-income | 24 | 27.6 |  | 23.3 | 3,008 | 13.7 | 16,663 | 17.7 |
| Middle-income | 35 | 40.2 |  | 45.3 | 2,736 | 6.4 | 19,733 | 20.9 |
| Upper-income | 22 | 25.3 |  | 28.4 | 860 | 3.2 | 38,091 | 40.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 87 | 100.0 |  | 100.0 | 7,913 | 8.4 | 94,234 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 6,314 | 1,147 |  | 18.2 | 4,037 | 63.9 | 1,130 | 17.9 |
| Moderate-income | 40,732 | 19,925 |  | 48.9 | 16,001 | 39.3 | 4,806 | 11.8 |
| Middle-income | 63,287 | 45,829 |  | 72.4 | 12,828 | 20.3 | 4,630 | 7.3 |
| Upper-income | 36,852 | 28,998 |  | 78.7 | 5,878 | 16.0 | 1,976 | 5.4 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 147,185 | 95,899 |  | 65.2 | 38,744 | 26.3 | 12,542 | 8.5 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,600 | 8.4 |  | 7.8 | 181 | 17.3 | 75 | 9.4 |
| Moderate-income | 4,159 | 21.7 |  | 21.5 | 236 | 22.5 | 194 | 24.4 |
| Middle-income | 8,227 | 42.9 |  | 43.1 | 408 | 38.9 | 364 | 45.7 |
| Upper-income | 5,169 | 27.0 |  | 27.6 | 223 | 21.3 | 163 | 20.5 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 19,155 | 100.0 | 17,311 | 100.0 | 1,048 | 100.0 | 796 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 90.4 |  | 5.5 |  | 4.2 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 6 | 1.6 |  | 1.6 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 59 | 15.4 |  | 15.5 | 1 | 14.3 | 0 | 0.0 |
| Middle-income | 256 | 66.8 |  | 66.6 | 5 | 71.4 | 2 | 100.0 |
| Upper-income | 62 | 16.2 |  | 16.3 | 1 | 14.3 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 383 | 100.0 |  | 100.0 | 7 | 100.0 | 2 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.7 |  | 1.8 |  | . 5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

The Huntsville MSA is the highest income metro area in Alabama. For the purposes of this analysis, HUD's median family income for 2010 and 2011 is used. As shown, the median family income for the MSA increased slightly between 2010 and 2011, from $\$ 68,000$ to $\$ 70,800$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels Huntsville, AL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 - 49.99\% |  |  | 50\% | 79.99\% |  | 80\% |  | 119.99\% | 120\% | \& above |  |
| 2010 | \$68,000 | 0 | - | \$33,999 | \$34,000 | - | \$54,399 | \$54,400 |  | \$81,599 | \$81,600 |  | \& above |
| 2011 | \$70,800 | 0 | - | \$35,399 | \$35,400 | - | \$56,639 | \$56,640 |  | \$84,959 | \$84,960 | - | \& above |

While income is much higher in the Huntsville MSA than elsewhere in the state, poverty and financial instability are concerns in certain communities. The poverty rate has increased slightly since 2000, and in 2009, $11.6 \%$ of the population in the MSA was living below the poverty level. The poverty rate is slightly higher in Limestone County. Food stamp usage, another indicator of financial distress, has also been on the rise. In 2009, $8.6 \%$ of the population in Madison County and $12.3 \%$ of the population in Limestone County received food stamps. ${ }^{166}$

## Housing Characteristics

The Huntsville housing market, like most of the country, weakened during the recent recession. However, the impact was lessened due to the strength of the technology and government sectors in the region.

Home sales in Huntsville declined significantly from peak levels in 2006 and hit the lowest point in 2010. Since then, home sales have started to stabilize and in 2011, 8,411 homes were sold in the Huntsville area. ${ }^{167}$ The housing market in Huntsville mirrors the trends at the state level, where home sales and median prices have also dropped significantly since peak levels, but have shown some signs of stabilizing in the last two years. For the state, the median sales price was $\$ 120,593$ in September 2011. ${ }^{168}$

New home construction in the assessment area has slowed significantly. The number of single-family homes permitted in 2011 was 2,015, representing a $7 \%$ decline from the 2,175 permits in 2010. The current level of construction activity remains well below the peak in 2006 of 4,154. ${ }^{169}$

The Huntsville market has not experienced the high rates of foreclosure and mortgage delinquencies seen in other metro areas in the state. The percentage of mortgages considered seriously delinquent (defined as more

[^59]than 90 days past due or in foreclosure) increased from $3.3 \%$ in January 2010 to $6.7 \%$ in December 2011. ${ }^{170}$ Home purchase lending has declined since the peak levels in 2007, though not to the same degree as in other parts of the state. HMDA data for the assessment area indicates that the number of home purchase loans declined by about $37 \%$ between 2007 and 2010, while the number of loans statewide fell by $47 \%{ }^{171}$

The homeownership rate in the assessment has declined slightly since 2000. In 2010, 70\% of households owned homes. The homeownership rate was higher in Limestone County, which is more rural. Housing is still considered relatively affordable throughout the assessment area. In Madison County, $51 \%$ of the housing was considered affordable to a family earning less than $80 \%$ of the area median income in 2009. ${ }^{172}$

## Employment and Economic Conditions

The Huntsville economy was relatively resilient during the recession primarily due to its large base of high-tech and advanced manufacturing employment as well as a growing federal government and contractor presence in the area. The government and services sectors are the dominant sources of employment in the region, with each accounting for approximately $24 \%$ of jobs. ${ }^{173} 2010$ REIS data indicates that the primary employment concentrations in the assessment area are professional, scientific, and technical services; manufacturing; retail trade; and government. ${ }^{174}$ Major employers include Redstone Arsenal (US Army), Huntsville Hospital System, NASA/Marshall Space Flight Center, The Boeing Company, Science Applications International Corporation, the University of Alabama in Huntsville and local school districts and government. ${ }^{175}$

The Chamber of Commerce of Huntsville/Madison County recognizes five primary industries in the metro area: aerospace, defense, advanced manufacturing, information technology, and life sciences. ${ }^{176}$ The area is home to several large military and government research bases as well as private technology parks; among them are the aforementioned US Army's Redstone Arsenal and NASA’s Marshall Space Flight Center along with Cummings Research Park. These research centers encompass hundreds of high-tech and research companies, employing thousands of high-tech workers. Huntsville has the highest concentration of engineers in the country and is considered one of the leading aerospace and defense technology hubs in the US. ${ }^{187}$ This concentration of highpaying jobs, especially the engineering, science, and technical jobs, makes Huntsville’s 2010 average wages of $\$ 48,040$ the highest in the state and $8 \%$ higher than the average wage nationally. ${ }^{178}$

The U.S. Army's Redstone Arsenal is the area’s largest employer. It is a major federal research, development, testing and engineering center and is home to more than 60 different federal organizations and contractors,

[^60]
## Huntsville, Alabama

employing more than 36,000 people. The Huntsville area and Redstone Arsenal also received a large boost through the 2005 Base Realignment and Closure (BRAC), which has been a primary driver of growth in the area recently and has helped solidify the federal defense presence in the region. The BRAC process, which officially ended in September 2011, has brought in several federal agencies and approximately 4,450 military and civilian jobs, with an average salary of $\$ 80,000$. Redstone Arsenal also experienced more than $\$ 435$ million in new construction to accommodate all of the BRAC moves. ${ }^{179}$

Unemployment Rates
Assessment Area: AL Huntsville

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Huntsville MSA | 7.5 | 7.6 |
| Alabama | $\mathbf{9 . 5}$ | $\mathbf{9 . 0}$ |

Not Seasonally Adjusted

The Huntsville economy has weakened slightly as a result of the recession. The unemployment rate in the MSA increased from a low of $3.8 \%$ in 2008 to $7.6 \%$ in 2011. However, unemployment remains significantly lower than both the statewide and nationwide unemployment rates. The manufacturing, business and professional services sectors lost the greatest number of jobs from September 2010 to September 2011; however, because of the growth in the federal and military jobs in the area, total nonfarm employment in the area remains steady. ${ }^{180}$ Job loss in the manufacturing sector is largely due to layoffs of more than 1,200 employees at Continental Automotive Systems U.S., Inc., from 2009 through 2011. ${ }^{181}$

The area's private sector has shown signs of resiliency as well, including large-scale expansions by Lockheed Martin, Dynetics, and Raytheon announced in 2010. ${ }^{182}$ In September 2011, the Boeing Company completed a $\$ 45$ million expansion of its Patriot Advanced Capability-3 missile production facility. Dynetics, an engineering, scientific, and information technology company, is currently building a $\$ 52$ million 226,000-square-foot research and development facility in Cummings Research Park. When completed, the facility is expected to create more than 300 jobs, with an average salary of $\$ 100,000$ a year in the professional and business services sector. ${ }^{183}$

Federal defense spending has fueled Huntsville’s economy, but it also poses a significant risk. Jobs and federal funding may be reduced or eliminated by anticipated spending cuts as the US reduces operations in Iraq and Afghanistan and as the US Congress works to correct the federal budget deficit. NASA's Marshall Space Flight Center (MSFC), Huntsville's other large federal employer, has also been impacted by changing federal

[^61]spending priorities. Declining funding for the space program led to the elimination of 800 contract jobs in 2010, and additional job loss was expected in 2011. ${ }^{184}$

The Huntsville area was impacted by the April 2011 tornadoes that struck much of Alabama. The damage was concentrated in Limestone County and northwestern Madison County. The tornadoes destroyed approximately 250 homes in Limestone County and damaged an additional 300 homes to various degrees. In Madison County, an estimated 300 homes were either destroyed or sustained major damage, and the Federal Emergency Management Agency verified approximately $\$ 10$ million in losses. The storms also disrupted business and other activity due to extended power outages. The Small Business Administration has approved more than \$5.6 million in disaster loans in Limestone and Madison counties. ${ }^{185}$

## Community Contacts and Community Development Opportunities

One community contact in the area described the Huntsville area as relatively recession proof. The area is still experiencing growth and has not been significantly impacted by recent economic conditions, although there have been some layoffs. The contact pointed at the BRAC decisions, which will result in significant economic growth for the area, should be fully realized in 2011. Although the area is growing, there is sufficient housing in the area due to some premature overbuilding prior to the recession. Some specific needs for the area include road improvements, educational services, and transportation services as a result of the expected population growth. One specific banking need in the community is for international finance due to the large presence of the aerospace industry in the area. The contact stated that it has become difficult for many to obtain loans due to the economic downturn; however, it still seems that banks in the area are adequately meeting the credit needs of the community. Also, due to the growth, there are ample opportunities for banks to get involved in lending to the community.

There are a number of different opportunities for banks to engage in community development initiatives in the Huntsville area. The City of Huntsville Community Development Department operates several affordable housing programs, including a down payment assistance program for low- to moderate-income homebuyers and an owner-occupied home rehabilitation program for low- to moderate-income homeowners. The city's housing authority is also very active and has established a program to revitalize public housing and move residents into economic self-sufficiency.

The City of Huntsville did not receive a direct allocation of Neighborhood Stabilization Program funds, but has received funding through the allocation to the State of Alabama. Overall, the city has received over $\$ 5$ million in neighborhood stabilization funds, which have been used to purchase and rehabilitate foreclosed properties and to provide down payment assistance for individuals to purchase foreclosed homes. Habitat for Humanity and the Family Services Center are two nonprofits that have been engaged in the city's NSP programs.

Financial stability is another focus of community development work in Huntsville. Approximately 8.6\% of households are unbanked in the Huntsville MSA, meaning they have no type of deposit account with a mainstream financial institution. In addition, $20.4 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The

[^62]unbanked are disproportionately lower income and minority households. ${ }^{186}$ There are a number of nonprofit organizations, as well as the Huntsville Housing Authority, working to increase the financial stability of lowand moderate-income individuals by providing financial education, free tax assistance and related programs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

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

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 1,832 (55.5\%) small business loans compared to 1,469 (44.5\%) HMDA loans in the Huntsville, Alabama assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The Huntsville assessment area contains $1.7 \%$ of the bank's small business and HMDA lending by number of loans and $1.6 \%$ by dollar volume totaling $\$ 350.6$ million. In comparison, $1.7 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of small business and HMDA lending is good. For this analysis, the geographic distribution of small business and HMDA lending was compared with available demographic information. In addition, the performance of the aggregate lenders was also considered when assessing the bank's performance. The unemployment and poverty rates and the level of owner-occupied units and the number of small businesses in low- and moderate-income census tracts were issues also considered when assessing the bank's HMDA and small business lending performance.

## Small Business Loans

Regions Bank’s small business lending in low-income census tracts is excellent. During the review period, Regions Bank originated 12.1\% of its small business loans in low-income tracts, which contain 7.8\% of the small businesses in the assessment area. The bank's performance also exceeded the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is good. During the review period, Regions Bank originated $17.3 \%$ of its small business loans in moderate-income census tracts, which contain $21.5 \%$ of the small businesses in the assessment area. The bank's performance was greater than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts while the lending in upper-income tracts was greater than the percentage of small businesses

[^63]
## Home Purchase Loans

During the review period Regions Bank originated two of its home purchase loans in low-income tracts, which contain $1.2 \%$ of the owner-occupied units. It was also noted that the aggregate lenders had low penetration of home purchase loans compared to the percentage of owner-occupied units in low-income tracts. This suggests limited opportunities for home purchase lending in low-income tracts and, therefore, minimal weight was given to this performance area.

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $10.5 \%$ of its home purchase loans in moderate-income census tracts, which contain $20.8 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was less than aggregate in 2010 and greater than the aggregate in 2011.

The bank's home purchase lending in middle- and upper-income census tracts exceeded the percentage of owner-occupied units in these tracts.

## Home Refinance Loans

During the review period, Regions Bank originated only four ( $0.4 \%$ ) of its home refinance loans in low-income census tracts. Additionally, it was noted that the aggregate lenders had low levels of home refinance loans compared to the percentage of owner-occupied units, which was only $1.2 \%$. This suggests limited opportunities for this type of lending in low-income tracts and, therefore, minimal weight was given to this performance area.

Regions Bank’s home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $9.4 \%$ of its home refinance loans in moderate-income census tracts, which contain $20.8 \%$ of the owner-occupied units. Regions Bank's performance was less than the aggregate in 2010 and greater than the aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending in low-income census tracts is good. Regions Bank originated two (1.8\%) home improvement loans in low-income tracts during the review period; however, only $1.2 \%$ of owner-occupied housing units are located in low-income tracts. Regions Bank's performance was slightly greater than the aggregate in both years 2010 and 2011.

Regions Bank’s home improvement lending in moderate-income census tracts is excellent when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated 20.0\% of its home improvement loans in moderate-income tracts, which contain $20.8 \%$ of the owner-occupied units in the assessment area. Additionally, Regions Bank’s performance exceeded the aggregate in both 2010 and 2011.

The bank's home improvement lending in middle-income tracts was greater than the percentage of owneroccupied units in these tracts while the lending in upper-income tracts was less than the percentage of owneroccupied units.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. For this analysis, the distribution of HMDA lending across borrower income levels and small business lending across business revenue sizes was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the demographic data, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than aggregate in 2011. The bank originated $27.8 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $90.4 \%$. However, of the 1,832 small business loans originated during the review period, 1,009 (60.0\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $69.4 \%$, which was still less than the percentage of businesses in the Huntsville, Alabama assessment area. However, $85.6 \%$ of the 1,832 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank’s performance was less than the aggregate in 2010 and greater than the aggregate in 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is adequate. The bank made $14.3 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $21.0 \%$ of total families in the assessment area. Regions Bank's performance was less than the aggregate in 2010 and greater than aggregate in 2011.

Home purchase lending to moderate-income borrowers is good. At 19.5\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at 17.7\%. Regions Bank's performance was less than aggregate in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made $12.4 \%$ of its refinance loans to low-income borrowers. Low-income families make up $21.0 \%$ of total families in the assessment area. It was noted that the aggregate performance was also less than the percentage of low-income families, indicating opportunity may be limited for home refinance lending. Nonetheless, the bank's performance exceeded the aggregate lenders in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $16.4 \%$ was less than the percentage of moderate-income families in the assessment area at 17.7\%. Regions Bank's performance exceeded the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is good. Regions Bank's percentage of home improvement loans at $19.1 \%$ was less than the percentage of low-income families in the assessment area at $21.0 \%$. However, the bank's performance was greater than the aggregate in 2010 and less than the aggregate in 2011.

Home improvement lending to moderate-income borrowers is good. Regions Bank's percentage of home improvement loans at $21.8 \%$ was greater than the percentage of moderate-income families in the assessment area at $17.7 \%$. The bank's performance was less than the aggregate in 2010 and greater than the aggregate in 2011.

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

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Huntsville assessment area. The bank originated three community development loans totaling $\$ 13.6$ million during the review period. All loans financed affordable housing for low- and moderate-income individuals. Affordable housing and neighborhood stabilization are two of the area's top community development needs. The bank's community development loan portfolio inside the assessment area exhibits adequate responsiveness to these credit needs of low- and moderate-income individuals and geographies and small businesses. Additionally, the number and the dollar amount of community development loans are adequate given the bank's presence in the market.

The community development loans are as follows:

- Two loans to support the construction of a 56-unit affordable housing development with income restrictions for low- and moderate-income tenants that includes Low Income Housing Tax Credits and City of Huntsville HOME funding; and
- One loan for an 84-unit affordable multi-family, income-restricted housing development that utilized the Low Income Housing Tax Credit Program and permanent financing from the Alabama Multifamily Loan Consortium.


## Investment Test

The bank's investment test performance in the Huntsville assessment area is excellent. The bank had eight investments totaling $\$ 23.8$ million, including one current period investment of $\$ 6.4$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through FNMA investment instruments and Low Income Housing Tax Credits (LIHTCs). Regional investments primarily funded small businesses and startup companies through SBICs and community revitalization. Affordable housing, neighborhood stabilization, household financial stability and small business development are several of the top community development needs in the area. The dollar volume of Regions Bank's current and total investments is good given the bank's presence in the assessment area.

The bank also made 10 contributions totaling approximately $\$ 18,000$. In addition, the bank made contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities and to organizations that promote economic development.

## Huntsville, Alabama

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. For example, the bank has financed several LIHTC projects, including a 56 -unit development that provides housing affordable to low- and moderate-income elderly residents.

## Service Test

The bank's service test performance is in the Huntsville assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Huntsville assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 21 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open any branches and closed one branch, located in an upper-income census tract, in the Huntsville, Alabama assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Huntsville, Alabama

## Geographic Distribution of Branches

Assessment Area: AL Huntsville

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | I Branc <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus <br> \# | Extend- <br> ed <br> Hours <br> \# | Week <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 6 | 6.9\% | 3.9\% | 8.4\% |
| Moderate | Total | 6 | 28.6\% | 0 | 0 | 6 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 1 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 1 |  |  | 24 | 27.6\% | 26.6\% | 21.7\% |
| Middle | Total | 10 | 47.6\% | 0 | 0 | 10 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 35 | 40.2\% | 43.5\% | 42.9\% |
| Upper | Total | 5 | 23.8\% | 0 | 1 | 5 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 22 | 25.3\% | 26.0\% | 27.0\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 21 | 100.0\% | 0 | 1 | 21 | 0 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 1 0 |  | 0 | 0 | 1 |  |  | 87 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 528 service hours in various capacities for community development organizations, by participating in 65 different community development services. Many of the community development services focused on education, affordable housing, youth services, and various other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. Furthermore, the majority of these schools are located in low- and moderateincome geographies.

## METROPOLITAN AREA

(Full-scope Review)

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

The Mobile assessment area and the Mobile MSA are composed solely of Mobile County. As of December 31, 2011, Regions Bank operated 29 branch offices in the Mobile, Alabama assessment area representing $12.0 \%$ of its branches in Alabama. Two branches are in low-income tracts, 2 branches are in moderate-income tracts, 14 branches are in middle-income tracts, and 11 branches are in upper-income tracts. As of June 30, 2011, the bank had $\$ 2.3$ billion in deposits in the Mobile, Alabama assessment area representing $10.5 \%$ of Regions Bank's total deposits in Alabama.

Regions Bank has the dominant market presence in the Mobile assessment area. According to the June 30, 2011 FDIC Summary of Deposits Report, Regions Bank was ranked $1^{\text {st }}$ with a deposit market share of $38.2 \%$ ( $\$ 2.3$ billion). RBC Bank had $12.5 \%$ of the market share followed by Compass Bank with $11.7 \%$ of deposits. Overall, there are 20 banks operating 124 branches in the assessment area. Many of the bank's competitors are statewide and multi-regional banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area.

Regions Bank is consistently one of the top small business reporters in Mobile. The bank originated 2,059 small business loans in this market in 2010 and 2011, which represented $1.9 \%$ of its total small business lending. In 2010, Regions ranked $2^{\text {nd }}$ of 47 small business reporters with $13.6 \%$ of the small business loans. Regions significantly increased its number of small business loans in 2011, primarily by purchasing loans. In 2011, Regions was the top ranked small business lender with $23.2 \%$ of all loans. American Express Bank was the other strong small business lender in both years.

Regions Bank is also a top HMDA lender in the Mobile assessment area. In 2010, Regions ranked $2^{\text {nd }}$ out of 266 HMDA reporters with $8.8 \%$ of total loans. Regions Bank's HMDA lending declined in 2011, and the bank was ranked $4^{\text {th }}$ out of 261 lenders with $7.6 \%$ of all HMDA loans. Wells Fargo Bank, Bank of America and JP Morgan Chase were the leading HMDA lenders in the market in 2011.

## Demographic Characteristics

Mobile is the $2^{\text {nd }}$ most populous MSA, after Birmingham, in Alabama. The MSA’s population growth has been much slower than other parts of the state, increasing by only $3.3 \%$ between 2000 and 2010 while population statewide grew by $7.2 \%$. In 2010, the population in the Mobile MSA was 412,992 . Mobile is the largest city in the county, with a population of approximately 195,000 . Prichard and Saraland are the only other cities in the county with a population greater than $10,000 .{ }^{187}$

The Mobile assessment area contained 114 census tracts; 2000 US census data indicates that there were 17 (14.9\%) low-income census tracts, 20 (17.5\%) moderate-income tracts, 51 ( $44.7 \%$ ) middle-income tracts and 26 (22.8\%) upper-income tracts. The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

[^64]
## Mobile, Alabama

## Combined Demographics Report

Assessment Area: AL Mobile


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. Median family income in the Mobile MSA is slightly below median family income for the state. The following table sets forth the estimated median family income for the years 2010 and 2011 for the Mobile MSA. As shown, the median family income increased slightly between 2010 and 2011, from $\$ 50,500$ to $\$ 51,200$. The table also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2000 census, $15.6 \%$ of the families in the assessment area lived below the poverty level.

## Borrower Income Levels

Mobile, AL MSA

| HUD Estimated Median <br> Family Income | Low |  |  | Moderate |  | Middle |  | Upper |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\mathbf{2 0 1 0}$ | $\mathbf{\$ 5 0 , 5 0 0}$ | 0 | - | $\$ 25,249$ | $\$ 25,250$ | - | $\$ 40,399$ | $\$ 40,400$ | - | $\$ 60,599$ | $\$ 60,600$ | - |
| $\mathbf{2 0 1 1}$ | $\mathbf{\$ 5 1 , 2 0 0}$ | 0 | - | $\$ 25,599$ | $\$ 25,600$ | - | $\$ 40,959$ | $\$ 40,960$ | - | $\$ 61,439$ | $\$ 61,440$ | - |

Poverty and financial instability are significant concerns in Mobile County, where it is estimated that 20.5\% of the population was living below the federal poverty line in $2010 .{ }^{188}$ Food stamp usage, another indicator of financial distress, has also been on the rise. In 2009, $21.5 \%$ of the population in the Mobile MSA received food stamps compared to $16.6 \%$ of the population statewide. ${ }^{189}$

## Housing Characteristics

The Mobile housing market, like most of the country, experienced the negative effects of the recent recession. The Mobile Association of Realtors reports that there were 5,466 residential home sales in 2006; the figure dropped to just 3,258 in 2010, and increased slightly in 2011. ${ }^{190}$ Median home prices have also declined from the peak in September 2008. In September 2011, the median home price was $\$ 98,000$. Home prices appear to be ticking upward in 2012. ${ }^{191}$ Home prices in Mobile experienced the biggest drop of all metro areas in Alabama between the $3^{\text {rd }}$ quarter 2010 and the $3^{\text {rd }}$ quarter 2011. ${ }^{192}$ Foreclosed properties comprise a significant portion of home sales in Mobile, which contributes to the depressed home prices. For the 12 months ending in June 2011, homes that were in REO (Real Estate Owned) represented 33\% of all existing home sales, up from $22 \%$ in the previous 12 months. ${ }^{193}$

[^65]New home construction in the assessment area has slowed significantly. The number of single-family homes permitted in 2011 declined to 733 , representing a $69 \%$ drop from the 2,367 permits in $2006 .{ }^{194}$ Mobile's communities are characterized by an aging housing stock, with the median age of housing in the county at 35 years old in 2010. ${ }^{195}$

The high rate of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) is a concern threatening the economic recovery in Mobile. The percentage of seriously delinquent mortgages increased from $7.9 \%$ in January 2010 to $12.7 \%$ in December 2011. ${ }^{196}$ Further evidence of the weakened housing market is the decline in home purchase lending. HMDA data for the assessment area indicates that the number of home purchase loans declined by about $39 \%$ between 2007 and 2010, while the number of loans statewide fell by $47 \%{ }^{197}$

The homeownership rate in the Mobile MSA has declined slightly over the past decade, and in 2010, 67\% of households owned homes. The homeownership rate was even lower in the city of Mobile, where only $56 \%$ of households owned homes. Housing is still considered relatively affordable in the MSA, where approximately $43 \%$ of the housing was considered affordable to a family earning less than $80 \%$ of the area median income in 2009. ${ }^{198}$

Overall, the housing market is showing some signs of stabilization but was seriously impacted by the recession. The aging housing stock, the concentration of delinquent mortgages, high unemployment and other economic factors create a fragile market with reduced opportunities for HMDA lending.

## Employment and Economic Conditions

While Mobile began as a port city with an industrial base focused on the paper and chemical industries, the area has worked to diversify its economy. The Mobile Area Chamber of Commerce states that $81 \%$ of the area's workforce is employed in the service industry, when including government. ${ }^{199}$ The Chamber of Commerce identifies its primary service industries as banking, health care, information technology, and maritime services. The area's economy has a significant manufacturing sector, especially in the shipbuilding, aviation/aerospace and chemical industries, and a significant transportation/distribution sector, primarily due to its history as a port city and regional intermodal transportation hub. In fact, Mobile was ranked $8^{\text {th }}$ by Business Facilities in the listing of top logistics/distribution and shipping hubs for $2011 .{ }^{200}$ Retail trade is also important in the area, comprising approximately $17 \%$ of employment in the area. Mobile is the largest city along the Gulf of Mexico between New Orleans and Tampa, and because of its port, the city is a considerable player in international trade, ranking $9^{\text {th }}$ in the country in overall waterborne foreign trade by cargo volume in 2010. ${ }^{201}$

[^66]2010 REIS data indicates that primary employment concentrations in the assessment area are in retail trade, health care and social assistance, construction, and administrative and waste services. ${ }^{202}$ Other significant employment clusters are in manufacturing, accommodation and food services, and local government. Major employers in the area include the Mobile County Public School System, Infirmary Health Systems, University of South Alabama (USA) and USA Health Systems. The top manufacturing firms in the area include Austal USA, ST Aerospace Mobile, and ThyssenKrupp Steel USA. ${ }^{203}$

Mobile, like other cities in Alabama, experienced significant job loss and rising unemployment during the recession. Nonfarm employment increased steadily for the five years up to 2008 and then went through several years of decline. While the number of jobs in the area has started to increase again, nonfarm employment remains about $5 \%$ below 2008 levels. ${ }^{204}$ The unemployment rate has also risen significantly, from a low during 2007 of $3.4 \%$ to $11 \%$ at several points during the recession. As shown in the table below, the unemployment rate declined slightly between 2010 and 2011, from $10.2 \%$ to $10.1 \%$. However, the unemployment rate in the Mobile MSA remains well above the statewide rate of $9.0 \% .{ }^{205}$

## Unemployment Rates

## Assessment Area: AL Mobile

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Mobile MSA | 10.2 | 10.1 |
| Alabama | $\mathbf{9 . 5}$ | $\mathbf{9 . 0}$ |

Not Seasonally Adjusted
Job losses occurred in almost every industry in the area as of June 2010 compared to 12 months earlier, led by financial activities, manufacturing, mining/logging/construction, professional and business services, and government. ${ }^{206}$ Along with the recession, the 2010 gulf oil spill had an impact in the area, although effects of the oil spill seem to have been mixed. It hurt the area’s fishing industry, but actually helped lodging revenues and retails sales due to the large number of recovery workers located in the area. ${ }^{207}$

Although the job loss from the recession was significant in Mobile, recent developments in the manufacturing industry point to a recovery. In late 2010, the U.S. Navy awarded Austal USA a $\$ 3.5$ billion contract to build combat ships, resulting in a plan to double the size of its Mobile facility by hiring 2,100 employees. ThyssenKrupp continues its plan to move to full employment in its $\$ 5$ billion carbon and stainless steel complex, ultimately increasing the workforce to $1,700 .{ }^{208}$ In 2010, SSAB broke ground on an expansion of its

[^67]
## Mobile, Alabama

steel mill that will result in 137 new jobs. Additionally, the Alabama State Port Authority announced in late 2010 it would invest $\$ 360$ million in infrastructure improvements to the Port of Mobile. ${ }^{209}$

## Community Contacts and Community Development Opportunities

One community contact in the area indicated that the Mobile area was adversely impacted by the recession. Unemployment and increased housing foreclosures are issues in the area. Banks in the area have tightened lending standards, making it more difficult for area residents to obtain necessary financing. Specifically, the community contact pointed at a need for additional lending, especially with affordable home loans as lending has been down considerably over the last few years. The community contact also indicated that there is a need for home improvement loans as the housing stock has aged. Finally, there is also a need for banks to participate in community development programs in the community, including services such as financial counseling.

There are a number of different opportunities for banks to engage in community development initiatives in Mobile. Mobile County is the lead public entity for affordable housing and community development outside of the cities of Mobile and Pritchard. The county focuses on developing new affordable housing (single-family and multi-family) and providing down payment assistance. There is one active Community Housing Development Organization (CHDO) that operates in the county. The county also supports different community development and social services, including homeownership counseling, homeless prevention and support for domestic violence programs.

The City of Mobile also has an active affordable housing and community development program that is administered by the Mobile Housing Board. The Housing Board focuses on developing affordable housing and providing housing counseling in addition to providing the traditional services of a public housing authority. The Mobile Housing Board also operates the Clinton L. Johnson Center for Economic Development, which provides a variety of workforce training, financial counseling, small business and other services to promote economic empowerment for low- and moderate-income residents in Mobile.

Neither the City of Mobile nor Mobile County received a direct allocation of Neighborhood Stabilization Program funds, but both jurisdictions received funding through the allocation to the State of Alabama. The city and county together have received approximately $\$ 5$ million that has been used to support the acquisition and rehabilitation of foreclosed properties for resale or rental. The city and county are both working with local nonprofit organizations to implement their programs. In the City of Mobile, the program is challenged by the lack of qualified homebuyers and the overall weakness in the housing market. ${ }^{210}$

The City of Pritchard received a $\$ 20$ million allocation from the second round of NSP funding. Pritchard has experienced significant economic decline as industries and jobs have left the community. The city's housing stock was also badly damaged by Hurricane Katrina and then with the more recent foreclosure crisis. The city's housing authority applied for the NSP funds to help stabilize hard hit communities, including an area where the authority had recently completed a $\$ 20$ million HOPE VI project. The funds have been used primarily for the acquisition and rehabilitation of single-family and multi-family units, both for rent and resale. In addition, the City has set up a land bank to purchase foreclosed or blighted properties for use at a future time. ${ }^{211}$

[^68]The financial stability of low- and moderate income individuals is a concern in Mobile. Approximately 12.5\% of households are unbanked in the Mobile MSA, meaning they have no type of deposit account with a mainstream financial institution. In addition, $24.5 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower income and minority households. ${ }^{212}$ Mobile is part of the FDIC's Black Belt Alliance for Economic Inclusion (AEI), which is working to expand access to mainstream banking products, smaller dollar loans, financial education, free tax assistance, IDAs and other related programs for lowto moderate-income areas. ${ }^{213}$

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

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

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 2,059 (53.9\%) small business loans compared to 1,762 (46.1\%) HMDA loans in the Mobile, Alabama assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The Mobile assessment area contains $2.0 \%$ of the bank's small business and HMDA lending by number of loans and $1.9 \%$ by dollar volume totaling $\$ 420.8$ million. In comparison, $2.3 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, Regions Bank's geographic distribution of loans reflects good penetration throughout the assessment area.

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is good. During the review period, Regions Bank originated $7.4 \%$ of its small business loans in low-income tracts, which contain $5.7 \%$ of the small businesses in the assessment area. The bank's performance exceeded aggregate in 2010 and was comparable to the aggregate in 2011.

Regions Bank's small business lending in moderate-income tracts is also good. During the review period, Regions Bank originated $9.8 \%$ of its small business loans in moderate-income census tracts, which contain $9.9 \%$ of the small businesses in the assessment area. However, the bank's performance exceeded the aggregate in both 2010 and 2011.

[^69]The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts while the lending in upper-income tracts was greater than the percentage of small businesses in upper-income tracts.

## Home Purchase Loans

During the review period Regions Bank originated five ( $0.9 \%$ ) of its home purchase loans in low-income tracts, which contain $4.9 \%$ of the owner-occupied units. It was also noted that the aggregate lenders had low penetration of home purchase loans compared to the percentage of owner-occupied units in low-income tracts. This suggests limited opportunities for home purchase lending in low-income tracts and, therefore, minimal weight was given to this performance area.

Home purchase lending in moderate-income tracts is good. During the review period, Regions Bank originated $5.1 \%$ of its home purchase loans in moderate-income census tracts, which contain $11.9 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was greater than the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

During the review period Regions Bank originated four (0.4\%) of its home refinance loans in low-income tracts, which contain $4.9 \%$ of the owner-occupied units. It was also noted that the aggregate lenders had low penetration of home refinance loans compared to the percentage of owner-occupied units in low-income tracts. This suggests limited opportunities for home refinance lending in low-income tracts and, therefore, minimal weight was given to this performance area.

Home refinance lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $3.2 \%$ of its home refinance loans in moderate-income census tracts, which contain $11.9 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was slightly less than the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in low-income census tracts is good. During the review period, Regions Bank originated $4.0 \%$ of its home improvement loans in low-income census tracts, which contain $4.9 \%$ of the owneroccupied units in the assessment area. Regions Bank's performance was greater than aggregate in both 2010 and 2011.

Regions Bank's home improvement lending in moderate-income census tracts is adequate. During the review period, the bank originated $7.9 \%$ of its home improvement loans in moderate-income census tracts, which contain $11.9 \%$ of the owner-occupied units. Regions Bank's performance was less than the aggregate in 2010 but greater than aggregate in 2011.

The bank's home improvement lending in middle-income tracts was greater than the percentage of owneroccupied units in these tracts while the lending in upper-income tracts was equal to the percentage of owneroccupied units.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

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

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank’s lending to small businesses was higher than the aggregate in 2010 and less than the aggregate in 2011. The bank originated $24.2 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $88.6 \%$. However, of the 2,059 small business loans originated during the review period, 1,201 loans (58.3\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $58.0 \%$, which is still less than the percentage of businesses in the Mobile, Alabama assessment area that are considered small businesses. However, $79.8 \%$ of the 2,059 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in both 2010 and 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is adequate. The bank made $6.3 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $23.7 \%$ of total families in the assessment area. The aggregate also had low levels of home purchase loans to low-income borrowers. The bank's performance was greater than aggregate in 2010 and slightly less than the aggregate in 2011.

The bank's home purchase lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area and to the aggregate performance. The bank's percentage of home purchase lending to moderate-income borrowers at $25.6 \%$ was greater than the percentage of moderateincome families in the assessment area at $15.7 \%$. Additionally, Regions Bank’s performance exceeded the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good when compared to the percentage of lowincome families in the assessment area and to the aggregate performance. The bank's percentage of home refinance lending to low-income borrowers at $4.8 \%$ was less than the percentage of low-income families in the assessment area at $23.7 \%$. However, Regions Bank’s performance exceeded the aggregate in both 2010 and 2011.

Home refinance lending to moderate-income borrowers is excellent. At 16.3\%, the bank's percentage of home refinance lending to moderate-income borrowers was greater than the percentage of moderate-income families
in the assessment area at 15.7\%. Additionally, Regions Bank's performance exceeded the aggregate in both 2010 and 2011.

The bank's refinance lending to middle- and upper-income borrowers exceeded the percentage of middle- and upper-income families in the assessment area.

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is adequate. The bank made $8.5 \%$ of its home improvement loans to low-income borrowers. Low-income families make up $23.7 \%$ of total families in the assessment area. The aggregate also had low levels of home improvement loans compared to the percentage of low-income families in the assessment area. The bank's performance was greater than the aggregate in 2010 but less than the aggregate in 2011.

The bank's home improvement lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home improvement lending to moderate-income borrowers at $21.5 \%$ is greater than the percentage of moderate-income families in the assessment area at $15.7 \%$. Regions Bank's performance was comparable to aggregate in 2010 and greater than aggregate in 2011.

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

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Mobile, Alabama assessment area. The bank originated 14 community development loans totaling $\$ 23.1$ million during the review period. The majority of the loans financed affordable housing and community services targeted to lowand moderate-income individuals. Primary community development needs inside the assessment area include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization tied to elevated foreclosure rates and financial stability for residents. The bank's community development loans inside the assessment area exhibit good responsive to affordable housing and community service needs. Furthermore, the number and the dollar amount of community development loans are good given the bank's presence in the market.

Examples of community development lending include the following:

- Several loans to a Federally Qualified Health Center (FQHC) located in Mobile that provides accessible and affordable health care services to the homeless, medically underserved and low-income residents of Mobile, Baldwin and Choctaw counties and surrounding communities.
- Two loans to support an affordable multi-family housing development with $100 \%$ of units restricted to tenants earning $60 \%$ or less of the area median income (AMI). Other financing mechanisms for this project include Low Income Housing Tax Credits and the Federal Home Loan Bank’s (FHLB) Affordable Housing Program (AHP).
- Two loans to a nonprofit affordable housing developer that specializes in housing for low-income families.


## Investment Test

The bank's performance in the Mobile assessment area under the investment test is good. The bank had eight investments totaling $\$ 20.0$ million, including two current period investments totaling $\$ 12.5$ million. In addition,
the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for community development and affordable housing, primarily through GNMA investment instruments and Low Income Housing Tax Credits (LIHTCs). The broader regional investments primarily funded small businesses and startup companies through SBICs and community revitalization through a New Markets Tax Credit fund. Primary community development needs inside the assessment area include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization tied to elevated foreclosure rates and financial stability for residents. The dollar volume of Regions Bank's current and total investments is reasonable given the bank's presence in the assessment area.

The bank also made 27 contributions and one in-kind donation totaling approximately $\$ 100,875$. In addition, the bank made contributions to national organizations that may provide an indirect benefit to low- and moderate-income individuals and communities in the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities and to organizations that promote economic development.

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include the following:

- Several LIHTC projects, including a 92-unit development that provides housing affordable to low- and moderate-income individuals;
- An in-kind donation of a single-family home to a government agency for rehabilitation and resale to a qualified low- or moderate-income homebuyer;
- Several donations to nonprofit organizations working to improve educational opportunities for disadvantaged children; and
- A contribution to a local organization to support a Volunteer Income Tax Assistance (VITA) site.


## Service Test

The bank's service test performance in the Mobile assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Mobile assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Regions Bank’s 29 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open any branches and closed one branch (located in a middle-income tract) in the Mobile, Alabama assessment area. The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Mobile, Alabama

## Geographic Distribution of Branches

Assessment Area: AL Mobile

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | al Branch $\%$ | $\begin{gathered} \text { open } \\ \# \end{gathered}$ | Closed <br> \# | Drive thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 2 | 6.9\% | 0 | 0 | 1 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 17 | 14.9\% | 8.6\% | 6.3\% |
| Moderate | Total | 2 | 6.9\% | 0 | 0 | 2 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 20 | 17.5\% | 13.6\% | 10.2\% |
| Middle | Total | 14 | 48.3\% | 0 | 1 | 14 | 9 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 1 \\ & 0 \end{aligned}$ |  | 0 | 0 0 | 1 |  |  | 51 | 44.7\% | 49.2\% | 50.2\% |
| Upper | Total | 11 | 37.9\% | 0 | 0 | 10 | 8 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 26 | 22.8\% | 28.6\% | 33.4\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $0$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 29 | 100.0\% | 0 | 1 | 27 | 18 | 4 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 1 \\ & 0 \end{aligned}$ |  | 0 | 0 | 1 |  |  | 114 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 1,435 service hours in various capacities for community development organizations, by participating in 123 different community development services. Many of the community development services focused on activities that support small businesses, education, affordable housing, youth services, and various other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. In addition, Regions Bank employees provided a high level of financial and technical assistance to various boards of directors of community development organizations.

## Metropolitan Areas (Limited Review)

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

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

## - Anniston Assessment Area (Calhoun County)

o As of December 31, 2011, Regions Bank operated seven branches in the assessment area, representing 2.9\% of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 381.2$ million in deposits in this assessment area, representing a market share of 23.7\% and 1.7\% of Regions Bank's total deposits in Alabama.

- Auburn Assessment Area (Lee County)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing 1.2\% of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 248.0$ million in deposits in this assessment area, representing a market share of $12.4 \%$ and $1.1 \%$ of Regions Bank's total deposits in Alabama.
- Decatur Assessment Area (Lawrence and Morgan Counties)
o As of December 31, 2011, Regions Bank operated six branches in the assessment area, representing $2.5 \%$ of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 453.0$ million in deposits in this assessment area, representing a market share of 24.1\% and 2.1\% of Regions Bank's total deposits in Alabama.
- Dothan Assessment Area (Houston County)
o As of December 31, 2011, Regions Bank operated seven branches in the assessment area, representing $2.9 \%$ of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 464.8$ million in deposits in this assessment area, representing a market share of 22.5\% and 2.1\% of Regions Bank's total deposits in Alabama.
- Florence Assessment Area (Colbert and Lauderdale Counties)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing $2.1 \%$ of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 219.8$ million in deposits in this assessment area, representing a market share of $9.9 \%$ and $1.0 \%$ of Regions Bank's total deposits in Alabama.
- Gadsden Assessment Area (Etowah County)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing 2.1\% of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 262.6$ million in deposits in this assessment area, representing a market share of 22.6\% and 1.2\% of Regions Bank's total deposits in Alabama.
- Montgomery Assessment Area (Autauga, Elmore and Montgomery Counties)
o As of December 31, 2011, Regions Bank operated 23 branches in the assessment area, representing 9.5\% of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 2.0$ billion in deposits in this assessment area, representing a market share of 27.5\% and 8.9\% of Regions Bank's total deposits in Alabama.
- Tuscaloosa Assessment Area (Tuscaloosa County)
o As of December 31, 2011, Regions Bank operated 11 branches in the assessment area, representing 4.6\% of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 705.5$ million in deposits in this assessment area, representing a market share of 25.7\% and 3.2\% of Regions Bank's total deposits in Alabama.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Anniston | Consistent | Consistent | Consistent |
| Auburn | Consistent | Not Consistent (Above) | Consistent |
| Decatur | Not Consistent <br> (Above) | Consistent | Consistent |
| Dothan | Consistent | Not Consistent (Above) | Consistent |
| Florence | Consistent | Not Consistent (Below) | Consistent |
| Gadsden | Not Consistent <br> (Above) | Not Consistent (Below) | Not Consistent (Below) |
| Montgomery | Not Consistent <br> (Above) | Not Consistent (Below) | Consistent |
| Tuscaloosa | Consistent | Not Consistent (Above) | Not Consistent (Below) |

The Birmingham, Huntsville and Mobile assessment areas received full-scope reviews, and the bank's performance in the Birmingham assessment area was given greater consideration in determining the overall rating for the state. Birmingham is the bank's largest market in Alabama in terms of deposits, loans, and branches. The full-scope areas selected represent $68.2 \%$ of the deposits in the assessment areas in Alabama as well as $51.0 \%$ of the branches. The full-scope assessment areas also represent $48.6 \%$ of the HMDA loans and $57.8 \%$ of the small business loans in the state. Therefore, the three full-scope assessment areas represent more than half of the deposits and branches and a large portion of loans in the State of Alabama.

For the Lending Test, performance was stronger than the bank’s performance in the state in three limited-scope assessment areas (Decatur, Gadsden and Montgomery) and consistent with the bank's performance in the remaining limited-scope assessment areas (Anniston, Auburn, Dothan, Florence, and Tuscaloosa).

For the Investment Test, the performance in three limited-scope assessment areas (Gadsden, Florence and Montgomery) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas. The performance in three limited-scope assessment areas (Auburn, Dothan, and Tuscaloosa) was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas. The performance in the Anniston and Decatur limited-scope assessment areas was consistent with the bank's performance in the state.

For the service test, the performance in two limited-scope assessment areas (Gadsden and Tuscaloosa) was weaker than the bank's performance in the state. The performance in the Gadsden assessment area was weaker than the bank's performance in the state due to limited accessibility of delivery systems and fewer community development services completed by the bank. The performance of the Tuscaloosa assessment area was weaker than the bank's performance in the state due to fewer community development services completed by the bank. The performance in the remaining limited-scope assessment areas (Anniston, Auburn, Decatur, Dothan, Florence, and Montgomery) was consistent with the bank’s performance in the state.

## Metropolitan Areas (Limited Review)

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

## Non-Metropolitan Areas (Limited Review)

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

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

- Baldwin-Coffee-Covington-Escambia Assessment Area (Baldwin, Coffee, Covington and Escambia Counties)
o As of December 31, 2011, Regions Bank operated 19 branches in the assessment area, representing 7.9\% of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 829.6$ million in deposits in this assessment area, representing a market share of $16.1 \%$ and 3.8\% of Regions Bank's total deposits in Alabama.
- Fayette Assessment Area (Fayette County)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $0.8 \%$ of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 56.6$ million in deposits in this assessment area, representing a market share of $21.5 \%$ and $0.3 \%$ of Regions Bank's total deposits in Alabama.
- Northern Alabama Assessment Area (Cherokee, Cullman, DeKalb, Jackson and Marshall Counties)
o As of December 31, 2011, Regions Bank operated 12 branches in the assessment area, representing 5.0\% of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 833.3$ million in deposits in this assessment area, representing a market share of $17.5 \%$ and $3.8 \%$ of Regions Bank's total deposits in Alabama.
- Southern Alabama Assessment Area (Choctaw, Clarke, Conecuh, Dallas, Marengo, Monroe, Pike and Sumter Counties)
o As of December 31, 2011, Regions Bank operated 14 branches in the assessment area, representing 5.8\% of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 456.6$ million in deposits in this assessment area, representing a market share of $14.8 \%$ and $2.1 \%$ of Regions Bank's total deposits in Alabama.
- Tallapoosa-Talladega Assessment Area (Talladega and Tallapoosa Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $1.7 \%$ of its branches in Alabama.
o As of June 30, 2011, the bank had $\$ 141.3$ million in deposits in this assessment area, representing a market share of $10.3 \%$ and $0.6 \%$ of Regions Bank's total deposits in Alabama.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Baldwin-Coffee- <br> Covington- <br> Escambia | Consistent | Not Consistent <br> (Above) | Consistent |
| Fayette | Consistent | Not Consistent <br> (Below) | Not Consistent (Below) |
| Northern Alabama | Consistent | Not Consistent <br> (Above) | Consistent |
| Southern Alabama | Not Consistent <br> (Above) | Not Consistent <br> (Above) | Consistent |
| Tallapoosa- <br> Talladega | Not Consistent <br> (Above) | Not Consistent <br> (Above) | Not Consistent (Below) |

As stated earlier, the Birmingham, Huntsville, and Mobile assessment areas received full-scope reviews, and the bank's performance in the Birmingham assessment area was given greater consideration in determining the overall rating for the state. Birmingham is by far the bank's largest market in Alabama in terms of deposits, loans, and branches. The full-scope areas selected together represent $68.2 \%$ of the deposits in the assessment areas in Alabama as well as $51.0 \%$ of the branches. The full-scope assessment areas also represent $48.6 \%$ of the HMDA loans and $57.8 \%$ of the small business loans in the state. Therefore, the three full-scope assessment areas represent more than half of the deposits and branches and a large portion of loans in the State of Alabama.

For the Lending Test, performance was stronger than the bank's performance in the state in two limited-scope assessment areas (Southern Alabama and Tallapoosa-Talladega) and consistent with the bank's performance in the remaining limited-scope assessment areas (Baldwin-Coffee-Covington-Escambia, Fayette and Northern Alabama).

For the Investment Test, the performance in one limited-scope assessment area (Fayette) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment area. The performance in four limited-scope assessment areas (Baldwin-Coffee-CovingtonEscambia, Northern Alabama, Southern Alabama and Tallapoosa-Talladega) was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in two limited-scope assessment areas (Fayette and TallapoosaTalladega) was weaker than the bank's performance in the state due to fewer community development services. The performance in the remaining limited-scope assessment areas (Baldwin-Coffee-Covington-Escambia, Northern Alabama, and Southern Alabama) was consistent with the bank's performance in the state.

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

## Arkansas

## CRA RATING FOR ARKANSAS: Satisfactory ${ }^{214}$

## The Lending Test is rated: High Satisfactory <br> The Investment Test is rated: The Service Test is rated: <br> High Satisfactory <br> Outstanding

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas and is occasionally in a leadership position in response to the community development needs of the assessment areas.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank is a leader in providing community development services throughout the assessment areas.

[^70]
## SCOPE OF EXAMINATION

Full-scope reviews were conducted for three assessment areas in the State of Arkansas:

- Hot Springs
- Little Rock
- Northwest Arkansas (non-MSA)

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

- Fayetteville
- Fort Smith
- Jonesboro
- Northeast Arkansas (non-MSA)
- Southern Arkansas (non-MSA)
- Union (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

Lending activity in Arkansas accounted for $4.3 \%$ of the bank's total lending activity. HMDA-reportable lending in Arkansas represented 5.1\% of the bank's total HMDA-reportable lending, while small business and small farm lending represented $3.8 \%$ of the bank's total small business and small farm lending. As of June 30, 2011, the bank had $\$ 4.0$ billion in deposits in Arkansas representing 4.1\% of Regions Bank's total deposits. Additionally, as of June 30, 2011, the bank ranked ${ }^{\text {nd }}$, among 145 insured institutions, in deposit market share with $8.2 \%$ of the deposits within the state. Regions Bank operates 91 branch offices in Arkansas representing $5.3 \%$ of the bank's total branches.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending test performance in the State of Arkansas is High Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs in all three full-scope assessment areas.

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

Given that the largest percentage of the bank's branches, deposits, and lending is in the Little Rock assessment area, the performance in this assessment area drove the overall statewide rating, although performance within each assessment area was also considered. HMDA lending performance was given more weight than small business loans. Furthermore, Regions Bank originated 806 small farm loans in Arkansas during the review period; therefore, small farm lending was not presented in this report due to the bank’s minimal lending activity in Arkansas for this product.

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Arkansas assessment areas. Lending activity is adequate in all three full-scope assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

## Statewide Summary of Lending Activity

Assessment Areas Located in
Arkansas

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s})$ | \% |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 1,615 | $18.9 \%$ | $\$ 222,992$ | $22.9 \%$ |
| HMDA Refinance | 2,460 | $28.7 \%$ | $\$ 305,989$ | $31.4 \%$ |
| HMDA Home Improvement | 326 | $3.8 \%$ | $\$ 2,429$ | $0.2 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{4 , 4 0 1}$ | $\mathbf{5 1 . 4 \%}$ | $\mathbf{\$ 5 3 1 , 4 1 0}$ | $\mathbf{5 4 . 5 \%}$ |
| Total Small Business | $\mathbf{3 , 3 5 4}$ | $\mathbf{3 9 . 2} \%$ | $\mathbf{\$ 3 2 4 , 5 8 9}$ | $\mathbf{3 3 . 3} \%$ |
| Total Farm | $\mathbf{8 0 6}$ | $\mathbf{9 . 4 \%}$ | $\mathbf{\$ 1 1 9 , 2 5 4}$ | $\mathbf{1 2 . 2 \%}$ |
| TOTAL LOANS | $\mathbf{8 , 5 6 1}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 9 7 5 , 2 5 3}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank’s HMDA and small business loans is good. The geographic distribution was good in Little Rock, while it was adequate in both Hot Springs and Northwest Arkansas.

Overall, the distribution of loans by borrower's income and revenue size of business is good. The borrower distribution is considered good in all three full-scope assessment areas. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Arkansas assessment areas. The bank made 75 community development loans totaling $\$ 139.4$ million during the review period, which represented $11.0 \%$ by number and $10.0 \%$ by dollar amount of the bank's total community development lending. The majority of the loans financed affordable housing for low- and moderate-income individuals or revitalization/stabilization activities. Although the bank is a leader in community development lending in Little Rock, it had no community development lending in Northwest Arkansas. In addition, the Hot Springs assessment area had a good level of community development lending. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating in the State of Arkansas is High Satisfactory when considering the bank's statewide performance and its overall presence in the state. The bank made significant use of qualified investments and contributions. The bank exhibited excellent responsiveness to credit and community development needs through its investment activities in the Little Rock assessment area, while performance in the Northwest Arkansas and Hot Springs assessment areas was poor.

The bank made 38 qualified investments of approximately $\$ 48.2$ million and contributions of $\$ 111,758$ within the Arkansas assessment areas. Of the 38 investments, 12 totaling $\$ 39.6$ million were current period

## Arkansas

investments. Most of the investments provided support for affordable housing, through GNMA investment instruments and the purchase of Low Income Housing Tax Credits. In addition, the bank had a $\$ 1.5$ million prior period community development investment in a regional community development financial institution (CDFI) that serves the state of Arkansas and several surrounding states. The bank also had investments that benefitted a broader regional area that includes Arkansas. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs. Additional details regarding specific investments can be found in the full-scope assessment area sections.

## Service Test

The service test rating is Outstanding when considering the bank's statewide performance in Arkansas.

## Retail Services

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

## Community Development Services

The bank is a leader in providing community development services that benefit residents and small businesses of the assessment areas. Out of the three full-scope assessment areas, community development services were excellent in the Little Rock and Northwest Arkansas assessment areas and adequate in the Hot Springs assessment area.

METROPOLITAN AREA<br>(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOT SPRINGS, ARKANSAS ASSESSMENT AREA

The Hot Springs, Arkansas assessment area includes Garland County, which comprises all of the Hot Springs, Arkansas MSA (Hot Springs MSA). There are no low-, six moderate-, 11 middle-, and two upper-income tracts in this assessment area. As of December 31, 2011, Regions Bank operated 9 branch offices in the Hot Springs, Arkansas assessment area representing 9.9\% of its branches in Arkansas.

The Hot Springs, Arkansas assessment area is a relatively small banking market. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 14 financial institutions operating 59 branch locations in the Hot Springs MSA. Regions Bank was ranked $1^{\text {st }}$ with deposit market share of $25.4 \%$ ( $\$ 431.2$ million). Summit Bank ranked $2^{\text {nd }}$ with $19.6 \%$ deposit market share and Bank of America ranked $3^{\text {rd }}$ with $11.1 \%$.

Regions Bank is an active small business and HMDA lender in the assessment area. In 2010, the bank ranked $11^{\text {th }}$ out of 32 small business reporters with $5.2 \%$ of all small business loans. By 2011, Regions jumped to $2^{\text {nd }}$ of 38 small business reporters with $13.8 \%$ of all small business loans. From 2010 to 2011, the bank's small business lending increased from 64 to 214 loans. Regions significantly increased its number of small business loans in 2011, primarily by purchasing loans. For HMDA lending, Regions Bank ranked $7^{\text {th }}$ in 2010 and 2011 with $5.2 \%$ and $4.5 \%$ of all HMDA loans, respectively. Wells Fargo and Summit Bank were consistently among the top HMDA lenders in the assessment area.

## Demographic Characteristics

The assessment area population is growing at an average rate. According to census data, the population of Garland County in 2000 was 88,068 people, which represented $3.3 \%$ of the total statewide population. From 2000 to 2010, the county's population grew by $9.03 \%$ compared to the statewide population, which grew by $9.07 \%$. Conversely, the rate of growth has been declining in recent years. From 2005 to 2010, net migration was positive but declined each year from a high of 1,149 individuals in 2005 to a low of 513 individuals in 2010. Net migration is defined as the number of in-migrants less the number of out-migrants and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns from the present year to the previous year. ${ }^{215}$

The table below shows selected demographic information for the Hot Springs assessment area.

[^71]
## Hot Springs, Arkansas

## Combined Demographics Report

Assessment Area: AR Hot Springs


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

Food stamp usage has increased in the assessment area. From 2000 to 2009, the percentage of Garland County residents receiving food stamps increased at a rate greater than the state of Arkansas. In 2000, 7.4\% of assessment area residents received food stamps, which increased to $14.4 \%$ by 2009 . The percentage of residents receiving these benefits statewide increased from $9.4 \%$ to $15.8 \%$ during the same time period. Furthermore, an estimated $15.9 \%$ of families in the assessment area lived below the poverty line in 2009 compared to $17.7 \%$ statewide. ${ }^{216}$

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following table sets forth the estimated median family income for the years 2010 through 2011 for the Hot Springs, Arkansas MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper). According to the 2000 census, $10.5 \%$ of the families in the assessment area lived below the poverty level.

## Borrower Income Levels Hot Springs, AR MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$47,200 | 0 | - | \$23,599 | \$23,600 | - | \$37,759 | \$37,760 | - | \$56,639 | \$56,640 | - | \& above |
| 2011 | \$48,800 | 0 | - | \$24,399 | \$24,400 | - | \$39,039 | \$39,040 | - | \$58,559 | \$58,560 | - | \& above |

## Housing Characteristics

The assessment area housing market has been impacted by the recent economic downturn but to a lesser degree than many urban areas due to a smaller increase in housing prices before the recession. Since 2009, Garland County has experienced a relatively consistent upward trend in average home sale prices, unlike the state which has remained relatively flat. The Arkansas Realtors Association reports that the 2011 average selling price for a home in Garland County was $\$ 166,231$, up $1.7 \%$ from one year prior and $5.3 \%$ from 2009. Statewide, the 2011 average home selling price was $\$ 142,518$, representing a $1.2 \%$ decrease from one year prior and flat from 2009. ${ }^{217}$

Census data show that there were 44,953 housing units in the assessment area in 2000, $59.9 \%$ of which were owner-occupied, $24.3 \%$ were rental units and $15.9 \%$ were vacant. There were no low-income tracts in the assessment area, and only $40 \%$ of housing units in moderate-income census tracts were owner-occupied, indicating limited lending opportunity in this area. The median age of housing stock across the assessment area was 25 years, but was 43 years in moderate-income tracts. ${ }^{218}$ Housing permits also declined, with only 37 single-family permits issued in 2011 compared to 159 in 2005, representing a $76.7 \%$ decrease. Multi-family development is not a significant source of housing inside the assessment area. ${ }^{219}$

[^72]Mortgage delinquencies have had an adverse impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $4.0 \%$ in January 2010 to 7.3\% in December 2011. HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings has stabilized. After decreasing nearly $46 \%$ between 2007 and 2009, the number of single-family home purchase originations has remained relatively steady above 600. Refinance activity has remained strong in recent years with 2009 and 2010 activity greater than all years since 2004 although there was a reduction in activity between 2010 and 2011.

## Employment and Economic Conditions

Garland County, Arkansas is a popular retirement destination known for its hot spring bathhouses and horse racing. It is also home to Hot Springs National Park, the oldest unit of the national park system and a popular tourist attraction. In 2011, nearly 1.4 million people visited the park. ${ }^{220}$ A study completed by Michigan State University estimates that during 2010 visitors to Hot Springs National Park spent $\$ 89$ million and that about $\$ 84.5$ million of that total came from out-of-town guests. The figures include spending at motels, hotels, bed and breakfast establishments, restaurants and grocery stores, and on retail and fuel purchases. National Park Service (NPS) employee and contract labor salaries and park and contractor purchases of supplies and materials added another $\$ 4.99$ million to the local economy. ${ }^{221}$

The assessment area is also home to National Park Community College (NPCC), the fourth largest community college in the state. NPCC is a two-year institution that averages approximately 4,000 students per semester. Approximately 2,000 additional students attend the community college for noncredit and continuing education classes. ${ }^{222}$ NPCC is also one of the area's largest employers with more than 600 employees. Other top employers include St. Joseph’s Mercy Health Center, Oaklawn Park Racing and Gaming, Wal-Mart Stores, National Park Medical Center and the City of Hot Springs. ${ }^{223}$

As of 2010, total employment in the Hot Springs MSA was 51,380 . The largest private sector employment industries included health care and social assistance, retail trade, and accommodation and food services. Combined, these sectors account for more than $44 \%$ of private, nonfarm employment. Many of the jobs in these industries are directly tied to tourism, especially retail trade, which accounts for more than $15 \%$ of private nonfarm employment. The area’s reliance on retail trade led in part to a 2012 report listing Hot Springs, Arkansas as one of the 10 poorest cities in the nation. ${ }^{224}$ Conversely, there have been several recent indicators that the region is growing. Sales tax collections in 2011 surpassed those of 2008, indicating that tourism is back to pre-recession levels and residents have returned to more normalized shopping habits. Construction related to commercial and residential development, medical and health facilities, and transportation is increasing, resulting in construction-related job growth. ${ }^{225}$ Additionally, the Berry Plastics Corporation, a packaging

[^73]
## Hot Springs, Arkansas

manufacturer in the city of Hot Springs formerly known as Rexam PLC, led hiring in the manufacturing sector by bringing on an additional 140 employees in 2011.

Downtown Hot Springs has historically been a source for tourism-related economic activity due to its proximity to Hot Springs National Park and local bathhouses. However, the area is in need of investment to remain attractive to tourists and residents. The Hot Springs Metro Partnership, formerly known as the Garland County Economic Development Corporation, produced an economic development strategy in 2011 to respond to the needs of the area. The strategy is designed to build upon the strengths of the destination via three areas of focus: downtown revitalization, business attraction and expansion, and entrepreneurship. Among other things, the downtown revitalization plan calls for launching downtown as an "innovation zone" catering to entrepreneurs and information technology firms while development of the business climate focuses on matching businesses with the appropriate customers and economic development resources as well as using resources to develop the local workforce and provide support for start-ups and entrepreneurs.

Unemployment in the assessment area is similar to the state. The table below shows that the assessment area unemployment rate rose to $8.3 \%$ in 2011 from $8.1 \%$ in 2010 compared to the state unemployment rate, which is currently $8.0 \%$. The 2011 nationwide average unemployment rate was $8.9 \%$.

## Unemployment Rates

Assessment Area: AR Hot Springs

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Hot Springs MSA | 8.1 | 8.3 |
| Arkansas | 7.9 | $\mathbf{8 . 0}$ |

Not Seasonally Adjusted
From an economic perspective, the assessment area appears to be recovering. While unemployment rose in 2011, it is only slightly higher than the statewide unemployment rate and continues to remain below the national average. Jobs and tourism are returning to the area after the recent recession, and the Hot Springs Metro Partnership is taking steps to engage the private and public sectors in economic development activities. While housing remains the most challenging issue, it appears that the market has stabilized and should benefit from the area's focused development efforts.

## Community Contacts and Community Development Opportunities

Two community contacts were interviewed to discuss local community development: one specializing in business development and the other in planning and economic development. The business development specialist noted that the local economy is vibrant due to the predominance of middle-income retired persons. As a result, this contact suggested health care as the most pressing need of the community. The second contact noted that the local economy is strong for individuals with retirement savings but very challenging for many of the working-class residents. No major employers have recently left the area, and housing values remained depressed across the region. The contact added that the majority of employers are retail-focused and there are no major manufacturing companies. Both contacts spoke positively of bank participation in helping to meet local community needs although credit worthiness remains a challenge for many residents. Also, one contact noted that banks need to do a better job at reaching out to unbanked and under-banked residents.

## Hot Springs, Arkansas

In its 2010-2014 CDBG Consolidated Plan, the City of Hot Springs outlines challenges related to affordable housing and its strategy moving forward. Among other things, the document notes that due to the age of its current affordable housing stock, lead paint remediation is top priority. The city has established a five-year plan that includes allocating federal and local resources to develop affordable housing, rehabilitate existing "at risk" housing stock, expand neighborhood revitalization efforts by offering homebuyer education, homeownership counseling, etc., and install and improve housing infrastructure. Due to the involvement of federal dollars through the CDBG and HOME programs, all programs are designed to benefit low- and moderate-income individuals and families. ${ }^{226}$

Bank On is a national initiative with local programs focused on connecting unbanked and under-banked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $7.7 \%$ of households in Garland County are unbanked relative to $10.1 \%$ statewide. Additionally, $21.3 \%$ of households in the assessment area are listed as under-banked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $22.3 \%$ of under-banked households statewide. ${ }^{227}$

The State of Arkansas received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. Arkansas received $\$ 19.6$ million under the NSP1 allocation process and $\$ 5$ million under NSP3. Garland County was named in the NSP1 award as one of the top 15 counties in Arkansas for incidence of foreclosure while Hot Springs was cited as an entitlement city for NSP3 activities. ${ }^{228}$

There are nine community development financial institutions (CDFIs) in the state of Arkansas, but none are located inside the assessment area. Other community development opportunities include participation in the Low Income Housing Tax Credit (LIHTC) Program. Arkansas receives an allocation of approximately \$6.5 million in Low Income Housing Tax Credits annually. ${ }^{229}$ The state also provides resources such as a housing trust fund and below-market financing to stimulate the development of affordable housing for low- and moderate-income individuals and families.

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## Hot Springs, Arkansas

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

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

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 345 (56.3\%) HMDA loans compared to 268 (43.7\%) small business loans in the Hot Springs assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Hot Springs assessment area contains $0.3 \%$ of the bank's small business and HMDA lending by number of loans and $0.3 \%$ by dollar volume totaling $\$ 69.8$ million. In comparison, $0.4 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of small business and HMDA loans is adequate. For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates and the level of owner-occupied units and the number of small businesses in moderate-income census tracts were issues considered when assessing the bank's performance. In addition the performance of the aggregate lenders was also considered when assessing the bank's performance.

## Home Purchase Loans

Regions Bank's home purchase lending in moderate-income census tracts is adequate. During the review period, the bank originated $8.4 \%$ of its home purchase loans in moderate-income census tracts, which contain $15.1 \%$ of the owner-occupied units. Regions Bank's performance was slightly less than the aggregate in 2010 and 2011.

The bank's home purchase lending in middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Home Refinance Loans

Regions Bank’s home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $6.0 \%$ of its home refinance loans in moderate-income census tracts, which contain $15.1 \%$ of the owner-occupied units. Regions Bank's performance was slightly less than the aggregate in 2010 and slightly greater than the aggregate in 2011.

The bank's refinance lending in middle- and upper-income tracts was greater than the percentage of owneroccupied units in these tracts.

## Home Improvement Loans

Regions Bank's home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated five home improvement loans, representing $33.3 \%$ of its home improvement loans, in the moderate-income census

## Hot Springs, Arkansas

tracts, which contain $15.1 \%$ of the owner-occupied units in the assessment area. Although it appears that the bank exceeded the aggregate in 2010, the bank only made a total of seven home improvement loans in 2010, four of which were in a moderate-income census tract. In 2011, the bank only made one home improvement loan in a moderate-income tract, and its performance was slightly less than the aggregate.

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

## Small Business Loans

Regions Bank's small business lending in moderate-income census tracts is good. During the review period, Regions Bank originated $24.3 \%$ of its small business loans in moderate-income tracts, which contain $26.6 \%$ of the small businesses in the assessment area. The bank's performance was slightly greater than the aggregate in 2010 and 2011.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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

The bank's home purchase lending to low-income borrowers is good. The bank's percentage of home purchase lending to low-income borrowers at $9.5 \%$ was less than the percentage of moderate-income families in the assessment area at $19.0 \%$. The bank made six refinance loans to low-income borrowers in 2010 and performed better than the aggregate that year. However, while the bank only made three home purchase loans to lowincome borrowers in 2011, the bank's performance was equal to the aggregate in that year.

The bank’s home purchase lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home purchase lending to moderate-income borrowers at $18.9 \%$ was slightly greater than the percentage of moderate-income families in the assessment area at $18.1 \%$. Although Regions Bank's performance was less than the aggregate in 2010, it exceeded the aggregate in 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Refinance Loans

Home refinance lending to low-income borrowers is excellent. The bank's percentage of home refinance lending to low-income borrowers at $7.2 \%$ was less than the percentage of low-income families in the assessment area at $19.0 \%$. However, the bank's lending to low-income borrowers exceeded the aggregate in both years 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is excellent when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $20.4 \%$ exceeded the percentage of moderate-income families in the assessment area at $18.1 \%$. Additionally, Regions Bank’s performance greatly exceeded the aggregate in both years 2010 and 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is poor. Low-income families constitute $19.0 \%$ of the families in the assessment area, but the bank did not make any home improvement loans to low-income borrowers. It was noted that aggregate lenders also had low penetration in this segment of the market.

The bank's home improvement lending to moderate-income borrowers is adequate when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home improvement lending to moderate-income borrowers at $20.0 \%$ was greater than the percentage of moderate-income families in the assessment area at $18.1 \%$. The bank originated two home improvement loans to moderate-income borrowers in 2010 and performed better than the aggregate that year. However, in 2011 the bank originated only one home improvement loan to low-income borrowers and performed less than the aggregate.

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

## Small Business Lending

Considering the bank's performance when compared to the demographic and aggregate lending data, the distribution of small business lending by business revenue size is adequate. The bank originated $25.0 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $91.2 \%$. However, of the 268 small business loans originated during the review period, 150 loans (56.0\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $56.8 \%$. Additionally, the bank's lending to small businesses exceeded the aggregate in 2010 but was significantly less than the aggregate in 2011. Also, 81.7\% of the 268 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank’s performance was less than the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Hot Springs assessment area. The bank originated three community development loans totaling $\$ 5.3$ million during the review period. The loans financed community revitalization activities and community services targeted to low- and moderateincome individuals. Local community development needs include but are not limited to small business development and financing as well as community services targeted to low- and moderate-income individuals. The bank's community development loan portfolio inside the assessment area exhibited good responsiveness to local community credit needs. The number and dollar amount of loans is good given the bank's presence in the market.

Examples of community development lending include:

- Multiple loans that promote economic development by financing a small business located in a low- or moderate-income geography that has been designated for revitalization; and
- One loan to a nonprofit affordable housing developer that specializes in housing for low-income families.


## Hot Springs, Arkansas

## Investment Test

The bank's performance in the Hot Springs assessment area under the investment test is poor. The bank had two investments totaling $\$ 414,850$ and no current period investments. The bank had investments that benefitted a broader regional area that includes the assessment area. Prior period direct investments in the assessment area provided support for affordable housing through HUD bonds and support for community revitalization through an investment in a regional CDFI. The broader regional investments primarily funded small businesses and startup companies through SBICs. Affordable housing, economic development including small business finance and job creation and household financial stability are several of the top community development needs in the area. The dollar volume of Regions Bank's current and total investments is poor given the bank's presence in the assessment area.

The bank also made six contributions totaling approximately $\$ 11,404$. In addition, the bank made contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities and to organizations that promote economic development.

## Service Test

The bank's service test performance in the Hot Springs assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Hot Springs assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of nine branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed one branch (located in a moderate-income tract) in the Hot Springs, Alabama assessment area. The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend and extended hours at many of its branch offices, including those located in moderate-income tracts. Bank products and services and normal business hours are consistent throughout the assessment area.

## Hot Springs, Arkansas

## Geographic Distribution of Branches

Assessment Area: AR Hot Springs

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | I Branc <br> \% | es <br> Open <br> \# | Closed \# | Drive thrus <br> \# | Extend- <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census Tracts |  | Households <br> \% | Total <br> Businesses <br> \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Moderate | Total | 3 | 33.3\% | 0 | 1 | 3 | 2 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 1 0 |  | 0 | 0 0 | 1 |  |  | 6 | 31.6\% | 22.3\% | 27.2\% |
| Middle | Total | 4 | 44.4\% | 0 | 0 | 4 | 3 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 11 | 57.9\% | 65.0\% | 60.0\% |
| Upper | Total | 2 | 22.2\% | 0 | 0 | 2 | 1 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 2 | 10.5\% | 12.7\% | 12.8\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 9 | 100.0\% | 0 | 1 | 9 | 6 | 4 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 1 0 |  | 0 | 0 | 1 |  |  | 19 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 285 service hours in various capacities to community development organizations, by participating in 40 different community development services. Many of the community development services focused on activities that support small businesses, education, affordable housing, youth services, and various other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by providing counsel to a community organization whose mission is to build and finance homes for low- and moderate-income individuals.

METROPOLITAN AREA<br>(Full-scope Review)

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

The Little Rock-North Little Rock-Conway, Arkansas MSA includes Faulkner, Grant, Lonoke, Perry, Pulaski, and Saline counties. The Little Rock assessment area includes all of these except Perry County. The assessment area has 144 census tracts, with seven low-income and 32 moderate-income tracts. As of December 2011, Regions operated 33 branches in the Little Rock assessment area, including two in low-income tracts, five in moderate-income tracts and a total of 11 bordering at least one low- or moderate-income tract. FEMA declared Faulkner, Lonoke, Pulaski, and Saline counties a federal disaster area in June 2011 due to severe storms, tornadoes, and flooding.

The Little Rock, Arkansas assessment area is an active banking market where Regions Bank is a market share leader. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 36 financial institutions operating 348 branch locations with a total of $\$ 13.6$ billion in deposits. Regions Bank ranked $2^{\text {nd }}$ with deposit market share of $13.6 \%$ ( $\$ 1.9$ billion). Bank of America had the largest deposit market share at $19.0 \%$.

Regions Bank is also an active lender in the assessment area. In 2010, the bank was ranked $8^{\text {th }}$ out of 68 small business reporters by originating $4.4 \%$ of all small business loans. In 2011, the bank moved up to $2^{\text {nd }}$ of 66 small business reporters by generating $9.4 \%$ of all small business loans. The bank increased small business loan production from 410 loans in 2010 to 1,096 loans in 2011, primarily by purchasing loans. For HMDA lending, Regions Bank ranked $10^{\text {th }}$ in both 2010 and 2011 with $3.1 \%$ and $2.7 \%$ of all HMDA loans, respectively. Loan production decreased from 1,012 in 2010 to 741 in 2011. Bank of America, Wells Fargo Bank and JPMorgan Chase Bank were among the top HMDA lenders in the assessment area.

## Demographic Characteristics

The assessment area population is growing rapidly relative to the state of Arkansas. According to census data, the assessment area population in 2000 was 600,309 , representing $22.5 \%$ of the total statewide population. From 2000 to 2010, the assessment area's population grew by $14.8 \%$ compared to the statewide population, which grew by $9.1 \%$. As of 2010, the assessment area’s population of 689,312 represented $23.6 \%$ of the statewide population. The principal city of the assessment area, Little Rock, is located in Pulaski County and is the largest city in the state by population but experienced the smallest population growth rate during the decade. While more suburban counties such as Faulkner, Lonoke and Saline experienced population growth by approximately $30 \%$, Pulaski County's population grew by only $5.9 \%$ from 2000 to $2010 .{ }^{230}$

Net migration statistics further explain population growth trends of the area. From 2005 to 2010 net migration was positive in all counties except Pulaski, with Faulkner and Saline counties exhibiting the most consistent positive net migration trends during the time period. Net migration is defined as the number of in-migrants less the number of out-migrants and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns from the present year to the previous year. ${ }^{231}$

The following table shows selected demographic information for the Little Rock assessment area.

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## Little Rock, Arkansas

## Combined Demographics Report

Assessment Area: AR Little Rock

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 7 | 4.9 |  | 2.3 | 1,319 | 34.8 | 32,079 | 19.6 |
| Moderate-income | 32 | 22.2 |  | 17.3 | 5,192 | 18.4 | 29,363 | 18.0 |
| Middle-income | 77 | 53.5 |  | 54.5 | 6,993 | 7.9 | 36,697 | 22.5 |
| Upper-income | 28 | 19.4 |  | 26.0 | 1,106 | 2.6 | 65,299 | 40.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 144 | 100.0 |  | 100.0 | 14,610 | 8.9 | 163,438 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 8,058 | 2,339 |  | 29.0 | 4,665 | 57.9 | 1,054 | 13.1 |
| Moderate-income | 47,682 | 21,717 |  | 45.5 | 20,418 | 42.8 | 5,547 | 11.6 |
| Middle-income | 137,401 | 87,852 |  | 63.9 | 39,283 | 28.6 | 10,266 | 7.5 |
| Upper-income | 64,074 | 45,300 |  | 70.7 | 15,531 | 24.2 | 3,243 | 5.1 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 257,215 | 157,208 |  | 61.1 | 79,897 | 31.1 | 20,110 | 7.8 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,780 | 5.4 |  | 4.7 | 206 | 10.5 | 195 | 11.5 |
| Moderate-income | 5,651 | 17.0 |  | 16.0 | 527 | 26.8 | 382 | 22.5 |
| Middle-income | 17,067 | 51.3 |  | 52.5 | 816 | 41.5 | 712 | 41.9 |
| Upper-income | 8,758 | 26.3 |  | 26.8 | 418 | 21.3 | 412 | 24.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 33,256 | 100.0 |  | 100.0 | 1,967 | 100.0 | 1,701 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.0 |  | 5.9 |  | 5.1 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 7 | 1.2 |  | 1.3 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 85 | 15.1 |  | 14.6 | 4 | 26.7 | 2 | 40.0 |
| Middle-income | 361 | 64.2 |  | 64.4 | 9 | 60.0 | 3 | 60.0 |
| Upper-income | 109 | 19.4 |  | 19.7 | 2 | 13.3 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 562 | 100.0 |  | 100.0 | 15 | 100.0 | 5 | 100.0 |
|  | Percentage of Total Farms: |  |  | 96.4 |  | 2.7 |  | . 9 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

While the population inside the assessment area has been increasing, incomes have been declining as indicated by the percentage of residents eligible for food stamps. Food stamp usage increased between 2000 and 2010 in all counties in the assessment area. During this time period, the percentage of assessment area residents receiving food stamps increased by $121 \%$ from 39,323 individuals to 87,155 . Pulaski County had the highest percentage of residents using the program at $14.8 \%$, followed by Grant and Lonoke counties both at $11.3 \%$. All counties in the assessment area have a lower usage rate than the statewide rate of $15.8 \%$. ${ }^{232}$

Eligibility for the free and reduced price lunch program is also on the rise, further highlighting income challenges faced by many assessment area residents. In 2000, four of the 19 school districts (21.1\%) in the assessment area had more than $50 \%$ of their students eligible for free or reduced price lunches. By 2010, this number increased to 11 of 19 school districts (57.9\%). Three of the five school districts with the largest increases in student eligibility were in Saline County while the largest number of students using the program in 2010 was in the urban core of Pulaski County.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following table sets forth the estimated median family income for the years 2010 and 2011 for the MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper) and shows that the HUD estimated median family income increased by $\$ 2,400$ from 2010 to 2011, or $4.1 \%$.

## Borrower Income Levels

## Little Rock - North Little Rock - Conway, AR MSA

| $\begin{array}{c}\text { HUD Estimated Median } \\ \text { Family Income }\end{array}$ | Low |  |  | Moderate |  | Middle |  | Upper |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\mathbf{2 0 1 0}$ | $\mathbf{\$ 5 9 , 1 0 0}$ | 0 | - | $\$ 29,549$ | $\$ 29,550$ | - | $\$ 47,279$ | $\$ 47,280$ | - | $\$ 70,919$ | $\$ 70,920$ |$\quad-\quad$ \& above $)$

## Housing Characteristics

The assessment area housing market was impacted by the recent housing crisis and continues to face challenges, but there are signs of recovery. The Arkansas Realtors Association reports that counties such as Faulkner, Lonoke and Pulaski have seen average housing prices recover and increase beyond 2008 prices. Conversely, the number of units sold in all assessment area counties is down considerably from 2008. In Pulaski County, 187 new and existing housing units were sold in January 2011 for an average selling price of $\$ 187,110$. This compares to January 2008 when 261 units were sold for an average selling price of $\$ 168,183$. Lonoke County's housing market faired similarly to Pulaski County during this time period, but others struggled. The number of housing units sold in Faulkner County from January 2008 to January 2011 decreased 38.2\% from 76 units to 47 units while the average selling price increased only marginally during this time period. Nearby Saline County saw both units sold and average prices decline from January 2008 to January 2011, with units down by $14 \%$ and prices down by $8 \%$ and continuing to show weakness. Generally speaking, these trends continued into 2012. ${ }^{233}$

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## Little Rock, Arkansas

Census data show that there were 257,215 housing units in the assessment area in 2000, $61.1 \%$ of which were owner-occupied, $31.1 \%$ were rental units and $7.8 \%$ were vacant. While the majority of assessment area housing was owner-occupied, a majority of housing units in low- and moderate-income census tracts were rentals or vacant, indicating limited lending opportunity in these areas. The median age of housing stock across the assessment area was 25 years, but this figure was 40 years in low-income tracts and 35 in moderate-income tracts. ${ }^{234}$ Housing permits, an indicator of housing demand, have also declined in recent years. After reaching their peak in 2005, the number of single-family permits declined by $63.9 \%$. Multi-family permits have followed a different course. From 2005 to 2006, the number of multi-family permits declined by $87.4 \%$ from 103 permits to 13 permits but has since recovered to 77 permits issued in 2011. ${ }^{235}$

Mortgage delinquencies have had an adverse impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from 4.1\% in January 2010 to 9.9\% in December 2011. HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings is weak. Home purchase loans have been in a general state of decline since 2005, with the number of loans originated annually inside the assessment area declining by $41 \%$ from 2005 to 2011. Refinance activity exhibited more strength during this time period, experiencing a significant increase in year-over-year production from 2008 and 2009 and remaining robust in 2010 and 2011.

## Employment and Economic Conditions

The assessment area is part of the Little Rock-North Little Rock-Conway, Arkansas MSA located in central Arkansas at the intersections of Interstate 30 and Interstate 40. It is home to the city of Little Rock, the capital of Arkansas and the state's most populous city. The city of Little Rock is the economic center of the assessment area, and the greater metropolitan area fuels much of the state's economic activity. Total employment in 2010 for the MSA was 425,850. Leading private nonfarm employment sectors included health care and social assistance, retail trade, and administrative and waste management services. Combined, these sectors accounted for over 12\% of private nonfarm employment. As home to the state capital and Little Rock Air Force Base, the area also has a large government employer base. Of the 80,400 government jobs in the MSA, 35,107 (43.7\%) were state government and 8,311 (10.3\%) were US military. ${ }^{236}$ Local government was also well represented with more than 27,000 jobs, but this has also created strains on the local economy as governments at all levels cut spending.

Little Rock Air Force Base is the home of C-130 Combat Airlift and is the Department of Defense’s only training base for the C-130 airplane. There are 5,000 active duty military and civilian members on the base, with approximately 5,500 family members working on and around the base. ${ }^{237}$ In 2011, the Air Force estimated that the base's annual economic impact on the local area was $\$ 713.6$ million, which includes an estimated 3,317 indirect jobs created with an annual dollar impact of approximately $\$ 129.4$ million. ${ }^{238}$ Little Rock is also home to one of the largest projects of the United States Army Corps of Engineers: the McClellan-Kerr Navigation System on the Arkansas River. The system provides a 448-mile navigation channel for barge traffic from the Mississippi River northwest to 15 miles east of Tulsa, Oklahoma. ${ }^{239}$

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The Little Rock Port also plays an important role in the local economy. It is an intermodal river port with a large industrial business complex. As a result, international corporations such as LM Glasfiber, an alternative energy manufacturer, have established new facilities adjacent to the port in recent years. ${ }^{240}$ The port was awarded a \$960,000 Economic Development Administration (EDA) public works investment in 2012 to help fund construction of the Arkansas River Resource Center. This state-of-the-art facility will provide new marketing opportunities for the port, helping it create additional economic development opportunities for the Arkansas River, which will also benefit the adjacent Little Rock Port Industrial Park. According to grantee estimates, 45 new jobs will be created by this project. ${ }^{241}$

In 2011, financial firm Kiplinger ranked Little Rock number seven out of ten on its Best Value Cities list, noting that the area's job market is diverse, inclusive of a 500 -employee Caterpillar factory in North Little Rock, the headquarters of IT company Acxiom and world-class medical centers. Additionally, the completion of the Clinton Presidential Library in 2004 sparked a downtown renaissance. The city was somewhat cushioned from the recent national economic recession by more than $\$ 1$ billion in new corporate investments in 2007 and $2008 .{ }^{242}$ The Milken Institute also recognized the Little Rock MSA in 2009, ranking it $23^{\text {rd }}$ out of the 200 largest metro areas on its Best Performing Cities list for success in creating and sustaining jobs and economic growth. ${ }^{243}$ This viewpoint was reflected again in 2009 by Business Week, which ranked the Little Rock metropolitan area number four on its Forty Strongest U.S Metro Economies list. Criteria for this ranking included job growth, gross metro product, unemployment change and home price changes. ${ }^{244}$

The City of Little Rock's City Manager reports that the city has seen a steady increase in economic development activities while employment in manufacturing, transportation and service sector employment are growing at a steady rate. Little Rock is one of the top 15 aggressive development markets in the nation and has doubled in the past 30 years, with projections indicating it will double again in during the next 20 years. ${ }^{245}$

Several major companies have expanded their operations in the Little Rock market in recent years. In 2010 Caterpillar, manufacturer of construction and mining equipment, located its new North American motor grader production facility in North Little Rock. The company is investing $\$ 140$ million and employs approximately 600 people at this location. ${ }^{246}$ Also in 2010, computer company Hewlett-Packard opened a state-of-the-art customer service center in Conway, citing the area's quality workforce as a factor. The company plans to fill more than 1,200 positions at the $\$ 28$ million facility. ${ }^{247}$ The area is also becoming active in the growing wind energy industry. In 2008, windmill blade manufacturers LM Glasfiber and Polymarin Composites announced the expansion of their manufacturing facilities to Little Rock, where together they plan to hire more than 1,500 people and invest millions of dollars. ${ }^{248}$

As a result of these economic developments, the Little Rock economy has performed relatively well throughout the economic crisis of the last few years although challenges persist. Little Rock's recession-related decline in

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employment in 2009 was milder than the nation's decline and the road to recovery started earlier in Little Rock, where the first increase in employment occurred in December 2009. This recovery, however, has been substantially less steady than the nation's during 2010 and 2011, featuring large swings from one quarter to the next. Between February and April 2012, Little Rock's employment contracted at an average rate of $0.5 \%$ per month, while national employment grew at an average rate of $0.1 \%$ per month. ${ }^{249}$

While unemployment remains an issue inside the assessment area, it does so to a lesser degree than the state of Arkansas and nationwide. The following table shows that the unemployment rate remained flat from 2010 to 2011 at $7 \%$ in the MSA compared to the statewide unemployment rate of $8 \%$ in 2011. The 2011 nationwide average unemployment rate was $8.9 \%{ }^{250}$

## Unemployment Rates

Assessment Area: AR Little Rock

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Little Rock MSA | 7.0 | 7.0 |
| Faulkner County | 7.2 | 7.0 |
| Grant County | 7.0 | 7.2 |
| Lonoke County | 6.8 | 6.8 |
| Pulaski County | 7.1 | 7.2 |
| Saline County | 6.6 | 6.5 |
| Arkansas | $\mathbf{7 . 9}$ | $\mathbf{8 . 0}$ |
| Not Seasonally Adjusted |  |  |

## Community Contacts and Community Development Opportunities

Two community contacts were interviewed to discuss local community development; one specializing in economic development and the other affordable housing. The economic development specialist discussed the area's diverse employer base as one of the economy's strong points but noted that more commercial credit is needed from financial institutions to help businesses start-up or expand. Greater access to working capital loans for local small businesses would also have a trickle-down effect that would positively impact the community. The affordable housing specialist noted that home affordability remains an issue for low- and moderate-income individuals and that there is an acute need for affordable rental housing. While the two contacts had differing views on the state of the local economy, both mentioned Regions Bank as being a positive contributor to the community.

While community and economic development projects are being implemented across the region, the Pulaski Empowerment Zone (PEZ) located in downtown Little Rock and North Little Rock is a targeted revitalization area that offered various tax incentives for locating and operating a business within the zone. The PEZ was designated in 2002 and expired on December 31, 2011. It was comprised of 15 census tracts that met specific poverty and population criteria and encompassed a total area of 17.2 square miles. In order to qualify for tax

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incentives in the PEZ, the business must have been, among other things, located in the empowerment zone and employ residents of the zone.

Financial stability via access to mainstream banking products is also an issue for many residents. Bank On is a national initiative focused on connecting unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $7.4 \%$ of households in the MSA are unbanked relative to $10.1 \%$ statewide. Additionally, $25 \%$ of households in the MSA are listed as underbanked, meaning they have a bank account but continue to rely on alternative financial services like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $22.3 \%$ of underbanked households statewide. ${ }^{251}$ Additionally, numerous natural disasters have hit Arkansas in recent years, impacting the financial stability of individuals and businesses. Since 2008, the Federal Emergency Management Agency (FEMA) has issued 13 major disaster declarations, some of which include counties located inside the assessment area. These should provide opportunities for financial institutions to meet the disaster recovery-related credit needs of the community.

The state of Arkansas received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. Arkansas received $\$ 19.6$ million under the NSP1 allocation process and $\$ 5$ million under NSP3. The City of Little Rock received NSP2 funding in the amount of $\$ 8.6$ million, and the City of North Little Rock received $\$ 6.4$ million in NSP2 funding. The purpose of these funds is to save neighborhoods where foreclosed and abandoned buildings are considerably impacting community viability and to increase home ownership. ${ }^{252}$

There are nine community development financial institutions (CDFIs) in the state of Arkansas and one is located inside the assessment area. It is an economic development finance organization operating a small business loan pool. Community development opportunities also include participation in the Low Income Housing Tax Credit (LIHTC) program. Arkansas receives an allocation of approximately $\$ 6.5$ million in federal LIHTCs annually. ${ }^{253}$ The state also provides resources such as a housing trust fund and below-market financing to promote the development of affordable housing for low- and moderate-income individuals and families.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending performance in the Little Rock assessment area is good. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 1,753 (54.8\%) HMDA loans compared to 1,447 (45.2\%) small business loans in the Little Rock, Arkansas assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's

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lending test rating in the assessment area. The Little Rock assessment area contains $1.6 \%$ of the bank's small business and HMDA lending by number of loans and $1.9 \%$ by dollar volume totaling $\$ 424.5$ million. In comparison, $1.9 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of small business and HMDA lending is good. For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates and the level of owner-occupied units and the number of small businesses in low- and moderateincome census tracts were issues considered when assessing the bank's performance. In addition the performance of the aggregate lenders was considered when assessing the bank's performance.

## Home Purchase Loans

Home purchase lending in low-income census tracts is good. Regions Bank originated $1.0 \%$ of its home purchase loans in low-income tracts, which contain $1.5 \%$ of the owner-occupied units. Although the bank originated in low-income tracts four home purchase loans in 2010 and three in 2011, the bank's performance was slightly greater than the performance of the aggregate lenders.

Home purchase lending in moderate-income tracts is good. During the review period, Regions Bank originated 8.1\% of its home purchase loans in moderate-income census tracts, which contain $13.8 \%$ of the owner-occupied units in the assessment area. The bank's performance was better than the aggregate in 2010 and 2011.

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

## Home Refinance Loans

Regions Bank originated two home refinance loans each in 2010 and 2011 in low-income tracts. One and a half percent of owner occupied units are located in low-income tracts. Aggregate lenders also failed to originate home refinance loans at a level comparable to the percentage of owner occupied units in these tracts. This suggests limited opportunities for this type of lending in low-income tracts and, therefore, minimal weight was given to this performance area.

Regions Bank’s home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $3.4 \%$ of its home refinance loans in moderate-income census tracts, where $13.8 \%$ of the owner-occupied units are located. The bank performed slightly less than the aggregate in 2010 and 2011.

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

## Home Improvement Loans

Regions Bank’s home improvement lending in low-income census tracts is adequate. With two loans (2.2\%), the bank's percentage of home improvement loans in low-income tracts exceeded the percentage of owner occupied units in the assessment area at $1.5 \%$. It was noted that the aggregate lenders also had low levels of home improvement loans compared to the percentage of owner-occupied units.

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Regions Bank's home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated $9.9 \%$ of its home improvement loans in moderate-income tracts, which contain $13.8 \%$ of the owner-occupied units in the assessment area. Three home improvement loans were originated in moderate-income tracts in 2010, and six were originated in 2011. The bank's performance was less than the aggregate in 2010 and comparable to the aggregate in 2011.

The bank's home improvement lending in middle-income tracts was greater than the percentage of owneroccupied units in these tracts while the lending in upper-income tracts was less than the percentage of owneroccupied units.

## Small Business Loans

Regions Bank’s small business lending in low-income census tracts is excellent. During the review period, Regions Bank originated $8.4 \%$ of its small business loans in low-income tracts, which contain $4.7 \%$ of the small businesses in the assessment area. Additionally, the bank performed better than the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is good. During the review period, Regions Bank originated $14.7 \%$ of its small business loans in moderate-income census tracts, which contain $16.0 \%$ of the small businesses in the assessment area. The bank's performance was comparable to the aggregate during both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's distribution of loans based on borrower's income or gross annual revenues 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

The bank's home purchase lending to low-income borrowers is good. Regions Bank made 12.4\% of its home purchase loans to low-income borrowers. Low-income families make up $19.6 \%$ of total families in the assessment area. Additionally, the bank performed above the aggregate in 2010 and 2011.

Regions Bank's home purchase lending to moderate-income borrowers is excellent when compared to the percentage of moderate-income families in the assessment area. During the review period, Regions Bank originated $30.6 \%$ of its home purchase loans to moderate-income borrowers, which represent $18.0 \%$ of the assessment area. Additionally, the bank performed above the aggregate in 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is excellent. The bank's percentage of home refinance lending to low-income borrowers at $7.9 \%$ was less than the percentage of low-income families in the assessment area at 19.6\%. However, the bank performed above the aggregate in 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is good. Regions Bank made $14.9 \%$ of its home refinance loans to moderate-income borrowers. Moderate-income families make up 18.0\% of total families in the assessment area. Additionally, the bank performed above the aggregate in 2010 and 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is excellent. Regions Bank made 16.5\% of its home improvement loans to low-income borrowers. Low-income families make up $19.6 \%$ of total families in the assessment area. Additionally, the bank performed above the aggregate in 2010 and 2011.

Regions Bank's home improvement lending to moderate-income borrowers is excellent when compared to the percentage of moderate-income families in the assessment area. During the review period, Regions Bank originated $24.2 \%$ of its home improvement loans to moderate-income borrowers, which represent $18.0 \%$ of the assessment area. Additionally, the bank performed above the aggregate in 2010 and 2011.

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

## Small Business Lending

Considering the bank's performance when compared to the small business demographic and aggregate data, the distribution of small business loans by revenue size is adequate. The bank originated $28.5 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.0 \%$. However, of the 1,447 small business loans originated during the review period, 719 loans (49.7\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $56.7 \%$. Additionally, the bank's lending to small businesses exceeded the aggregate in 2010, but was significantly less than the aggregate in 2011. Also, $73.7 \%$ of the 1,447 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank’s performance was less than the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Little Rock, Arkansas assessment area. The bank originated 20 community development loans totaling $\$ 67.0$ million during the review period. The majority of loans financed affordable housing for low- and moderate-income individuals or revitalization/stabilization activities. Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, small business finance, job growth and neighborhood stabilization. The bank's community development loan portfolio inside the assessment area exhibits excellent responsiveness to the credit needs of low- and moderate-income individuals and geographies and small

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businesses. The dollar volume of community development loans is excellent relative to the bank's presence in the market.

Examples of community development lending include the following:

- Nearly $\$ 30$ million for the development of LIHTC-supported affordable housing, resulting in approximately 500 new income-restricted units for low- and moderate-income individuals;
- A loan to a nonprofit organization that provides low- to no-cost drug treatment, emergency shelter and counseling services to at-risk youth; and
- Several loans to businesses located in the Pulaski Empowerment Zone (PEZ) that revitalize or stabilize the area in a manner that is consistent with the PEZ goal of promoting economic development and job growth in the distressed community.


## Investment Test

The bank's performance in the Little Rock assessment area under the investment test is excellent. The bank had 17 investments totaling $\$ 37.3$ million, including eight current period investments totaling $\$ 31.1$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through LIHTCs, LIHTC investment funds and GNMA investment instruments. Regional investments primarily funded small businesses and startup companies through investments in SBICs, and community revitalization. Local community development needs include but are not limited to affordable housing for low- and moderate-income individuals, small business finance, job growth and neighborhood stabilization. The dollar volume of Regions Bank's current and total investments is excellent given the bank's presence in the assessment area.

The bank also made 68 contributions totaling $\$ 60,400$. In addition, the bank made contributions to national organizations that may provide an indirect benefit to low- and moderate-income individuals and communities in the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities, affordable housing and economic development.

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include the following:

- LIHTCs for eight projects totaling 625 units, including five current period investments for 293 housing units. Projects provide housing affordable to low- and moderate-income individuals.
- Contributions to several different organizations in Little Rock that provide counseling and other forms of assistance to disadvantaged populations, including the homeless, youth and seniors.


## Service Test

The bank's service test performance in the Little Rock assessment area is excellent. Its retail and community development services reflect good responsiveness to the needs of the Little Rock assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 33 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open or close any branches in the Little Rock assessment area. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend and extended hours at

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many of its branch offices, including those located in low- or moderate-income tracts. Bank products, services, and normal business hours are consistent throughout the assessment area.

Geographic Distribution of Branches
Assessment Area: AR Little Rock


DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank is a leader in providing community development services in the assessment area. During the review period, Regions Bank employees volunteered 1,860 service hours in various capacities for community development organizations, by participating in 140 community development services. Many of the community development services focused on activities that promote small businesses, education, affordable housing, youth services, and various other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. In addition, Regions Bank employees served on the boards of directors or committees of various community organizations which provide services in low- and moderateincome geographies or to low- and moderate-income individuals.

## 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)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing $5.5 \%$ of its branches in Arkansas.
o As of June 30, 2011, the bank had $\$ 156.8$ million in deposits in this assessment area, representing a market share of $2.0 \%$ and $3.9 \%$ of Regions Bank's total deposits in Arkansas.
- Fort Smith Assessment Area (Sebastian County)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing $5.5 \%$ of its branches in Arkansas.
o As of June 30, 2011, the bank had $\$ 267.3$ million in deposits in this assessment area, representing a market share of $10.9 \%$ and $6.7 \%$ of Regions Bank's total deposits in Arkansas.
- Jonesboro Assessment Area (Craighead and Poinsett Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $4.4 \%$ of its branches in Arkansas.
o As of June 30, 2011, the bank had $\$ 196.0$ million in deposits in this assessment area, representing a market share of $7.6 \%$ and $4.9 \%$ of Regions Bank'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 tables below. Please refer to the tables in Appendix G for information regarding these areas.

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Fayetteville | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Fort Smith | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |
| Jonesboro | Consistent | Not Consistent (Above) | Not Consistent (Below) |

The Hot Springs, Little Rock and Northwest Arkansas assessment areas received full-scope reviews, and the bank's performance in the Little Rock assessment area was given greater consideration in determining the overall rating for the state. Little Rock is by far the bank's largest market in Arkansas in terms of deposits, loans, and branches. The full-scope areas selected together represent $67.5 \%$ of the deposits in the assessment areas in Arkansas as well as $59.4 \%$ of the branches. The full-scope assessment areas also represent $57.8 \%$ of the HMDA loans and $62.4 \%$ of the small business loans in the state. Therefore, the three full-scope assessment areas represent more than half of the deposits, branches and loans in the State of Arkansas.

## Metropolitan Areas (Limited Review)

For the Lending Test, performance was weaker than the bank's performance in the state in two of the limitedscope assessment areas (Fayetteville and Fort Smith) and consistent with the bank's performance in the remaining limited-scope assessment area (Jonesboro). The distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Fayetteville and Fort Smith assessment areas.

For the Investment Test, the performance in two limited-scope assessment areas (Fayetteville and Fort Smith) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas. The performance in the Jonesboro limited-scope assessment area was stronger than the bank's performance in the state.

For the Service Test, the performance in two limited-scope assessment areas (Fort Smith and Jonesboro) was weaker than the bank's performance in the state. The performance in the Jonesboro assessment area was weaker than the bank's performance in the state due to limited accessibility of delivery systems. The performance in the Fort Smith assessment area was weaker than the bank's performance in the state due to fewer community development services.

The performance in the remaining limited-scope assessment area (Fayetteville) was consistent with the bank's performance in the state.

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

## NON-METROPOLITAN STATEWIDE AREA

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NORTHWEST ARKANSAS ASSESSMENT AREA

The Northwest Arkansas retail banking market is served primarily by community banks. According to the June 30, 2011 FDIC Summary of Deposits Report, Regions Bank held the second largest share of deposits, with $\$ 410$ million or $13.7 \%$ of the total deposits. Liberty Bank of Arkansas had the greatest share of deposit at $14.6 \%$. Community First Bank, Arvest Bank, First Federal Bank and First Security Bank each held between 5 and 8\% of total deposits. Overall there were 26 financial institutions operating 96 branches in the assessment area.

Regions ranked $5^{\text {th }}$ out of 166 HMDA reporters in 2010 with $4.9 \%$ of total loans. Overall HMDA lending in the assessment area declined between 2010 and 2011, and Regions Bank's HMDA lending followed the same trend. In 2011 Regions ranked $7^{\text {th }}$ out of 175 HMDA reporters, with $3.9 \%$ of HMDA loans. JPMorgan Chase, Arvest Mortgage Company, Liberty Bank, Wells Fargo and Bank of America are the leading HMDA lenders in the market.

Regions ranked $5^{\text {th }}$ out of 37 small business reporters in 2010 with $6.9 \%$ of the small business loans. Regions doubled small business lending in 2011, primarily by purchasing small business loans, and was the $2^{\text {nd }}$ ranked small business lender in the market with $12.1 \%$ of all loans. Arvest Bank and American Express were the two other leading small business lenders in the market.

## Demographic Characteristics

Northwest Arkansas is primarily a rural area. The population in the assessment area increased between 2000 and 2010 by about $8.8 \%$, which is consistent with the statewide population growth rate of $9.1 \%$. Pope County, with 61,754 residents in 2010, is the most populated county and experienced the greatest population growth between 2000 and 2010 at $13.4 \%$. Russellville, which is the largest city in the assessment area, with 27,920 residents in 2010, experienced $18 \%$ growth since 2000. Overall population in the assessment area was 185,118 in $2010 .{ }^{254}$

The following table provides demographic characteristics of the bank's assessment area based on the 2000 U.S. census data used to analyze the bank's CRA performance.

[^81]
## Northwest Arkansas

## Combined Demographics Report

Assessment Area: AR Northwest AR


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

According to U.S. census estimates, median family income in 2010 ranged from \$39,226 in Johnson County to $\$ 48,696$ in Logan County. ${ }^{255}$ For the purposes of this analysis, HUD's 2010 and 2011 median family income for Arkansas non-metro areas is used. As shown, the median family income decreased slightly between 2010 and 2011, from $\$ 43,400$ to $\$ 43,300$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels State Non-metro AR

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$43,400 | 0 | - | \$21,699 | \$21,700 | - | \$34,719 | \$34,720 |  | \$52,079 | \$52,080 |  | \& above |
| 2011 | \$43,300 | 0 | - | \$21,649 | \$21,650 | - | \$34,639 | \$34,640 |  | \$51,959 | \$51,960 |  | \& above |

Poverty is a persistent and growing issue in most counties in the assessment area. The estimated poverty rate in 2010 ranged from $14.3 \%$ in Logan County to $22.6 \%$ in Van Buren County. The poverty rate increased significantly in all counties between 2000 and 2010, with the exception of Logan County, where the percentage of people living in poverty declined. In Van Buren, the percentage of people living below the poverty line increased by almost $58 \% .{ }^{256}$ Utilization of food stamps has also been increasing throughout the assessment area. Logan County had the highest percentage of residents receiving food stamps in 2009 at $20.2 \%$, while food stamp usage was lowest in Pope County at $14.7 \%$. Statewide, $15.8 \%$ of the population relied on food stamps in 2009. ${ }^{257}$

## Housing Characteristics

The housing market in the assessment area weakened during the recent economic downturn. Since 2009, home prices have fluctuated in the assessment area. The Arkansas Realtors Association reports that the 2011 average selling price in the assessment area ranged from $\$ 81,327$ in Johnson County to $\$ 146,904$ in Conway County. The average home price in Pope County was $\$ 114,681$, representing a $2.3 \%$ decline from 2010. Statewide, the 2011 average home selling price was $\$ 142,518$, representing a $1.2 \%$ decrease from one year prior and flat from 2009. ${ }^{258}$

Home sales and new home construction have declined. Home sales fell by $44 \%$ across the assessment area since the peak in 2005. In Polk County, sales were down by $37 \%$, though the county still accounts for the majority of sales in the assessment area. ${ }^{259}$ New home construction also slowed after 2005, and building permits for new single-family homes decreased by 65\% between 2005 and 2011. ${ }^{260}$

[^82]
## Northwest Arkansas

Foreclosure and mortgage delinquency rates have been rising in the assessment area. Seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) increased from 5.0\% in January 2010 to $9.4 \%$ in December 2011. Johnson County had the highest mortgage delinquency rate at $12.6 \%$ at the end of 2011. ${ }^{261}$

Similar to other rural communities, most of the households in the Northwest Arkansas area are owner-occupied, though the homeownership rate has been declining in all counties since 2000. However, the homeownership rate is still well above $70 \%$ in all counties, except for Pope County. Housing is considered affordable in the assessment area. The percentage of homes that were affordable to a household earning $80 \%$ of the area median income ranged from $48.7 \%$ in Boone County to $68.8 \%$ in Logan County. Affordable rental housing, however, is a concern. The percentage of renters in 2009 considered cost burdened, meaning they spent more than $30 \%$ of their income on housing, ranged from $31.3 \%$ in Van Buren County to $49.5 \%$ in Johnson County. ${ }^{262}$

The number of vacant housing units in the assessment area is rising, particularly in some counties. In Johnson and Van Buren counties, housing vacancies increased by about $25 \%$ between 2000 and 2010, and in Van Buren, over $28 \%$ of the housing units were vacant in $2010 .{ }^{263}$ The large number of vacant housing units is most likely due to the manufacturing job losses in the past few years and is contributing to the overall economic challenges in the county. ${ }^{264}$

## Employment and Economic Conditions

Northwest Arkansas is a very rural area, and the economy is driven primarily by agriculture and some manufacturing. The region is adjacent to the Ozarks, a mountainous area that draws tourists and other recreational users for fishing, hiking and boating. There are very few urban areas throughout the assessment area, with Russellville the only city with more than 25,000 residents.

As of 2010, total employment in the Northwest Arkansas assessment area was 51,380 . Pope County was the primary employment center, with $40 \%$ of the jobs, followed by Boone County with $24 \%$. The largest employment sectors included manufacturing, retail, construction, administrative and waste services, health care and social assistance, and local government. The largest manufacturing operations are in food processing. ConAgra and Tyson Foods are the largest employers in the area. Other major employers include Entergy Operation, the Russellville School District, Arkansas Tech-Ozark Campus, and St. Mary’s Regional Medical Center. ${ }^{265}$ Arkansas Tech is a technical and vocational college with approximately 2,050 students enrolled. ${ }^{266}$

Rural Arkansas has experienced a significant economic shift in the past decade as a result of manufacturing and agricultural job loss. However, the Northwest Arkansas area has seen an increase in service sector jobs, which has helped offset some of the job loss in certain counties. Overall, the state fared better than the rest of the nation during the recession, with unemployment in 2010 reaching $7.9 \%$ compared to almost $10 \%$ nationwide. All counties in the assessment area did experience a rise in unemployment, with most counties peaking in 2010. The unemployment rate declined slightly between 2010 and 2011 in most counties, and Boone, Johnson, and

[^83]
## Northwest Arkansas

Pope counties are performing better than the state, where the unemployment rate increased slightly to $8.0 \%$ in 2011. Van Buren County has the highest unemployment rate at $9.8 \%$. ${ }^{267}$

## Unemployment Rates

Assessment Area: AR Northwest

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Boone County | 7.4 | 7.4 |
| Conway County | 8.4 | 8.3 |
| Johnson County | 7.6 | 7.2 |
| Logan County | 8.2 | 8.4 |
| Pope County | 7.8 | 7.6 |
| Van Buren County | 10.0 | 9.8 |
| Arkansas | $\mathbf{7 . 9}$ | $\mathbf{8 . 0}$ |

Not Seasonally Adjusted

## Community Contacts and Community Development Opportunities

Community development opportunities in Northwest Arkansas are very limited. Support for local small businesses is important, and there is a small business development center (SBDC) at Arkansas Tech in Russellville. The SBDC provides counseling and workshops to small business owners and helps to connect them with financing programs available through the state. There are a number of state programs designed to increase access to capital in the rural counties in the state.

Russellville has an active Mainstreet Program that is leading the revitalization of the historic downtown. Through the Mainstreet Program, there are some financing programs and other types of assistance for local small businesses.

According to two community contacts in Northwest Arkansas, access to capital for small businesses and commercial development and expansion were the biggest credit needs in the market. Both contacts thought that there was an adequate supply of affordable housing. Overall, the contacts felt that banks were involved in local community efforts, but there was much more that could be done.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Northwest Arkansas assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes few, if any, community development loans.

[^84]
## Northwest Arkansas

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 449 (54.2\%) HMDA loans compared to 380 (45.8\%) small business loans in the Northwest Arkansas assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Northwest Arkansas assessment area contains $0.4 \%$ of the bank's small business and HMDA lending by number of loans and $0.3 \%$ by dollar volume totaling $\$ 64.0$ million. In comparison, $0.4 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of small business and HMDA lending is adequate. For this analysis the geographic distribution of small business and HMDA 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, the unemployment and poverty rates and the level of owneroccupied units and the number of small businesses in moderate-income census tracts were issues considered when assessing the bank's performance with regards to HMDA and small business lending.

Given that there are no low-income tracts in the Northwest Arkansas assessment area, no evaluation of the bank's lending performance in low-income tracts was conducted.

## Home Purchase Loans

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $2.8 \%$ of its home purchase loans in moderate-income census tracts, which contain $2.2 \%$ of the owner-occupied units in the assessment area. The bank's performance exceeded the aggregate in 2010, but Regions Bank made no home purchase loans in moderate-income tracts in 2011.

The bank's home purchase lending in middle-income tracts was below the percentage of owner-occupied units in these tracts while the lending in upper-income tracts was greater than the percentage of owner-occupied units.

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income census tracts is excellent when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated $4.2 \%$ of its home refinance loans in moderate-income tracts, which contain $2.2 \%$ of the owner-occupied units in the assessment area. Additionally, the bank’s performance was greater than the aggregate in both 2010 and 2011.

The bank's home refinance lending in middle-income tracts was below the percentage of owner-occupied units in these tracts while the lending in upper-income tracts was slightly greater than the percentage of owneroccupied units.

## Home Improvement Loans

Home improvement lending in moderate-income census tracts is poor. Regions Bank originated none of its home improvement loans in moderate-income tracts, which contain $2.2 \%$ of the owner-occupied units. The aggregate lenders' performance exceeded the demographic in 2010 and was less than the demographic in 2011.

The bank's home improvement lending in middle-income tracts was greater than the percentage of owneroccupied units in these tracts while the lending in upper-income tracts was less than the percentage of owneroccupied units.

## Small Business Loans

Regions Bank's small business lending in moderate-income tracts is good. During the review period, Regions Bank originated $2.6 \%$ of its small business loans in moderate-income census tracts, which contain $3.5 \%$ of the small businesses in the assessment area. The bank's performance was slightly above the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was below the percentage of small businesses in these tracts while the lending in upper-income tracts was greater than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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 good. Regions Bank's percentage of loans at $11.0 \%$ was below the percentage of low-income families in the assessment area at 17.8\%; however, the bank’s lending to low-income borrowers exceeded aggregate performance for both years during the review period.

Home purchase lending to moderate-income borrowers is good. Regions Bank's percentage of home purchase loans to moderate-income borrowers at $22.9 \%$ exceeded the percentage of moderate-income families in the assessment area at $17.7 \%$. Additionally, the bank's lending to moderate-income borrowers exceeded aggregate performance for both years during the review period.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, and the lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made $7.4 \%$ of its refinance loans to low-income borrowers. Low-income families make up $17.8 \%$ of total families in the assessment area. The aggregate also did not originate refinance loans commensurate to the percentage of low-income families in the assessment area. The bank performed above the aggregate in 2010. However, the bank originated only three loans in 2011 and performed below the aggregate.

The bank's home refinance lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $16.9 \%$ was slightly less than the percentage of moderate-income families in the assessment area at $17.7 \%$. However, Regions Bank's performance was above the aggregate in both years 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is good. Region Bank's percentage of loans at 16.1\% was comparable to the percentage of low-income families in the assessment area at $17.8 \%$.

Home improvement lending to moderate-income borrowers is good. Region Bank's percentage of home improvement loans to moderate-income borrowers at $21.4 \%$ exceeded the percentage of moderate-income families in the assessment area at $17.7 \%$. The bank originated only four home improvement loans in 2010, and its performance was below the aggregate. However, its lending increased in 2011, when it originated eight loans and its lending performance was greater than the aggregate.

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

## Small Business Lending

Considering the bank's performance when compared to the small business demographic and aggregate data, the distribution of small business loans by revenue size is adequate. The bank originated $27.9 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $90.9 \%$. However, of the 380 small business loans originated during the review period, 226 loans (59.5\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $68.8 \%$. Additionally, the bank's lending to small businesses exceeded the aggregate in 2010, but was significantly less than the aggregate in 2011. Also, $85.5 \%$ of the 380 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank makes few, if any, community development loans in the Northwest Arkansas assessment area. The bank originated no community development loans during the review period. Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization tied to foreclosure mitigation and promotion of economic development by financing small businesses. None of the area's community credit needs were responded to by the bank with community development lending.

## Investment Test

The bank's performance in the Northwest Arkansas assessment area under the investment test is poor. The bank had two investments totaling $\$ 434,414$; the bank had no current period investments. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Prior period direct investments in the assessment area provided support for affordable housing and community development, primarily through HUD bonds. Regional investments primarily funded small businesses and startup companies through investments in SBICs and community revitalization. Local community development needs include but are not limited to small business development and financing as well as community services targeted to low- and moderate-income individuals. The dollar volume of Regions Bank's current and total investments is poor given the bank's presence in the assessment area.

The bank also made 30 contributions totaling approximately $\$ 12,374$. In addition, the bank made contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to

## Northwest Arkansas

organizations involved in providing community services targeted to low- and moderate-income individuals and communities and to organizations that promote economic development.

## Service Test

The bank's service test performance in the Northwest Arkansas assessment area is excellent. Its retail and community development services reflect good responsiveness to the needs of the Northwest Arkansas assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 12 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank closed three branches (two in middle-income tracts and one in an upper-income tract) in the Northwest Arkansas assessment area. The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including extended hours at the branch located in a moderate-income tract. Bank products, services, and normal business hours are consistent throughout the assessment area.

## Northwest Arkansas

## Geographic Distribution of Branches

Assessment Area: AR Northwest AR

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branch <br> \% | $\begin{gathered} \text { Open } \\ \# \end{gathered}$ | Closed \# | Drive thrus | Extend- <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Moderate | Total | 1 | 8.3\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 1 | 2.6\% | 2.2\% | 3.5\% |
| Middle | Total | 10 | 83.3\% | 0 | 2 | 10 | 4 | 5 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 3 \\ & 0 \end{aligned}$ |  | 0 | 0 | 3 |  |  | 33 | 84.6\% | 83.8\% | 83.8\% |
| Upper | Total | 1 | 8.3\% | 0 | 1 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 5 | 12.8\% | 14.0\% | 12.7\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 12 | 100.0\% | 0 | 3 | 12 | 6 | 6 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 3 0 |  | 0 | 0 | 3 |  |  | 39 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank is a leader in providing community development services in the assessment area. During the review period, Regions Bank employees provided 690 service hours in various capacities for community development organizations, by participating in 42 community development services. Many of the community development services focused on activities that promote small businesses, education, affordable housing, tax assistance, and various other community services that aided low- and moderate-income geographies and lowand moderate-income individuals. In particular, Regions Bank employees provided financial and technical expertise on the board of directors and committees of various community organizations. For instance, Regions Bank employees provided counsel to a community organization whose mission is to improve the living conditions for low- and moderate-income individuals through affordable housing and emergency food and shelter programs.

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

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

- Northeast Arkansas Assessment Area (Clay, Cross, Greene, Independence, Jackson, Lawrence, St. Francis, White and Mississippi Counties)
o As of December 31, 2011, Regions Bank operated 16 branches in the assessment area, representing $17.6 \%$ of its branches in Arkansas.
o As of June 30, 2011, the bank had $\$ 474.9$ million in deposits in this assessment area, representing a market share of $9.7 \%$ and $11.9 \%$ of Regions Bank's total deposits in Arkansas.
- Southern Arkansas Assessment Area (Clark, Dallas, Howard and Little River Counties)
o As of December 31, 2011, Regions Bank operated six branches in the assessment area, representing $6.6 \%$ of its branches in Arkansas.
O As of June 30, 2011, the bank had $\$ 153.1$ million in deposits in this assessment area, representing a market share of 15.8\% and 3.8\% of Regions Bank's total deposits in Arkansas.
- Union Assessment Area (Union County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $1.1 \%$ of its branches in Arkansas.
o As of June 30, 2011, the bank had $\$ 52.2$ million in deposits in this assessment area, representing a market share of $4.5 \%$ and $1.3 \%$ of Regions Bank'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 tables below. Please refer to the tables in Appendix G for information regarding these areas.

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Northeast <br> Arkansas | Consistent | Not Consistent <br> (Below) | Not Consistent (Below) |
| Southern <br> Arkansas | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Below) |
| Union | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Below) |

As stated earlier, the Hot Springs, Little Rock and Northwest Arkansas assessment areas received full-scope reviews, and the bank's performance in the Little Rock assessment area was given greater consideration in determining the overall rating for the state. Little Rock is by far the bank's largest market in Arkansas in terms of deposits, loans, and branches. The full-scope areas selected together represent $67.5 \%$ of the deposits in the assessment areas in Arkansas as well as $59.4 \%$ of the branches. The full-scope assessment areas also represent

## Non-Metropolitan Areas (Limited Review)

$57.8 \%$ of the HMDA loans and $62.4 \%$ of the small business loans in the state. Therefore, the three full-scope assessment areas represent more than half of the deposits, branches and loans in the State of Arkansas.

For the Lending Test, performance was weaker than the bank's performance in the state in two of the limitedscope assessment areas (Southern Arkansas and Union) and consistent with the bank's performance in the Northern Arkansas assessment area. The distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Southern Arkansas and Union assessment areas.

For the Investment Test, the performance in all three limited-scope assessment areas (Northeast Arkansas, Southern Arkansas and Union) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in all three limited-scope assessment areas was weaker than the bank's performance in the state. The performance in the Southern Arkansas and Union assessment areas was weaker than the bank's performance in the state due to less accessibility of delivery systems. The performance in the Northeast Arkansas assessment area was weaker than the bank's performance in the state due to limited accessibility of delivery systems and fewer community development services.

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

## Florida

## CRA RATING FOR FLORIDA: $\underline{\text { Satisfactory }}$

## The Lending Test is rated: <br> The Investment Test is rated: <br> The Service Test is rated: <br> High Satisfactory <br> Outstanding <br> Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides an excellent level of qualified community development investments and grants in the assessment areas and is often in a leadership position in response to the community development needs of the assessment areas.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides an adequate level of community development services throughout the assessment areas.


## SCOPE OF EXAMINATION

Full-scope reviews were conducted for four assessment areas in the State of Florida:

- Jacksonville
- Orlando
- Pensacola
- Tampa

Limited-scope reviews were conducted for the remaining 18 assessment areas:

- Citrus (non-MSA)
- Daytona
- Ft. Lauderdale
- Ft. Myers
- Ft. Walton
- Gainesville
- Lakeland
- Miami
- Naples
- Northern Florida (non-MSA)
- Ocala
- Okeechobee (non-MSA)
- Palm Bay
- Panama City
- Punta Gorda
- Sarasota
- Tallahassee
- West Palm Beach

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

Lending activity in Florida accounted for 26.4\% of the bank's total lending activity. HMDA lending in Florida represented $20.0 \%$ of the bank's total HMDA lending, while small business lending represented $31.4 \%$ of the bank's total small business lending. As of June 30, 2011, the bank had $\$ 19.3$ billion in deposits in Florida, accounting for $19.6 \%$ of Regions Bank's total deposits. Additionally, as of June 30, 2011, the bank ranked $4^{\text {th }}$ among 313 insured institutions in deposit market share, with $4.7 \%$ of the deposits within the state. As of December 31, 2011, Regions Bank operated 375 branch offices in Florida representing 21.8\% of the bank's total branches.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of Florida is High Satisfactory. Lending activity reflects good responsiveness to assessment area credit needs in the Jacksonville and Orlando full-scope assessment areas, while Pensacola and Tampa were considered adequate.

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

Although Regions Bank is both a small business and HMDA lender, small business lending was given greater consideration in determining the lending test rating for Florida because the bank originated more small business loans by number than HMDA loans. Additionally, the Tampa assessment area received greater consideration when determining the rating because it holds a greater percentage of the bank's deposits, loans, and branches in the state of Florida than the other full-scope assessment areas. Furthermore, Regions Bank originated only 120
small farm loans in Florida during the review period; therefore, no detailed discussion of these loans is included in this section of the report.

## Lending Activity

Lending levels reflect good responsiveness to the credit needs of the Florida assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

Statewide Summary of Lending Activity
Assessment Areas Located in
Florida

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | \% |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 10,786 | $20.7 \%$ | $\$ 1,994,636$ | $35.0 \%$ |
| HMDA Refinance | 5,771 | $11.1 \%$ | $\$ 1,241,141$ | $21.8 \%$ |
| HMDA Home Improvement | 738 | $1.4 \%$ | $\$ 9,749$ | $0.2 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{1 7 , 2 9 5}$ | $\mathbf{3 3 . 2 \%}$ | $\$ 3,245,526$ | $\mathbf{5 6 . 9 \%}$ |
| Total Small Business | $\mathbf{3 4 , 7 4 0}$ | $\mathbf{6 6 . 6 \%}$ | $\$ 2,442,129$ | $\mathbf{4 2 . 8 \%}$ |
| Total Farm | $\mathbf{1 2 0}$ | $\mathbf{0 . 2 \%}$ | $\mathbf{\$ 1 5 , 5 0 2}$ | $\mathbf{0 . 3 \%}$ |
| TOTAL LOANS | $\mathbf{5 2 , 1 5 5}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 5 , 7 0 3 , 1 5 7}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank's HMDA and small business loans is adequate. The geographic distribution was good in the Jacksonville and Pensacola full-scope assessment areas in the state, while Orlando and Tampa were considered adequate. Overall, the distribution of loans by borrower income and revenue size of business is adequate. The borrower distribution is considered good in Orlando and Pensacola and adequate in Jacksonville and Tampa. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Florida assessment areas. The bank made 149 community development loans totaling $\$ 251.2$ million during the review period, which represented $21.9 \%$ by number and $18.0 \%$ by dollar amount of the bank's community development lending. The majority of the loans promoted economic development by financing small businesses. Although the bank is a leader in community development lending in Jacksonville and Orlando, it had a low level of community development lending in Pensacola. In addition, Tampa had a good level of community development lending. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating in the State of Florida is Outstanding when considering the bank's statewide performance and its overall presence in the state. The bank made excellent use of qualified investments and contributions. The bank exhibited excellent responsiveness to credit and community development needs

## Florida

through its investment activities in the Orlando and Tampa assessment areas, while performance in the Jacksonville and Pensacola assessment areas was good.

The bank made 113 qualified investments of approximately $\$ 177.3$ million and contributions of $\$ 349,987$ within the Florida assessment areas. Of the 113 investments, 12 totaling $\$ 104.9$ million were current period investments. Most of the investments provided support for affordable housing, through GNMA and FNMA investment instruments and the purchase of Low Income Housing Tax Credits. Total investments include prior period community development project investments totaling $\$ 1.8$ million in statewide community development financial institutions (CDFIs). The bank also had investments that benefitted its footprint or a broader regional area that includes Florida. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs, and community revitalization through a New Markets Tax Credit fund. In addition to the contributions specific to the assessment areas, the bank made two contributions totaling $\$ 24,000$ that benefit the entire state, including the assessment areas. These contributions provided support for affordable housing and community revitalization.

## Service Test

The service test rating is Low Satisfactory when considering the bank's statewide performance.

## Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderateincome geographies or low- and moderate-income individuals. The bank did close a number of branches in the State of Florida since the previous CRA performance evaluation; nevertheless, the closing of branches has not significantly affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies or low- and moderate-income individuals.

## Community Development Services

The bank provides an adequate level of community development services that benefit residents and small businesses in the assessment areas. Out of the four full-scope assessment areas, community development services were good in the Pensacola assessment area and adequate in the Jacksonville, Orlando and Tampa assessment areas.

## METROPOLITAN AREA

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JACKSONVILLE ASSESSMENT AREA

The Jacksonville assessment area includes Clay, Duvall, Nassau and St. Johns counties in Florida, which are four of the five counties that comprise the Jacksonville MSA. Within the assessment area there are 11 low-, 51 moderate-, 101 middle-, and 34 upper-income tracts. As of December 31, 2011, Regions Bank operated 25 branch offices in the Jacksonville assessment area, representing $6.7 \%$ of its branches in Florida. One branch is in a low-income tract, 3 branches are in moderate-income tracts, 15 branches are in middle-income tracts, and 6 branches are in upper-income tracts.

Jacksonville is a robust banking market dominated by three large institutions: Bank of America, EverBank and Wells Fargo; however, Regions Bank is an active player in the market. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 42 financial institutions operating 315 branch locations across the assessment area with a total of $\$ 46.6$ billion in deposits. Regions Bank ranked $6^{\text {th }}$ with a deposit market share of $2.0 \%$ ( $\$ 949.9$ million). Bank of America had the largest deposit market share at $47.3 \%$, followed by EverBank with 19.4\% and Wells Fargo Bank with 13.2\%.

The Jacksonville market is dominated by two large small business lenders that accounted for more than $42 \%$ of small business loans in 2010 and 2011. Regions Bank, however, was an active lender in the market. In 2010, Regions ranked $4^{\text {th }}$ out of 80 small business reporters by originating $6.3 \%$ of all small business loans. In 2011, the bank ranked $4^{\text {th }}$ out of 96 small business reporters but increased its small business lending performance to $7.6 \%$ of all small business loans. From 2010 to 2011, the bank's small business lending performance increased from 922 loans to 1,461 loans. For HMDA lending, Regions Bank ranked $20^{\text {th }}$ in 2010 with $1.3 \%$ of all HMDA loans, and $21^{\text {st }}$ in 2011 with $1.2 \%$. HMDA lending declined from 527 loans in 2010 to 443 in 2011. Bank of America, Wells Fargo and JPMorgan Chase were the top HMDA lenders in the market in 2011.

## Demographic Characteristics

Population growth in the Jacksonville MSA has been relatively strong over the last 10 years. The assessment area's population grew by $19.8 \%$ from 2000 to 2010, while the statewide population grew by $15 \%$. As of 2010, the population inside the Jacksonville MSA was $1,318,481$ people, representing $7 \%$ of the total statewide population. Net migration has been positive, but decreasing since 2006. Net migration is defined as the number of in-migrant households less the number of out-migrant households and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns for a particular year. ${ }^{268}$

The table below shows selected demographic information for the Jacksonville, Florida assessment area.

[^85]
## Combined Demographics Report

Assessment Area: FL Jacksonville

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 11 | 5.6 |  | 2.8 | 2,875 | 35.5 | 56,706 | 19.3 |
| Moderate-income | 51 | 25.9 |  | 18.6 | 8,412 | 15.4 | 54,305 | 18.5 |
| Middle-income | 101 | 51.3 |  | 53.8 | 10,493 | 6.6 | 67,684 | 23.0 |
| Upper-income | 34 | 17.3 |  | 24.8 | 1,696 | 2.3 | 115,096 | 39.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 197 | 100.0 |  | 100.0 | 23,476 | 8.0 | 293,791 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 15,754 | 5,794 |  | 36.8 | 7,576 | 48.1 | 2,384 | 15.1 |
| Moderate-income | 95,323 | 46,698 |  | 49.0 | 38,457 | 40.3 | 10,168 | 10.7 |
| Middle-income | 247,942 | 156,249 |  | 63.0 | 71,755 | 28.9 | 19,938 | 8.0 |
| Upper-income | 108,432 | 77,722 |  | 71.7 | 21,333 | 19.7 | 9,377 | 8.6 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 467,451 | 286,463 |  | 61.3 | 139,121 | 29.8 | 41,867 | 9.0 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2,487 | 3.6 |  | 3.3 | 244 | 6.9 | 186 | 6.0 |
| Moderate-income | 14,339 | 21.0 |  | 20.3 | 1,047 | 29.7 | 776 | 25.1 |
| Middle-income | 34,134 | 50.1 |  | 50.6 | 1,567 | 44.4 | 1,445 | 46.7 |
| Upper-income | 17,177 | 25.2 |  | 25.7 | 672 | 19.0 | 690 | 22.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 68,137 | 100.0 |  | 100.0 | 3,530 | 100.0 | 3,097 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 90.3 |  | 5.2 |  | 4.5 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 5 | 1.2 |  | 0.5 | 1 | 5.0 | 2 | 28.6 |
| Moderate-income | 45 | 10.9 |  | 11.2 | 2 | 10.0 | 0 | 0.0 |
| Middle-income | 291 | 70.6 |  | 70.9 | 15 | 75.0 | 3 | 42.9 |
| Upper-income | 71 | 17.2 |  | 17.4 | 2 | 10.0 | 2 | 28.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 412 | 100.0 |  | 100.0 | 20 | 100.0 | 7 | 100.0 |
|  | Percentage of Total Farms: |  |  | 93.4 |  | 4.9 |  | 1.7 |

[^86]
## Income Characteristics

Food stamp usage has also been on the rise in recent years. The number of food stamp program participants in the assessment area more than doubled from 2006 to 2009. In Duval County, home to the City of Jacksonville, nearly $16 \%$ of residents received food stamps in 2009, compared to $13.3 \%$ statewide. The greater Jacksonville area was second in the nation for growth in resident dependency on food stamps, with program participation increasing by $131 \%$ from 2005 to 2010 to include nearly $20 \%$ of the area's population. ${ }^{269}$ This indicates a growing number of low-income households are increasingly dependent on government assistance for basic needs due to declining incomes.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 and 2011 for the Jacksonville MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper).

## Borrower Income Levels Jacksonville, FL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 |  | 49.99\% | 50\% | - | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$65,800 | 0 | - | \$32,899 | \$32,900 | - | \$52,639 | \$52,640 | - | \$78,959 | \$78,960 |  | \& above |
| 2011 | \$66,400 | 0 | - | \$33,199 | \$33,200 | - | \$53,119 | \$53,120 | - | \$79,679 | \$79,680 |  | \& above |

## Housing Characteristics

The housing market in Florida suffered severely during the recent recession. The Jacksonville MSA was impacted but fared better than some major metro areas across the state. According to the Florida Association of Realtors, the 2010 median sales price for a single-family home in the Jacksonville MSA was $\$ 142,000$, representing a $30 \%$ decline from the peak in 2006. Price declines continued in 2011 to $\$ 123,600$, an additional $13 \%$ decline from 2010. Statewide, housing prices declined by approximately $45 \%$ since 2006. Home sales in the Jacksonville area have begun to increase in light of lower prices. From 2009 to 2010, sales increased by $11 \%$, though remain well below the peak sales level in $2005 .{ }^{270}$

The condo market also experienced a severe price decline locally and across the state. Prices in Jacksonville fell by $39 \%$ between 2009 and 2011 to a median sales price of $\$ 70,000 .{ }^{271}$ Statewide, there was a significant overbuilding of condos over the past several years; therefore, the decline in prices reflects excess supply and declining demand. ${ }^{272}$

New home construction in the Jacksonville MSA slowed dramatically. Single-family building permits were down $82 \%$ from a high of 18,331 in 2005 to 3,216 in 2011; meanwhile, building permits for multi-family units

[^87]dropped $90 \%$ from a peak of 6,186 in 2005 to only 625 in 2011. Both single family and multifamily permit issuances increased from 2010 to 2011, indicating potential stabilization of the two markets. ${ }^{273}$

Foreclosures are a concern in the Jacksonville MSA. According to RealtyTrac, almost 25,000 housing units received a foreclosure filing in 2010, or $4.2 \%$ of housing units. Nationally, $2.3 \%$ of housing units received a foreclosure notice in 2010. Foreclosures are still significantly higher than historical levels, but the number declined by approximately $6 \%$ between 2009 and $2010 .{ }^{274}$ However, the number of loans 90 or more days delinquent, in foreclosure or REO increased in 2011, indicating foreclosure and distressed properties remain a challenge for the region. ${ }^{275}$

The 2000 census indicates that there were 467,451 total housing units in the assessment area, of which $61 \%$ were owner-occupied. The median value of housing units was $\$ 92,539$ in 2000, which was lower than median housing values of both the state of Florida at $\$ 93,200$ and the United States at $\$ 119,600$. The median age of housing in the assessment area was 23 years, compared to a statewide Florida median age of 20 years. The median gross rent was $\$ 616$, which was lower than the state at $\$ 641$.

Affordability of rental housing is a concern. In Jacksonville, 34\% of renters were considered "cost burdened" in 2000 , meaning they spent more than $30 \%$ of their income on rent. The percentage of cost-burdened renters remained at $34 \%$ in 2010 , with $44 \%$ of these renters spending more than $50 \%$ of their income on rent. ${ }^{276}$

## Employment and Economic Conditions

The Jacksonville MSA has a well-diversified economic base and is a regional center for health care, financial and business services. The military also maintains a strong presence in the Jacksonville MSA and throughout Northeast Florida, with installations including the Naval Air Station Jacksonville, Naval Station Mayport, Kings Bay Naval Base, Camp Blanding Joint Training Center, Naval Aviation Depot Jacksonville, and Marine Corps Blount Island Command. These installations provide employment to more than 50,000 active duty, reserve and civilian men and women. Of the personnel who exit the military each year, more than 3,000 choose to remain in the region, providing a steady stream of highly skilled and disciplined workers for area businesses. In Duval County alone, the economic impact of installations includes $\$ 737$ million paid in salaries, $\$ 860$ million paid in pensions and transfers, $\$ 5.7$ billion of consumption, $\$ 11.7$ billion of sales activity, 110,713 jobs and a capital investment of $\$ 1$ billion. ${ }^{277}$ Overall, the military is an important source of economic growth and stability for the Jacksonville MSA.

The Jacksonville Port, or JAXPORT, is also an important economic driver in the region, providing direct employment, sales and tax revenue, and creating new business opportunities for local firms that engage in international trade and travel. In Jacksonville alone, nearly 23,000 people are employed in port-dependent

[^88]
## Jacksonville, Florida

positions. An additional 43,000 positions are related to cargo activity in the Port of Jacksonville; these are jobs within the region's manufacturing, retail, wholesale and distribution industries. Cargo activity in Jacksonville generates nearly $\$ 19$ billion in total economic activity. The cruise industry also uses JAXPORT, creating an estimated economic impact of $\$ 67$ million in the Northeast Florida region. ${ }^{278}$

The diversification of the Jacksonville economy is evident in the 2008 REIS data, which indicates there are significant worker populations in all of the following industries across the MSA: retail trade, health care and social assistance, accommodation and food services, local government, administrative and waste services, construction, finance and insurance, transportation and warehousing, and wholesale trade. ${ }^{279}$ The Jacksonville Naval Air Station is the largest employer in the Jacksonville MSA. Other major employers include the Duval County Public Schools, the Mayport Naval Station, the City of Jacksonville, Baptist Health, Bank of America Merrill Lynch, Blue Cross \& Blue Shield of Florida, Citi Bank, and the Mayo Clinic. Jacksonville is home to three Fortune 500 companies: CSX, Fidelity National Financial, and Winn-Dixie.

Despite the strength of the military and the diverse economic base, Jacksonville was hard hit by the recent recession. The region lost $8.4 \%$ of total jobs between 2007 and $2010 .{ }^{280}$ Construction, other services, and manufacturing were the sectors that experienced the biggest decline. The following chart shows unemployment rates relevant to the assessment area for years 2010 and 2011. As shown in the table below, the Jacksonville area saw a decrease in its unemployment rate and remains below the statewide unemployment rate.

Unemployment Rates
Assessment Area: FL Jacksonville

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Jacksonville MSA | 10.9 | 10.1 |
| Clay County | 10.1 | 9.3 |
| Duval County | 11.5 | 10.6 |
| Nassau County | 2.5 | 9.6 |
| St. Johns County | 9.2 | 8.5 |
| Florida | $\mathbf{1 1 . 3}$ | $\mathbf{1 0 . 5}$ |

Not Seasonally Adjusted

While unemployment remains a significant concern in the Jacksonville MSA, there are signs that the region is recovering. According to the Institute for Economic Recovery at the University of Central Florida, the Jacksonville MSA is projected to recover more quickly than other MSAs in the state. ${ }^{281}$ The local economy is starting to generate new jobs, but at a slow pace. The primary sectors experiencing job growth include leisure

[^89]and hospitality, and education and health care. The construction and manufacturing sectors are also growing again. Job gains, however, have been offset by losses in the financial services and government sectors. ${ }^{282}$

Despite the recent economic downturn, the Jacksonville MSA remains an attractive location for new business location and expansion. During the past three years the JAXUSA Partnership has worked with over 100 companies representing diverse industries that have located or expanded in the region. Economic development efforts are targeted around several key industries: advanced manufacturing, aviation and aerospace, finance and insurance services, information technology, life sciences, and logistics distribution. ${ }^{283}$

The military also continues to serve as an important economic driver for the region. It was recently announced that Jacksonville’s Naval Station at Mayport is anticipated to be the homeport of a nuclear-powered aircraft carrier, which will bring in approximately 3,200 new jobs to the area and an estimated $\$ 426$ million in capital improvements and necessary upgrades. The military economy is also thriving at Cecil Commerce Center, a 17,000-acre decommissioned military base. Boeing relocated its F/A-18 maintenance program to Cecil, creating more than 60 new high-wage jobs. In addition, the region anticipates that nearly $\$ 200$ million in federal defense spending will be allocated for Northeast Florida military projects. ${ }^{284}$

Overall, the economic conditions in the Jacksonville region are improving but remain uncertain. The unemployment rate remains high and job growth is slow. The housing market is still very unstable, with declining prices, slow sales and little new construction. In addition, foreclosures are a significant concern, largely because of the high unemployment rate. However, there are signs of recovery for the region and indications that the pace of growth will accelerate. ${ }^{285}$

## Community Contacts and Community Development Opportunities

Several community contacts indicated that the housing market in Jacksonville is in very poor condition. The number of foreclosures and distressed property sales are continuing to drive down housing prices and depress housing recovery. In addition, potential homebuyers struggle to obtain first mortgage financing. Banks have significantly tightened underwriting standards, requiring much higher credit scores for potential borrowers. Borrowers who had been considered bankable are no longer able to qualify for conventional or even FHA financing. One contact also reported that demand for the organization's housing programs has declined significantly, largely because people are afraid of homeownership or figure they will not be eligible for a mortgage.

Another contact expressed the concern that banks were no longer meeting the financing needs of community development corporations (CDCs). In particular, financial institutions are not actively supporting CDCs or providing acquisition and construction financing that many CDCs rely on for their projects.

To help stabilize communities hard hit by foreclosure, the City of Jacksonville/Duval County has received over \$33 million in Neighborhood Stabilization Program (NSP) funds from the US Department of Housing and

[^90]Urban Development in the past four years. ${ }^{286}$ The funds have been allocated primarily for the acquisition and rehabilitation of foreclosed properties and to provide mortgage subsidies for buyers of foreclosed homes. However, the lack of first mortgage financing referenced by several community contacts is a significant concern as the success of NSP ultimately depends on finding new buyers for the stabilized properties.

Other community development opportunities include participation in the federal government's Low Income Housing Tax Credit (LIHTC) Program, which will provide an estimated $\$ 41.6$ million in tax credits to the state of Florida in 2012 for the provision of affordable housing. ${ }^{287}$

In addition to mortgage financing and resources to support affordable housing, there is a need for more small business assistance. The Federal Reserve Bank of Atlanta hosted a small business roundtable in Jacksonville in 2010 with lenders and small business technical assistance providers. All of the technical assistance providers indicated that financial institutions had stopped making smaller loans to business owners, and there was a significant need for loans under $\$ 100,000$. Participants also indicated that there was a need for microloans (under $\$ 35,000$ ) and other alternative sources of small business financing, such as community development financial institutions (CDFIs). Jacksonville has only one CDFI, which is engaged in providing home ownership related financing to low-income individuals and families. Most of the meeting participants indicated that due to tightening underwriting standards, small businesses were unable to access financing from conventional lenders that they needed to sustain operations.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

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

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 2,375 ( $71.0 \%$ ) small business loans compared to 970 ( $29.0 \%$ ) HMDA loans in the Jacksonville assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The Jacksonville assessment area contains $1.7 \%$ of the bank's small business and HMDA lending by number of loans and $1.8 \%$ by dollar volume, totaling $\$ 402.5$ million. In comparison, $1.0 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of small business and HMDA lending is good. For this analysis, the geographic distribution of small business and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderate-income

[^91]census tracts, were considered when assessing the bank’s performance. In addition, the performance of the aggregate lenders was also considered.

During the review period, Regions Bank originated no home purchase, home refinance, or home improvement loans in low-income census tracts. However, the level of owner-occupied units in low-income tracts is very low at only $2 \%$. Additionally, the performance of aggregate lenders was also below the percentage of owneroccupied units in these tracts. This suggests limited opportunities for these types of loans in low-income tracts and, therefore, minimal weight was given to this performance area.

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is excellent. During the review period, Regions Bank originated $5.3 \%$ of its small business loans in low-income tracts, which contain $3.3 \%$ of the small businesses in the assessment area. The bank's performance exceeded the aggregate in both 2010 and 2011.

Regions Bank’s small business lending in moderate-income tracts is good. During the review period, Regions Bank originated $21.7 \%$ of its small business loans in moderate-income census tracts, which contain $20.3 \%$ of the small businesses in the assessment area. Additionally, the bank's performance was better than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts while the lending in upper-income tracts was greater than the percentage of small businesses.

## Home Purchase Loans

Regions Bank's home purchase lending in moderate-income census tracts is poor when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions originated $5.8 \%$ of its home purchase loans in moderate-income census tracts, which contain $16.3 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was less than the aggregate in both 2010 and 2011.

The bank's home purchase lending in middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income census tracts is poor. During the review period, the bank originated $5.7 \%$ of its home refinance loans in moderate-income census tracts, which contain $16.3 \%$ of the owner-occupied units. Additionally, Regions Bank’s performance was below aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Regions Bank's home improvement lending in moderate-income census tracts is excellent when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. Regions Bank originated $27.7 \%$ of its home improvement loans in moderate-income census tracts, which contain $16.3 \%$ of the owner-occupied units in the assessment area. Additionally, Regions Bank's performance exceeded the aggregate performance in both 2010 and 2011.

The bank's home improvement lending in middle- and upper-income tracts was less than the percentage of owner-occupied units in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses was better than the aggregate in 2010 and less than the aggregate in 2011. The bank originated $38.5 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $90.3 \%$. However, of the 2,375 small business loans originated during the review period, 1,029 loans (43.3\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $67.9 \%$, which is still less than the percentage of businesses in the Jacksonville assessment area that are considered small businesses at $90.3 \%$. However, $87.2 \%$ of the 2,375 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses, and was noted by a community contact as a particular need in the assessment area. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank’s performance was less than the aggregate in both 2010 and 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is adequate. The bank made $9.1 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $19.3 \%$ of total families in the assessment area. The aggregate also had low levels of home purchase loans to low-income borrowers. The bank's performance was less than the aggregate in 2010 and was comparable to the aggregate in 2011.

Home purchase lending to moderate-income borrowers is good. At $22.6 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $18.5 \%$. In addition, the bank's performance was slightly better than the aggregate in 2010, but less than the aggregate in 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is adequate. The bank made $4.2 \%$ of its refinance loans to low-income borrowers. Low-income families make up $19.3 \%$ of total families in the assessment area. The aggregate also had low levels of home refinance loans compared to the percentage of low-income families in the assessment area. The bank's performance was less than the aggregate in 2010 and exceeded the aggregate in 2011.

The bank's home refinance lending to moderate-income borrowers is also adequate when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $12.8 \%$ was less than the percentage of moderate-income families in
the assessment area at $18.5 \%$. Regions Bank’s performance was slightly less than aggregate in 2010, and greater than aggregate in 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of loans at $12.8 \%$ was less than the percentage of low-income families in the assessment area at $19.3 \%$. Furthermore, the bank's lending to low-income borrowers was less than aggregate performance in 2010, but exceeded aggregate in 2011.

The bank's home improvement lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home improvement lending to moderate-income borrowers at $21.3 \%$ exceeded the percentage of moderate-income families in the assessment area at $18.5 \%$. Regions Bank's performance was below aggregate in 2010 and equal to aggregate in 2011.

The bank's home improvement lending to middle-income borrowers was less than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Jacksonville assessment area. The bank originated 33 community development loans totaling $\$ 43.3$ million during the review period. The majority of the loans financed activities that revitalize or stabilize low- and moderate-income geographies or promoted economic development by financing small businesses. Local community development credit needs include but are not limited to neighborhood revitalization and stabilization activities, affordable housing for low- and moderate-income individuals, and small business financing. The bank’s community development loan portfolio inside the assessment area exhibited good responsiveness to local community credit needs. The number and the dollar amount of community development loans are excellent given the bank's presence in the market.

Examples of community development lending include the following:

- Numerous loans that promote economic development by financing small businesses as part of the SBA's 504 Certified Development Company program;
- Multiple loans that promote economic development by financing small businesses located in low- and moderate-income geographies that have been designated for revitalization; and
- Two loans to a nonprofit organization that operates a food bank and provides other community services for low- and moderate-income individuals.


## Investment Test

The bank's performance in the Jacksonville assessment area under the investment test is good. The bank had seven investments totaling $\$ 8.3$ million, including one current period investments totaling $\$ 7.0$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through GNMA and FNMA investment instruments and Low Income Housing Tax Credits (LIHTCs). Regional investments primarily

## Jacksonville, Florida

funded small businesses, startup companies through investments in SBICs, and community revitalization. Local community development needs include but are not limited to neighborhood revitalization and stabilization activities, affordable housing for low- and moderate-income individuals, household financial stability and financial education, and small business financing. The dollar volume of Regions Bank's current and total investments is good given the bank's presence in the assessment area.

The bank also made three contributions totaling approximately $\$ 6,800$. In addition, the bank made several contributions to statewide and national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to lowand moderate-income individuals and communities.

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include the following:

- A 106-unit LIHTC project that provides housing affordable to low- and moderate-income residents; and
- Contributions to support financial stability efforts, including Bank On Jacksonville and a free tax assistance program.


## Service Test

The bank's service test performance in the Jacksonville assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Jacksonville assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 25 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank closed three branches (one in a moderate-income tract, one in a middle-income tract, and one in an upper-income tract) in the Jacksonville assessment area. The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderateincome geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

## Jacksonville, Florida

## Geographic Distribution of Branches

Assessment Area: FL Jacks onville


## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 510 service hours in various capacities for community development organizations by participating in 69 community development services. The majority of the community development services focused on education, affordable housing, and service on the boards of directors or committees for community organizations that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by providing counsel to a community organization whose mission is to provide low- and moderate-income individuals with emergency shelter, counseling, tax assistance, and financial education.

## METROPOLITAN AREA

(Full-scope Review)

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

The Orlando assessment area includes Lake, Orange, Osceola, and Seminole counties in Florida. These counties make up the Orlando-Kissimmee-Sanford, Florida MSA (Orlando MSA). Within the assessment area there are 8 low-, 76 moderate-, 151 middle-, and 93 upper-income tracts. As of December 31, 2011, Regions Bank operated 51 branch offices in the Orlando assessment area, representing $13.6 \%$ of its branches in Florida. As of June 30, 2011, the bank had $\$ 1.8$ billion in deposits in the Orlando assessment area, $9.2 \%$ of Regions Bank's total deposits in Florida.

Orlando is an active banking market dominated by three large institutions: SunTrust Bank, Bank of America and Wells Fargo Bank. Regions Bank also has a strong presence in the market. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 51 financial institutions operating 611 branch locations across the MSA with a total of $\$ 35.0$ billion in deposits. Regions Bank ranked $4^{\text {th }}$ behind the three large banks, with a deposit market share of $5.1 \%$ ( $\$ 1.8$ billion). SunTrust Bank had the largest deposit market share at 23.4\%, followed by Bank of America with 19.9\%, and Wells Fargo Bank with 14.2\%.

The Orlando market has one dominant small business lender that accounted for nearly one third of small business loans in 2010 and 2011: American Express Bank. Regions Bank, however, was an active lender in the market. In 2010, Regions ranked $4^{\text {th }}$ out of 120 small business reporters by originating $7.6 \%$ of all small business loans. In 2011, the bank ranked $5^{\text {th }}$ out of 115 small business reporters, but increased its small business lending performance to 9.2 \% of all small business loans. From 2010 to 2011, the bank's small business lending performance increased from 1,954 loans to 3,165 loans. For HMDA lending, Regions Bank ranked $14^{\text {th }}$ in 2010 and 2011 with $1.4 \%$ and $1.3 \%$ of all HMDA loans, respectively. HMDA lending at Regions Bank was relatively flat with 714 loans in 2010 and 689 loans in 2011. Bank of America, Wells Fargo, and JPMorgan Chase were consistently the top HMDA lenders in the market.

## Demographic Characteristics

The counties comprising the Orlando assessment area experienced significant growth relative to the state of Florida between 2000 and 2010. During this time period, Florida's population growth rate was nearly $18 \%$ whereas Orange and Lake counties grew by $28 \%$ and $41 \%$, respectively; Osceola County's population grew by more than $55 \%$. Seminole County's population, on the other hand, slightly lagged the state with a growth rate of $16 \%$ during the 10 -year period. As of 2010 , the assessment area's population was $2,134,411$, representing approximately $11.4 \%$ of the state's population. Orange County, home to the City of Orlando, is the most densely populated county in the assessment area with nearly 1.15 million residents, representing nearly $54 \%$ of the assessment area's population.

The table below shows selected demographic information for the Orlando assessment area.

## Orlando, Florida

## Combined Demographics Report

Assessment Area: FL Orlando

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 8 | 2.4 |  | 1.3 | 2,312 | 40.2 | 79,923 | 18.7 |
| Moderate-income | 76 | 23.2 |  | 21.5 | 12,967 | 14.1 | 80,437 | 18.8 |
| Middle-income | 151 | 46.0 |  | 48.7 | 14,215 | 6.8 | 97,128 | 22.7 |
| Upper-income | 93 | 28.4 |  | 28.5 | 3,566 | 2.9 | 170,890 | 39.9 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 328 | 100.0 |  | 100.0 | 33,060 | 7.7 | 428,378 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 10,103 |  |  | 25.6 | 6,578 | 65.1 | 935 | 9.3 |
| Moderate-income | 157,827 |  |  | 47.1 | 66,357 | 42.0 | 17,071 | 10.8 |
| Middle-income | 341,030 |  |  | 60.6 | 102,917 | 30.2 | 31,309 | 9.2 |
| Upper-income | 174,591 |  |  | 74.9 | 34,848 | 20.0 | 8,988 | 5.1 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 683,551 | 414,548 |  | 60.6 | 210,700 | 30.8 | 58,303 | 8.5 |
|  | Total Businesses by Tract |  |  | Businesses by Tract \& Revenue Size |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,798 | 1.5 |  | 1.4 | 174 | 2.9 | 121 | 2.4 |
| Moderate-income | 23,778 | 19.6 |  | 19.0 | 1,503 | 25.1 | 1,263 | 25.4 |
| Middle-income | 57,206 | 47.2 |  | 47.3 | 2,700 | 45.1 | 2,308 | 46.3 |
| Upper-income | 38,527 | 31.8 |  | 32.3 | 1,613 | 26.9 | 1,289 | 25.9 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 121,309 | 100.0 |  | 100.0 | 5,990 | 100.0 | 4,981 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 91.0 |  | 4.9 |  | 4.1 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2 | 0.2 |  | 0.2 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 168 | 19.2 |  | 19.1 | 12 | 22.2 | 3 | 15.8 |
| Middle-income | 517 | 59.2 |  | 59.3 | 30 | 55.6 | 12 | 63.2 |
| Upper-income | 187 | 21.4 |  | 21.3 | 12 | 22.2 | 4 | 21.1 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 874 | 100.0 |  | 100.0 | 54 | 100.0 | 19 | 100.0 |
|  | Percentage of Total Farms: |  |  | 91.6 |  | 6.2 |  | 2.2 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

Food stamp usage is up across the state of Florida and in each of the four counties that comprise the assessment area. As of 2009, $13.3 \%$ of the statewide population received food stamps. While the statewide rate was higher than all counties in the assessment area except Osceola, the increase in program participation across the assessment area from 2000 to 2009 was substantial. For example, from 2000 to 2009 the number of people receiving food stamps in Osceola County increased by 450\%. In densely populated Orange County, this number increased by 277\%. Comparatively, statewide the number of food stamp recipients increased by 180\%.

Poverty rates were generally flat from 2000 to 2009, with Seminole County experiencing the greatest increase during the time period. As of 2009, the statewide poverty rate was $13.2 \%$. Osceola County had a slightly higher poverty rate than the state, whereas the remaining three counties had lower poverty rates, with Seminole County exhibiting the lowest poverty rate at $9.4 \%$.
Participation in the free and reduced price lunch programs can also be used to understand the income characteristics of a population, as the program is typically offered to students of low- or moderate-income means. There were a total of four school districts in the assessment in 2010, three of which had more than $50 \%$ of students participating in the free and reduced price lunch program. The Osceola County School District had the highest percentage of students receiving free or reduced price lunch benefits at $64 \%$; in Seminole County $39 \%$ of students participate in the program. All four school districts had fewer than $50 \%$ of students participating in the free and reduced price lunch program in 2000.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for years 2010 and 2011 for the Orlando MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper) and shows that the estimated median family income in the assessment area decreased by \$3,500 or 5.7\% from 2010 to 2011.

## Borrower Income Levels <br> Orlando-Kissimmee-Sanford, FL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$60,900 | 0 | - | \$30,449 | \$30,450 | - | \$48,719 | \$48,720 | - | \$73,079 | \$73,080 |  | \& above |
| 2011 | \$57,400 | 0 | - | \$28,699 | \$28,700 | - | \$45,919 | \$45,920 | - | \$68,879 | \$68,880 |  | \& above |

## Housing Characteristics

Housing affordability remains an issue across the assessment area. Census data show that the estimated median value of an owner-occupied home was generally higher inside the assessment area between 2005 and 2009 than across the state. Orange and Seminole counties had the highest median home values at $\$ 233,900$ and $\$ 243,700$, respectively, while Lake County had the lowest median home value at $\$ 173,700$. Statewide, the median home value during this period was $\$ 211,300$.

The housing market in Orange County experienced a great deal of volatility between 2005 and 2010. The median value of a single-family home in Orange County peaked in 2006 at $\$ 285,000$. By 2010, this value decreased to $\$ 170,000$, a $40 \%$ reduction. The condo market experienced even greater volatility. Condo prices
peaked in 2007 with a median value $\$ 202,700$, but plummeted $71 \%$ to $\$ 58,000$ in $2010 .{ }^{288}$ Median home prices have remained relatively flat through 2010 and 2011.

Census data also show that there were 683,551 housing units in the assessment area in 2000, of which $60.7 \%$ were owner-occupied, $30.8 \%$ were rental units, and $8.5 \%$ were vacant. While a majority of units were owneroccupied, a higher percentage of housing units in low- and moderate-income tracts were rental units, indicating reduced opportunities for mortgage origination in these geographies. The median age of housing stock across the assessment area was 30 years, but this figure increased to 36 years in low-income tracts. Housing permits are on the decline, with single-family permits declining by more than $83 \%$ from 2004 and $2011{ }^{289}$ Multifamily residential permits declined by $89 \%$ from 2005 to 2010, but saw a sizeable increase from 2010 to 2011, with 1,900 permits issued in the Orlando MSA.

Mortgage delinquencies and reduced loan demand have also had an impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $14.7 \%$ in January 2010 to $20.2 \%$ in December $2011 .^{290}$ Furthermore, HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to be weak, declining from a high of 54,834 loans in 2005 to 15,931 in 2010, a reduction of nearly $71 \%$. Refinance activity saw a similar decline, likely due to the lack of equity left in homes after the drastic decline in home value between 2006 and 2010. ${ }^{291}$

## Employment and Economic Conditions

The Orlando area economy relies heavily on the service and tourisms industries. The US Bureau of Labor and Statistics indicates that approximately $20 \%$ of total employment in the Orlando MSA is in the leisure and hospitality industry, much of which is tied to tourism. It is estimated that the area's tourism industry has an economic impact of more than $\$ 27.6$ billion on the area. ${ }^{292}$ Other important industries include accommodation and food services, retail trade, government and government enterprises, and health care and social assistance.

In 2010, the leisure and hospitality industry sector in particular added approximately 5,400 jobs, relative to 2009 when approximately 9,400 jobs were lost in the industry. The top employer in the market was Walt Disney Company, a leisure and hospitality sector company that employed more than 60,000 people. Other top employers included Wal-Mart Stores, Inc. with approximately 16,750 employees, Florida Hospital with approximately 16,000 employees and Publix Super Markets, Inc. with approximately 15,600 employees. Orlando is also home to Universal Studios and SeaWorld as well as multiple professional sports teams and the country's second largest convention center. Several institutions of higher learning call Orlando home, including the University of Central Florida (UCF), the second largest university in the nation by student enrollment as of 2010. ${ }^{293}$

The Institute for Economic Competitiveness at UCF periodically produces economic forecasts for the state of Florida and regional markets. In its most recent publication, the report suggests that the Florida economy will

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begin to grow in earnest in 2013. While future growth will be driven by growth of the labor force, much of the reduction in unemployment in recent years was due to labor force contraction. Underemployment is also an indicator of economic well-being. The state of Florida's underemployment rate was $17 \%$ for the third quarter of 2011 through the second quarter of 2012. As the economy grows, this number should decrease along with the unemployment rate. The sectors of the job market expected to experience the strongest average growth over the next three years are construction; professional and business services; trade, transportation and utilities; education and health services; and information. Additionally, the statewide population is expected to grow. By 2015, the growth rate should hit $1.7 \%$, which would be the fastest growth rate since 2006. Job growth and baby boomer retirement will likely boost net migration to the state. ${ }^{294}$

For the Orlando economy in particular, the area is expected to show moderate growth moving forward. The UCF economic forecast report indicates that personal income is expected to grow at an annual rate of 4.9\% while average annual wage growth will be $2.2 \%$, the lowest level of all MSAs studied in Florida. Conversely, the Orlando area will see population growth of $2.2 \%$, the highest growth rate of all MSAs studied in Florida. Employment is expected to grow by $2.2 \%$ annually, with the fastest growing sector being construction and mining, followed by the professional and business sector. The only sector that is forecasted to experience negative growth is federal government employment. ${ }^{295}$ Orlando had a net loss of 54,000 private sector jobs from August 2007 to August 2012. ${ }^{296}$

Generally speaking, employment across the state began to stabilize in 2010 after reaching recession lows. Total employment in the Orlando assessment area reached 1.24 million jobs in 2010. ${ }^{297}$ While recent job growth indicates improvement, unemployment has remained a challenge for the Florida economy as a whole and the Orlando assessment area in particular. From 2007 to 2010, unemployment inside the assessment area increased from $3.7 \%$ to $11.2 \%$. The following chart shows unemployment rates relevant to the assessment area for years 2010 and 2011. As shown in the table below, the Orlando MSA's unemployment rate decreased to $10.4 \%$ in 2011, at a rate similar to the state of Florida.

## Unemployment Rates

Assessment Area: FL Orlando

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Orlando MSA | 11.2 | 10.4 |
| Florida | $\mathbf{1 1 . 3}$ | $\mathbf{1 0 . 5}$ |

Not Seasonally Adjusted

To combat the effects of the economic downturn in 2008 and 2009, GrowFL was established as a regional economic gardening initiative. Established in 2009, GrowFL is managed through the University of Central Florida’s Economic Gardening Institute. With various partnerships throughout the state, including Orange County and the Florida High Tech Corridor Council, the Institute collaborates with statewide partners to support

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the growth of second-stage businesses via technical assistance focused on enhancing sales growth, CEO roundtable groups designed to facilitate peer-to-peer information exchange, and other capacity-building services. GrowFL notes that its services have helped create more than 3,200 jobs through September 2011, with a total economic impact of more $\$ 510.4$ million, and helped businesses participating to grow $10.9 \%$ faster than similar non-GrowFL businesses. ${ }^{298}$

## Community Contacts and Community Development Opportunities

Two community contacts were interviewed in the Orlando assessment area, one specializing in affordable housing development and neighborhood revitalization, and another with expertise in health and human services. The affordable housing contact noted that the Orlando economy is improving in light of unemployment and real estate issues, though the commercial real estate market is severely strained. With regard to participation of banks in local community development activities, this contact noted that financial institutions are doing a satisfactory job, but community development lending is limited and banks are focusing more on grants and services to meet community development needs.

The second contact discussed homelessness for children and families as a pervasive issue in the community as a result of the area's economic challenges. Furthermore, the contact noted that families are leaving the area to find work elsewhere as the unemployment rate remains high. Similar to the affordable housing specialist, this contact noted that many banks are responding to community needs by conducting service activities in partnership with community development organizations.

The Florida Prosperity Partnership is a collaborative effort of banks and nonprofit sector service providers with a presence in the Orlando market designed to increase the financial capacity and stability of residents. The organization defines its purpose as convening individuals and organizations with the desire to leverage their talent, resources, and passion to improve the prosperity of Florida's families. This is accomplished in part by partnering with financial institutions to promote the benefits of mainstream banking and rolling out the "Bank On" program throughout Florida.

Bank On is a national initiative with local programs focused on connecting unbanked and under-banked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $5.5 \%$ of households in the MSA are unbanked compared to $7 \%$ for the state of Florida. Additionally, $19.5 \%$ of households in the assessment area are listed as under-banked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $16.8 \%$ of under-banked households statewide. ${ }^{299}$

The state of Florida received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. The City of Orlando received $\$ 6.7$ million under the NSP1 allocation process and $\$ 3.1$ million under NSP3. NSP1 funds were acquired to purchase and rehabilitate residential properties for resale as purchase or rental properties to income-qualified individuals. The NSP3 funds have been specifically earmarked for acquiring and rehabilitating rental units for very low-income individuals. ${ }^{300}$

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There are 16 certified community development financial institutions (CDFIs) located in Florida, comprised of credit unions and loan funds; three are located in Orlando, all of which administer loan funds. Community development opportunity also includes participation in the Low Income Housing Tax Credit (LIHTC) Program, which provided an estimated $\$ 41.6$ million in tax credits to the state of Florida in 2012 for the provision of affordable housing. ${ }^{301}$

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

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

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 5,074 (78.3\%) small business loans compared to 1,403 (21.7\%) HMDA loans in the Orlando assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The Orlando assessment area contains $3.3 \%$ of the bank's small business and HMDA lending by number of loans and $2.7 \%$ by dollar volume, totaling $\$ 601.7$ million. In comparison, $1.8 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of small business and HMDA loans is adequate. For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderateincome census tracts, were considered when assessing the bank's performance; in addition, the performance of the aggregate lenders was considered.

During the review period, Regions made only two home purchase loans and no home refinance or home improvement loans in low-income census tracts. However, only $0.6 \%$ the owner-occupied units were in lowincome census tracts. Additionally, the performance of aggregate lenders was also less than the percentage of owner-occupied units in these tracts. This suggests limited opportunities for home purchase, home refinance, and home improvement lending in low-income tracts and, therefore, minimal weight was given to this performance area

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is good. During the review period, Regions Bank originated $1.5 \%$ of its small business loans in low-income tracts, which contain $1.4 \%$ of the small businesses in the assessment area. In comparison to aggregate, the bank's performance was equal to aggregate in 2010 and slightly above aggregate in 2011.

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Regions Bank's small business lending in moderate-income tracts is adequate. During the review period, Regions Bank originated 15.9\% of its small business loans in moderate-income census tracts, which contain $19.0 \%$ of the small businesses in the assessment area. The bank's performance was comparable to the aggregate in 2008 and 2009.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses.

## Home Purchase Loans

Home purchase lending in moderate-income census tracts is adequate. During the review period, Regions Bank originated $12.4 \%$ of its home purchase loans in moderate-income census tracts; $17.9 \%$ of the owner-occupied units are located in moderate-income census tracts. The bank's performance was greater than aggregate in 2010 and comparable to aggregate in 2011.

The bank's home purchase lending in middle-income tracts was slightly less than the percentage of owneroccupied units in these tracts, while lending in upper-income tracts was greater than the percentage of owneroccupied units.

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income census tracts is poor. During the review period, the bank originated $5.0 \%$ of its home refinance loans in moderate-income census tracts, which contain $17.9 \%$ of the owner-occupied units. However, it was noted that the aggregate's performance was also below the percentage of owner-occupied units in these tracts. Nonetheless, the bank's performance was below aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in moderate-income census tracts is adequate. Regions Bank originated 16.7\% of its home improvement loans in moderate-income census tracts, which contain $17.9 \%$ of the owner-occupied units. The bank's performance was less than the aggregate in 2010 and 2011.

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

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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 Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is good. The bank's lending was double that of the aggregate in 2010, and less than the aggregate in 2011. The bank originated $38.0 \%$ of its loans to small businesses compared to the percentage

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of small businesses in the assessment area at $91.0 \%$. However, of the 5,074 small business loans originated during the review period, 2,136 loans (42.1\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $65.6 \%$, which is less than the percentage of businesses in the Orlando assessment area that are considered small businesses at $91.0 \%$. However, $88.3 \%$ of the 5,074 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank’s performance was less than the aggregate performance in 2010 and 2011.

## Home Purchase Loans

Home purchase lending to low-income borrowers is good. At 11.2\%, the bank's percentage of home purchase lending to low-income borrowers was less than the percentage of low-income families in the assessment area at $18.7 \%$. However, the bank's lending to low-income borrowers exceeded the aggregate in both 2010 and 2011.

The bank's home purchase lending to moderate-income borrowers is excellent. The bank made $24.8 \%$ of its home purchase loans to moderate-income borrowers. Not only did the bank exceed the percentage of moderateincome families in the assessment area at $18.8 \%$, the bank also exceeded the aggregate performance in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made $5.4 \%$ of its refinance loans to low-income borrowers. Low-income families make up $18.7 \%$ of total families in the assessment area; however, the bank's lending to low-income borrowers was greater than the aggregate in both 2010 and 2011. The aggregate lenders also had low lending levels to low-income borrowers.

The bank's home refinance lending to moderate-income borrowers is also good. The bank's percentage of home refinance lending to moderate-income borrowers at $13.4 \%$ was less than the percentage of moderateincome families in the assessment area at $18.8 \%$; however, the bank's lending to moderate-income borrowers exceeded the aggregate performance in both 2010 and 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is poor. Regions Bank's percentage of home improvement loans to low-income borrowers at $5.6 \%$ was below the percentage of low-income families in the assessment area at $18.7 \%$. Additionally, the bank's lending to low-income borrowers was below the aggregate in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is adequate. Regions Bank's percentage of loans at $15.7 \%$ was below the percentage of moderate-income families in the assessment area at $18.8 \%$. The bank's lending to moderate-income borrowers was less than the aggregate in 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was less than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Orlando assessment area. The bank originated 25 community development loans totaling $\$ 37.0$ million during the review period. The bank’s loans financed affordable housing for low- and moderate-income individuals and promoted economic development by financing small businesses, both of which exhibit excellent responsiveness to local community credit needs. The number and the dollar amount of community development loans inside the assessment area are excellent given the bank's presence in the market.

Examples of community development lending include the following:

- Numerous loans that promote economic development by financing small businesses as part of the SBA 504 Certified Development Company program; and
- Five loans to support the construction of multi-family affordable housing benefiting from Low Income Housing Tax Credits (LIHTCs). The majority of units in each of the developments financed by the bank are income-restricted to $60 \%$ of the area median income (AMI). Combined, these loans will result in the development of more than 300 affordable housing units.


## Investment Test

The bank's performance in the Orlando assessment area under the investment test is excellent. The bank had seven investments totaling $\$ 24.0$ million, including two current period investments totaling $\$ 16.2$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through GNMA investment instruments and LIHTCs. The broader regional investments primarily funded small businesses and startup companies through SBICs, and community revitalization through a New Markets Tax Credit fund. Local community development needs include but are not limited to neighborhood revitalization and stabilization activities, affordable housing for low- and moderate-income individuals, household financial stability and financial education, and small business financing. The dollar volume of Regions Bank's current and total investments is excellent given the bank's presence in the assessment area.

The bank also made three contributions and one in-kind donation totaling \$84,500. In addition, the bank made several contributions to statewide and national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to lowand moderate-income individuals and communities.

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include the following:

- LIHTCs, including two current period projects totaling 152 units that provide housing affordable to low- and moderate-income residents; and
- An in-kind donation of land to a local church that provides critical community services, including a food bank.


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## Service Test

The bank's service test performance in the Orlando assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Orlando assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 51 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank closed five branches (three in middle-income tracts and two in upper-income tracts) in the Orlando assessment area. The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

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## Geographic Distribution of Branches

Assessment Area: FL Orlando

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | I Branch <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses $\%$ |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 8 | 2.4\% | 1.5\% | 1.5\% |
| M oderate | Total | 8 | 15.7\% | 0 | 0 | 7 | 7 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 76 | 23.2\% | 22.5\% | 19.6\% |
| Middle | Total | 26 | 51.0\% | 0 | 3 | 26 | 25 | 4 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 151 | 46.0\% | 49.6\% | 47.2\% |
| Upper | Total | 17 | 33.3\% | 0 | 2 | 17 | 17 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 93 | 28.4\% | 26.5\% | 31.8\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 51 | 100.0\% | 0 | 5 | 50 | 49 | 7 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 328 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 1,587 service hours in various capacities for community development organizations by participating in 195 community development services. The majority of the community development services focused on education and affordable housing that aided low- and moderateincome geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. Furthermore, the majority of these schools are located in low- and moderate-income geographies.

## METROPOLITAN AREA

(Full-scope Review)

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

The Pensacola assessment area includes Escambia and Santa Rosa counties in Florida. Escambia and Santa Rosa counties constitute the Pensacola-Ferry Pass-Brent, Florida MSA (Pensacola MSA). Within the assessment area there are three low-, 22 moderate-, 37 middle-, and 15 upper-income tracts. As of December 31, 2011, Regions Bank operated 18 branch offices in the Pensacola, Florida assessment area representing $4.8 \%$ of its branches in Florida. As of June 30, 2011, the bank had approximately $\$ 1.1$ billion in deposits in the Pensacola assessment area representing $5.8 \%$ of Regions Bank's total deposits in Florida.

The Pensacola assessment area is a relatively small banking market and Regions Bank is the dominant institution. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 24 financial institutions operating 112 branch locations across the MSA with a total of $\$ 5.1$ billion in deposits. Regions Bank ranked $1^{\text {st }}$ with a deposit market share of $22.2 \%$ ( $\$ 1.1$ billion). Wells Fargo Bank had the $2^{\text {nd }}$ largest percentage of deposit market share at $15.2 \%$, and Synovus Bank ranked $3^{\text {rd }}$ with $11.8 \%$ market share.

Regions Bank also has a large lending presence in the Pensacola assessment area. In 2010, the bank ranked $2^{\text {nd }}$ out of 49 small business reporters with $15.2 \%$ of all small business loans. In 2011, the bank ranked $1^{\text {st }}$ out of 59 small business reporters and increased its small business lending performance to $21.5 \%$ of all small business loans. From 2010 to 2011, the bank's small business lending increased from 695 loans to 1,304 loans. For HMDA lending, Regions Bank ranked $7^{\text {th }}$ in 2010 with $4.3 \%$ and $5^{\text {th }}$ in 2011 with $4.5 \%$ of all HMDA loans. HMDA lending at Regions Bank was relatively flat with 588 loans in 2010 and 565 loans in 2011. Bank of America, Wells Fargo, and JPMorgan Chase were consistently the top HMDA lenders in the market.

## Demographic Characteristics

Assessment area population growth occurred but at a much slower rate than the statewide population. From 2000 to 2010, the assessment area population grew by $8.9 \%$, compared to $17.6 \%$ statewide. The majority of growth occurred in Santa Rosa County, where the growth rate was $28.6 \%$. Escambia County's population, on the other hand, grew by only $1.1 \%$. As of 2010, the total population of the assessment area was nearly 449,000 , representing $2.4 \%$ of the statewide population. Migration trends further highlight the area’s population changes. From 2005 to 2010, net migration was mostly negative, primarily as a result of negative net migration in Escambia County, but this trend has slowed in recent years. Net migration is defined as the number of inmigrant households less the number of out-migrant households and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns for a particular year. ${ }^{302}$

The table below shows selected demographic information for the Pensacola assessment area.

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## Pensacola, Florida

## Combined Demographics Report

Assessment Area: FL Pensacola

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3 | 3.9 |  | 1.9 | 826 | 39.9 | 21,936 | 20.3 |
| Moderate-income | 22 | 28.6 |  | 17.5 | 3,840 | 20.3 | 19,215 | 17.8 |
| Middle-income | 37 | 48.1 |  | 56.7 | 5,844 | 9.5 | 23,815 | 22.0 |
| Upper-income | 15 | 19.5 |  | 23.9 | 1,152 | 4.5 | 43,139 | 39.9 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 77 | 100.0 |  | 100.0 | 11,662 | 10.8 | 108,105 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 3,814 |  |  | 38.1 | 1,897 | 49.7 | 465 | 12.2 |
| Moderate-income | 33,671 |  |  | 52.8 | 11,714 | 34.8 | 4,179 | 12.4 |
| Middle-income | 97,942 |  |  | 63.8 | 24,604 | 25.1 | 10,845 | 11.1 |
| Upper-income | 38,339 |  |  | 73.5 | 6,739 | 17.6 | 3,435 | 9.0 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 173,766 | 109,888 |  | 63.2 | 44,954 | 25.9 | 18,924 | 10.9 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 693 | 3.0 |  | 2.7 | 74 | 6.8 | 35 | 4.4 |
| Moderate-income | 4,861 | 20.7 |  | 19.8 | 357 | 32.6 | 226 | 28.5 |
| Middle-income | 12,043 | 51.3 |  | 51.9 | 449 | 41.0 | 382 | 48.1 |
| Upper-income | 5,890 | 25.1 |  | 25.6 | 215 | 19.6 | 151 | 19.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 23,487 | 100.0 |  | 100.0 | 1,095 | 100.0 | 794 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 92.0 |  | 4.7 |  | 3.4 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 36 | 12.0 |  | 11.6 | 2 | 50.0 | 0 | 0.0 |
| Middle-income | 218 | 72.9 |  | 73.7 | 0 | 0.0 | 2 | 100.0 |
| Upper-income | 45 | 15.1 |  | 14.7 | 2 | 50.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 299 | 100.0 |  | 100.0 | 4 | 100.0 | 2 | 100.0 |
|  | Percentage of Total Farms: |  |  | 98.0 |  | 1.3 |  | . 7 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

The percentage of assessment area residents receiving food stamps increased from 2000 to 2009 but at a rate less than the state of Florida: 135\% inside the assessment area versus $181 \%$ statewide. ${ }^{303}$ Furthermore, poverty rates inside the assessment area remained relatively flat during the same time period whereas the state saw a slight increase.

Free and reduced price lunch program participation can also be used to understand the income characteristics of a community. There are two school districts in the assessment, one per county. In the Escambia County School District, nearly $60 \%$ of students received free or reduced price lunch benefits compared to $37 \%$ of students in the Santa Rosa County School District, in 2010. These numbers represent relatively slight increases from 2000.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the Pensacola MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper) and shows that the estimated median family income rose $\$ 900$, or $1.6 \%$, from 2010 to 2011.

## Borrower Income Levels <br> Pensacola-Ferry Pass-Brent, FL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$57,500 | 0 | - | \$28,749 | \$28,750 | - | \$45,999 | \$46,000 | - | \$68,999 | \$69,000 | - | \& above |
| 2011 | \$58,400 | 0 | - | \$29,199 | \$29,200 | - | \$46,719 | \$46,720 | - | \$70,079 | \$70,080 | - | \& above |

## Housing Characteristics

Housing affordability inside the assessment is mixed relative to the state and other Florida housing markets. In 2010, the median price of a single-family home in Escambia County was less than the statewide median sales price of $\$ 159,000$, but in Santa Rosa County it was higher by almost $\$ 20,000$. Conversely, condo prices in both counties remain well above the state 2010 median value of $\$ 105,000$. Escambia County's median condo sales price in 2010 was $\$ 250,000$ compared Santa Rosa County's median condo sales price of $\$ 255,000$. Both of these figures continued to rise in 2011. ${ }^{304}$

Census data also show that there were 173,766 housing units in the assessment area in 2000, of which $63.2 \%$ were owner-occupied, $25.9 \%$ were rental units, and $10.9 \%$ were vacant. While a majority of units were owneroccupied, a higher percentage of housing units in low- and moderate-income tracts were rental units, indicating reduced opportunities for mortgage origination in these geographies. The median age of housing stock across the assessment area was 23 years, but this figure increased to 43 years and 39 years in low- and moderateincome tracts, respectively. Additionally, housing permit activity declined from its peak years. Single-family permits declined by $74 \%$ from 2004 and 2009, while multi-family residential permits experienced a decline of almost $94 \%$ from 2003 to 2009, but both categories saw an increase in activity during 2010. ${ }^{305}$

[^97]Mortgage delinquencies and reduced loan demand have also had an impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $6.3 \%$ in January 2010 to $11.8 \%$ in December 2011. ${ }^{306}$ Furthermore, HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to be weak, declining from a high of 7,631 loans in 2005 to 3,288 in 2010, a reduction of nearly $57 \%$. Refinance activity saw a smaller decline. ${ }^{307}$

## Employment and Economic Conditions

As of 2010, total employment in the Pensacola assessment area was approximately 218,690; employment was concentrated in the following industries: government and government enterprises, health care and social assistance, and retail trade. The military is an important component of the local economy and has provided economic stability in recent years. One of the area's largest employers is Naval Air Station Pensacola with more than 22,000 active duty and military personnel. The US Navy reports that the Department of Defense is the largest economic engine in the Pensacola area, providing more than $\$ 5.1$ billion annually in salary and wages. ${ }^{308}$ According to the Consolidated Federal Funds Report, the Pensacola MSA received over $\$ 521.9$ million in Department of Defense procurement contracts in 2009. In addition to the military, some of the area's top employers include local health care facilities, University of West Florida, Naval Federal Credit Union, Gulf Power Company, and local and state government. ${ }^{309}$

Tourism is also a driver of the local economy. The Pensacola Bay Area Chamber of Commerce claims that more than 3.5 million visitors come to the area each year, estimating an overall impact of $\$ 1.2$ billion and 18,000 jobs for the local economy. ${ }^{310}$ However, tourism in the area has faced steep challenges due to the nationwide recession and hurricanes. Nonetheless, Pensacola was on track for its best tourism year ever as of April 2010 with a $17 \%$ increase from a year earlier; however, yet another obstacle - the oil spill of 2010 derailed tourism to the area, resulting in a sharp decline of travelers to Pensacola. ${ }^{311}$

The Pensacola assessment area is also home to three Enterprise Zones. An Enterprise Zone is a specific geographic area targeted for economic revitalizing. Enterprise Zones encourage economic growth and investment in distressed areas by offering tax advantages and incentives to businesses locating within the zone boundaries. Some of the targeted industries in Florida Enterprise Zones include but are not limited to financial services, life sciences, manufacturing and information technology. ${ }^{312}$
The Institute for Economic Competitiveness at the University of Central Florida (UCF) periodically produces economic forecasts for the state of Florida and regional markets. In its most recent publication, the report suggests that the Florida economy will begin to grow in earnest in 2013. While future growth will be driven by growth of the labor force, much of the reduction in unemployment in recent years was due to labor force contraction. Underemployment is also an indicator of economic well-being. The state of Florida's underemployment rate was $17 \%$ for the third quarter of 2011 through the second quarter of 2012. As the economy grows, this number should decrease along with the unemployment rate. The sectors of the job market

[^98]
## Pensacola, Florida

expected to experience the strongest average growth over the next three years are construction; professional and business services; trade, transportation and utilities; education and health services; and information. Additionally, the statewide population is expected to grow. By 2015, the annual growth rate should hit 1.7\%, which would be the fastest growth rate since 2006. Job growth and baby boomer retirement will likely boost net migration to the state. ${ }^{313}$

For the Pensacola economy in particular, the area is expected to show low levels of growth moving forward. The UCF economic forecast report indicates that personal income is expected to grow at an annual rate of 3.7\% while average annual wage growth will be $2.3 \%$. The Pensacola area is projected to experience a marginal growth rate of $0.6 \%$, the lowest growth rate of any metro area studied in Florida. Employment is expected to grow by $0.6 \%$ annually, with the fastest growing sector being construction and mining followed by the professional and business sector. The state and local government and federal government sectors are all forecast to have negative growth rates in the coming years. Additionally, the area is expected to benefit from the recently passed federal RESTORE Act, which mandates that $80 \%$ of fines levied against BP go to Gulf communities most affected by the 2010 Deepwater Horizon oil spill. Both counties in the assessment area are in line to receive millions of dollars as a result. ${ }^{314}$

The Greater Pensacola Chamber of Commerce has also developed an economic development strategy titled Vision 2015. This strategic plan is designed to aggressively recruit new business, help existing businesses expand, and leverage the strong partnerships with the military to stimulate economic growth, with a goal of creating 3,000 new jobs. The program is focused on increased involvement from private sector entities and individuals in economic development activities and will ultimately involve a $\$ 6.5$ million investment in the community through local donors and business sponsors. The plan has five areas of focus: new business attraction/recruitment; existing business retention, expansion and workforce development; armed services/military innovation; entrepreneurship; and community/project development. Under the heading of new business attraction/recruitment, there is a specific focus on creating 1,000 jobs in designated low- to moderateincome geographies throughout the Pensacola region, such as CRA districts, Enterprise Zones and HUBZones. ${ }^{315}$
Unemployment remains a challenge for the local economy. While the unemployment rate for the assessment area rose significantly during the second half of the last decade, it remains below the state. The following table illustrates the unemployment rates for the assessment area and the State of Florida.

## Unemployment Rates

Assessment Area: FL Pensacola

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Pensacola MSA | 10 | 9.8 |
| Florida | $\mathbf{1 1 . 3}$ | $\mathbf{1 0 . 5}$ |

Not Seasonally Adjusted

[^99]The national average unemployment rates for 2010 and 2011 were $9.6 \%$ and $8.9 \%$, respectively. Unemployment rates for the assessment area were lower than the state but higher than the nation. Combined with other factors, the economy appears to be in recovery mode but facing headwinds that could increase the time needed to fully stabilize.

## Community Contacts and Community Development Opportunities

One community contact specializing in community building and investment was interviewed in the Pensacola assessment area. The contact stated that the local economy is in bad shape due to the financial crisis, BP oil spill and impact from recent hurricanes. The contact also noted that due to recent reductions in local government resources, the greatest community need is nutrition assistance for low-income families. Financial institutions operating in the area tend to be actively involved in community development activities through employee service and grant provision. Regions Bank was noted as being particularly active.

Bank On is a national initiative with local programs focused on connecting unbanked and under-banked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $5.5 \%$ of households in the MSA are unbanked compared to $7 \%$ for the state of Florida. Additionally, 19.5\% of households in the assessment area are listed as under-banked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $16.8 \%$ of under-banked households statewide. ${ }^{316}$

The state of Florida received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. Escambia County received $\$ 4.57$ million under the NSP1 allocation process and $\$ 4.7$ million under NSP3. NSP1 funds were targeted to geographies with the greatest need in keeping with the priorities established in the National Housing and Economic Recovery Act of 2008. NSP3 funds were acquired to continue and enhance activities targeting foreclosed, abandoned, blighted and vacant homes and properties which were initiated with the county's NSP1 Grant. ${ }^{317}$

There are 16 certified community development financial institutions (CDFIs) located in the state of Florida, comprised of credit unions and loan funds, but none are located inside the assessment area. CDFIs such as the Florida Community Loan Fund have a statewide footprint that can impact the assessment area. Community development opportunity also includes participation in the Low Income Housing Tax Credit (LIHTC) Program, which provided an estimated $\$ 41.6$ million in tax credits to the state of Florida in 2012 for the provision of affordable housing. ${ }^{318}$ The state of Florida does not offer a separate LIHTC program for affordable housing development.

[^100]
## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance is adequate. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a low level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 1,972 (63.1\%) small business loans compared to 1,153 (36.9\%) HMDA loans in the Pensacola assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The Pensacola assessment area contains $1.6 \%$ of the bank's small business and HMDA lending by number of loans and $1.3 \%$ by dollar volume, totaling $\$ 286.5$ million. In comparison, $1.1 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of small business and HMDA lending is good. For this analysis, the geographic distribution of small business and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderate-income census tracts, were considered when assessing the bank's performance; in addition, the performance of the aggregate lenders was considered.

During the review period, Regions Bank originated no home refinance or home improvement loans in lowincome tracts. Aggregate lenders also had a very minimal level of home refinance and home improvement loans compared to the percentage of owner-occupied units, which was only $1.3 \%$. This suggests limited opportunities for these types of loans in low-income tracts and, therefore, minimal weight was given to this performance area.

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is good. During the review period, Regions Bank originated 3.3\% of its small business loans in low-income tracts, which contain $2.7 \%$ of the small businesses in the assessment area. The bank performed comparably to the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is also good. During the review period, Regions Bank originated $19.6 \%$ of its small business loans in moderate-income census tracts, which contain $19.8 \%$ of the small businesses in the assessment area. The bank's performance was below the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses.

## Home Purchase Loans

Home purchase lending in low-income tracts is good. During the review period, Regions Bank originated 1.1\% of its home purchase loans in low-income tracts, which contain $1.3 \%$ of the owner-occupied units in the

## Pensacola, Florida

assessment area. Aggregate lenders also had low levels of home purchase loans compared to the percentage of owner-occupied units in these tracts. Additionally, Regions Bank's performance was above the aggregate in both 2010 and 2011.

Home purchase lending in moderate-income tracts is also good. During the review period, Regions Bank originated $11.9 \%$ of its home purchase loans in moderate-income tracts, which contain $16.2 \%$ of the owneroccupied units in the assessment area. Additionally, Regions Bank's performance exceeded the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income census tracts is good. During the review period, the bank originated $8.5 \%$ of its home refinance loans in moderate-income tracts, which contain $16.2 \%$ of the owner-occupied units; however, Regions Bank's performance exceeded the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Regions Bank's home improvement lending in moderate-income tracts is excellent. The bank originated 19.7\% of its home improvement loans in moderate-income tracts, which contain $16.2 \%$ of the owner-occupied units in the assessment area. Additionally, Regions Bank's performance exceeded the aggregate in both 2010 and 2011.

The bank's home improvement lending in middle- and upper-income tracts was slightly less than the percentage of owner-occupied units in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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 Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than aggregate in 2011. The bank originated $30.4 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $92.0 \%$. However, of the 1,972 small business loans originated during the review period, 1,114 loans (56.5\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $69.9 \%$, which is still less than the percentage of businesses in the Pensacola assessment area that are considered small businesses at $92.0 \%$. However, $90.6 \%$ of the 1,972 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and greater than aggregate in 2011.

## Home Purchase Loans

Home purchase lending to low-income borrowers is excellent. At 19.1\%, the bank's percentage of home purchase lending to low-income borrowers was comparable to the percentage of low-income families in the assessment area at $20.3 \%$. Additionally, the bank's lending to low-income borrowers greatly exceeded the aggregate in both 2010 and 2011.

Home purchase lending to moderate-income borrowers is excellent. At 26.0\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $17.8 \%$. The bank's lending to moderate-income borrowers also exceeded the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made $8.8 \%$ of its refinance loans to low-income borrowers. Low-income families make up $20.3 \%$ of total families in the assessment area. The aggregate also had low levels of refinance loans to low-income borrowers; however the bank’s lending to low-income borrowers was greater than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is excellent. The bank's percentage of home refinance lending to moderate-income borrowers at $17.5 \%$ was comparable to the percentage of moderateincome families in the assessment area at $17.8 \%$. Also, the bank’s lending to moderate-income borrowers exceeded the aggregate performance in both 2010 and 2011.

The bank's refinance lending to middle-income borrowers was comparable to the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of loans at $11.3 \%$ was below the percentage of low-income families in the assessment area at $20.3 \%$. The bank's volume of lending was low; however, the bank's performance was better than the aggregate in both 2010 and 2011.

The bank's home improvement lending to moderate-income borrowers is excellent. The bank's percentage of home improvement lending to moderate-income borrowers at $25.4 \%$ exceeded the percentage of moderateincome families in the assessment area at $17.8 \%$. Additionally, the bank's lending to moderate-income borrowers exceeded the aggregate performance in both 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Community Development Lending

Regions Bank makes a low level of community development loans in the Pensacola assessment area. The bank originated four community development loans totaling $\$ 1.7$ million during the review period, comprised of SBA 504 Certified Development Company program loans to local companies. All loans promoted economic development by financing small businesses, an activity that is responsive to local community development

## Pensacola, Florida

needs. Other community development needs include affordable housing targeted to low- and moderate-income individuals, community revitalization/stabilization, and job creation. The bank's community development loan portfolio exhibits relatively poor responsiveness to the needs of low-income individuals and geographies inside the assessment area. Furthermore, the number and the dollar amount of community development loans are poor given the bank's presence in the market.

## Investment Test

The bank's performance in the Pensacola assessment area under the investment test is good. The bank had 11 investments totaling $\$ 8.2$ million, including two current period investments totaling $\$ 4.8$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through GNMA and FNMA investment instruments and several community development program investments. Regional investments primarily funded small businesses and startup companies through SBICs and community revitalization. Local community development needs include but are not limited to neighborhood revitalization and stabilization activities, affordable housing for low- and moderate-income individuals, household financial stability and financial education, small business financing, and job creation. The dollar volume of Regions Bank's current and total investments is good given the bank's presence in the assessment area.

The bank also made 10 contributions totaling $\$ 33,245$. In addition, the bank made several contributions to statewide and national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities and to organizations that promote economic development. Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs.

## Service Test

The bank's service test performance in the Pensacola assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Pensacola assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 18 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank opened one branch (located in a moderate-income tract) and closed four branches (two in moderate-income tracts, one in a middle-income tract, and one in an upper-income tract) in the Pensacola assessment area. The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank has weekend hours in all of its geographies, including low- and moderate-income tracts; the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Pensacola, Florida

## Geographic Distribution of Branches

Assessment Area: FL Pensacola

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branc <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week <br> end <br> Hours <br> \# | Census Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 1 | 5.6\% | 0 | 0 | 1 | 0 | 1 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 3 | 3.9\% | 2.2\% | 3.0\% |
| M oderate | Total | 3 | 16.7\% | 1 | 2 | 3 | 0 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 22 | 28.6\% | 19.1\% | 20.7\% |
| Middle | Total | 11 | 61.1\% | 0 | 1 | 11 | 0 | 5 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 37 | 48.1\% | 56.2\% | 51.3\% |
| Upper | Total | 3 | 16.7\% | 0 | 1 | 3 | 0 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 15 | 19.5\% | 22.5\% | 25.1\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 18 | 100.0\% | 1 | 4 | 18 | 0 | 10 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 77 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 837 service hours in various capacities for community development organizations by participating in 81 community development services. The majority of the community development services focused on activities that promote small businesses and education that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. Furthermore, the majority of these schools are located in low- and moderate-income geographies.

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

The assessment area includes Hillsborough, Pinellas, Pasco and Hernando counties. These four counties make up the Tampa-St. Petersburg-Clearwater, Florida MSA (Tampa MSA). Within the assessment area there are 16 low-, 141 moderate-, 248 middle- and 142 upper-income tracts. As of December 31, 2011, Regions Bank operated 78 branch offices in the Tampa assessment area representing $20.8 \%$ of its branches in Florida. As of June 30, 2011, the bank had approximately $\$ 4.4$ billion in deposits in the Tampa assessment area, representing 22.8\% of Regions Bank's total deposits in Florida.

The Tampa MSA is a competitive banking market dominated by several large institutions, and Regions Bank is an active player. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 74 financial institutions operating 788 branch locations with a total of $\$ 57.6$ billion in deposits. Regions Bank ranked $5^{\text {th }}$ with a deposit market share of $7.6 \%$ ( $\$ 4.4$ billion). Bank of America had the largest deposit market share at $17.2 \%$, followed by Wells Fargo Bank with 16.2\%, SunTrust Bank with 13.6\%, and Raymond James Bank with 12.1\%.

Regions Bank is a CRA and HMDA lending leader in the assessment area. In 2010, the Regions ranked $2^{\text {nd }}$ out of 132 CRA reporters by originating $9.6 \%$ of all CRA loans. In 2011, the bank was also $2^{\text {nd }}$ out of 126 CRA reporters and increased its CRA lending performance to $11.9 \%$ of all CRA loans. From 2010 to 2011, the bank's CRA loans increased from 3,516 to 5,456 loans. For HMDA lending, Regions Bank ranked $6^{\text {th }}$ in 2010 with $2.3 \%$ of all HMDA loans, and $9^{\text {th }}$ in 2011 with $1.7 \%$. Loan production decreased from 1,472 units in 2010 to 1,077 units in 2011. Wells Fargo Bank, Bank of America, and JPMorgan Chase were consistently the top HMDA lenders in the assessment area.

## Demographic Characteristics

Population growth from 2000 to 2010 was robust in all counties across the assessment area with the exception of Pinellas County. Hillsborough, Pasco and Hernando counties all experienced population growth rates higher than the state's growth rate of $17.6 \%$ during this time period. Pinellas County, on the other hand, saw a small decrease in its population. As of 2010, the assessment area's total population was 2.8 million, representing $14.8 \%$ of the state's total population. Hillsborough County, home to the City of Tampa, is the most densely populated county in the assessment area with nearly 1.2 million residents, representing more than $44 \%$ of the assessment area's total population.

The table below shows selected demographic information for the Tampa assessment area.

## Tampa, Florida

## Combined Demographics Report

| Assessment Area: FL Tampa |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 16 | 2.9 |  | 1.8 | 4,315 | 36.6 | 120,832 | 18.8 |
| Moderate-income | 141 | 25.8 | 147,007 | 22.9 | 20,001 | 13.6 | 122,519 | 19.1 |
| Middle-income | 248 | 45.3 | 298,002 | 46.5 | 20,388 | 6.8 | 141,129 | 22.0 |
| Upper-income | 142 | 26.0 | 184,566 | 28.8 | 5,539 | 3.0 | 256,889 | 40.1 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 547 | 100.0 | 641,369 | 100.0 | 50,243 | 7.8 | 641,369 | $100.0$ |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# |  |
| Low-income | 24,803 | $\begin{array}{\|c\|} \hline 5,473 \\ \hline \end{array}$ |  | 22.1 | 15,962 | 64.4 | 3,368 | 13.6 |
| Moderate-income | 283,652 | 156,764 |  | 55.3 | 86,934 | 30.6 | 39,954 | 14.1 |
| Middle-income | 541,338 | 344,900 |  | 63.7 | 134,427 | 24.8 | 62,011 | 11.5 |
| Upper-income | 294,186 | 207,257 |  | 70.5 | 57,599 | 19.6 | 29,330 | 10.0 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 1,143,979 | 714,394 |  | 62.4 | 294,922 | 25.8 | 134,663 | 11.8 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | $\begin{aligned} & \text { Revenue Not } \\ & \text { Reported } \end{aligned}$ |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2,428 | 1.7 |  | 1.6 | 213 | 2.8 | 179 | 2.9 |
| Moderate-income | 33,986 | 24.1 |  | 23.5 | 2,300 | 30.5 | 1,834 | 29.9 |
| Middle-income | 61,561 | 43.7 |  | 43.8 | 3,269 | 43.4 | 2,605 | 42.5 |
| Upper-income | 42,947 | 30.5 |  | 31.2 | 1,750 | 23.2 | 1,506 | 24.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 140,922 | 100.0 |  | 100.0 | 7,532 | 100.0 | 6,124 | 100.0 |
|  | Percentage of | Total B | ness | 90.3 |  | 5.3 |  | 4.3 |
|  | Total Farn |  |  | Farm | by Tract \& R | evenue |  |  |
|  |  |  |  |  | Over \$1 Million |  | Revenue Reporte |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 0.1 |  | 0.1 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 253 | 21.9 |  | 21.4 | 15 | 29.4 | 6 | 26.1 |
| Middle-income | 623 | 53.9 |  | 54.3 | 24 | 47.1 | 12 | 52.2 |
| Upper-income | 279 | 24.1 |  | 24.2 | 12 | 23.5 | 5 | 21.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 1,156 | 100.0 |  | 100.0 | 51 | 100.0 | 23 | 100.0 |
|  | Percentage of | Total F |  | 93.6 |  | 4.4 |  | 2.0 |

[^101]
## Income Characteristics

Food stamp usage increased across the assessment at a rate greater than the state. From 2000 to 2009, the number of food stamp recipients statewide increased $180 \%$ compared to a $216 \%$ increase inside the assessment area. Hernando County saw the largest percentage increase of food stamp recipients at 330\%. Densely populated Hillsborough County saw its number of food stamp recipients increase by $213 \%$ to 184,261 people. Additionally, poverty rates inside the assessment area saw minor increases from 2000 to 2009. All counties in the assessment had a poverty rate lower than the statewide rate of $13.2 \%$, with the exception of Hillsborough County.

Participation in the free and reduced price lunch program also increased. There were a total of four school districts in the assessment area in 2010, three of which had more than $50 \%$ of students participating in the free and reduced price lunch program. The Hernando County School District had the highest percentage of students receiving benefits at $55 \%$; $48 \%$ of students in Pinellas County participated in the program. All four school districts had fewer than $50 \%$ of students participating in 2000.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for years 2010 and 2011 for the Tampa MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper) and shows that the estimated median family income for the assessment area decreased by $\$ 3,700$, or $6.2 \%$, between 2010 and 2011.

## Borrower Income Levels

Tampa-St. Petersburg-Clearwater, FL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$59,400 | 0 | - | \$29,699 | \$29,700 | - | \$47,519 | \$47,520 |  | \$71,279 | \$71,280 |  | \& above |
| 2011 | \$55,700 | 0 | - | \$27,849 | \$27,850 | - | \$44,559 | \$44,560 | - | \$66,839 | \$66,840 |  | \& above |

## Housing Characteristics

The housing crisis had a significant impact on the Tampa assessment area, but housing remained more affordable inside the assessment than statewide. The estimated median home value of an owner-occupied single-family home statewide between 2005 and 2009 was $\$ 211,300$. All four counties in the assessment area had lower values in this category. Pasco and Hernando counties were the lowest at $\$ 161,000$, while Hillsborough County's median value was $\$ 200,600$, and Pinellas County's was $\$ 188,500$. When comparing these numbers to median values in 2000, Pasco County saw the greatest increase with $137 \%$. All other counties experienced increases less than the state rate of $127 \%$. ${ }^{319}$

The impact of the housing crisis on this assessment area and other geographies throughout Florida cannot be understated. For example, in the population center of Hillsborough County, single-family median home prices peaked in 2006 at $\$ 237,000$, and then proceeded to rapidly decline, reaching $\$ 132,500$ in 2011 , a $44 \%$ drop. Median condo prices were hit even harder, dropping $71 \%$ from their peak price of $\$ 179,900$ in 2007 to $\$ 52,000$ in 2011.

[^102]Census data also shows that there were 1,143,979 housing units in the assessment area in 2000, of which $62.4 \%$ were owner-occupied, $25.8 \%$ were rental units, and $11.8 \%$ were vacant. While a majority of units were owneroccupied, a higher percentage of housing units in low- and moderate-income tracts were rental units, indicating reduced opportunities for mortgage origination in these geographies. The median age of housing stock across the assessment area was 24 years, but this figure increased to 32 years in low-income tracts. Housing permit activity declined, with single-family permits reduced by $84 \%$ from 2005 to 2010, although permit activity increased $2.6 \%$ in 2011. Multi-family residential building permits declined $64 \%$ during the same time period and continued to decline into 2011. ${ }^{320}$

Mortgage delinquencies and reduced loan demand have also had an impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $10.3 \%$ in January 2010 to $17.6 \%$ in December $2011 .^{321}$ Furthermore, HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to be weak across the assessment area, declining from a high of 67,604 loans in 2005 to 18,751 in 2010, a reduction of more than $72 \%$. Refinance activity exhibited a similar trend, likely due to loss of equity experienced by homeowners as a result of the housing crisis in Florida. ${ }^{322}$

## Employment and Economic Conditions

Tampa is the largest open water estuary in Florida, encompassing nearly 400 square miles and bordering three counties: Hillsborough, Manatee, and Pinellas. The city of Tampa is Florida's third most populous city, and Hillsborough County is Florida's fourth most populous county. Tampa is known as a tourist destination due to its white sandy beaches. The largest employers located in the Tampa MSA include BayCare Health Care System, TECO Energy Inc., and MacDill Air Force Base. The city is also home to several institutions of higher learning, including the University of South Florida and the University of Tampa (USF), multiple professional sports teams and the theme park Busch Gardens.

Hillsborough County is home to two Enterprise Zones; Pinellas County has one. An Enterprise Zone is a specific geographic area targeted for economic revitalization. Enterprise Zones encourage economic growth and investment in distressed areas by offering tax advantages and incentives to businesses locating within the zone boundaries. Some of the targeted industries in Florida Enterprise Zones include but are not limited to financial services, life sciences, manufacturing, and information technology. ${ }^{323}$

The Institute for Economic Competitiveness at the University of Central Florida (UCF) periodically produces economic forecasts for the state of Florida and regional markets. In its most recent publication, the report suggests that the Florida economy will begin to grow in earnest in 2013. While future growth will be driven by growth of the labor force, much of the reduction in unemployment in recent years was due to labor force contraction. Underemployment is also an indicator of economic well-being. The state of Florida's underemployment rate was $17 \%$ for the third quarter of 2011 through the second quarter of 2012. As the economy grows, this number should decrease along with the unemployment rate. The sectors of the job market expected to experience the strongest average growth over the next three years are construction; professional and business services; trade, transportation and utilities; education and health services and information. Additionally, the statewide population is expected to grow. By 2015, the annual growth rate should hit $1.7 \%$,

[^103]
## Tampa, Florida

which would be the fastest growth rate since 2006. Job growth and baby boomer retirement will likely boost net migration to the state. ${ }^{324}$

For the Tampa economy in particular, the area is expected to show moderate growth moving forward. The UCF economic forecast report indicates that personal income is expected to grow at an average annual rate of $4.6 \%$ while average annual wage growth will be $2.5 \%$. The Tampa area is projected to experience a marginal growth rate of $1.5 \%$. Employment is expected to grow by $1.5 \%$ annually, with the fastest growing sector being the professional and business sector, followed by construction and mining. The other services and federal government sectors are forecast to have negative growth rates in the coming years. Other notable aspects for the regional economy include the Center for Advanced Medical Learning and Simulation, an extension of USF that recently opened in St. Petersburg as a training facility for robotic training. This development is expected to be a boon for the local economy as the Center will attract doctors from around the country for multi-day training programs. Additionally, St. Petersburg is home to Crystal Clear Technologies, one of the fastest-growing private companies in the nation as a provider of IT and cyber-security services to the US military. ${ }^{325}$

In 2010, total employment in the Tampa assessment area was approximately 1.4 million jobs. ${ }^{326}$ Industries with the largest number of employees included health care and social assistance, retail trade, government and government enterprises, and administrative and waste management services. Unemployment continues to present challenges for the local economy. The Tampa market's unemployment rate increased from $4.2 \%$ in 2007 to $10.9 \%$ in 2011. The following table illustrates the unemployment rates for the assessment area and the State of Florida.

## Unemployment Rates

Assessment Area: FL Tampa

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Tampa MSA | 11.8 | 10.9 |
| Florida | $\mathbf{1 1 . 3}$ | $\mathbf{1 0 . 5}$ |

Not Seasonally Adjusted

While the Tampa area economy continues to be challenged with unemployment and housing-related issues like many other Florida markets, it has begun to stabilize since hitting recession lows.

## Community Contacts and Community Development Opportunities

Two community contacts were interviewed in the Tampa assessment area, one specializing in neighborhood revitalization and community development and another with expertise in health and human services. The community development specialist discussed the impact of foreclosures on community members and the increased need for foreclosure counseling for many lower-income homeowners. Additionally, this individual noted that unemployment and underemployment continue to drag on the economy. Regarding financial

[^104]
## Tampa, Florida

institution involvement in local community and economic development initiatives, the contact added that most banks have scaled bank community development lending and are focused on providing employee services.
The health and human services contact described the local economy as depressed, reiterating many of the same points as the previous contact regarding the impact of foreclosures and unemployment. This contact added that many people are leaving Florida due to the bleak economic picture. Additionally, the Bank On initiative was discussed as a means for financial institutions to be responsive to local community development needs, but the contact expressed concern over the lack of a physical presence that banks have in local low- and moderateincome communities.

Bank On is a national initiative with local programs focused on connecting unbanked and under-banked individuals with traditional banking products and services in order to reduce costs and increase financial stability. Bank On St. Pete helps local residents without a checking or savings account learn to manage their money and save for the future. Several financial institutions with a presence in the local market participate in the program. ${ }^{327}$ The organization estimates that $6.8 \%$ of households in St. Petersburg are unbanked and $4.7 \%$ of households in the Tampa MSA are unbanked. Additionally, $19 \%$ of households in the assessment area are listed as under-banked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. ${ }^{328}$

The Florida Prosperity Partnership also has a presence in Tampa in order to increase the financial capacity and stability of residents. The organization defines its purpose as convening individuals and organizations with the desire to leverage their talent, resources, and passion to improve the prosperity of Florida's families. This is accomplished in part by partnering with financial institutions to promote the benefits of mainstream banking and rolling out the "Bank On" program throughout Florida.

The state of Florida received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. The City of Tampa received $\$ 13.6$ million under the NSP1 allocation process and $\$ 4.7$ million under NSP3. NSP1 funds were acquired to purchase and rehabilitate residential properties in targeted neighborhoods with high incidences of foreclosure, resulting in affordable rental and home purchase units for income-qualified individuals. The NSP3 funds are being used for targeted rehabilitation of multi-family rental unit foreclosures. ${ }^{329}$ Other government entities in the assessment area received NSP funding as well.

There are 16 certified community development financial institutions (CDFIs) located in the state of Florida, comprised of credit unions and loan funds. Three CDFIs are located in Tampa, all of which administer loan funds. Community development opportunity also includes participation in the Low Income Housing Tax Credit (LIHTC) Program, which provided an estimated $\$ 41.6$ million in tax credits to the state of Florida in 2012 for the provision of affordable housing. ${ }^{330}$ The state of Florida does not offer a separate LIHTC program for affordable housing development.

[^105]
## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

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

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 8,887 (77.7\%) small business loans compared to 2,549 (22.3\%) HMDA loans in the Tampa assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The Tampa assessment area contains $5.9 \%$ of the bank's small business and HMDA lending by number of loans and $4.6 \%$ by dollar volume, totaling $\$ 1.0$ billion. In comparison, $4.5 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of small business and HMDA loans is adequate. For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderateincome census tracts, were considered when assessing the bank's performance; the performance of the aggregate lenders was also considered.

Regions Bank originated no home refinance or home improvement loans in low-income tracts in 2010. In 2011, Regions Bank originated only one home refinance loan and one home improvement loan in low-income tracts. Aggregate lenders also had a very minimal level of home refinance and home improvement loans in 2010 and 2011 compared to the percentage of owner-occupied units, which was only $0.8 \%$. This suggests limited opportunities for these types of loans in low-income tracts and, therefore, minimal weight was given to this performance area.

## Small Business Loans

Regions Bank's small business lending in low-income tracts is poor. During the review period, Regions Bank originated $0.9 \%$ of its small business loans in low-income census tracts, which contain $1.6 \%$ of the small businesses in the assessment area. Additionally, the bank's performance was below the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is good. During the review period, Regions Bank originated $20.9 \%$ of its small business loans in moderate-income census tracts, which contain $23.5 \%$ of the small businesses in the assessment area. Additionally, the bank's performance was equal to the aggregate in 2010 and slightly greater than the aggregate in 2011.

The bank's small business lending in both middle- and upper-income tracts was greater than the percentage of small businesses located in these tracts.

## Tampa, Florida

## Home Purchase Loans

Home purchase lending in low-income census tracts is good. Regions Bank originated $0.7 \%$ of its home purchase loans in low-income tracts, which contain $0.8 \%$ of the owner-occupied units. The bank's performance was better than the aggregate in both 2010 and 2011.

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $12.3 \%$ of its home purchase loans in moderate-income census tracts, which contain $21.9 \%$ of the owner-occupied units in the assessment area. The bank's performance was below the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income tracts is adequate. During the review period, the bank originated $10.3 \%$ of its home refinance loans in moderate-income tracts, which contain $21.9 \%$ of the owner-occupied units. Regions Bank’s performance was slightly less than the aggregate in 2010 and greater than the aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $17.0 \%$ of its home improvement loans in moderate-income tracts, which contain $21.9 \%$ of the owneroccupied units in the assessment area. Regions Bank’s performance was less than the aggregate in 2010 and comparable to the aggregate in 2011.

The bank's home improvement lending in both middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. Regions Bank’s performance significantly exceeded the aggregate in the percentage of small business loans originated to small businesses in 2010. Subsequently, the bank's performance decreased and was less than the aggregate in 2011. Additionally, the bank originated $35.6 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $90.3 \%$. However, of the 8,887 small business loans originated during the review period, 4,232 loans (47.6\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $68.1 \%$, which is less than the percentage of businesses in the Tampa assessment area that are considered small businesses at $90.3 \%$. However, $90.8 \%$ of the 8,887
originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in both 2010 and 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is good. The bank made $9.8 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $18.8 \%$ of total families in the assessment area. However, the bank exceeded the aggregate performance both in 2010 and 2011.

Home purchase lending to moderate-income borrowers is also good. At $22.0 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at 19.1\%. Although the bank's performance was less than the aggregate in 2010, the bank outperformed the aggregate in 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank's percentage of home refinance lending to low-income borrowers at $6.5 \%$ was less than the percentage of low-income families in the assessment area at $18.8 \%$. However, the aggregate also had low levels of home refinance loans compared to the percentage of low-income families in the assessment area. Additionally, the bank's lending to low-income borrowers exceeded the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is adequate. The bank made $13.1 \%$ of its refinance loans to moderate-income borrowers. Moderate-income families make up $19.1 \%$ of total families in the assessment area. However, the bank's performance exceeded the aggregate in 2010 and was comparable to the aggregate in 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is good. The bank made $15.8 \%$ of its home improvement loans to low-income borrowers. Low-income families make up $18.8 \%$ of total families in the assessment area. The bank’s lending to low-income borrowers was greater than the aggregate in 2010 and less than the aggregate in 2011. The aggregate lenders also had low levels of home improvement loans to lowincome borrowers compared to demographics.

Home improvement lending to moderate-income borrowers is also good. At 21.1\%, the bank's percentage of home improvement lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $19.1 \%$. The bank's lending to moderate-income borrowers was slightly less than the aggregate in 2010 and equal to the aggregate in 2011.

## Tampa, Florida

The bank's home improvement lending to middle-income borrowers was less than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Tampa assessment area. The bank originated 32 community development loans totaling $\$ 44.1$ million during the review period. The majority of the loans promote economic development by financing small businesses or finance affordable housing for low- and moderate-income individuals. Local community development needs include but are not limited to affordable housing for low- and moderate-income individuals, small business finance, and neighborhood stabilization tied to elevated foreclosure rates. The bank's community development portfolio exhibits good responsiveness to local community credit needs. The number and the dollar amount of loans are good considering the bank's presence in the market

Examples of community development lending include the following:

- Numerous loans that promote economic development by financing small business as part of the SBA's 504 Certified Development Company program;
- Two loans to a local lending consortium engaged in the development of affordable multi-family housing, resulting in 30 housing units restricted to tenants with incomes of $60 \%$ or less of the area median income (AMI);
- One loan to purchase and rehab a building for a community health care organization in Pinellas County that provides quality affordable health care to low- and moderate-income individuals; and
- One loan for the construction and rehab of a daycare facility located in a moderate-income census tract.


## Investment Test

The bank's performance in the Tampa assessment area under the investment test is excellent. The bank had 16 investments totaling $\$ 50.6$ million, including one current period investment of $\$ 38.0$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for community revitalization through the purchase of a Qualified School Construction Bond and for affordable housing through FNMA and GNMA investment instruments and Low Income Housing Tax Credits (LIHTCs). Regional investments primarily funded small businesses and startup companies through investments in SBICs and community revitalization. Local community development needs include but are not limited to neighborhood revitalization and stabilization activities, affordable housing for low- and moderate-income individuals, household financial stability and financial education, and small business financing. The dollar volume of Regions Bank's current and total investments is excellent given the bank's presence in the assessment area.

The bank also made 33 contributions and one in-kind donation totaling $\$ 87,150$. In addition, the bank made several contributions to statewide and national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to lowand moderate-income individuals and communities.

Regions Bank’s investment portfolio and contributions are responsive to several of the identified community development needs. Examples include:

- The purchase of a Qualified School Construction Bond that will fund renovations at public schools in Hillsborough County that serve primarily low- and moderate-income students;


## Tampa, Florida

- Contributions to local nonprofit organizations that provide financial counseling, homeownership assistance, and free tax assistance for low- and moderate-income individuals; and
- An in-kind donation of a single-family house to a nonprofit organization to use for providing affordable housing.


## Service Test

The bank's service test performance in the Tampa assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Tampa assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 78 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank closed five branches (two in moderate-income tracts, two in middle-income tracts, and one in an upper-income tract) in the Tampa assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in low- or moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

## Geographic Distribution of Branches

Assessment Area: FL Tampa

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | I Branch $\%$ | es <br> Open <br> \# | Closed <br> \# | Drive thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
| Low | Total | 1 | 1.3\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 16 | 2.9\% | 2.1\% | 1.7\% |
| Moderate | Total | 20 | 25.6\% | 0 | 2 | 18 | 18 | 6 |  |  |  |  |
|  | DTO LS | 1 0 |  | 0 | 0 | 1 |  |  | 141 | 25.8\% | 24.1\% | 24.1\% |
| Middle | Total | 36 | 46.2\% | 0 | 2 | 36 | 36 | 12 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 248 | 45.3\% | 47.5\% | 43.7\% |
| Upper | Total | 21 | 26.9\% | 0 | 1 | 21 | 21 | 10 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 0 | 0 |  |  | 142 | 26.0\% | 26.3\% | 30.5\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 78 | 100.0\% | 0 | 5 | 76 | 76 | 28 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 1 \\ & 0 \end{aligned}$ |  | 0 | 0 0 | 1 |  |  | 547 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 1,409 service hours in various capacities for community development organizations by participating in 204 community development services. Many of the community development services focused on education, affordable housing, youth services, and various other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by teaching financial education classes to elementary and middle school students. The majority of these schools have a high number of students on free or reduced price lunch programs. Furthermore, the majority of these schools are located in low- and moderateincome geographies. In addition, Regions Bank employees served on the boards of directors and committees of various community organizations which provide services in low- and moderate-income geographies or to lowand moderate-income individuals.

## Metropolitan Areas (Limited Review)

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

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

## - Daytona Assessment Area (Volusia County)

o As of December 31, 2011, Regions Bank operated nine branches in the assessment area, representing $2.4 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 377.0$ million in deposits in this assessment area, representing a market share of $4.6 \%$ and $2.0 \%$ of Regions Bank's total deposits in Florida.

- Ft. Lauderdale Assessment Area (Broward County)
o As of December 31, 2011, Regions Bank operated 19 branches in the assessment area, representing $5.1 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 1.0$ billion in deposits in this assessment area, representing a market share of $2.7 \%$ and $5.3 \%$ of Regions Bank's total deposits in Florida.
- Ft. Myers Assessment Area (Lee County)
o As of December 31, 2011, Regions Bank operated 11 branches in the assessment area, representing $2.9 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 367.4$ million in deposits in this assessment area, representing a market share of $3.2 \%$ and $1.9 \%$ of Regions Bank’s total deposits in Florida.
- Ft. Walton Assessment Area (Okaloosa County)
o As of December 31, 2011, Regions Bank operated seven branches in the assessment area, representing $1.9 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 515.3$ million in deposits in this assessment area, representing a market share of $14.6 \%$ and $2.7 \%$ of Regions Bank's total deposits in Florida.
- Gainesville Assessment Area (Alachua County)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing $0.8 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 69.8$ million in deposits in this assessment area, representing a market share of $2.1 \%$ and $0.4 \%$ of Regions Bank's total deposits in Florida.
- Lakeland Assessment Area (Polk County)
o As of December 31, 2011, Regions Bank operated six branches in the assessment area, representing $1.6 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 159.8$ million in deposits in this assessment area, representing a market share of $2.8 \%$ and $0.8 \%$ of Regions Bank’s total deposits in Florida.
- Miami Assessment Area (Dade County)
o As of December 31, 2011, Regions Bank operated 48 branches in the assessment area, representing $12.8 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 3.4$ billion in deposits in this assessment area, representing a market share of $4.1 \%$ and $17.5 \%$ of Regions Bank's total deposits in Florida.
- Naples Assessment Area (Collier County)
o As of December 31, 2011, Regions Bank operated 11 branches in the assessment area, representing $2.9 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 693.7$ million in deposits in this assessment area, representing a market share of $7.0 \%$ and $3.6 \%$ of Regions Bank's total deposits in Florida.


## - Ocala Assessment Area (Marion County)

## Metropolitan Areas (Limited Review)

o As of December 31, 2011, Regions Bank operated 12 branches in the assessment area, representing 3.2\% of its branches in Florida.
o As of June 30, 2012, the bank had $\$ 915.1$ million in deposits in this assessment area, representing a market share of $18.6 \%$ and $4.8 \%$ of Regions Bank's total deposits in Florida.

- Palm Bay Assessment Area (Brevard County)
o As of December 31, 2011, Regions Bank operated 11 branches in the assessment area, representing $2.9 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 408.3$ million in deposits in this assessment area, representing a market share of $5.4 \%$ and $2.1 \%$ of Regions Bank's total deposits in Florida.
- Panama City Assessment Area (Bay County)
o As of December 31, 2011, Regions Bank operated ten branches in the assessment area, representing $2.7 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 820.8$ million in deposits in this assessment area, representing a market share of $32.1 \%$ and $4.3 \%$ of Regions Bank's total deposits in Florida.
- Punta Gorda Assessment Area (Charlotte County)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $1.1 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 172.8$ million in deposits in this assessment area, representing a market share of $5.6 \%$ and $0.9 \%$ of Regions Bank's total deposits in Florida.
- Sarasota Assessment Area (Manatee and Sarasota Counties)
o As of December 31, 2011, Regions Bank operated 16 branches in the assessment area, representing $4.3 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 624.0$ million in deposits in this assessment area, representing a market share of $3.8 \%$ and $3.2 \%$ of Regions Bank's total deposits in Florida.
- Tallahassee Assessment Area (Leon County)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing $1.3 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 233.2$ million in deposits in this assessment area, representing a market share of $4.7 \%$ and $1.2 \%$ of Regions Bank's total deposits in Florida.


## - West Palm Beach Assessment Area (Palm Beach County)

o As of December 31, 2011, Regions Bank operated 13 branches in the assessment area, representing $3.5 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 451.9$ million in deposits in this assessment area, representing a market share of $1.2 \%$ and $2.3 \%$ of Regions Bank'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 tables below. Please refer to the tables in Appendix G for information regarding these areas.

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Daytona | Not Consistent <br> (Below) | Consistent | Consistent |
| Ft. <br> Lauderdale | Consistent | Not Consistent (Below) | Consistent |
| Ft. Myers | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Ft. Walton | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Above) |
| Gainesville | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Above) |
| Lakeland | Consistent | Consistent | Consistent |
| Miami | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Naples | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Ocala | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Above) |
| Palm Bay | Consistent | Consistent | Consistent |
| Panama City | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Punta Gorda | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Sarasota | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Above) |
| Tallahassee | Not Consistent <br> (Below) | Consistent | Not Consistent (Below) |
| West Palm | Not Consistent <br> (Below) | Not Consistent (Below) | Neach |

The Jacksonville, Orlando, Pensacola and Tampa assessment areas received full-scope reviews, and the bank's performance in the Tampa assessment area was given greater consideration in determining the overall rating for the state. Tampa is by far the bank's largest market in Florida in terms of deposits, loans, and branches. The full-scope areas selected together represent $42.7 \%$ of the deposits in the assessment areas in Florida as well as $45.9 \%$ of the branches. The full-scope assessment areas also represent $35.1 \%$ of the HMDA loans and $52.7 \%$ of the small business loans in the state. Therefore, the four full-scope assessment areas represent a large portion of the deposits, branches and loans in the State of Florida.

## Metropolitan Areas (Limited Review)

For the Lending Test, performance was weaker than the bank’s performance in the state in 12 of the limitedscope assessment areas (Daytona, Ft. Myers, Ft. Walton, Gainesville, Miami, Naples, Ocala, Panama City, Punta Gorda, Sarasota, Tallahassee, and West Palm Beach) and consistent in the bank's performance in the remaining limited-assessment areas (Ft. Lauderdale, Lakeland, and Palm Bay). The distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Daytona and Gainesville assessment areas. The distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Ft. Walton, Panama City, Punta Gorda and West Palm Beach assessment areas. Lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Sarasota assessment area. The distribution of loans by borrower's income contributed to weaker performance in the Naples and Tallahassee assessment areas. The low level of lending to low- and moderate-income borrower contributed to weaker performance in the Ft. Myers, Miami, and Ocala assessment areas.

For the Investment Test, the performance in 11 limited-scope assessment areas (Ft. Lauderdale, Ft. Myers, Ft. Walton, Gainesville, Miami, Naples, Ocala, Panama City, Punta Gorda, Sarasota, and West Palm Beach) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas. The performance in the remaining limited-scope assessment areas (Daytona, Lakeland, Palm Bay, and Tallahassee) was consistent with the bank's performance in the state.

For the Service Test, the performance in four limited-scope assessment areas (Ft. Walton, Gainesville, Ocala, and Sarasota) was stronger than the bank's performance in the state. The performance in one limited-scope assessment area (West Palm Beach) was weaker than the bank's performance in the state due to fewer community development services. The performance in the remaining limited-scope assessment areas was consistent with the bank's performance in the state.

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

## Non-Metropolitan Areas (Limited Review)

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

## INSTITUTION'S OPERATIONS IN THE FLORIDA NON-METROPOLITAN ASSESSMENT AREAS

- Citrus Assessment Area (Citrus and Sumter Counties)
o As of December 31, 2011, Regions Bank operated six branches in the assessment area, representing $1.6 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 387.7$ million in deposits in this assessment area, representing a market share of $10.6 \%$ and $2.0 \%$ of Regions Bank's total deposits in Florida.
- Northern Florida Assessment Area (Calhoun, Holmes, Jackson, Walton and Washington Counties)
o As of December 31, 2011, Regions Bank operated 11 branches in the assessment area, representing $2.9 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 384.9$ million in deposits in this assessment area, representing a market share of $22.8 \%$ and $2.0 \%$ of Regions Bank's total deposits in Florida.
- Okeechobee Assessment Area (Okeechobee County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $0.3 \%$ of its branches in Florida.
o As of June 30, 2011, the bank had $\$ 44.4$ million in deposits in this assessment area, representing a market share of $9.4 \%$ and $0.2 \%$ of Regions Bank'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 tables below. Please refer to the tables in Appendix G for information regarding these areas.

| Nonmetropolitan Assessment Areas |  |  |  |
| :--- | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Citrus | Consistent | Consistent | Consistent |
| Northern Florida | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Above) |
| Okeechobee | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Below) |

As stated earlier, the Jacksonville, Orlando, Pensacola and Tampa assessment areas received full-scope reviews, and the bank's performance in the Tampa assessment area was given greater consideration in determining the overall rating for the state. Tampa is by far the bank's largest market in Florida in terms of deposits, loans, and branches. The full-scope areas selected together represent $42.7 \%$ of the deposits in the assessment areas in Florida, as well as $45.9 \%$ of the branches. The full-scope assessment areas also represent $35.1 \%$ of the HMDA loans and $52.7 \%$ of the small business loans in the state. Therefore, the four full-scope assessment areas represent a large portion of the deposits, branches and loans in the State of Florida.

For the lending test, performance was weaker than the bank's performance in the state in two of the limitedscope assessment areas (Northern Florida and Okeechobee). The distribution of loans by borrower’s income

## Non-Metropolitan Areas (Limited Review)

and lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in these two assessment areas.

For the Investment Test, the performance in two limited-scope assessment areas (Northern Florida and Okeechobee) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in one limited-scope assessment area (Northern Florida) was stronger than the bank's performance in the state. The performance in the Okeechobee assessment area was weaker than the bank's performance in the state due to fewer community development services. The performance in the remaining limited-scope assessment area (Citrus) was consistent with the bank's performance in the state.

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

## CRA RATING FOR GEORGIA: Satisfactory ${ }^{331}$

## The Lending Test is rated: High Satisfactory <br> The Investment Test is rated: The Service Test is rated: <br> High Satisfactory <br> High Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment areas. In addition, the distribution of borrowers reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas and is occasionally in a leadership position in response to the community development needs of the assessment areas.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides a relatively high level of community development services throughout the assessment areas.

[^106]
## Georgia

## SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in the State of Georgia:

- Atlanta
- Northeast Georgia (non-MSA)

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

- Albany
- Athens
- Dalton
- Gainesville
- Jefferson-Jenkins (non-MSA)
- Morgan-Elbert-Wilkes (non-MSA)
- Northwest Georgia (non-MSA)
- Rome
- Savannah
- Southwest Georgia (non-MSA)
- Valdosta

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 GEORGIA

Lending activity in Georgia accounted for 6.5\% of the bank's total lending activity. HMDA lending in Georgia represented $7.9 \%$ of the bank's total HMDA lending, while small business lending represented $5.5 \%$ of the bank's total small business lending. As of June 30, 2011, the bank had $\$ 5.5$ billion in deposits in Georgia accounting for $5.6 \%$ of Regions Bank's total deposits. Additionally, as of June 30, 2011, the bank ranked $6^{\text {th }}$ among 292 insured institutions, in deposit market share, with $3.3 \%$ of the deposits within the state. As of December 31, 2011, Regions Bank operated 117 branch offices in Georgia representing $6.8 \%$ of the bank's total branches.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of Georgia is High Satisfactory. Lending activity reflects good responsiveness to assessment area credit needs. Given the volume of loans, branches, and deposits in the Atlanta assessment area, the performance in this area drove the overall statewide rating, although performance within each assessment area was considered. HMDA lending performance was given the most weight, followed by small business lending. Small farm lending is not presented in this report due to the bank's minimal lending activity in Georgia for this product.

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

## Lending Activity

Lending levels reflect good responsiveness to the credit needs of the Georgia assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

# Statewide Summary of Lending Activity 

Assessment Areas Located in
Georgia

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s})$ | $\mathbf{\%}$ |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 2,159 | $16.7 \%$ | $\$ 374,376$ | $21.2 \%$ |
| HMDA Refinance | 4,225 | $32.7 \%$ | $\$ 773,487$ | $43.7 \%$ |
| HMDA Home Improvement | 466 | $3.6 \%$ | $\$ 4,047$ | $0.2 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{6 , 8 5 0}$ | $\mathbf{5 3 . 0} \%$ | $\mathbf{\$ 1 , 1 5 1 , 9 1 0}$ | $\mathbf{6 5 . 1 \%}$ |
| Total Small Business | $\mathbf{5 , 9 2 8}$ | $\mathbf{4 5 . 8} \%$ | $\mathbf{\$ 5 9 8 , 9 7 1}$ | $\mathbf{3 3 . 9 \%}$ |
| Total Farm | $\mathbf{1 5 4}$ | $\mathbf{1 . 2 \%}$ | $\mathbf{\$ 1 7 , 2 5 4}$ | $\mathbf{1 . 0 \%}$ |
| TOTAL LOANS | $\mathbf{1 2 , 9 3 2}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 1 , 7 6 8 , 1 3 5}$ | $\mathbf{1 0 0 . 0} \%$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank’s HMDA and small business loans is good. The geographic distribution was good in Atlanta. Although there are no low- or moderate-income census tracts in the Northeast Georgia assessment area, an evaluation of the geographic distribution was conducted based on lending in middle- and upper-income tracts. The bank's geographic distribution performance in Northeast Georgia was adequate.

Overall, the distribution of loans by borrower's income and revenue size of business is good. The borrower distribution is considered good in both Atlanta and Northeast Georgia. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Georgia assessment areas. The bank made 28 community development loans totaling $\$ 54.9$ million during the review period, which represented $4.1 \%$ by number and $3.9 \%$ by dollar amount of the bank's community development lending. The majority of the loans promoted economic development by financing small businesses or financed activities that help to revitalize or stabilize low- and moderate-income geographies. Although the bank made an adequate level of community development loans in the Atlanta assessment are, there was no community development lending in the Northeast Georgia assessment area. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating is High Satisfactory when considering the bank's statewide performance and its overall presence in the State of Georgia. The bank made significant use of qualified investments and contributions. The bank exhibited good responsiveness to credit and community development needs through its
investment activities in the Atlanta assessment area, while performance in the Northeast Georgia assessment area was adequate.

The bank made 25 qualified investments of approximately $\$ 55.7$ million and contributions of $\$ 228,850$ within the Georgia assessment areas. Of the 25 investments, 7 totaling $\$ 39.6$ million were current period investments. Most of the investments provided support for community development and affordable housing through HUD bonds, GNMA and FNMA investment instruments, and the purchase of Low Income Housing Tax Credits (LIHTCs) or investments in LIHTC funds. The bank also had investments that benefitted its footprint or a broader regional area that includes Georgia. The broader regional investments primarily funded small businesses and startup companies through SBICs and community revitalization through a New Markets Tax Credit fund. In addition to the contributions specific to the assessment areas, the bank made a $\$ 1,000$ contribution to an organization that provides affordable housing across the state, including the bank's assessment areas.

## Service Test

The service test rating is High Satisfactory when considering the bank's statewide performance in Georgia.

## Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or to low- and moderate-income individuals. The record of opening and closing of offices has not affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies or low- and moderate-income individuals.

## Community Development Services

The bank provides a relatively high level of community development services that benefit residents and small businesses of the assessment areas. Out of the two full-scope assessment areas, community development services were good in both the Atlanta and Northeast Georgia assessment areas.

## METROPOLITAN AREA

(Full-scope Review)

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

The Atlanta assessment area consists of 21 counties that are part of the 28 -county Atlanta-Sandy SpringsMarietta, GA MSA, including Barrow, Bartow, Carroll, Cherokee, Cobb, Clayton, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Paulding, Pickens, Rockdale, and Spalding. As of December 2011, Regions Bank had 69 branches in the Atlanta assessment area, with 1 in lowincome census tracts, 17 in moderate-income tracts, and 24 additional branches bordering low- and moderateincome tracts.

The assessment area banking market is competitive with a significant presence of national and multi-regional banks. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 106 financial institutions operating 1,316 branch locations in the assessment area. SunTrust Bank held the largest deposit market share of 25.9\% (\$29.3 million) followed by Wells Fargo Bank (20.1\%), and Bank of America (17.2\%). Regions Bank ranked $5^{\text {th }}$ with $3.1 \%$ of the market and $\$ 3.4$ billion in deposits. Regions Bank operates a large branch network covering a broad geography in the Atlanta metro region, yet the bank holds a small share of the market, which has declined slightly over the past few years.

Regions Bank increased small business lending in the Atlanta market over the evaluation period. In 2010, Regions ranked $12^{\text {th }}$ out of 153 small business loan reporters with 1,035 loans or $1.5 \%$ of the market. Regions increased small business lending in 2011 primarily through the purchase of loans and was ranked $7^{\text {th }}$ out of 152 reporters with 2,563 or $2.9 \%$ of the total loans. American Express is the dominant small business loan reporter in the market, followed by Wells Fargo Bank, Capital One, and Chase Bank.

For HMDA lending, Regions ranked $16^{\text {th }}$ in 2010 with $1.2 \%$ of total loans, and fell to $19^{\text {th }}$ in 2011 with less than $1 \%$ of all HMDA loans. Wells Fargo, Bank of America, JPMorgan Chase, and SunTrust Mortgage were the leading HMDA reporters in the market in 2011.

## Demographic Characteristics

The Atlanta assessment area contains 651 census tracts; 2000 census data indicates that there are 72 (11.1\%) low-income census tracts, 164 (25.2\%) moderate-income tracts, 233 (35.8\%) middle-income tracts, and 182 (28.0\%) upper-income tracts. The following table provides the demographic information for the assessment area used to analyze the bank's CRA performance.

## Atlanta, Georgia

## Combined Demographics Report

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 72 | 11.1 |  | 4.9 | 17,232 | 33.9 | 201,821 | 19.6 |
| Moderate-income | 164 | 25.2 |  | 21.1 | 25,659 | 11.8 | 183,314 | 17.8 |
| Middle-income | 233 | 35.8 |  | 40.7 | 20,326 | 4.8 | 227,821 | 22.1 |
| Upper-income | 182 | 28.0 |  | 33.3 | 7,606 | 2.2 | 417,621 | 40.5 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 651 | 100.0 |  | 100.0 | 70,823 | 6.9 | 1,030,577 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 92,940 | 4,330 |  | 26.2 | 58,338 | 62.8 | 10,272 | 11.1 |
| Moderate-income | 353,189 | 163,605 |  | 46.3 | 167,476 | 47.4 | 22,108 | 6.3 |
| Middle-income | 620,297 | 420,030 |  | 67.7 | 171,295 | 27.6 | 28,972 | 4.7 |
| Upper-income | 500,003 | 373,726 |  | 74.7 | 102,705 | 20.5 | 23,572 | 4.7 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 1,566,429 | 981,691 |  | 62.7 | 499,814 | 31.9 | 84,924 | 5.4 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 11,653 | 4.3 |  | 4.0 | 835 | 5.8 | 835 | 6.8 |
| Moderate-income | 48,640 | 17.8 |  | 17.6 | 2,724 | 19.0 | 2,486 | 20.2 |
| Middle-income | 107,265 | 39.2 |  | 39.6 | 5,215 | 36.3 | 4,445 | 36.1 |
| Upper-income | 105,879 | 38.7 |  | 38.8 | 5,581 | 38.9 | 4,561 | 37.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 273,437 | 100.0 |  | 100.0 | 14,355 | 100.0 | 12,327 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 90.2 |  | 5.2 |  | 4.5 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 21 | 1.5 |  | 1.4 | 1 | 4.0 | 0 | 0.0 |
| Moderate-income | 290 | 20.2 |  | 20.0 | 9 | 36.0 | 3 | 15.8 |
| Middle-income | 681 | 47.4 |  | 47.6 | 12 | 48.0 | 6 | 31.6 |
| Upper-income | 445 | 31.0 |  | 31.0 | 3 | 12.0 | 10 | 52.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 1,437 | 100.0 |  | 100.0 | 25 | 100.0 | 19 | 100.0 |
|  | Percentage of Total Farms: |  |  | 96.9 |  | 1.7 |  | 1.3 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Atlanta, Georgia

## Income Characteristics

The Atlanta metro area is the largest in the Southeast and one of the fastest growing regions in the country. Between 2000 and 2010, metro Atlanta (the 10 counties surrounding the city of Atlanta) was the third fastest growing region in the country, behind Dallas and Houston. ${ }^{332}$ Between 2010 and 2011, the region ranked $7^{\text {th }}$ nationally in total population added. ${ }^{333}$ US census data indicate the population in the assessment area in 2010 was $4,989,401 .{ }^{334}$ The largest population centers are in Fulton, Gwinnett, Cobb, and DeKalb counties.
Much of the growth has occurred in the northern, suburban counties, and in particular, Gwinnett County. Between 2000 and 2010, Gwinnett County’s population increased by $37 \%$ from 588,448 to 808,291. According to the 2010 census, Gwinnett County had the $18^{\text {th }}$ largest population gain in the nation between 2000 and 2010. While the suburban counties grew significantly, the area around the urban core of Atlanta, inside the perimeter and south of I-20, lost population in the last decade. Much of the population growth has come from non-white races and Hispanics, resulting in a much more diverse region. ${ }^{335}$

Incomes rose in the last decade, but there is significant variation in the median family income in the counties throughout the assessment area. Median family income was highest in the largest urban and suburban counties and lowest in the smaller rural counties. Haralson County had the lowest median family income in 2009 at $\$ 44,547$ while Forsyth County was the highest at $\$ 95,955$. In the largest population centers, median family income in 2009 ranged from $\$ 61,259$ in DeKalb County up to $\$ 77,370$ in Fulton County. ${ }^{336}$

For the purposes of this analysis, HUD's median family income for the entire Atlanta MSA for 2010 and 2011 is used. As shown, the median family income for the MSA declined between 2010 and 2011, from $\$ 71,800$ to $\$ 68,300$. The following table provides a breakdown of the estimated annual income based on income level.

## Borrower Income Levels <br> Atlanta-Sandy Springs-Marietta, GA MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% |  | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$71,800 | 0 | - | \$35,899 | \$35,900 | - | \$57,439 | \$57,440 | - | \$86,159 | \$86,160 |  | \& above |
| 2011 | \$68,300 | 0 | - | \$34,149 | \$34,150 | - | \$54,639 | \$54,640 |  | \$81,959 | \$81,960 |  | \& above |

## Housing Characteristics

The Atlanta metro area was severely impacted by the housing market downturn. The region has experienced many of the challenges seen across the country, including significant price depreciation, declining sales and increasing foreclosures. Home prices in metro Atlanta fell by 6\% in 2010 and 9\% in 2011, making Atlanta one

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## Atlanta, Georgia

of the regions with the greatest price depreciation in the country. ${ }^{337}$ Housing price decline varies throughout the assessment area, with the sharpest declines occurring in Barrow, Douglas and Gwinnett Counties. ${ }^{338}$ The median home value for all single-family homes in 2011 was $\$ 98,600 .{ }^{339}$

Most counties in the assessment area have seen a slight improvement in repeat home sales in 2011 over 2010, but overall, home sales remain just a fraction of the peak levels seen in the mid-2000s. ${ }^{340}$ Distressed sales represent approximately $40 \%$ of all existing home sales in the Atlanta market, which has contributed to the depressed sales prices. ${ }^{341}$ New home construction has slowed dramatically throughout the assessment area, but activity did appear to be picking up in 2011 in several counties, particularly in Fulton and Forsyth counties. ${ }^{342}$ There is a large inventory of new homes throughout the assessment area, particularly in Fulton, Gwinnett, Forsyth, and Cobb counties. At the end of 2011, the larger counties in the assessment area had between a 9- and 18 -month supply of new homes available, indicating that new residential construction will be limited in the foreseeable future. ${ }^{343}$

Homeowners in Atlanta continue to struggle with foreclosures and mortgage delinquencies, and the rate of seriously delinquent mortgages (those more than 90 days past due and in foreclosure) is significantly above the state and national average. Throughout the assessment area, the percentage of seriously delinquent mortgages continued to rise throughout 2010 and 2011, reaching a high of $11.2 \%$ in December 2011. The percentage of seriously delinquent mortgages was highest in Rockdale (16.4\%) and Douglas (15.6\%) and lowest in Forsyth County (5.7\%). ${ }^{344}$ Almost $40 \%$ of mortgages in the Atlanta metro area were underwater at the end of 2011, indicating that there is still a significant risk of additional foreclosures. ${ }^{345}$

Homeownership rates throughout the assessment area vary significantly. According to the 2010 census, Forsyth, Fayette and Paulding counties had the highest homeownership rates (exceeding 82\% in all counties), and Fulton County, the most urban county, had the lowest rate at $53.7 \%{ }^{346}$ Housing vacancy has increased in the last few years in both urban and more rural counties. In Dawson County, over 19\% of the housing units were vacant, and in Fulton County, the core of the Atlanta metro area, approximately 14\% of the housing units were vacant in $2010 .{ }^{347}$ The median age of the housing stock varies significantly throughout the assessment area. The oldest housing stock is found in Fulton and DeKalb counties (31 and 33 years), and Forsyth County is by far the youngest community, with a median housing age of 15 years. ${ }^{348}$

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## Employment and Economic Conditions

The Atlanta MSA is the $8^{\text {th }}$ largest metro area in the country, with more than 3 million jobs. Metro Atlanta consistently ranks in the top five regions with the most Fortune 500 headquarters and is currently home to 10 Fortune 500 companies. ${ }^{349}$ Delta Airlines, AT\&T, Emory University, Cox Enterprises, UPS, and WellStar Health Systems are the largest private employers in the region. Other major companies, including Coca Cola and Home Depot, are headquartered in Atlanta. All together, the 20 largest employers in the region employ over 200,000 people. ${ }^{350}$ The Atlanta economy is highly diverse with sectors including retail and wholesale trade, health care, accommodation and food services, services (administrative, professional and technical), finance, construction, transportation and warehousing, information, and local government. Within the assessment area, Fulton, Gwinnett, DeKalb and Cobb counties are the largest employment centers. ${ }^{351}$
The recession had a significant impact on metro Atlanta. From 2008 through 2010, the region lost 194,000 jobs-and job loss continued in to 2011. ${ }^{352}$ In fact, the Atlanta region lost more jobs in the 12-month period from August 2010 to August 2011 than any other metro area in the country. ${ }^{353}$ Most of the job losses in the region have occurred in finance and construction. State and local government budget cuts have also led to a decline in government sector employment. ${ }^{354}$ Since 2010, jobs have been added in transportation, administrative services, health care, educational services, and finance and insurance. ${ }^{355}$

As shown in the chart below, unemployment rates fell in all counties in the assessment area between 2010 and 2011. However, there is variation in unemployment rate across the assessment area, and some counties are still facing significant challenges. In the Atlanta MSA, unemployment fell from $10.2 \%$ to $9.6 \%$ between 2010 and 2011. The highest unemployment rates were in Spalding (12.5\%) and Clayton (12.2\%) counties. Forsyth County had the lowest unemployment rate at $7.3 \%$. Statewide, the unemployment rate in 2011 was $9.8 \%{ }^{356}$

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## Atlanta, Georgia

## Unemployment Rates

| Assessment Area: GA Atlanta |  |  |
| :---: | :---: | :---: |
| Area | Years - Annualized |  |
|  | 2010 | 2011 |
| Atlanta MSA | 10.2 | 9.6 |
| Barrow County | 10.2 | 9.3 |
| Bartow County | 11.2 | 10.2 |
| Carroll County | 11.1 | 10.7 |
| Cherokee County | 8.7 | 8.1 |
| Cobb County | 9.6 | 8.9 |
| Clayton County | 12.5 | 12.2 |
| Coweta County | 9.6 | 8.9 |
| Dawson County | 9.9 | 8.9 |
| Dekalb County | 10.6 | 10.1 |
| Douglas County | 10.7 | 10.2 |
| Fayette County | 8.3 | 8.1 |
| Forsyth County | 7.9 | 7.3 |
| Fulton County | 11.0 | 10.5 |
| Gwinnett County | 9.0 | 8.5 |
| Haralson County | 11.4 | 10.4 |
| Heard County | 12.0 | 10.9 |
| Henry County | 9.9 | 9.7 |
| Paulding County | 10.1 | 9.4 |
| Pickens County | 9.8 | 9.7 |
| Rockdale County | 11.2 | 10.8 |
| Spalding County | 13.0 | 12.5 |
| Georgia | 10.2 | 9.8 |

Not Seasonally Adjusted

Despite the economic downturn, the region has continued to attract new companies, and existing companies are continuing to expand. In 2011, more than 90 companies announced new locations or expansions in the region, projecting to create more than 11,000 new jobs in the region in the next three years. Some of the major new announcements in 2011 include Home Depot's new national call center, which will create 700 new jobs in Cobb County, and the expansion of the corporate headquarters of RockTenn, creating 500 new jobs in Gwinnett County. Porsche Cars North America also announced relocation and expansion of its North America headquarters adjacent to the airport, creating 100 new jobs. The region benefits tremendously from Hartsfield-

Jackson Atlanta International Airport, which is the world's busiest airport for passenger travel and a major center for cargo operations. ${ }^{357}$

The Atlanta metro region consistently ranks near the top as a business friendly region in economic development publications. The region was also ranked by the Kauffman Foundation as the second best metro area in the nation for entrepreneurial activity, and Forbes ranked the region as the best metro area for minority entrepreneurs in 2011. ${ }^{358}$

## Community Contacts and Community Development Opportunities

The recession, coupled with the continuing housing and foreclosure crisis, has had a significant impact on lowand moderate-income communities in the Atlanta region. While the region experienced significant population and income growth in the last decade, poverty and financial instability are major concerns in certain communities. The percentage of families living below the poverty level increased across the assessment area between 2000 and 2009, with the exception of Fulton County. Between 2005 and 2009, it is estimated that more than $10 \%$ of families in Fulton, DeKalb, Clayton and five other smaller counties lived below the poverty level. In addition, the number of families receiving food stamps has been increasing, and in 2009, over 650,000 families were relying on food stamps. ${ }^{359}$

Access to financial services is another issue facing low- and moderate-income individuals in the assessment area. According to the FDIC's 2011 National Survey of Unbanked and Underbanked Households, 9.7\% of households are unbanked, meaning they have no type of deposit account with a mainstream financial institution. In addition, $25.7 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower-income and minority households. ${ }^{360}$ Finally, CredAbility, an Atlanta-based consumer counseling organization, reported that based on the CredAbility Consumer Distress Index, in the first quarter of 2012, residents of the Atlanta metro region were some of the most financially distressed in the nation. The high level of financial distress indicates a need for more financial education and other household financial stability efforts targeting low- and moderate-income households. ${ }^{361}$

The foreclosure crisis intensified the need for community development initiatives to help stabilize individuals and communities. As discussed earlier, the metro Atlanta area consistently ranks at the top nationally for the number of foreclosures; one community contact indicated that the biggest need for low- and moderate-income communities is foreclosure prevention and neighborhood stabilization.

To aid communities that have been impacted by foreclosures, the federal government created the Neighborhood Stabilization Program (NSP) in late 2008. To date, through two rounds of NSP funding, $\$ 123.6$ million has been awarded to nine grantees in the metro Atlanta region: the City of Atlanta and the counties of Cobb, Clayton, DeKalb, Fulton, Gwinnett, Douglas, Henry and Rockdale. ${ }^{362}$ Each jurisdiction has developed an

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individual program, but in general, the funds have been used to purchase and renovate foreclosed homes for rental or resale, to rehabilitate multi-family housing, for new construction (particularly in foreclosed subdivisions), and for down payment assistance to aid homeowners with purchasing foreclosed homes. As of January 2012, 1,223 units had been acquired and 251 neighborhoods impacted by the NSP investment within the MSA.

To help support neighborhood stabilization, one community contact indicated that there was a need for more flexible mortgage underwriting to help individuals with lower credit scores move back into homeownership. There is also a need for loans such as the FHA 203(k) mortgage that would help homeowners purchase and renovate foreclosed homes in impacted neighborhoods.

In late 2010, Piece by Piece, an innovative regional foreclosure response program, was launched. This initiative brings together regional public and private stakeholders focused on preventing foreclosure and revitalizing distressed neighborhoods by reoccupying vacant and abandoned homes. Regional leaders come together regularly to discuss best practices in foreclosure prevention and community stabilization. Most of the nonprofit housing organizations have switched from providing first-time homebuyer counseling to focusing on foreclosure prevention. The Piece by Piece program has attracted representation from over 140 agencies, including local and national nonprofit organization, foundations, local and state government, the Federal Reserve Bank of Atlanta, and financial institutions.

Foreclosure counseling is clearly a critical need in the region, but resources are limited. The Federal Reserve Bank of Atlanta convened a meeting with foreclosure stakeholders in June 2011 to discuss loan modifications, and one of the barriers to assisting troubled homeowners was lack of staffing and resources at the housing counseling agencies to meet the increased demand.

Access to credit for small business owners is also an issue. The Federal Reserve Bank of Atlanta conducted a series of forums in 2010 in Southeastern cities, and several themes emerged: 1) small and particularly minority businesses were struggling to secure the capital needed to cover basic business operations or business expansions, and 2) small businesses need access to technical assistance that goes beyond starting a business to cover a wider range of topics.

Overall, the community development environment in the Atlanta region is sophisticated, with strong engagement from nonprofits, government agencies, foundations and financial institutions. However, like most sectors of the economy, the downturn has taken a toll on this industry, and particularly on nonprofits. Demand for services has increased at the same time that public funding sources have been shrinking. Continued assistance is needed to help build the capacity of local organizations in the region to conduct a wide range of community development activities, including small business lending and technical assistance, affordable housing development, financial education, and community development finance.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Atlanta assessment area is good. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

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Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 3,714 ( $51.5 \%$ ) HMDA loans compared to 3,500 ( $48.5 \%$ ) small business loans in the Atlanta assessment area. Therefore, HMDA lending was given slightly more weight than small business lending in determining the bank's lending test rating in the assessment area. The Atlanta assessment area contains $3.7 \%$ of the bank's small business and HMDA lending by number of loans and $5.1 \%$ by dollar volume, totaling $\$ 1.1$ billion. In comparison, $3.5 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

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

## Home Purchase Loans

Home purchase lending in low-income census tracts is adequate. Regions Bank originated $1.2 \%$ of its home purchase loans in low-income tracts, which contain $2.5 \%$ of the owner-occupied units in the assessment area. Although the bank's performance was less than the aggregate's performance in both 2010 and 2011, it appears that all lenders had relatively low levels of home purchase loans compared to the percentage of owner-occupied units in low-income census tracts.

Regions Bank's home purchase lending in moderate-income tracts is also adequate. During the review period, Regions Bank originated $13.2 \%$ of its home purchase loans in moderate-income census tracts, which contain $16.7 \%$ of the owner-occupied units in the assessment area. The bank's performance was slightly better than the aggregate in 2010 and 2011.

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

## Home Refinance Loans

Regions Bank's home refinance lending in low-income tracts is adequate. During the review period, Regions Bank originated $1.1 \%$ of its home refinance loans in low-income census tracts, which contain $2.5 \%$ of the owner-occupied units in the assessment area. The bank's performance was comparable to the aggregate in 2010 and 2011.

Regions Bank's home refinance lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $9.7 \%$ of its home refinance loans in moderate-income census tracts, which contain $16.7 \%$ of the owner-occupied units in the assessment area. The bank's performance was slightly better than the aggregate in 2010 and 2011.

The bank's home refinance lending in middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

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## Home Improvement Loans

Home improvement lending in low-income census tracts is poor. During the review period, Regions Bank originated only one home improvement loan ( $0.6 \%$ ) in low-income tracts, which contain $2.5 \%$ of the owneroccupied units in the assessment area. It appears that all lenders had low levels of home improvement loans compared to the percentage of owner-occupied units in low-income census tracts. The bank's one loan was originated in 2010, and its performance was slightly above the aggregate for this year. However, given that the bank did not originate any home improvement loans in 2010, the bank's performance was less than the aggregate.

Regions Bank's home improvement lending in moderate-income census tracts is excellent. The bank's performance exceeded both the area demographics and the aggregate performance. During the review period, Regions Bank originated 21.5 \% of its home improvement loans in moderate-income tracts, which contain $16.7 \%$ of the owner-occupied units in the assessment area.

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

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is adequate. Regions Bank originated 1.9\% of its small business loans in low-income tracts, which contain $4.0 \%$ of the small businesses in the assessment area. Although the bank's performance was less than the aggregate's performance in years 2010 and 2011, it appears that all lenders had low levels of small business loans compared to the percentage of small businesses in low-income census tracts.

Regions Bank's small business lending in moderate-income census tracts is excellent. The bank's performance exceeded both the area demographic and aggregate performance. During the review period, Regions Bank originated $18.3 \%$ of its small business loans in moderate-income tracts, which contain $17.6 \%$ of the small businesses in the assessment area.

The bank's small business lending in middle-income tracts was greater than the percentage of small businesses in these tracts, while the lending in upper-income tracts was less than the percentage of small businesses in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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

The bank's home purchase lending to low-income borrowers is good. The bank's percentage of home purchase lending to low-income borrowers at $19.5 \%$ was comparable to the percentage of low-income families in the assessment area at $19.6 \%$. Additionally, the bank's performance exceeded the aggregate performance in both 2010 and 2011.

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Home purchase lending to moderate-income borrowers is also good. At 22.5\%, the bank's percentage of home purchase lending to moderate-income borrowers exceeded the percentage of moderate-income families in the assessment area at $17.8 \%$. However, the bank performed below the aggregate in 2010 and 2011.

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

## Home Refinance Loans

Regions Bank's home refinance lending to low-income borrowers is excellent. During the review period, Regions Bank originated $10.5 \%$ of its home refinance loans to low-income borrowers, which represent $19.6 \%$ of the total families in the assessment area. The bank's performance exceeded the aggregate performance in both 2010 and 2011.

Regions Bank's home refinance lending to moderate-income borrowers is good. During the review period, Regions Bank originated $16.7 \%$ of its home refinance loans to moderate-income borrowers, which comprise $17.8 \%$ of the total families in the assessment area. The bank's performance exceeded the aggregate performance in both 2010 and 2011.

The bank's home refinance lending to middle-income borrowers was slightly less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Regions Bank's home improvement lending to both low- and moderate-income borrowers is excellent. The bank's performance exceeded both the area demographic and aggregate performance. During the review period, Regions Bank originated $24.9 \%$ of its home improvement loans to low-income borrowers, which represent $19.6 \%$ of total families in the assessment area. Additionally, the bank originated $26.0 \%$ of its home improvement loans to moderate-income borrowers, which comprise $17.8 \%$ of total families in the assessment area.

The bank's home improvement lending to middle-income borrowers was slightly greater than the percentage of middle-income families in the assessment area, while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to the area demographic and the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses was higher than the aggregate in 2010 and lower in 2011. The bank originated $27.5 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $90.2 \%$. However, of the 3,500 small business loans originated during the review period, 1,750 (50.0\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $55.1 \%$, which is less than the percentage of businesses in the assessment area that are considered small businesses, at $90.2 \%$. Also, $75.5 \%$ of the 3,500 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank performed less than the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Atlanta, Georgia assessment area. The bank originated 18 community development loans totaling $\$ 15.3$ million during the review period. The majority of the loans promoted economic development by financing small businesses or financed activities that help to revitalize or stabilize low- and moderate-income geographies. Local community development needs include but are not limited to neighborhood stabilization tied to elevated foreclosure rates, economic development activities including small business finance, and financial stability activities for residents. The bank's community development loan portfolio exhibits adequate responsiveness to community credit needs in the assessment area. Furthermore, the number and the dollar amount of loans are adequate given the bank's presence in the market.

Examples of community development lending include the following:

- Several loans that promote economic development by financing small businesses as part of the SBA's 504 Certified Development Company program;
- Two loans to support the development of a Low Income Housing Tax Credit multi-family affordable housing development with 72 units restricted to individuals earning up to $60 \%$ of the area median income;
- One loan to a nonprofit, Federally Qualified Health Center (FQHC) in Atlanta that provides comprehensive health care services to the medically underserved and receives federal funds to provide sliding fee-based services to qualified patients; and
- Two loans to the local member of a national network of nonprofit organizations that provide housing and other supportive services to victims of domestic violence and sexual assault.


## Investment Test

The bank's performance in the Atlanta assessment area under the investment test is good. The bank had 11 investments totaling $\$ 17.2$ million, including two current period investments totaling $\$ 10.8$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through FNMA and GNMA investment instruments, Low Income Housing Tax Credits (LIHTCs), and investments in LIHTC funds. The broader regional investments primarily funded small businesses and startup companies through SBICs, and community revitalization through a New Markets Tax Credit fund. Identified community development needs include, but are not limited to, neighborhood stabilization due to elevated foreclosure and unemployment rates, affordable housing for low- and moderate-income individuals, foreclosure counseling and financial education, and small business finance. The dollar volume of Regions Bank’s current and total investments is good given the bank's presence in the assessment area.

The bank also made 26 contributions totaling $\$ 190,900$. In addition, the bank made contributions to statewide and national organizations that may provide an indirect benefit to low- and moderate-income individuals and communities in the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities, affordable housing and economic development.

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include the following:

- Low Income Housing Tax Credits for a 72-unit project that provides housing affordable to low- and moderate-income individuals in metro Atlanta.


## Atlanta, Georgia

- Sponsorship of a program through a national financial education provider to provide online and inperson financial education to students at middle and high schools located in low- and moderate-income neighborhoods in metro Atlanta. Regions Bank staff members were also involved with this initiative as a community development service opportunity and worked with several schools to implement expanded financial education initiatives, including an in-school bank operated by students.
- Several contributions to organizations that provide credit and foreclosure counseling, as well as homeownership assistance.


## Service Test

The bank's service test performance in the Atlanta assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Atlanta assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Regions Bank's 69 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed three branches (all middle-income tracts) in the Atlanta assessment area. The bank's record of closing branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in low- or moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

## Atlanta, Georgia

## Geographic Distribution of Branches

Assessment Area: GA Atlanta

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branc <br> \% |  | Closed \# | Drive thrus | Extend- <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses <br> \% |
|  | Total | 1 | 1.5\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
| Low | DTO LS | 0 |  | 0 | 0 | 0 |  |  | 72 | 11.1\% | 5.6\% | 4.3\% |
| Moderate | Total | 17 | 24.6\% | 0 | 0 | 17 | 6 | 13 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 164 | 25.2\% | 22.3\% | 17.8\% |
| Middle | Total | 25 | 36.2\% | 0 | 3 | 25 | 9 | 25 |  |  |  |  |
|  | DTO <br> LS | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 233 | 35.8\% | 39.9\% | 39.2\% |
| Upper | Total | 26 | 37.7\% | 0 | 0 | 21 | 6 | 26 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 |  | 0 | 0 | 0 |  |  | 182 | 28.0\% | 32.1\% | 38.7\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
|  | Total | 69 | 100.0\% | 0 | 3 | 64 | 22 | 65 |  |  |  |  |
| Total | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 651 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 2,614 service hours in various capacities for community development organizations by participating in 347 community development services. Many of the community development services focused on education, affordable housing, youth services, and various other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered with a community organization whose mission is to revitalize low- and moderate-income geographies and to assist low- and moderate-income individuals with buying a home.

## Metropolitan Areas (Limited Review)

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

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

- Albany Assessment Area (Dougherty and Lee Counties)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing $4.3 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 248.8$ million in deposits in this assessment area, representing a market share of $14.3 \%$ and $4.5 \%$ of Regions Bank's total deposits in Georgia.
- Athens Assessment Area (Clarke County)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $1.7 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 76.8$ million in deposits in this assessment area, representing a market share of $3.6 \%$ and $1.4 \%$ of Regions Bank's total deposits in Georgia.
- Dalton Assessment Area (Murray and Whitfield Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $3.4 \%$ of its branches in Georgia.
O As of June 30, 2011, the bank had $\$ 174.2$ million in deposits in this assessment area, representing a market share of $9.0 \%$ and $3.2 \%$ of Regions Bank's total deposits in Georgia.
- Gainesville Assessment Area (Hall County)
o As of December 31, 2011, Regions Bank operated eight branches in the assessment area, representing $6.8 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 414.7$ million in deposits in this assessment area, representing a market share of $16.5 \%$ and $7.5 \%$ of Regions Bank's total deposits in Georgia.
- Rome Assessment Area (Floyd County)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing 2.6\% of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 124.7$ million in deposits in this assessment area, representing a market share of $9.1 \%$ and $2.3 \%$ of Regions Bank's total deposits in Georgia.
- Savannah Assessment Area (Chatham County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $0.9 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 34.5$ million in deposits in this assessment area, representing a market share of $0.8 \%$ and $0.6 \%$ of Regions Bank's total deposits in Georgia.
- Valdosta Assessment Area (Lowndes County)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $1.7 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 108.9$ million in deposits in this assessment area, representing a market share of $6.3 \%$ and $2.0 \%$ of Regions Bank's total deposits in Georgia.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

## Metropolitan Areas (Limited Review)

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Albany | Consistent | Not Consistent (Above) | Consistent |
| Athens | Not Consistent <br> (Below) | Not Consistent (Above) | Consistent |
| Dalton | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |
| Gainesville | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |
| Rome | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Savannah | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Valdosta | Not Consistent <br> (Below) | Not Consistent (Above) | Not Consistent (Above) |

The Atlanta and Northeast Georgia assessment areas received full-scope reviews, and the bank's performance in the Atlanta assessment area was given greater consideration in determining the overall rating for the state. Atlanta is by far the bank's largest market in Georgia in terms of deposits, loans, and branches. The full-scope areas selected together represent $69.6 \%$ of the deposits in the assessment areas in Georgia as well as $66.7 \%$ of the branches. The full-scope assessment areas also represent $62.5 \%$ of the HMDA loans and $68.7 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits, branches and loans in the State of Georgia.

For the Lending Test, performance was weaker than the bank's performance in the state in six of the limitedscope assessment areas (Athens, Dalton, Gainesville, Rome, Savannah and Valdosta). The distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in those assessment areas. The bank's performance in the Albany assessment area was consistent with the statewide performance in Georgia.

For the Investment Test, the performance in three limited-scope assessment areas (Albany, Athens and Valdosta) was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas. The performance in four limited-scope assessment areas (Dalton, Gainesville, Rome and Savannah) was weaker than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in one limited-scope assessment area (Valdosta) was stronger than the bank's performance in the state. The performance in two limited-scope assessment areas (Dalton and Gainesville) was weaker than the bank's performance in the state due to fewer community development services. The performance in the remaining limited-scope assessment areas was consistent with the bank's performance in the state.

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

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

The Northeast Georgia assessment area consists of Banks, Habersham, Jackson, Lumpkin, Rabun, Stephens, and White counties. Within the assessment area there are no low- or moderate-income tracts; however, the assessment area contains 24 middle- and 7 upper-income tracts. As of December 2011, Regions operated nine branches in the assessment area representing 7.7\% of its branches in Georgia. Eight branches are in middleincome tracts, and one branch is in an upper-income tract.

The majority of the banks serving the Northeast Georgia market are community banks; Regions is the only large bank to hold a significant share of deposits. According to the June 30, 2011 FDIC Summary of Deposits Report, South Carolina Bank and Trust held $21.8 \%$ of the deposit market share, followed by United Community Bank with $16.8 \%$. Regions was ranked $3^{\text {rd }}$ in the market, with $\$ 398.3$ million in deposits or $12.2 \%$ of total deposits. Overall there were 19 financial institutions operating 73 branches in the assessment area.

Regions ranked $7^{\text {th }}$ out of 260 HMDA reporters in 2010 with $4.4 \%$ of total loans. Overall HMDA lending in the assessment area declined between 2010 and 2011, and Regions Bank's HMDA lending followed the same trend. Regions was again ranked $7^{\text {th }}$ out of 255 lenders with $3.9 \%$ of all HMDA loans. Wells Fargo Bank, JPMorgan Chase, South Carolina Bank and Trust, United Community Bank, and Bank of America are the leading HMDA lenders in the market.

Regions ranked $6^{\text {th }}$ out of 38 small business loan reporters in 2010 with $5.4 \%$ of the small business loans. Small business lending increased in the assessment area between 2010 and 2011, and Regions ranked $2^{\text {nd }}$ in 2011 out of 51 reporters with $13.5 \%$ of all loans. American Express was the top small business lender in the market, along with South Carolina Bank and Trust, United Community Bank, and Citibank.

## Demographic Characteristics

Northeast Georgia is primarily a rural area, with low population density. Several counties in the assessment area have been designated by the Appalachian Regional Commission (ARC) as part of the Appalachian region, which is an area known for very high rates of poverty and financial distress. White, Rabun, and Banks are classified as underserved counties, and Stephens is classified as a distressed county. Despite the high levels of financial distress, there are no low- or moderate-income tracts in the assessment area according to 2000 US census data.

Jackson is the largest county in the assessment area, and with about 60,500 residents, represented about $27 \%$ of the assessment area population in 2010. Habersham had about 43,000 residents in 2010 and the remaining counties had less than 30,000 residents. The total population in the assessment area was 221,482 in 2010, representing a $28 \%$ increase over the 2000 population. Statewide, population grew by about $18 \%$ over the same time period. The largest population increase occurred in Jackson County, which grew by 45\%. Lumpkin, White, Banks and Habersham also saw significant population growth. ${ }^{363}$

The table below shows selected demographic information for the Northeast Georgia assessment area.

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## Combined Demographics Report

Assessment Area: GA Northeast GA

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 7,587 | 15.7 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 7,935 | 16.5 |
| Middle-income | 24 | 77.4 |  | 74.4 | 3,654 | 10.2 | 10,210 | 21.2 |
| Upper-income | 7 | 22.6 |  | 25.6 | 886 | 7.2 | 22,504 | 46.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 31 | 100.0 | 48,236 | 100.0 | 4,540 | 9.4 |  | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0.0 |  |
| Moderate-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 58,876 | 36,975 |  | 62.8 | 12,086 | 20.5 | 9,815 | 16.7 |
| Upper-income | 17,371 | 12,569 |  | 72.4 | 3,548 | 20.4 | 1,254 | 7.2 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 76,247 | 49,544 |  | 65.0 | 15,634 | 20.5 | 11,069 | 14.5 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  |  |  | Over \$1 Million |  | Revenue Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 7,284 | 73.2 |  | 73.2 | 266 | 69.8 | 326 | 76.2 |
| Upper-income | 2,671 | 26.8 |  | 26.8 | 115 | 30.2 | 102 | 23.8 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 9,955 | 100.0 |  | 100.0 | 381 | 100.0 | 428 | 100.0 |
|  | Percentage of | otal B | ness | 91.9 |  | 3.8 |  | 4.3 |
|  | Total Farm |  |  | Farm | by Tract \& R | evenue |  |  |
|  | Tract |  |  |  | Over \$1 Million |  | Revenue Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 196 | 70.8 |  | 71.2 | 1 | 33.3 | 0 | 0.0 |
| Upper-income | 81 | 29.2 |  | 28.8 | 2 | 66.7 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 277 | 100.0 |  | 100.0 | 3 | 100.0 | 0 | . 0 |
|  | Percentage of | Total F |  | 98.9 |  | 1.1 |  | . 0 |

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## Northeast Georgia

## Income Characteristics

According to the US census estimates, median family income in 2010 ranged from \$48,606 in Banks County to $\$ 58,239$ in Jackson County. The median family income in all counties in the assessment area was lower than the median family income for the state, estimated at $\$ 58,790 .{ }^{364}$ For the purposes of this analysis, HUD's 2010 and 2011 median family income for Georgia non-metro areas is used. As shown, the median family income decreased between 2010 and 2011, from $\$ 46,400$ to $\$ 44,600$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

Borrower Income Levels
State Non-metro GA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% |  | 79.99\% | 80\% |  | 119.99\% | 120\% | - | \& above |
| 2010 | \$46,400 | 0 | - | \$23,199 | \$23,200 | - | \$37,119 | \$37,120 |  | \$55,679 | \$55,680 | - | \& above |
| 2011 | \$44,600 | 0 | - | \$22,299 | \$22,300 | - | \$35,679 | \$35,680 |  | \$53,519 | \$53,520 | - | \& above |

According to the 2000 census, $9.4 \%$ of the families in the assessment area lived below the poverty level. The number of people living in poverty in the Northeast Georgia area has increased significantly over the last decade in all counties but Stephens. The poverty rate within the assessment area ranges from $15.1 \%$ in Jackson County to $19.6 \%$ in Habersham. Statewide, $15.7 \%$ of the population was estimated to live below the federal poverty line between 2005 and 2009. ${ }^{365}$ Utilization of food stamps has also been increasing throughout the assessment area. Stephens County had the highest percentage of residents receiving food stamps in 2009 at $22.6 \%$, while food stamp usage was lowest in Habersham County at $11.1 \% .{ }^{366}$

## Housing Characteristics

The housing market in Northeast Georgia is unique due to its rapid growth before the recession as a popular second home and retiree market, as well as the dramatic population growth in Jackson County. However, new housing development almost came to a halt during the economic downturn. At the peak in 2005, almost 3,500 building permits for new residential units were issued in the 7-county area. By 2011, the number had declined to 296 , a $91 \%$ decline in 6 years. Clearly the dramatic slow-down in the housing market had a much larger economic impact in terms of construction job loss.

Home sales in the assessment area declined by 31\% between 2006 and 2009, though the performance varied significantly across the assessment area. Rabun, Lumpkin and Banks counties each saw sales drop by more than $50 \%$ over the time period, while sales in Habersham County fell by less than $1 \%$. The sales market has rebounded since 2009 in all counties, with the exception of Jackson County, and overall, sales were up almost $50 \%$ in 2011 over 2009. ${ }^{367}$

Population growth and the increase in second home communities have driven up the home prices in the several communities, but there is a variation in the median home price in the assessment area. Home prices in 2011 were lowest in Stephens County at $\$ 52,000$ and highest in Rabun County at $\$ 120,000$. Throughout the

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## Northeast Georgia

assessment area, home prices fell by at least $20 \%$ in each county between 2007 and 2011. The largest declines were observed in Habersham (35\%) and Stephens (38\%). In Jackson County, the median home price was $\$ 110,000$ in 2011, representing a $24 \%$ decline from the peak prices in $2007 .{ }^{368}$

Rising foreclosure and mortgage delinquency rates have negatively impacted the region's housing market. Throughout the assessment area, seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) increased from $7.1 \%$ in January 2010 to $9.9 \%$ in December 2011. The problem is most acute in the smaller counties, including Stephens (15.8\%) and Banks (12.2\%). ${ }^{369}$

Similar to other rural communities, most of the households in the Northeast Georgia area are homeowners, and the homeownership rate in each county is approximately $75 \%$. However, housing affordability is a concern. In 2009, less than $30 \%$ of homes were considered affordable to a family making less than $80 \%$ of the area median income in all counties, with the exception of Banks and Stephens. ${ }^{370}$

## Employment and Economic Conditions

The Northeast Georgia economy is heavily dependent on agriculture. In the past, lumber and textiles were strong industries, but over the past several decades most of the plants have closed. Today, the agricultural industry is driven by poultry and food processing. The area also has a growing tourism industry, as more people have discovered its natural amenities and historic downtowns.

The region has been hard hit by a number of major plant closings in the past five years. Louisiana-Pacific and Caterpillar closed their facilities in Jackson County in 2008 and 2009, and most recently, Clark Steel announced a consolidation and will be closing a plant in Jackson County. Fruit of the Loom closed a manufacturing plant in Rabun County in 2007, eliminating over 1,000 jobs in a county of just 16,000 at the time. In 2009, Lumpkin County lost the Mohawk carpet manufacturing plant, which employed over 350. Overall, the changing global market has had a large impact on the local economy. ${ }^{371}$

Recently, however, economic activity in the region appears to be picking up, particularly in Jackson County. Jackson has been one of the fastest growing counties in the country over the past decade, growing at twice the rate as the state of Georgia. The county is considered an exurb of the metro Atlanta area and was historically seen as a bedroom community for Gwinnett County. The economy was based on farming and distribution. ${ }^{372}$ The distribution sector has been driving most of the growth in the county in the past five years. According to the Alliance for Economic Development in Jackson County, there has been more than $\$ 700$ million in new investment announced since 2008, and the county has been one of the largest job creators in the state. Some of the major announcements include the new Carter's distribution center ( 1,000 jobs), a new Bed Bath and Beyond e-fulfillment center ( 900 jobs), and a $\$ 320$ million Toyota plant ( 350 jobs). Overall, the region has gained several thousand new jobs since 2010. ${ }^{373}$

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There has also been activity in other Northeast Georgia counties. In 2010, Steel Cell, based in Habersham County, announced an expansion that would create about 60 new jobs. Freudenberg-NOK, a manufacturer of oil seals for cars and the largest employer in White County, has seen an increase in demand for its products, and employment is up by about $20 \%$. ${ }^{374}$

While the region has seen some new investment in the manufacturing and distribution sectors, economic development efforts have also shifted to new opportunities. Most of the counties are seeking to capitalize on the natural amenities for more tourist activity, as well as higher priced second home communities. Counties are also focused on fostering local small business and entrepreneurship. Several of the counties have received designation as an "Entrepreneur Friendly" community by the State of Georgia. To support small businesses and to increase the attractiveness of the area to tourists, many of the small towns throughout the assessment area have active Main Street or other targeted revitalization programs to restore their historic downtowns. ${ }^{375}$

Transportation and infrastructure investment are high priorities for this region. Interstate 85 runs through Jackson County, but because access to the other counties is more limited, they are looking at various scenarios to improve local transportation. Increasing access to broadband is another focus for economic development as it is seen as a necessity for small businesses and any other type of industry recruitment. In 2009, the North Georgia Network (a collaborative effort of eight counties in the Georgia mountains region) won a $\$ 33$ million federal stimulus grant to build a high-speed fiber-optic network that will cover a 260 -mile loop, extending from Atlanta north to the Georgia mountains. The grant has been paying for most of the project, with local money covering the remaining expansion. The network will pass 245 county and city government facilities, schools, educational institutions and hospitals. Local residents and economic development officials see this project as a real game changer, and it will eliminate one of the major barriers that have limited business recruitment and expansion in the region. ${ }^{376}$

Workforce development and improving the overall educational system are also high priorities for economic development officials. Given the dramatic shift in the economic base of the region, many workers need retraining, and the schools need to be better connected to help develop what are perceived to be the skills for the next generation of jobs.

Agriculture is the largest industry in the region, but there are significant worker concentrations in a number of different sectors, including manufacturing (and specifically food processing), retail, construction, administration and waste services, accommodations and food service, and local government. ${ }^{377}$ The two largest employers in the area are Fieldale Farms, with over 2,000 employees, and Wayne Farms, with about 1,100 employees. In the 13-county Georgia Mountains Regional Commission area, which includes the entire assessment area minus Jackson County, Regions Bank is the $8^{\text {th }}$ largest employer. ${ }^{378}$ In Jackson County, GRUMA Corporation, Kubota Industrial Equipment Corporation, Baker \& Taylor Inc. (distribution) and Systemax Inc. (distribution center) each employ more than $400 .{ }^{379}$

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## Northeast Georgia

As discussed earlier, there have been a number of major plant closings in the region, which have resulted in significant job loss. In addition, the recession has impacted tourism in the area and the growth of the retiree/second home market. The construction sector almost came to a halt during the recession. Unemployment increased significantly across the assessment area, peaking in most counties in 2009 and 2010. The unemployment rate in Rabun County was the highest, peaking at $12.5 \%$ in 2011. In Jackson County, the largest employment center, unemployment peaked at $11 \%$ in in $2009 .{ }^{380}$ As shown in the table below, the unemployment rate continued to decline between 2010 and 2011 in all counties, with the exception of Rabun. Unemployment in Banks, Habersham and Jackson counties compares favorably to the state, where the unemployment rate was $9.8 \%$ in 2011.

The following chart shows unemployment rates relevant to the assessment area for 2010 through 2011.

## Unemployment Rates

Assessment Area: GA Northeast

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Banks County | 7.8 | 7.3 |
| Habersham County | 9.8 | 9.6 |
| Jackson County | 10.7 | 9.7 |
| Lumpkin County | 11.5 | 10.6 |
| Rabun County | 12.2 | 12.5 |
| Stephens County | 10.6 | 10.1 |
| White County | 10.2 | 9.8 |
| Georgia | $\mathbf{1 0 . 2}$ | $\mathbf{9 . 8}$ |

Not Seasonally Adjusted

## Community Contacts and Community Development Opportunities

Community development opportunities in the Northeast Georgia assessment area are limited, but affordable housing and support for small businesses are important to the residents of the area. Affordable rental housing is a particular need, given the agricultural workforce that tends to be drawn to temporary rental housing. In addition, at least $45 \%$ of the renters in several counties in the assessment area (White, Stephens and Lumpkin) were considered cost burdened in 2010, meaning they spend more than $30 \%$ of their gross income for rental expenses.

Downtown revitalization is another important community development opportunity throughout the assessment area. As mentioned earlier, many of the small towns throughout the assessment area have been designated as part of the Historic Main Street program or have developed other special incentive programs to try to restore the downtown areas.

Finally, support for small businesses is critical. Economic development efforts in the assessment area are primarily focused on supporting local small businesses, and there are financing and technical assistance

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## Northeast Georgia

programs available throughout the assessment area. A community contact that specializes in small business lending said small businesses had been very hard hit by the recession and the loss of revenue from the tourism industry. The contact noted that small business owners that had used real estate as collateral for their loans were struggling because of declining property values. The contact indicated that banks were only lending to the "top tier" businesses, so there was a growing need for alternative financing sources, such as community development financial institutions (CDFIs). The contact thought that investment in a CDFI is a good opportunity for banks to support small businesses, even if they were not able to make the loans directly. Overall, the perception was that banks, and specifically large banks, could be more responsive and take a larger role in addressing community needs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending performance in the Northeast Georgia assessment area is good. The distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes few, if any, community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 574 (50.3\%) small business loans compared to 567 (49.7\%) HMDA loans in the Northeast Georgia assessment area. Therefore, small business lending was given equal weight as HMDA lending in determining the bank's lending test rating in the assessment area. The Northeast Georgia assessment area contains $0.6 \%$ of the bank's small business and HMDA lending by number of loans, and $0.6 \%$ by dollar volume, totaling $\$ 132.3$ million. In comparison, $0.4 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

Although there are no low- or moderate-income census tracts in the Northeast Georgia assessment area, an evaluation of the geographic distribution was conducted based on lending in middle- and upper-income tracts. The bank's geographic distribution performance in the assessment area is adequate.

## HMDA Lending

Generally, the bank's HMDA lending to middle-income geographies was greater than or comparable to the percentage of owner-occupied units in middle income tracts as well as to the aggregate lending in those tracts. The bank's HMDA lending in upper-income geographies was either less than or comparable to the percentage of owner-occupied units in upper-income tracts. The bank's performance was also comparable to the aggregate lenders' performance in upper-income tracts.

## Small Business Lending

The bank's small business lending to middle-income geographies was comparable to the percentage of small businesses in middle-income tracts, as well as the aggregate lending in those tracts. The bank's small business lending in upper-income geographies was less than the demographic as well as the aggregate lending performance in upper-income tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower income or gross annual revenues is good. For this analysis, the distribution of small business lending across business revenue sizes and HMDA lending across borrower

## Northeast Georgia

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

The bank's home purchase lending to low-income borrowers is poor. The bank originated only two home purchase loans to low-income borrowers during the review period, representing $2.5 \%$ of its total home purchase lending in the assessment area. Meanwhile, low-income families make up $15.7 \%$ of total families in the assessment area. In addition, the bank's performance was less than aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is good. At $21.0 \%$, the bank's percentage of home purchase lending to moderate-income borrowers exceeded the percentage of moderate-income families in the assessment area at $16.5 \%$. The bank's performance was below the aggregate in 2010; however, the bank's lending exceeded the aggregate in 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Refinance Loans

Home refinance lending to low-income borrowers is excellent. Regions Bank's percentage of loans at 9.0\% was below the percentage of low-income families in the assessment area at $15.7 \%$. However, the bank's lending to low-income borrowers exceeded aggregate performance in 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area and to the aggregate lenders. The bank's percentage of home refinance lending to moderate-income borrowers at $14.6 \%$ was less than the percentage of moderate-income families in the assessment area at $16.5 \%$. However, Regions Bank's performance was better than the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is adequate. The bank made $12.0 \%$ of its home improvement loans to low-income borrowers. Low-income families make up $15.7 \%$ of total families in the assessment area. Additionally, the bank’s lending to low-income borrowers was less than the aggregate performance in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $26.7 \%$ exceeded the percentage of moderate-income families in the assessment area at $16.5 \%$. Although the bank's performance was slightly below aggregate in 2011, home improvement lending significantly exceeded the aggregate in 2010.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to the area demographic and aggregate performance, the distribution of small business lending by business revenue size is good. The bank’s lending to small businesses exceeded the aggregate in 2010, but was less than aggregate in 2011. The bank originated $35.4 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $91.9 \%$. However, of the 574 small business loans originated during the review period, 318 loans (55.4\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $79.3 \%$, which is less than the percentage of businesses in the Northeast Georgia assessment area that are considered small businesses, at $91.9 \%$. Also, $84.1 \%$ of the 574 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of \$100,000 or less, Regions Bank’s performance was less than the aggregate in both 2010 and 2011.

## Community Development Lending

Regions Bank makes few, if any, community development loans in the Northeast Georgia assessment area. The bank originated no community development loans during the review period. Local community development needs include affordable housing for low- and moderate-income individuals, economic development through small business finance and targeted downtown revitalization initiatives, job growth, and neighborhood stabilization activities resulting from foreclosures and mortgage delinquencies. The bank was not responsive to any of these community credit needs with community development lending.

## Investment Test

The bank's performance in the Northeast Georgia assessment area under the investment test is adequate. The bank had two investments totaling $\$ 8.3$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Prior period direct investments in the assessment area provided support for affordable housing through Low Income Housing Tax Credits (LIHTCs) and for community revitalization through a Qualified Zone Academy Bond. Regional investments primarily funded small businesses and startup companies through investments in SBICs. Community development needs identified in the community include, but are not limited to, affordable housing for low- and moderate-income individuals, financial and foreclosure counseling, small business finance, job creation, and community revitalization. The dollar volume of Regions Bank’s current and total investments is adequate given the bank's limited presence in the assessment area.

The bank did not have any contributions specific to the Northeast Georgia assessment area. However, the bank made contributions to statewide and national organizations that may provide an indirect benefit to low- and moderate-income individuals and communities in the assessment area.

## Service Test

The bank's service test performance in the Northeast Georgia assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Northeast Georgia assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Regions Bank’s nine branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed four branches (all in middle-income tracts) in the Northeast Georgia assessment area. The bank's record of closing branches has generally not adversely

## Northeast Georgia

affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

Geographic Distribution of Branches
Assessment Area: GA Northeast GA

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | l Branc <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses <br> \% |
|  |  | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Moderate | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Middle | Total | 8 | 88.9\% | 0 | 4 | 8 | 3 | 8 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 24 | 77.4\% | 75.4\% | 73.2\% |
| Upper | Total | 1 | 11.1\% | 0 | 0 | 1 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 7 | 22.6\% | 24.6\% | 26.8\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 9 | 100.0\% | 0 | 4 | 9 | 3 | 9 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 31 | 100.0\% | 100.0\% | 100.0\% |
| DTO - Drive Thru Only |  |  |  |  |  |  |  |  |  |  |  |  |

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 352 service hours in various capacities for community development organizations by participating in 23 community development services. Many of the community development services focused on education, affordable housing, youth services, and various other community services that aided low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. In addition, Regions Bank employees served on the board of directors for a community organization whose purpose is to rehabilitate homes in distressed areas and provide affordable housing to low- and moderate-income individuals.

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

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

- Jefferson-Jenkins Assessment Area (Jefferson and Jenkins Counties)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing $2.6 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 64.7$ million in deposits in this assessment area, representing a market share of $16.7 \%$ and $1.2 \%$ of Regions Bank's total deposits in Georgia.
- Morgan-Elbert-Wilkes Assessment Area (Elbert, Morgan and Wilkes Counties)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing $2.6 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 133.2$ million in deposits in this assessment area, representing a market share of $15.8 \%$ and $2.4 \%$ of Regions Bank's total deposits in Georgia.
- Northwest Georgia Assessment Area (Chattooga, Gilmer, Gordon and Polk Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $3.4 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 154.7$ million in deposits in this assessment area, representing a market share of $8.2 \%$ and $2.8 \%$ of Regions Bank's total deposits in Georgia.
- Southwest Georgia Assessment Area (Crisp, Clay, Randolph and Decatur Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $3.4 \%$ of its branches in Georgia.
o As of June 30, 2011, the bank had $\$ 141.3$ million in deposits in this assessment area, representing a market share of $17.8 \%$ and $2.6 \%$ of Regions Bank's total deposits in Georgia.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Jefferson-Jenkins | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Above) |
| Morgan-Elbert- <br> Wilkes | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Below) |
| Northwest Georgia | Consistent | Not Consistent <br> (Above) | Not Consistent (Below) |
| Southwest Georgia | Consistent | Not Consistent <br> (Below) | Not Consistent (Below) |

As stated earlier, the Atlanta and Northeast Georgia assessment areas received full-scope reviews, and the bank's performance in the Atlanta assessment area was given greater consideration in determining the overall rating for the state. Atlanta is by far the bank's largest market in Georgia in terms of deposits, loans, and

## Non-Metropolitan Areas (Limited Review)

branches. The full-scope areas selected together represent $69.6 \%$ of the deposits in the assessment areas in Georgia as well as $66.7 \%$ of the branches. The full-scope assessment areas also represent $62.5 \%$ of the HMDA loans and $68.7 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits, branches and loans in the State of Georgia.

For the Lending Test, performance was weaker than the bank's performance in the state in two of the limitedscope assessment areas (Jefferson-Jenkins and Morgan-Elbert-Wilkes) and consistent with the bank's performance in the state in the other assessment areas.

For the Investment Test, the performance in one limited-scope assessment area (Northwest Georgia) was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment area. The performance in three limited-scope assessment areas (JeffersonJenkins, Morgan-Elbert-Wilkes and Southwest Georgia) was weaker than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in one limited-scope assessment area (Jefferson-Jenkins) was stronger than the bank's performance in the state. The performance in three limited-scope assessment areas (Morgan-Elbert-Wilkes, Northwest Georgia and Southwest Georgia) was weaker than the bank’s performance in the state. The performance in the Morgan-Elbert-Wilkes and Northwest Georgia limited-scope assessment areas was weaker than the bank's performance in the state due to fewer community development services and less accessibility of delivery systems. The performance in the Southwest Georgia limited-scope assessment area was weaker than the bank's performance in the state due to fewer community development services.

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

## Illinois

## CRA RATING FOR ILLINOIS: $\underline{S a t i s f a c t o r y ~}^{381}$

## The Lending Test is rated: <br> The Investment Test is rated: The Service Test is rated: <br> Low Satisfactory <br> Needs to Improve Outstanding

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans within the assessment areas.
- The bank provides a poor level of qualified community development investments and grants in the assessment areas.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides a relatively high level of community development services throughout the assessment areas.

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## Illinois

## SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in the State of Illinois:

- Decatur
- Peoria

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

- Bloomington
- Central Illinois (non-MSA)
- Champaign
- Livingston (non-MSA)
- Southeast Illinois (non-MSA)
- Southern Illinois (non-MSA)
- Springfield

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 ILLINOIS

Regions Bank’s lending activity in Illinois accounted for $1.3 \%$ of the bank's total lending activity, while deposits accounted for $1.2 \%$ of the bank's total deposits. As of June 30, 2011, the bank had $\$ 1.2$ billion in deposits in Illinois. Additionally, as of June 30, 2011, the bank ranked $20^{\text {th }}$, among 645 insured institutions, in deposit market share with $0.7 \%$ of the deposits within the state. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 1,657 (1.9\%) were in the Illinois assessment areas. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 959 (0.9\%) were in Illinois. As of December 31, 2011, Regions Bank operated 31 branch offices in Illinois representing $1.8 \%$ of the bank's total branches.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the Illinois assessment areas is Low Satisfactory. Region Bank's lending reflects an adequate responsiveness to the credit needs of both full-scope assessment areas.

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

Although Regions Bank is both a small business and HMDA lender, HMDA lending was given greater consideration in determining the lending test rating for Illinois because the bank originated more HMDA loans by number than small business loans. Additionally, between the two full-scope assessment areas, the Decatur assessment area received greater consideration when determining the rating because it holds a greater percentage of the bank's deposits and loans in Illinois than the Peoria full-scope assessment area. Furthermore, Regions Bank originated only 246 small farm loans in Illinois during the review period; therefore, no detailed discussion of these loans is included in this section of the report.

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Illinois assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

## Illinois

## Statewide Summary of Lending Activity

## Assessment Areas Located in Illinois

| Loan Type | $\#$ | \% | $\mathbf{\$ ( 0 0 0 s )}$ | \% |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 547 | $20.9 \%$ | $\$ 58,720$ | $22.3 \%$ |
| HMDA Refinance | 995 | $38.0 \%$ | $\$ 111,184$ | $42.1 \%$ |
| HMDA Home Improvement | 115 | $4.4 \%$ | $\$ 927$ | $0.4 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{1 , 6 5 7}$ | $\mathbf{6 3 . 3} \%$ | $\mathbf{\$ 1 7 0 , 8 3 1}$ | $\mathbf{6 4 . 8 \%}$ |
| Total Small Business | $\mathbf{7 1 3}$ | $\mathbf{2 7 . 3 \%}$ | $\mathbf{\$ 6 2 , 1 5 2}$ | $\mathbf{2 3 . 6 \%}$ |
| Total Farm | $\mathbf{2 4 6}$ | $\mathbf{9 . 4 \%}$ | $\mathbf{\$ 3 0 , 8 2 7}$ | $\mathbf{1 1 . 7 \%}$ |
| TOTAL LOANS | $\mathbf{2 , 6 1 6}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 2 6 3 , 8 1 0}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

Overall, the distribution of loans among geographies is adequate. The geographic distribution was adequate in both full-scope assessment areas in the state. There were minimal HMDA-related loans originated in low- and moderate-income tracts in both the full-scope assessment areas to conduct meaningful analyses. Although large lending gaps were noted, low-income and moderate-income tracts generally represented a larger share of tracts without lending than middle-income and upper-income tracts. In most of the low- and moderate-income tracts, the housing units were rental and a great percentage of the families in these tracts lived below the poverty level, especially in low-income tracts. This may have impacted the ability to originate HMDA-related loans in these tracts.

Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered adequate in both full-scope assessment areas in the state.

A detailed discussion of the geographic and borrower distribution is included in the analysis for each full-scope assessment area.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Illinois assessment areas. The bank made three community development loans totaling $\$ 3.3$ million during the review period, which represented $0.4 \%$ by number and $0.2 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the revitalization/stabilization of low- and moderate-income geographies. Although the bank made a relatively high level of community development loans in the Decatur assessment area, there was no community development lending in Peoria. More information on community development lending can be found in each full-scope assessment area section.

## Illinois

## Investment Test

The investment test rating is Needs to Improve when considering the bank’s statewide performance and its overall presence in the State of Illinois. The bank made poor use of qualified investments and contributions and exhibited poor responsiveness to credit and community development needs through its investment activities in the Decatur and Peoria assessment areas.

The bank made 12 qualified investments of approximately $\$ 6.7$ million and contributions of $\$ 73,738$ within the Illinois assessment areas. The bank had two current period investments in the state totaling $\$ 6.1$ million. Most of the investments provided support for community development and affordable housing through HUD bonds and GNMA investment instruments. The bank also had investments that benefitted a broader regional area that includes Illinois. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs. The largest donation during the review period was outside of the full-scope assessment areas. In Logan County, the bank donated a former bank branch to a nonprofit affordable housing group for use as its organizational headquarters. The bank also made contributions to national organizations that provided indirect benefit to low- and moderate-income individuals or communities within the Illinois assessment areas. Additional details regarding specific investments and contributions can be found in the fullscope assessment area sections.

## Service Test

The service test rating is Outstanding when considering the bank's statewide performance in Illinois.

## Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank’s geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

## Community Development Services

The bank provides a relatively high level of community development services that benefit residents and small businesses of the assessment areas. Of the two full-scope assessment areas, community development services were excellent in the Decatur assessment area and poor in the Peoria assessment area.

## METROPOLITAN AREA

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DECATUR ASSESSMENT AREA

The Decatur, Illinois assessment area includes all of Macon County, which makes up the entire Decatur MSA. There are 36 census tracts in the assessment area, consisting of 5 low-income tracts, 10 moderate-income tracts, 15 middle-income tracts and 6 upper-income tracts. As of December 31, 2011, Regions Bank operated four branch offices in the Decatur assessment area representing 12.9\% of its branches in Illinois. The four branches are located in one low-income census tract, one moderate-income tract, and two middle-income tracts.

The Decatur, Illinois MSA is small banking market with many smaller, local institutions. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 15 financial institutions operating 42 branch locations with a total of $\$ 1.8$ billion in deposits. Regions Bank ranked $4^{\text {th }}$ with deposit market share of $12.5 \%$ ( $\$ 227.2$ million). Hickory Point Bank and Trust had the largest deposit market share at $26.0 \%$ followed by Busey Bank with $18.5 \%$ and Soy Capital Bank and Trust with $13.5 \%$.

Regions Bank is an active small business and HMDA lender in the assessment area. In 2010, the bank ranked $8^{\text {th }}$ out of 35 small business loan reporters by originating $3.8 \%$ of all loans. In 2011, the bank was $6^{\text {th }}$ out of 40 reporters and increased its small business lending performance to $6.0 \%$ of all loans. From 2010 to 2011, the bank's small business loans increased from 45 to 91 loans. For HMDA lending, Regions Bank ranked $4^{\text {th }}$ in 2010 with $7.9 \%$ of all HMDA loans and $4^{\text {th }}$ in 2011 with $7.5 \%$. Loan production decreased from 275 units in 2010 to 233 units in 2011. Prairie State Bank and Trust, Busey Bank, and PNC Bank were the top HMDA lenders in the assessment area in 2011.

## Demographic Characteristics

The population of Macon County, Illinois is shrinking. According to census data, the population of Macon County in 2000 was 114,706 people, which represented $0.09 \%$ of the total statewide population. From 2000 to 2010, the county's population declined by $3.4 \%$, while the statewide population grew by $3.3 \%$. Migration trends further highlight the population decline. From 2005 to 2010, the assessment area saw an average net migration decline of nearly 500 people per year. Net migration is defined as the number of in-migrant households less the number of out-migrant households and is determined by comparing the addresses of inmigrant and out-migrant federal tax returns for a particular year. ${ }^{382}$

The table below shows selected demographic information for the Decatur assessment area.

[^118]
## Decatur, Illinois

## Combined Demographics Report

Assessment Area: IL Decatur


[^119]
## Income Characteristics

The percentage of Macon County, Illinois residents receiving food stamps is increasing at a rate greater than the state of Illinois. In 2000, 9.9\% of Macon County residents received food stamps, which increased to $17.2 \%$ by 2009. The percentage of residents receiving these benefits statewide increased from $6.6 \%$ in 2000 to $12.4 \%$ in 2009. ${ }^{383}$ Furthermore, an estimated $10.6 \%$ of families in the assessment area lived below the poverty line as of 2009 compared to $9.1 \%$ statewide.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the Decatur, Illinois MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper).

Borrower Income Levels
Decatur, IL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% |  | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$58,900 | 0 | - | \$29,449 | \$29,450 | - | \$47,119 | \$47,120 |  | \$70,679 | \$70,680 |  | \& above |
| 2011 | \$59,400 | 0 | - | \$29,699 | \$29,700 | - | \$47,519 | \$47,520 |  | \$71,279 | \$71,280 |  | \& above |

## Housing Characteristics

The Decatur, Illinois MSA housing market has been impacted by the recent economic downturn to a lesser degree than many areas. The Illinois Association of Realtors reports that 378 housing units were sold in 2011 with a median home sales price of $\$ 86,000$ compared to 915 units in 2006 with a median sales price $\$ 85,000 .^{384}$ This suggests that while the number of units sold has decreased by one-third, the median sales price remained relatively flat despite steep price declines in many housing markets across the country. This also contrasts with statewide figures showing a $53 \%$ decrease in units sold and a $3 \%$ decrease in median home sales prices from 2006 to 2011.

Census data show that there were 50,241 housing units in the assessment area in 2000, of which $66.4 \%$ were owner-occupied, $26.2 \%$ were rental units and $7.3 \%$ were vacant. While a majority of the assessment area's housing units were owner-occupied, a disproportionately higher percentage of housing units in low- and moderate-income tracts were rental units or vacant, indicating reduced opportunities for mortgage origination in these geographies. The median age of housing stock across the assessment area was 42 years, but this figure increased to 56 years in low-income tracts and 48 years in moderate-income tracts. Housing permits also declined, with only 70 single-family permits issued in 2011 compared to 325 in 2006, a $78.5 \%$ decrease. The reduction in multi-family permits was more dramatic, declining $90 \%$ from 2006 to $2011 .{ }^{385}$

Mortgage delinquencies and lack of loan demand adversely impacted the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $5.0 \%$ in January

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## Decatur, Illinois

2010 to $11.8 \%$ in December $2011 .^{386}$ Furthermore, HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings was weak, declining from a high of 1,600 loans in 2006 to 816 loans in 2010.

## Employment and Economic Conditions

Macon County, Illinois is located in the Decatur-Macon County Enterprise Zone. An enterprise zone is a partnership between state and local government, business, labor and community groups designed to encourage economic growth in the targeted area by attracting new industry and revitalizing existing businesses via the provision of tax breaks and other financial incentives. ${ }^{387}$ Tax increment financing (TIF) districts have also been set up throughout the region to capture tax revenue in order to combat the effects of blight while applying economic development incentives to businesses in the district.

Decatur is home to two institutions of higher learning, Millikin University, a four-year undergraduate university, and Richland Community College, as well as two major regional hospitals, Decatur Memorial Hospital and St. Mary's Hospital. ${ }^{388}$ Major employers include Archer Daniels Midland Company, Tate and Lyle, Caterpillar and the aforementioned hospitals and educational facilities. ${ }^{389}$ The largest employment sectors in the assessment area are manufacturing, health care and social assistance, and retail trade, which combine to account for more than $40 \%$ of total employment. ${ }^{390}$

Several major employers reduced the size of their workforces in the Decatur MSA. Archer Daniels Midland announced a $15 \%$ reduction of its Decatur-based corporate staff in 2012 due to volatility of commodity prices. ${ }^{391}$ In 2011, Tate and Lyle began moving its corporate headquarters from Decatur to the Chicago suburbs, reducing its employee base in Decatur by more than $10 \% .{ }^{392}$ And in 2009, industrial manufacturer Caterpillar announced that more than 1,000 Decatur-based workers would be laid off due to decreased demand for its products. ${ }^{393}$

To maintain economic competitiveness, the Center for Entrepreneurship at Millikin University, in partnership with key stakeholders, established "Grow Decatur," an "economic gardening" model for the region that focuses on entrepreneurship and support of existing businesses to drive community and economic growth. The initiative has identified three focal points: economic development, education, and quality of life. It is currently working with residents and businesses to further define what should be done in these areas to grow the economy and create new jobs. ${ }^{394}$

As a result of workforce reductions, the assessment area is also characterized by high unemployment relative to the state. The unemployment rate remained above $10 \%$ in 2011 since peaking in January 2010 at $14.2 \%$, while

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## Decatur, Illinois

both the statewide and nationwide unemployment rates have fallen into single digits. The following chart shows unemployment rates for the assessment area relative to the state of Illinois for 2010 and 2011.

## Unemployment Rates

Assessment Area: IL Decatur

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Decatur MSA | 12 | 10.6 |
| Illinois | $\mathbf{1 0 . 5}$ | $\mathbf{9 . 8}$ |

Not Seasonally Adjusted

Although the unemployment rate declined, it remains high relative to the state. While housing values maintained relatively stable, local and statewide median home sale prices saw a decline from 2010 to 2011, and building permit activity continues at low levels. Combined with elevated mortgage delinquencies and weak loan demand, the local economy remains fragile and will likely need continued strategic initiatives to increase the pace of recovery.

## Community Contacts and Community Development Opportunities

One community contact specializing in business development and entrepreneurship was interviewed for the Decatur, Illinois assessment area and indicated a general need for small business funding sources while specifically discussing the importance of the Grow Decatur initiative. The contact also noted that many banks have closed or reduced credit lines, creating substantial working capital credit needs for local businesses. When other capital sources cannot be identified, these companies often address the shortfall through layoffs. The contact added that considering the workforce reductions of major employers and a correspondingly high unemployment rate, the Decatur area needs proactive involvement from local stakeholders, including banks, to reverse the current economic trends.

The state of Illinois received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. Illinois received $\$ 53.1$ million under the NSP1 allocation process and $\$ 5$ million under NSP3. One Decatur-based project was funded by the state with $\$ 1.1$ million in NSP1 funds to rehabilitate 16 vacant properties that provide affordable, permanent supportive housing units to homeless, disabled and very low- and low-income veterans. ${ }^{395}$

There are no community development financial institutions (CDFIs) located in Macon County. Other community development opportunities include participation in the Low Income Housing Tax Credit (LIHTC) program, which is providing an estimated $\$ 22$ million in tax credits to the state of Illinois in 2012 for the provision of affordable housing. ${ }^{396}$ The state of Illinois also offers a separate LIHTC program for affordable housing development.

[^122]
## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

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

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 508 (79.0\%) HMDA loans compared to 135 (21.0\%) small business loans in the Decatur, Illinois assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Decatur, Illinois, assessment area contains $0.3 \%$ of the bank's small business and HMDA lending by number of loans and $0.3 \%$ by dollar volume, totaling $\$ 71.1$ million. In comparison, $0.2 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderate-income census tracts, were issues considered when assessing the bank's performance; the performance of the aggregate lenders was also considered. Considering all of these factors, the bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

During the review period, Regions Bank originated only one home purchase loan in a low-income tract. No home refinance or home improvement loans were originated in low-income tracts. The bank's one loan was originated in 2011. In both 2010 and 2011, the aggregate lenders also had very low lending levels of home mortgage loans compared to the percentage of owner-occupied units in low-income census tracts, which was $3.2 \%$. This level of lending activity may be indicative of a lack of lending opportunity in low-income census tracts. Due to the low level of owner-occupied units, as well as limited aggregate activity, the bank's performance is adequate, with minimal weighting given to home mortgage lending in low-income tracts.

## Home Purchase Loans

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $11.5 \%$ of its home purchase loans in moderate-income census tracts, which contain $21.9 \%$ of the owner-occupied units in the assessment area. The bank's performance was greater than the aggregate in 2010 but less than aggregate in 2011.

The bank's home purchase lending in middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $6.4 \%$ of its home refinance loans in moderate-income census tracts, which contain $21.9 \%$ of the owner-occupied units. Regions Bank's performance was comparable to the aggregate in both 2010 and 2011.

The bank's home refinance lending in middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Home Improvement Loans

Regions Bank's home improvement lending in moderate-income census tracts is adequate. Although the bank originated only five loans (21.7\%) in moderate-income census tracts, its percentage of home improvement lending in moderate-income census tracts was comparable to the percentage of owner-occupied units in the assessment area at $21.9 \%$. Additionally, the bank's performance exceeded the aggregate in 2010 but was less than the aggregate in 2011.

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

## Small Business Loans

Regions Bank's small business lending in low-income tracts is good. The bank's performance exceeded both the area demographics and the aggregate's performance. Regions Bank originated 20.7\% of its small business loans in low-income census tracts, which contain $11.0 \%$ of the small businesses in the assessment area. Additionally, the bank's performance was greater than the aggregate in both 2010 and 2011.

Regions Bank’s small business lending in moderate-income census tracts is adequate. During the review period, Regions Bank originated 23.7\% of its small business loans in moderate-income tracts, which contain $25.3 \%$ of the small businesses in the assessment area. However, the bank's performance was less than the aggregate's performance in both 2010 and 2011.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's distribution of loans by income and business revenue reflects adequate penetration throughout the assessment area. 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

The bank's home purchase lending to low-income borrowers is adequate. The bank originated $12.4 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $20.1 \%$ of total families in the assessment area. The bank's lending to low-income borrowers was greater than the aggregate in 2010. However, the bank's lending to low-income borrowers was less than the aggregate in 2011; aggregate lenders also had low levels of home purchase lending to low-income borrowers compared to demographics.

Home purchase lending to moderate-income borrowers is excellent. At $30.3 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at 18.5\%. Additionally, the bank's lending to moderate-income borrowers exceeded the aggregate performance in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is adequate. The bank made $6.0 \%$ of its refinance loans to low-income borrowers. Low-income families make up 20.1\% of total families in the assessment area.

Although the aggregate also had low levels of refinance loans to low-income borrowers, the bank's lending to low-income borrowers was greater than the aggregate in 2010 and comparable to the aggregate in 2011.

The bank's home refinance lending to moderate-income borrowers is adequate. The bank's percentage of home refinance lending to moderate-income borrowers at $13.5 \%$ was less than the percentage of moderate-income families in the assessment area at $18.5 \%$. Additionally, the bank's lending to moderate-income borrowers was less than the aggregate performance in 2010 and comparable to the aggregate in 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is very poor. Regions Bank originated only one home improvement loan in 2010 and none in 2011 to low-income borrowers. The bank's percentage of home improvement loans to low-income borrowers at $4.3 \%$ was significantly below the percentage of low-income families in the assessment area at 20.1\%. Additionally, the bank's lending to low-income borrowers was less than the aggregate in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is adequate. Regions Bank's percentage of loans at $17.4 \%$ was comparable to the percentage of moderate-income families in the assessment area at $18.5 \%$. The bank's lending to moderate-income borrowers was greater than the aggregate in 2010 but less than the aggregate in 2011.

The bank's home improvement lending to middle-income borrowers was less than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to the area demographic and the aggregate, the distribution of small business lending by business revenue size is poor. The bank's lending to small businesses was less than the aggregate in both 2010 and 2011. The bank originated $21.5 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $87.3 \%$. However, of the 135 small business loans originated during the review period, 78 (57.8\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $50.9 \%$, which is also less than the percentage of businesses in the Decatur assessment area that are considered small businesses. Also, $80.0 \%$ of the 135 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank performed less than the aggregate in 2010 and greater than the aggregate in 2011.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Decatur assessment area. The bank originated two community development loans totaling $\$ 2.7$ million during the review period. While

## Decatur, Illinois

the number of loans extended during the review period is small, the bank's presence is the market is limited, and the qualitative aspects of the loans are positive. Both loans revitalize or stabilize the low- and moderateincome geographies where they are located and created new jobs via business expansion in the Decatur-Macon County Enterprise Zone. The financing of small businesses and neighborhood stabilization are among the local area's community development needs. The bank's community development loan portfolio exhibits good responsiveness to these needs.

## Investment Test

The bank's performance in the Decatur assessment area under the investment test is poor. The bank had one investment totaling $\$ 485,000$. The bank also had investments that benefitted a broader regional area that includes the assessment area. Prior period direct investments in the assessment area provided support for community services to provide assistance to low-income seniors. Regional investments primarily funded small businesses and startup companies through SBICs. Community development needs identified in the community include, but are not limited to, affordable housing for low- and moderate-income individuals, small business finance, job creation and community revitalization.

The bank also made four contributions totaling $\$ 2,828$. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities and economic development. The bank's investment portfolio and contributions are not considered responsive to community development needs in the assessment area.

## Service Test

The bank's service test performance in the Decatur assessment area is excellent. Its retail and community development services reflect excellent responsiveness to the needs of the Decatur assessment area.

## Retail Services

The bank's delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of four branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open or close any branches in the Decatur assessment area. Banking services and hours of operations are tailored to the convenience and needs of the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in low- or moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

## Decatur, Illinois

## Geographic Distribution of Branches

Assessment Area: IL Decatur

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Brancl <br> \% | $\begin{aligned} & \text { hes } \\ & \text { Open } \\ & \# \end{aligned}$ | Closed \# | Drive <br> thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 1 | 25.0\% | 0 | 0 | 1 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 0 | 0 |  |  | 5 | 13.9\% | 5.9\% | 11.9\% |
| Moderate | Total | 1 | 25.0\% | 0 | 0 | 1 | 0 | 1 |  |  |  |  |
|  | DTO LS | 0 |  | 0 | 0 0 | 0 |  |  | 10 | 27.8\% | 30.3\% | 26.0\% |
| Middle | Total | 2 | 50.0\% | 0 | 0 | 2 | 0 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 15 | 41.7\% | 43.8\% | 41.9\% |
| Upper | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 6 | 16.7\% | 20.1\% | 20.1\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $0$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 4 | 100.0\% | 0 | 0 | 4 | 0 | 3 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 36 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank is a leader in providing community development services in the assessment area. During the review period, Regions Bank employees provided 234 service hours in various capacities for community development organizations, by participating in 36 community development services. Many of the community development services focused on education, affordable housing, youth services, and several other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to students at multiple schools where the majority of the students are on free or reduced price lunch programs. Furthermore, the majority of these schools are located in low- and moderate-income geographies. In addition, Regions Bank employees served on the boards of directors and committees of various community organizations which provide services in low- and moderate-income geographies or to low- and moderate-income individuals.

METROPOLITAN AREA<br>(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PEORIA, ILLINOIS ASSESSMENT AREA

The Peoria, Illinois assessment area includes two counties, Peoria and Tazewell. These counties, along with Marshall, Stark, and Woodford counties, which are excluded from the bank's assessment area, make up the Peoria MSA. There are 78 census tracts in the assessment area, including 10 low-income tracts (all in Peoria County), 11 moderate-income tracts, 42 middle-income tracts, and 15 upper-income tracts. The bank has four branches located in the assessment area: one in a low-income tract, one in a moderate-income tract, one in a middle-income tract and one in an upper-income-tract.

The Peoria assessment area is an active banking market with many smaller, local institutions. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 33 financial institutions operating 132 branch locations with a total of $\$ 5.4$ billion in deposits. Regions Bank ranked $13^{\text {th }}$ with deposit market share of $1.7 \%$ ( $\$ 92.2$ million). Morton Community Bank had the largest deposit market share at $27.1 \%$, followed by PNC Bank with $12.0 \%$, and South Side Trust and Savings Bank of Peoria with 10.1\%.

Regions Bank is not an active small business or HMDA lender in the assessment area. In 2010, the bank ranked $19^{\text {th }}$ out of 44 small business loan reporters by originating fewer than $1 \%$ of all loans. In 2011, the bank was $14^{\text {th }}$ out of 56 small business loan reporters and increased its CRA lending performance to $1.6 \%$ of all loans. From 2010 to 2011, the bank's small business loans increased from 18 to 62 loans. For HMDA lending, Regions Bank ranked $29^{\text {th }}$ in 2010 out of 230 reporters, and $36^{\text {th }}$ in 2011 out of 214 reporters; the bank's market share was less than 1\% for both years. Loan production decreased from 74 units in 2010 to 41 units in 2011. Citizens Equity First Credit Union and Busey Bank were among the top HMDA lenders in the assessment area.

## Demographic Characteristics

The population of the Peoria assessment area grew at an average rate. Census data indicate that the assessment area population in 2000 was 311,918 people, representing $2.5 \%$ of the total statewide population. From 2000 to 2010, the population grew by $3.2 \%$, compared to a statewide population growth rate of $3.3 \%$; however, the majority of this growth occurred during the first half of the decade as evidenced by migration trends. From 2005 to 2010, net migration in Tazewell County was positive, but negative in Peoria County. The lowest levels of net migration were in 2010, when Peoria County experienced an exodus of 1,900 people while Tazewell County had a net increase of 100 individuals. Net migration is defined as the number of in-migrant households less the number of out-migrant households and is determined by comparing the addresses of in-migrant and outmigrant federal tax returns for a particular year. ${ }^{397}$

The table below shows selected demographic information for the Peoria assessment area.

[^123]
## Peoria, Illinois

## Combined Demographics Report

Assessment Area: IL Peoria

| Income Categories | Tract Distribution |  | Families by Tract Income |  | $\begin{aligned} & \text { Families < Poverty } \\ & \text { Level as \% of } \\ & \text { Families by Tract } \end{aligned}$ |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 10 | 12.8 |  | 6.0 | 1,938 | 38.9 | 16,227 | 19.5 |
| Moderate-income | 11 | 14.1 |  | 13.1 | 1,358 | 12.4 | 15,500 | 18.6 |
| Middle-income | 42 | 53.8 |  | 59.5 | 2,577 | 5.2 | 19,424 | 23.3 |
| Upper-income | 15 | 19.2 |  | 21.4 | 412 | 2.3 | 32,128 | 38.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 78 | 100.0 |  | 100.0 | 6,285 | 7.5 | 83,279 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 9,275 | 3,241 |  | 34.9 | 4,804 | 51.8 | 1,230 | 13.3 |
| Moderate-income | 19,121 | 10,222 |  | 53.5 | 7,322 | 38.3 | 1,577 | 8.2 |
| Middle-income | 76,308 | 54,626 |  | 71.6 | 17,633 | 23.1 | 4,049 | 5.3 |
| Upper-income | 26,473 | 19,512 |  | 73.7 | 5,700 | 21.5 | 1,261 | 4.8 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 131,177 | 87,601 |  | 66.8 | 35,459 | 27.0 | 8,117 | 6.2 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,000 | 8.4 |  | 7.7 | 118 | 14.4 | 85 | 10.6 |
| Moderate-income | 1,543 | 12.9 |  | 12.6 | 119 | 14.5 | 127 | 15.9 |
| Middle-income | 6,573 | 55.1 |  | 56.0 | 384 | 46.9 | 408 | 51.0 |
| Upper-income | 2,817 | 23.6 |  | 23.7 | 197 | 24.1 | 180 | 22.5 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 11,933 | 100.0 |  | 100.0 | 818 | 100.0 | 800 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 86.4 |  | 6.9 |  | 6.7 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue NotReported Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 0.1 |  | 0.1 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 17 | 2.1 |  | 2.1 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 609 | 75.4 |  | 75.2 | 5 | 100.0 | 4 | 80.0 |
| Upper-income | 181 | 22.4 |  | 22.6 | 0 | 0.0 | 1 | 20.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 808 | 100.0 |  | 100.0 | 5 | 100.0 | 5 | 100.0 |
|  | Percentage of Total Farms: |  |  | 98.8 |  | . 6 |  | . 6 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

Food stamp usage is increasing across the state of Illinois and in the assessment area. From 2000 to 2009, the percentage of the statewide population receiving food stamps increased from $6.6 \%$ to $12.4 \%$. During the same time period, food stamp usage in Peoria County increased from $9.5 \%$ to $15.8 \%$ while in Tazewell County program participation more than doubled from $4.1 \%$ to $9 \%{ }^{398}$ As of 2009, an estimated $10.2 \%$ of families in Peoria County and $6.2 \%$ of families in Tazewell County lived below the poverty line, compared to $9.1 \%$ statewide.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the Peoria MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper).

Borrower Income Levels
Peoria, IL MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% |  | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$66,700 | 0 | - | \$33,349 | \$33,350 | - | \$53,359 | \$53,360 |  | \$80,039 | \$80,040 |  | \& above |
| 2011 | \$68,200 | 0 | - | \$34,099 | \$34,100 | - | \$54,559 | \$54,560 |  | \$81,839 | \$81,840 |  | \& above |

## Housing Characteristics

The Peoria, Illinois housing market was impacted to a lesser degree by the housing crisis than many other markets. The Illinois Association of Realtors reports the 2011 median sale price in Peoria County was $\$ 115,000$, a $1.7 \%$ decrease from the 2008 peak median price of $\$ 117,000$. Tazewell County performed similarly, decreasing $3.1 \%$ from its peak of $\$ 126,000$ in 2007 to $\$ 122,100$ in 2011. Comparatively, the state of Illinois saw a $33 \%$ drop in median home sale prices from 2006 to $2011 .{ }^{399}$ This suggests that the Peoria MSA housing market remained relatively stable during the recent housing crisis despite steep declines in other markets.

According to 2000 census data, there were 131,177 housing units in the assessment area, of which $66.8 \%$ were owner-occupied, $27.0 \%$ were rental units and $6.2 \%$ were vacant. While a majority of the assessment area's housing units were owner-occupied, a disproportionately higher percentage of housing units in low- and moderate-income tracts were rental units or vacant, indicating limited opportunities for mortgage origination in these tracts. The median age of housing stock across all census tract income categories was 40 years, but this number increased to 54 years in low-income tracts and 49 years in moderate-income tracts. Housing permits also declined, with only 433 single-family permits issued in 2011, compared to a peak of 1,388 permits in 2004. The reduction in multi-family permits was even more dramatic, declining $96 \%$ from 355 permits in 2005 to 16 in $2011 .{ }^{400}$

[^124]Mortgage delinquencies and low levels of loan demand continue to impact the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $5.1 \%$ in January 2010 to $11.4 \%$ in December 2011. Furthermore, HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to be weak, declining from a high of 5,788 loans in 2006 to 3,070 loans in 2010, a 47\% decrease.

## Employment and Economic Conditions

The Peoria MSA is home to the global headquarters of Caterpillar, Inc., a manufacturer of construction and mining equipment, diesel and natural gas engines, industrial gas turbines, and diesel-electric locomotives. ${ }^{401}$ Caterpillar employs more than 15,000 people in the Peoria area. Other major employers include Archer Daniels Midland, Komatsu American Corporation, Citizens Equity First Credit Union (CEFCU), Bradley University, multiple medical centers, and Wal-Mart. The largest employment sectors in the assessment area are manufacturing, health care and social assistance, retail trade, and government. ${ }^{402}$

The assessment area includes two enterprise zones, one in Peoria County and one in Tazewell County. An enterprise zone is an area designated by a municipality for targeted business growth and economic revitalization. The purpose of the enterprise zone is to stimulate economic growth and neighborhood revitalization in economically depressed areas. Businesses located in a designated enterprise zone are eligible to obtain special state and local tax incentives. ${ }^{403}$ Numerous tax increment financing (TIF) districts are also in place to capture tax revenue in order to combat the effects of blight and apply economic development incentives to businesses in the district.

The Economic Development Council (EDC) for Central Illinois developed a comprehensive economic development strategy for the region that was published in 2007. The primary drivers of the plan are the region's significant dependence on manufacturing for economic growth and slow population growth in recent years. The plan outlines four goals: development of targeted industries, infrastructure, quality of life, and rural and small communities. Targeted industries include technology commercialization and innovation, intermodal logistics, health care services, energy, agribusiness/agriscience, tourism, retail, specialized manufacturing, professional/technical services and global trade. Additionally, the EDC board structure was reorganized to make it more interactive with the communities and organizations the EDC serves, resulting in an Economic Development and Growth Experts (EDGE) group and Strategy Groups for each of the targeted industries. ${ }^{404}$

Bank On is a national initiative with local programs focused on connecting unbanked and under-banked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $4.7 \%$ of households in the MSA are unbanked compared to $6.2 \%$ across the state. Additionally, $16.8 \%$ of households in the assessment area are listed as under-banked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $15.7 \%$ of under-banked households statewide. ${ }^{405}$

[^125]
## Peoria, Illinois

The unemployment rate in the assessment area has been trending downward since January 2010. The following chart shows unemployment rates for the MSA and applicable counties relative to the state of Illinois for 2010 and 2011.

Unemployment Rates
Assessment Area: IL Peoria

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Peoria MSA | 10.4 | 8.8 |
| Peoria County | 11.0 | 9.5 |
| Tazewell County | 10.2 | 8.3 |
| Illinois | $\mathbf{1 0 . 5}$ | $\mathbf{9 . 8}$ |

Not Seasonally Adjusted
Generally speaking, the economic conditions in the Peoria MSA are relatively stable. Housing and unemployment indicators point to economic stabilization in spite of broader economic issues, but the current rise in delinquent mortgages and weak loan demand threaten to destabilize an already fragile mortgage market and the region's economic recovery.

## Community Contacts and Community Development Opportunities

One community contact specializing in community development and local government assistance was interviewed for the Peoria assessment area. The contact discussed the area's need for more affordable rental housing and first-time homebuyer programs, specifically highlighting the lack of supportive housing for special needs populations, such as veterans, persons with disabilities, and persons being re-entered into the community. An increase in the number of foreclosures is also putting a strain on community resources. Finally, the contact indicated a need for more proactive involvement of financial institutions in the local community, from homebuyer education to increased credit accessibility for moderate-size businesses.

The Peoria assessment area did not receive any funding under the federal government's Neighborhood Stabilization Program (NSP) or through the state of Illinois’ NSP allocation.

The assessment area is home to only one community development financial institution (CDFI), which provides services for quality of life and economic health issues for a specific community in Peoria. ${ }^{406}$ Other community development opportunities include participation in the Low Income Housing Tax Credit (LIHTC) Program, which provided an estimated $\$ 22$ million in tax credits to the State of Illinois in 2012 for the provision of affordable housing. ${ }^{407}$ The State of Illinois also offers a separate LIHTC program for affordable housing development.

[^126]
## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Regions Bank's lending performance in the Peoria assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes few, if any, community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 115 (59.6\%) HMDA loans compared to 78 (40.4\%) small business loans in the Peoria assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Peoria assessment area contains $0.1 \%$ of the bank's small business and HMDA lending by number of loans and $0.1 \%$ by dollar volume, totaling $\$ 23.6$ million. In comparison, $0.1 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderate-income census tracts, were issues considered when assessing the bank's performance; the performance of the aggregate lenders was also considered. Considering all of these factors, the bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

During the review period, Regions Bank originated no home purchase or home refinance loans in low-income tracts. In both 2010 and 2011, the aggregate lenders also had very low home purchase and home refinance lending levels compared to the percentage of owner-occupied units in low-income census tracts, which was $3.7 \%$. This lending activity may be indicative of a lack of lending opportunity in low-income census tracts. Due to the low level of owner-occupied units, as well as limited aggregate activity, the bank's performance is adequate, with minimal weighting given to home purchase and home refinance lending in lowincome tracts.

## Home Purchase Loans

Regions Bank's home purchase lending in moderate-income tracts is adequate. The bank's performance exceeded both the area demographics and the 2010 aggregate performance; however lending was below the aggregate in 2011. Overall, lending levels were very low in moderate-income tracts, with Regions Bank only originating three loans in these tracts.

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

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $6.9 \%$ of its refinance loans in moderate-income census tracts, which contain $11.7 \%$ of the owner-occupied units in the assessment area. It appears that aggregate lenders also had low levels of home

## Peoria, Illinois

refinance loans compared to the percentage of owner-occupied units in moderate-income census tracts. The bank's performance was below the aggregate in 2010; however, performance exceeded the aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending in low-income census tracts is poor. During the review period, the bank did not originate any home improvement loans in low-income census tracts. In 2010, aggregate lenders originated loans at a level comparable to the percentage of owner-occupied units in low-income tracts, which was $3.7 \%$; however, in 2011 aggregate lending was less than the percentage of owner-occupied units.

Regions Bank's home improvement lending in moderate-income tracts is adequate. The bank's performance exceeded both the area demographics and the 2011 aggregate performance. Lending in 2010 was less than the aggregate.

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

## Small Business Loans

Regions Bank's small business lending in low-income tracts is good. The bank's performance exceeded both the area demographics and the aggregate performance in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is also good. At 19.2\%, the bank's small business lending in moderate-income census tracts exceeded the percentage of small businesses these tracts at $12.6 \%$. The bank's performance was below the aggregate in 2010 but significantly above the aggregate in 2011.

The bank’s small business lending in middle- and upper-income tracts was less than the percentage of small businesses in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower-income or gross annual revenue 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

The bank's home purchase lending to low-income borrowers is adequate. The bank originated $16.7 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $19.5 \%$ of total families in the assessment area. The bank's lending to low-income borrowers was greater than the aggregate in 2010, but was less than the aggregate in 2011.

Home purchase lending to moderate-income borrowers is excellent; at 37.5\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families

## Peoria, Illinois

in the assessment area at $18.6 \%$. Additionally, the bank's lending to moderate-income borrowers exceeded the aggregate performance in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is excellent. The bank originated 14.9\% of its refinance loans to low-income borrowers. Low-income families make up $19.5 \%$ of total families in the assessment area. Additionally, the bank's lending to low-income borrowers exceeded the aggregate performance in 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is good. The bank's percentage of home refinance lending to moderate-income borrowers at $20.7 \%$ exceeded the percentage of moderate-income families in the assessment area at $18.6 \%$. Additionally, the bank's lending to moderate-income borrowers exceeded the aggregate performance in 2010 and 2011.

The bank's refinance lending to middle-income borrowers was greater than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was less than the percentage of upperincome families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Although the volume of Regions Bank's lending was low, the percentage of home improvement loans to low-income borrowers exceeded the percentage of low-income families, at $19.5 \%$, in the assessment area. The bank's performance also exceeded the aggregate in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is adequate. Again, the volume of Regions Bank’s lending was low; however, the bank's performance exceeded the percentage of moderate-income families, at $18.6 \%$, in the assessment area. The bank's performance also exceeded the aggregate in 2011, but was below the aggregate in 2010.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area; however, no home improvement loans were originated to upper-income borrowers.

## Small Business Lending

Considering the bank's performance when compared to the area demographic and the aggregate, the distribution of small business lending by business revenue size is poor. The bank's lending to small businesses was less than the aggregate in both 2010 and 2011. The bank originated $16.7 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $86.4 \%$. However, of the 78 small business loans originated during the review period, 41 (52.6\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $35.1 \%$, which is less than the percentage of businesses in the Peoria, Illinois assessment area that are considered small businesses, at $86.4 \%$. Also, $69.2 \%$ of the 78 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank performed below the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank makes few, if any, community development loans in the Peoria assessment area. The bank originated no community development loans during the review period. Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization

## Peoria, Illinois

tied to foreclosure mitigation, and promotion of economic development by financing small businesses. None of the area's community credit needs were responded to by the bank with community development lending.

## Investment Test

The bank's performance in the Peoria assessment area under the investment test is poor. The bank had one investment totaling $\$ 150,200$. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Prior period direct investments in the assessment area provided support for affordable housing and community development through an investment in a HUD bond. Regional investments primarily funded small businesses and startup companies through investments in SBICs. Community development needs identified in the community include, but are not limited to, affordable housing for low- and moderate-income individuals, small business financing, job creation, and community revitalization.

The bank also made two contributions totaling $\$ 60$. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities. The bank's investment portfolio and contributions are not considered responsive to community development needs in the assessment area.

## Service Test

The bank's service test performance in the Peoria assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Peoria assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment area. The distribution of the four branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed one branch (located in a middle-income tract) in the Peoria assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank has weekend hours for branches in low- and moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Peoria, Illinois

## Geographic Distribution of Branches

Assessment Area: IL Peoria

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | l Branch <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 1 | 25.0\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
| Low | DTO LS | 1 0 |  | 0 | 0 | 1 |  |  | 10 | 12.8\% | 6.5\% | 8.4\% |
| Moderate | Total | 1 | 25.0\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 |  | 0 | 0 | 0 |  |  | 11 | 14.1\% | 14.3\% | 12.9\% |
| Middle | Total | 1 | 25.0\% | 0 | 1 | 1 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 |  | 0 | 0 | 0 |  |  | 42 | 53.8\% | 58.8\% | 55.1\% |
| Upper | Total | 1 | 25.0\% | 0 | 0 | 1 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 |  | 0 | 0 | 0 |  |  | 15 | 19.2\% | 20.4\% | 23.6\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 4 | 100.0\% | 0 | 1 | 4 | 2 | 4 |  |  |  |  |
|  | DTO LS | 1 0 |  | 0 | 0 | 1 |  |  | 78 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a limited level of community development services in the assessment area, and improvement is needed. During the review period, Regions Bank employees provided 21 service hours for community development organizations, by participating in 18 community development service activities. According to information obtained from community contacts, there are opportunities for financial institutions to participate in community development services in the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

## Metropolitan Areas (Limited Review)

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

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

- Bloomington Assessment Area (McLean County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $3.2 \%$ of its branches in Illinois.
o As of June 30, 2011, the bank had $\$ 69.9$ million in deposits in this assessment area, representing a market share of $0.6 \%$ and $6.0 \%$ of Regions Bank's total deposits in Illinois.
- Champaign Assessment Area (Champaign County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $3.2 \%$ of its branches in Illinois.
o As of June 30, 2011, the bank had $\$ 25.4$ million in deposits in this assessment area, representing a market share of $0.6 \%$ and $2.2 \%$ of Regions Bank's total deposits in Illinois.
- Springfield Assessment Area (Sangamon County)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $6.5 \%$ of its branches in Illinois.
o As of June 30, 2011, the bank had $\$ 67.5$ million in deposits in this assessment area, representing a market share of $1.4 \%$ and $5.8 \%$ of Regions Bank's total deposits in Illinois.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Bloomington | Consistent | Not Consistent (Below) | Not Consistent (Below) |
| Champaign | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |
| Springfield | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |

The Decatur and Peoria assessment areas received full-scope reviews, and the bank's performance in the Decatur assessment area was given greater consideration in determining the overall rating for the state. Decatur is one of the bank's largest markets in Illinois in terms of deposits and loans. The full-scope areas selected together represent $27.3 \%$ of the deposits in the assessment areas in Illinois as well as $25.8 \%$ of the branches. The full-scope assessment areas represent $37.6 \%$ of the HMDA loans and $29.8 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent a large portion of the deposits, branches and loans in the State of Illinois.

## Metropolitan Areas (Limited Review)

For the Lending Test, performance in the Bloomington limited-scope assessment area was consistent with the bank's performance in the state. Performance in two limited-scope assessment areas (Champaign and Springfield) was weaker than the bank's performance in the state primarily because of lower levels of community development loans relative to the bank's operations in the assessment areas and the geographic distribution of loans.

For the Investment Test, the performance in all three limited-scope assessment areas (Bloomington, Champaign, and Springfield) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in all three limited-scope assessment areas was weaker than the bank's performance in the state. Fewer community development services were noted in all three assessment areas, while limited accessibility of delivery systems was an additional factor in the Bloomington and Springfield assessment areas.

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

## Non-Metropolitan Areas (Limited Review)

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

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

- Central Illinois Assessment Area (DeWitt, Logan and Christian Counties)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing $9.7 \%$ of its branches in Illinois.
o As of June 30, 2011, the bank had $\$ 116.7$ million in deposits in this assessment area, representing a market share of $7.3 \%$ and $10.0 \%$ of Regions Bank's total deposits in Illinois.
- Livingston Assessment Area (Livingston County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $3.2 \%$ of its branches in Illinois.
o As of June 30, 2011, the bank had $\$ 28.0$ million in deposits in this assessment area, representing a market share of $2.6 \%$ and $2.4 \%$ of Regions Bank's total deposits in Illinois.
- Southeast Illinois Assessment Area (Clark, Crawford and Wabash Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $12.9 \%$ of its branches in Illinois.
o As of June 30, 2011, the bank had $\$ 92.5$ million in deposits in this assessment area, representing a market share of $8.4 \%$ and $7.9 \%$ of Regions Bank's total deposits in Illinois.
- Southern Illinois Assessment Area (Franklin, Jackson, Johnson, Marion, Perry, Randolph, Washington and Williamson Counties)

O As of December 31, 2011, Regions Bank operated 11 branches in the assessment area, representing 35.5\% of its branches in Illinois.
o As of June 30, 2011, the bank had $\$ 449.0$ million in deposits in this assessment area, representing a market share of $9.2 \%$ and $38.4 \%$ of Regions Bank's total deposits in Illinois.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

|  | Nonmetropolitan Assessment Areas |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Central Illinois | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Below) |
| Livingston | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Below) |
| Southeast Illinois | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Below) |
| Southern Illinois | Consistent | Not Consistent <br> (Below) | Not Consistent (Below) |

## Non-Metropolitan Areas (Limited Review)

As stated earlier, the Decatur and Peoria assessment areas received full-scope reviews, and the bank's performance in the Decatur assessment area was given greater consideration in determining the overall rating for the state. Decatur is one of the bank's largest markets in Illinois in terms of deposits and loans. The fullscope areas selected together represent $27.3 \%$ of the deposits in the assessment areas in Illinois as well as $25.8 \%$ of the branches. The full-scope assessment areas also represent $37.6 \%$ of the HMDA loans and $29.8 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent a large portion of the deposits, branches and loans in the State of Illinois.

For the Lending Test, performance was weaker than the bank's performance in the state in three of the limitedscope assessment areas (Central Illinois, Livingston and Southeast Illinois) and consistent with the bank's performance in the state in the remaining limited-scope assessment area (Southern Illinois). The lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Central Illinois and Southeast Illinois assessment areas. The distribution of loans by borrower's income and lower levels of community development loans relative to the banks operations in the assessment area contributed to weaker performance in the Livingston assessment area.

For the Investment Test, the performance all four limited-scope assessment areas (Central Illinois, Livingston, Southeast Illinois and Southern Illinois) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in all four limited-scope assessment areas was weaker than the bank's performance in the state primarily due to fewer community development services. Limited accessibility of delivery systems was an additional factor in the Southeast Illinois assessment area.

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

## Indiana

## CRA RATING FOR INDIANA: Satisfactory

## The Lending Test is rated: Low Satisfactory <br> The Investment Test is rated: Outstanding <br> The Service Test is rated: <br> Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes a low level of community development loans within the assessment areas.
- The bank provides an excellent level of qualified community development investments and grants in the assessment areas and is often in a leadership position in response to the community development needs of the assessment areas.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides an adequate level of community development services throughout the assessment areas.


## Indiana

## SCOPE OF EXAMINATION

A full-scope review was conducted for one assessment area in the State of Indiana:

- Indianapolis

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

- Bloomington
- Clinton-Grant (non-MSA)
- Evansville
- Gary
- Knox-Lawrence (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 INDIANA

Lending activity in Indiana accounted for 2.9\% of the bank's total lending activity. HMDA lending in Indiana represented $3.5 \%$ of the bank's total HMDA lending, while small business and small farm lending represented $2.4 \%$ of the bank's total small business and small farm lending. As of June 30, 2011, the bank had $\$ 2.4$ billion in deposits in Indiana accounting for 2.5\% of Regions Bank’s total deposits. Additionally, as of June 30, 2011, the bank ranked $9^{\text {th }}$, among 187 insured institutions, in deposit market share with $2.5 \%$ of the deposits within the state. As of December 31, 2011, Regions Bank operated 64 branch offices in Indiana representing 3.7\% of the bank's total branches.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of Indiana is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs.

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

Although Regions Bank is both a small business and HMDA lender, HMDA lending was given greater consideration in determining the lending test rating for Indiana because the bank originated more HMDA loans by number than small business loans. Although the bank does originate a small number of small farm loans, it is not a major loan product for Regions Bank; therefore, no detailed discussion of these loans is included in this section of the report.

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Indiana assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

# Statewide Summary of Lending Activity 

Assessment Areas Located in
Indiana

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | $\%$ |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 1,133 | $19.8 \%$ | $\$ 147,487$ | $20.0 \%$ |
| HMDA Refinance | 1,807 | $31.6 \%$ | $\$ 277,612$ | $37.6 \%$ |
| HMDA Home Improvement | 101 | $1.8 \%$ | $\$ 864$ | $0.1 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{3 , 0 4 1}$ | $\mathbf{5 3 . 2 \%}$ | $\mathbf{\$ 4 2 5 , 9 6 3}$ | $\mathbf{5 7 . 6 \%}$ |
| Total Small Business | $\mathbf{2 , 2 5 9}$ | $\mathbf{3 9 . 5 \%}$ | $\mathbf{\$ 2 5 2 , 4 8 9}$ | $\mathbf{3 4 . 2 \%}$ |
| Total Farm | $\mathbf{4 1 3}$ | $\mathbf{7 . 2 \%}$ | $\mathbf{\$ 6 0 , 5 1 6}$ | $\mathbf{8 . 2 \%}$ |
| TOTAL LOANS | $\mathbf{5 , 7 1 3}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 7 3 8 , 9 6 8}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank's HMDA and small business loans is good. Overall, the distribution of loans by borrower's income and revenue size of business is also good. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment area is included in the next section of this report.

## Community Development Lending

Regions Bank makes a low level of community development loans in the Indiana assessment areas. The bank made 15 community development loans totaling $\$ 32.2$ million during the review period, which represented $2.2 \%$ by number and $2.3 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the purpose of affordable housing. More information on community development lending can be found in the full-scope assessment area section.

## Investment Test

The investment test rating for the State of Indiana is Outstanding when considering the bank's statewide performance and its overall presence in the state. The bank made excellent use of qualified investments and contributions and exhibited excellent responsiveness to credit and community development needs through its investment activities in the Indianapolis assessment area.

The bank made 11 qualified investments of approximately $\$ 1.6$ million and contributions of $\$ 24,775$ within the Indiana assessment areas. None of the investments were current period investments. Most of the investments provided support for affordable housing through HUD bonds, GNMA investment instruments, and the purchase of Low Income Housing Tax Credits (LIHTCs) or investments in LIHTC funds. Other investments supported community and economic development through investments in CDFIs that provided small business or real estate development loans. The bank also had investments that benefitted a broader regional area that includes Indiana. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs. The bank also made contributions to national organizations that provided indirect benefit to low- and moderate-income individuals or communities within the Indiana assessment areas.

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

## Service Test

The service test rating is Low Satisfactory when considering the bank's statewide performance in Indiana.

## Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderateincome geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

## Community Development Services

The bank provides an adequate level of community development services that benefit residents and small businesses of the assessment areas. Community development services were adequate for the one full-scope assessment area.

## METROPOLITAN AREA

(Full-scope Review)

## DESCRIPTIONS OF INSTITUTION'S OPERATIONS IN THE INDIANAPOLIS, INDIANA ASSESSMENT AREA

The Indianapolis assessment area includes four counties: Hamilton, Johnson, Marion and Morgan. These counties along with Boone, Brown, Hancock, Hendricks, Putnam, and Shelby counties, which are excluded from the bank's assessment area, make up the Indianapolis MSA. There are 263 census tracts in the assessment area, consisting of 26 low-, 82 moderate-, 101 middle-, 53 upper-income tracts, and one tract with unknown income. As of December 31, 2011, the bank had 29 branches located in the assessment area, including one in a low-income census tract and four in moderate-income tracts.

The Indianapolis assessment area is an active banking market dominated by two large national institutions. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 38 financial institutions operating 459 branch locations with a total of $\$ 27.1$ billion in deposits. Regions Bank ranked $7^{\text {th }}$ in deposit market share with $4.5 \%$ ( $\$ 1.2$ billion) of all deposits. JPMorgan Chase Bank had the largest deposit market share at $27.2 \%$, followed by PNC Bank with 23.1\%.

Regions Bank is an active HMDA and small business lender in the assessment area, but the market is dominated by several large lenders. In 2010, the bank ranked $14^{\text {th }}$ out of 90 small business loan reporters by originating $2.3 \%$ of all loans. In 2011, Regions Bank ranked $7^{\text {th }}$ out of 88 small business loan reporters with $4.2 \%$ of all loans. From 2010 to 2011, the bank's small business loans increased from 355 to 854 loans. For HMDA lending, Regions Bank ranked $22^{\text {nd }}$ in 2010 with less than $1 \%$ of all HMDA loans and $27^{\text {th }}$ in 2011, also with less than $1 \%$. JPMorgan Chase Bank, Union Savings Bank, and Wells Fargo Bank were among the top HMDA lenders in the assessment area.

## Demographic Characteristics

Population growth in the counties comprising the Indianapolis MSA has been strong. Census data indicate that the population of the area was $1,225,092$ in 2000 , representing $20.2 \%$ of the total statewide population. From 2000 to 2010, the assessment area population grew by $13.2 \%$, while the statewide population grew by $6.6 \%$. Marion County, home to the city of Indianapolis, was the most populous county in the assessment area with over 900,000 people and grew by $5 \%$ from 2000 to 2010. Net migration, while positive, has been on the decline across the assessment area since 2008. Net migration is defined as the number of in-migrant households less the number of out-migrant households and is determined by comparing the addresses of in-migrant and outmigrant federal tax returns for a particular year. ${ }^{408}$

The following table shows selected demographic information for the Indianapolis assessment area.

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## Indianapolis, Indiana

## Combined Demographics Report

## Assessment Area: IN Indianapolis

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 26 | 9.9 |  | 5.1 | 4,591 | 28.3 | 63,107 | 19.9 |
| Moderate-income | 82 | 31.2 |  | 25.2 | 10,220 | 12.8 | 58,379 | 18.4 |
| Middle-income | 101 | 38.4 |  | 40.8 | 5,374 | 4.2 | 71,234 | 22.5 |
| Upper-income | 53 | 20.2 |  | 28.9 | 1,545 | 1.7 | 124,060 | 39.2 |
| Unknown-income | 1 | 0.4 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 263 | 100.0 |  | 100.0 | 21,730 | 6.9 | 316,780 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 35,104 |  |  | 32.4 | 16,508 | 47.0 | 7,219 | 20.6 |
| Moderate-income | 148,218 | 67,736 |  | 45.7 | 64,854 | 43.8 | 15,628 | 10.5 |
| Middle-income | 214,994 | 133,553 |  | 62.1 | 67,789 | 31.5 | 13,652 | 6.3 |
| Upper-income | 129,348 | 101,546 |  | 78.5 | 21,605 | 16.7 | 6,197 | 4.8 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 527,664 | 314,212 |  | 59.5 | 170,756 | 32.4 | 42,696 | 8.1 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \text { \$1 Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,950 | 3.3 |  | 3.2 | 199 | 4.8 | 106 | 3.3 |
| Moderate-income | 9,756 | 16.7 |  | 16.4 | 793 | 19.3 | 567 | 17.9 |
| Middle-income | 24,941 | 42.7 |  | 42.2 | 1,819 | 44.3 | 1,530 | 48.3 |
| Upper-income | 21,791 | 37.3 |  | 38.2 | 1,289 | 31.4 | 964 | 30.4 |
| Unknown-income | 28 | 0.0 |  | 0.0 | 4 | 0.1 | 3 | 0.1 |
| Total Assessment Area | 58,466 | 100.0 |  | 100.0 | 4,104 | 100.0 | 3,170 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 87.6 |  | 7.0 |  | 5.4 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3 | 0.4 |  | 0.4 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 28 | 3.6 |  | 3.5 | 0 | 0.0 | 1 | 33.3 |
| Middle-income | 532 | 67.7 |  | 67.9 | 5 | 62.5 | 1 | 33.3 |
| Upper-income | 223 | 28.4 |  | 28.3 | 3 | 37.5 | 1 | 33.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 786 | 100.0 |  | 100.0 | 8 | 100.0 | 3 | 100.0 |
|  | Percentage of Total Farms: |  |  | 98.6 |  | 1.0 |  | . 4 |

[^128]
## Income Characteristics

Poverty is a growing concern across the assessment area. As of 2009, Marion County had 13\% of its population living below the poverty line, compared to state's poverty rate of $9.5 \%$. The other less populated counties in the assessment area had poverty rates lower than the state but increasing, which has resulted in increased participation in the food stamps program. From 2000 to 2009, the percentage of the statewide population receiving food stamps more than doubled from $5.4 \%$ to $12.3 \%$. All counties in the assessment area outpaced the state's growth in usage rate during this time period, with Johnson County in particular experiencing a $250 \%$ increase. ${ }^{409}$

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the Indianapolis-Carmel, IN MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper).

## Borrower Income Levels Indianapolis-Carmel, IN MSA



## Housing Characteristics

The Indiana housing market is soft but improving. Home values across the state and in the assessment area did not increase significantly during the first half of the 2000s like many other markets. In the assessment area, home values fluctuated in the latter half of the decade but have shown signs of stability. According to the Indiana Association of Realtors, the median sales price for existing single-family homes in the Indianapolis MSA in 2011 was $\$ 113,900$, representing an $8 \%$ decline from the peak price of $\$ 123,800$ in 2005.

New home construction in the Indianapolis MSA has slowed dramatically. Single-family building permits were down $76 \%$ from a high of 14,809 in 2001 to 3,620 in 2011. The multi-family market has fared somewhat better, dropping $51 \%$ from a peak of 3,045 in 1998 to 1,482 in 2011. The lowest level of multi-family building permit activity was 2007 with 744 permits issued. ${ }^{410}$

The 2000 census indicates that there were 527,644 total housing units in the assessment area, of which $60 \%$ were owner-occupied. The median value of housing units was $\$ 109,361$, which was higher than median housing values for the state of Indiana at $\$ 92,500$ but lower than the United States at $\$ 119,600$. The median age of housing in the assessment area was 30 years, compared to the statewide median age of 29 years. The median gross rent was $\$ 576$, which was higher than the state at $\$ 521$.

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Home affordability remains a hallmark of the Indianapolis housing market. In 2010, the Indianapolis housing affordability gave it the highest ranking on the Housing Opportunity Index (HOI), a metric created by the National Association of Home Builders and Wells Fargo, which determines affordability by measuring median home prices against median incomes. The HOI rating was driven by decent housing being affordable to $96 \%$ of families making the median income in the Indianapolis area. ${ }^{411}$

Mortgage delinquencies and lack of loan demand adversely impacted the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $6.6 \%$ in January 2010 to $11.6 \%$ in December 2011. Furthermore, HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings was weak, declining $51 \%$ from a high of 26,743 loans in 2006 to 13,127 loans in 2010.

## Employment and Economic Conditions

Indianapolis has a diverse employer base for its growing population. Some of the area’s largest employers include Eli Lilly and Company, Indiana University Health, St. Vincent Hospitals and Health Services, WalMart and Fed Ex. ${ }^{412}$ The largest private sector employment industries include health care and social services, retail trade, manufacturing and administrative, and waste management services. Combined, these industries account for $41 \%$ of private sector employment in the Indianapolis MSA.

The state of Indiana has more than 20 enterprise zones, including the Indianapolis, Indiana Enterprise Zone located in the Indianapolis MSA, which is located in the city of Indianapolis, the urban core of the region. Businesses located in the enterprise zone receive financial benefits such as tax abatements for their business activities in the zone. Indianapolis and Marion County jointly produced a 2010 Action Plan in conjunction with their Consolidated Plan to address the following six strategic community goals for the area: encourage economic development activities and efforts in the community, stabilize distressed neighborhoods through targeted development, support housing stabilization efforts, prevent homelessness through the support and operations of programs that serve very-low-income residents, decrease homelessness through the support of homeless programs and housing projects, and support the needs of persons living with HIV/AIDs and their families. The plan specifically highlights housing issues, including home repair, creating new opportunities for homeownership, and creating and rehabilitating affordable rental housing, as the plan's top priority. Funding sources for the Action Plan include the Community Development Block Grant (CDBG), the Home Investment Partnership Program (HOME), the Emergency Shelter Grant (ESG), and the Housing Opportunities for Persons with AIDS (HOPWA) program. ${ }^{413}$

Job loss has placed strains on the community. Since 2009, numerous companies have reduced staff or ceased operations. In 2009, Navistar International Group closed multiple Indianapolis-based facilities, resulting in approximately 700 employees being let go. Eli Lilly cut more than 300 jobs in 2011 as part of an effort to trim annual expenses by $\$ 1$ billion. More recently, Aurora Bank FSB announced the termination of all 450 employees at its Indianapolis office. ${ }^{414}$ These actions, along with other workforce reductions by employers throughout the MSA, have created challenges for the local economy, but as can be seen in the table below,

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## Indianapolis, Indiana

unemployment rates for the MSA and counties in the assessment area are generally lower than the state unemployment rate.

## Unemployment Rates

Assessment Area: IN Indianapolis

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Indianapolis MSA | 9.1 | 8.4 |
| Hamilton County | 7.0 | 6.3 |
| Johnson County | 8.4 | 7.7 |
| Marion County | 9.9 | 9.4 |
| Morgan County | 9.9 | 8.9 |
| Indiana | $\mathbf{1 0 . 1}$ | $\mathbf{9 . 0}$ |

Not Seasonally Adjusted

Generally speaking, economic conditions in the Indianapolis MSA are improving modestly, and housing affordability remains the primary driver. As a result of workforce reductions in recent years, the City of Indianapolis and Marion County are experiencing greater challenges with unemployment relative to the surrounding counties. Conversely, census data indicate that Indianapolis ranked number four in the country for U.S. college degree attainment from 2000 to 2008, an indicator that an educated workforce is in place for higher-skilled jobs if and when they return. ${ }^{415}$

## Community Contacts and Community Development Opportunities

Two community contacts specializing in affordable housing finance and homebuyer preparation were interviewed for the Indianapolis assessment area. Both contacts discussed the need for rehab of existing housing stock and more flexible home financing options from banks. Due to tightened credit standards, the home financing process, especially for low- and moderate-income borrowers, has become complex and arduous, discouraging potential buyers from pursuing homeownership. The interviewees suggested that banks could get more involved in development of the local community by buying tax credits and providing contributions to nonprofit community development organizations. Regions Bank was specifically mentioned as being an accessible financial institution and positive community development participant.

Indianapolis received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. The City received $\$ 29.1$ million under the NSP1 allocation process and $\$ 8$ million under NSP3. Hamilton County, Indiana also received $\$ 2.3$ million to provide targeted emergency assistance to help stabilize neighborhoods and stem the decline of home values. Additionally, the State of Indiana received $\$ 32.8$ million in combined NSP1 and NSP3 funding, a portion of which was allocated to the Indianapolis area to acquire

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## Indianapolis, Indiana

vacant residential properties for rehabilitation, as well as demolish blighted residential and commercial/industrial structures. ${ }^{416}$

The assessment area is home to three community development financial institutions (CDFIs), two of which are credit unions. ${ }^{47}$ The third organization is a nonprofit mortgage lender that offers home purchase financing products and homeownership-related educational services. Other community development opportunities include participation in the Low Income Housing Tax Credit (LIHTC) Program, which provided an estimated $\$ 14.3$ million in tax credits to the state of Indiana in 2012 for the provision of affordable housing. ${ }^{418}$

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Indianapolis assessment area is adequate. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a low level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 1,191 (52.4\%) small business loans compared to 1,080 (47.6\%) HMDA loans in the Indianapolis assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The Indianapolis assessment area contains $1.2 \%$ of the bank's small business and HMDA lending by number of loans and $1.5 \%$ by dollar volume, totaling $\$ 325.5$ million. In comparison, $1.2 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

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

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is good. The bank's performance was comparable to both the area demographic and the aggregate performance. During the review period, Regions Bank originated $3.4 \%$ of its small business loans in low-income tracts, which contain $3.2 \%$ of the small businesses in the assessment area. The bank performed slightly better than the aggregate in both 2010 and 2011.

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## Indianapolis, Indiana

Regions Bank's small business lending in moderate-income tracts is also good. At $15.5 \%$, the bank's percentage of small business lending in moderate-income tracts was comparable to the percentage of small businesses in the assessment area at $16.4 \%$. Additionally, the bank's performance exceeded the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was equal to the percentage of small businesses in these tracts, while lending in upper-income tracts was slightly higher than the percentage of small businesses.

## Home Purchase Loans

Home purchase lending in low-income census tracts is excellent. At $3.5 \%$, the bank's percentage of home purchase lending in low-income tracts was comparable to the level of owner-occupied units in these tracts at $3.6 \%$. Additionally, the bank's performance was greater than the aggregate performance in both 2010 and 2011.

Home purchase lending in moderate-income tracts is good. During the review period, Regions Bank originated $13.4 \%$ of its home purchase loans in moderate-income census tracts, which contain $21.6 \%$ of the owneroccupied units in the assessment area. Regions Bank’s performance was better than the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending in low-income census tracts is adequate. During the review period, Regions Bank originated only two ( $0.3 \%$ ) home refinance loans in the low-income tracts. It was also noted that the aggregate lenders had low levels of home refinance loans compared to the percentage of owner-occupied units, which was only $3.6 \%$. This suggests limited opportunities for this type of lending in low-income tracts and, therefore, minimal weight was given to this performance area.

The bank's home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $4.9 \%$ of its home refinance loans in moderate-income census tracts, which contain $21.6 \%$ of the owner-occupied units. The bank's performance was slightly less than the aggregate lenders in 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in low-income census tracts is poor. During the review period, Regions Bank originated no home improvement loans in low-income tracts, which contain $3.6 \%$ of the owner-occupied units in the assessment area. Aggregate lenders originated home improvement loans in low-income tracts at a level comparable to the percentage of owner-occupied units in 2010 and lower than the percentage of owneroccupied units in 2011, indicating there was some lending opportunity.

Home improvement lending in moderate-income tracts is adequate. During the review period, Regions Bank originated seven (17.1\%) of its home improvement loans in moderate-income census tracts, which contain

## Indianapolis, Indiana

$21.6 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was better than the aggregate in both 2010 and 2011.

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

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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 Lending

Considering the bank's performance when compared to the area demographic and the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses was greater than the aggregate in 2010 but much lower than the aggregate in 2011. The bank originated $26.9 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $87.6 \%$. However, of the 1,191 small business loans originated during the review period, 544 (45.7\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $49.5 \%$, which is less than the percentage of businesses in the Indianapolis assessment area that are considered small businesses, at $87.6 \%$. Also, $72.9 \%$ of the 1,191originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank performed below the aggregate in both 2010 and 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is good. The bank made $17.4 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $19.9 \%$ of total families in the assessment area. Regions Bank performed better than the aggregate in both 2010 and 2011.

Home purchase lending to moderate-income borrowers is excellent. At 29.1\%, the bank's percentage of home purchase lending to moderate-income borrowers exceeded the percentage of moderate-income families in the assessment area at 18.4\%. The bank performed better than the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low- and moderate-income borrowers is good. The bank's percentage of home refinance lending to low- and moderate-income borrowers was less than the percentage of low- and moderate-income families in the assessment area. However, the bank's lending to low- and moderate-income borrowers was greater than the aggregate performance in both 2010 and 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

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## Home Improvement Loans

The bank's home improvement lending to both low- and moderate-income borrowers is excellent. The bank's percentage of home improvement lending to both low- and moderate-income borrowers exceeded both the percentage of low- and moderate-income families in the assessment area, as well as the aggregate performance for both 2010 and 2011.

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

## Community Development Lending

Regions Bank makes a low level of community development loans in the Indianapolis assessment area. The bank originated one community development loan totaling $\$ 1.1$ million during the review period. The loan supports community services targeted to low- and moderate-income individuals by financing the expansion of a childcare facility in a moderate-income geography that serves more than 200 children. The facility currently receives a subsidy from the state of Indiana to provide its services. Affordable housing for low- and moderateincome individuals, neighborhood stabilization activities and job growth are some of the area's top community development needs. The bank's community development loan portfolio is small in dollar amount relative to its market presence and exhibits poor responsiveness to the credit needs of low- and moderate-income individuals and geographies and small businesses.

## Investment Test

The bank's performance in the Indianapolis assessment area under the investment test is excellent. The bank had five investments totaling $\$ 11.6$ million, including two current period investments totaling $\$ 9.6$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through GNMA investment instruments and Low Income Housing Tax Credits (LIHTCs) or investments in LIHTC funds. Regional investments primarily funded small businesses and startup companies through investments in SBICs. Affordable housing for low- and moderate-income individuals, neighborhood stabilization activities, job growth and household financial stability, and financial education are some of the area's top community development needs. The dollar volume of Regions Bank's current and total investments is excellent given the bank's presence in the assessment area.

The bank also made four contributions totaling $\$ 19,950$. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities and affordable housing.

- Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. For example, the two current period investments supported LIHTC projects that will provide a total of 256 housing units affordable to low- and moderate-income residents.


## Service Test

The bank's service test performance in the Indianapolis assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Indianapolis assessment area.

## Indianapolis, Indiana

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 29 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed one branch (located in an upper-income tract) in the Indianapolis assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

## Geographic Distribution of Branches

Assessment Area: IN Indianapolis

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branc <br> \% | es <br> Open <br> \# | Closed \# | Drive thrus | Extend ed Hours $\#$ | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 1 | 3.5\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 0 | 0 |  |  | 26 | 9.9\% | 5.7\% | 3.3\% |
| Moderate | Total | 4 | 13.8\% | 0 | 0 | 4 | 4 | 1 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 82 | 31.2\% | 27.3\% | 16.7\% |
| Middle | Total | 13 | 44.8\% | 0 | 0 | 12 | 10 | 5 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 101 | 38.4\% | 41.5\% | 42.7\% |
| Upper | Total | 11 | 37.9\% | 0 | 1 | 11 | 11 | 8 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 53 | 20.2\% | 25.5\% | 37.3\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 1 | 0.4\% | 0.0\% | 0.0\% |
| Total | Total | 29 | 100.0\% | 0 | 1 | 27 | 25 | 14 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 263 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 882 service hours in various capacities for community development organizations, by participating in 143 community development services. Many of the community development services focused on education, affordable housing, youth services, and various other community

## Indianapolis, Indiana

services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by providing counsel by serving on a committee for a community organization whose purpose is to provide low- and moderate-income individuals with homebuyer education, affordable mortgage products, and home improvement loans for asset preservation.

## Metropolitan Areas (Limited Review)

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

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

- Bloomington Assessment Area (Greene and Monroe Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing 6.3\% of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 150.8$ million in deposits in this assessment area, representing a market share of $6.6 \%$ and $6.2 \%$ of Regions Bank's total deposits in Indiana.
- Evansville Assessment Area (Gibson and Vanderburgh Counties)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $3.1 \%$ of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 79.3$ million in deposits in this assessment area, representing a market share of $2.0 \%$ and $3.3 \%$ of Regions Bank's total deposits in Indiana.
- Gary Assessment Area (Jasper County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $1.6 \%$ of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 26.6$ million in deposits in this assessment area, representing a market share of $4.8 \%$ and $1.1 \%$ of Regions Bank's total deposits in Indiana.
- Kokomo Assessment Area (Howard County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $1.6 \%$ of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 19.5$ million in deposits in this assessment area, representing a market share of $1.9 \%$ and $0.8 \%$ of Regions Bank's total deposits in Indiana.
- Lafayette Assessment Area (Carroll and Tippecanoe Counties)
o As of December 31, 2011, Regions Bank operated nine branches in the assessment area, representing 14.1\% of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 375.3$ million in deposits in this assessment area, representing a market share of $16.5 \%$ and $15.4 \%$ of Regions Bank's total deposits in Indiana.
- Louisville Assessment Area (Clark, Harrison and Washington Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing 6.3\% of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 159.8$ million in deposits in this assessment area, representing a market share of $7.3 \%$ and $6.6 \%$ of Regions Bank's total deposits in Indiana.
- Terre Haute Assessment Area (Vigo County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $1.6 \%$ of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 26.5$ million in deposits in this assessment area, representing a market share of $1.5 \%$ and $1.1 \%$ of Regions Bank's total deposits in Indiana.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

## Metropolitan Areas (Limited Review)

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Bloomington | Not Consistent <br> (Above) | Not Consistent (Below) | Consistent |
| Evansville | Not Consistent <br> (Above) | Not Consistent (Below) | Consistent |
| Gary | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |
| Kokomo | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Above) |
| Lafayette | Consistent | Not Consistent (Below) | Consistent |
| Louisville | Consistent | Not Consistent (Below) | Consistent |
| Terre Haute | Consistent | Not Consistent (Below) | Not Consistent (Above) |

The Indianapolis assessment areas received a full-scope review, and the bank's performance in that assessment area determined the overall rating for the state. Indianapolis is by far the bank's largest market in Indiana in terms of deposits, loans, and branches. The full-scope area selected represents $49.6 \%$ of the deposits in the assessment areas in Indiana as well as $45.3 \%$ of the branches. The full-scope assessment area also represents $35.5 \%$ of the HMDA loans and $52.7 \%$ of the small business loans in the state. Therefore, the Indianapolis assessment area represents approximately half of the deposits and a large portion of branches and loans in the State of Indiana.

For the Lending Test, performance was stronger than the bank's performance in the state in two of the limitedscope assessment areas (Bloomington and Evansville) and weaker than the bank's performance in two of the limited-scope assessment areas (Gary and Kokomo). The distribution of loans by borrower’s income and lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Gary and Kokomo assessment areas.

For the Investment Test, the performance in all seven limited-scope assessment areas (Bloomington, Evansville, Gary, Kokomo, Lafayette, Louisville, and Terre Haute) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in two limited-scope assessment areas (Kokomo and Terre Haute) was stronger than the bank's performance in the state. The performance in one limited-scope assessment area (Gary) was weaker than the bank's performance in the state due to fewer community development services. The remaining limited-scope assessment areas were consistent with the bank's performance in the state.

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

## Non-Metropolitan Areas (Limited Review)

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

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

- Clinton-Grant Assessment Area (Clinton and Grant Counties)
o As of December 31, 2011, Regions Bank operated six branches in the assessment area, representing 9.4\% of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 173.8$ million in deposits in this assessment area, representing a market share of $15.1 \%$ and $7.1 \%$ of Regions Bank's total deposits in Indiana.
- Knox-Lawrence Assessment Area (Knox and Lawrence Counties)
o As of December 31, 2011, Regions Bank operated seven branches in the assessment area, representing 10.9\% of its branches in Indiana.
o As of June 30, 2011, the bank had $\$ 217.3$ million in deposits in this assessment area, representing a market share of $20.4 \%$ and $8.9 \%$ of Regions Bank's total deposits in Indiana.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Clinton-Grant | Not Consistent <br> (Above) | Not Consistent <br> (Below) | Consistent |
| Knox-Lawrence | Consistent | Not Consistent <br> (Below) | Not Consistent (Above) |

As stated earlier, the Indianapolis assessment area received a full-scope review, and the bank's performance in that assessment area determined the overall rating for the state. Indianapolis is by far the bank's largest market in Indiana in terms of deposits, loans, and branches. The full-scope area selected represents $49.6 \%$ of the deposits in the assessment areas in Indiana as well as $45.3 \%$ of the branches. The full-scope assessment area also represents $35.5 \%$ of the HMDA loans and $52.7 \%$ of the small business loans in the state. Therefore, the Indianapolis assessment area represents approximately half of the deposits and a large portion of branches and loans in the State of Indiana.

For the Lending Test, performance was stronger than the bank's performance in the state in one of the limitedscope assessment areas (Clinton-Grant), and consistent in the Knox-Lawrence limited-scope assessment area.

For the Investment Test, the performance in both limited-scope assessment areas (Clinton-Grant and KnoxLawrence) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

## Non-Metropolitan Areas (Limited Review)

For the Service Test, the performance in one limited-scope assessment area (Knox-Lawrence) was stronger than the bank's performance in the state. The performance in the remaining limited-scope assessment area (ClintonGrant) was consistent with the bank's performance in the state.

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

## Iowa

## CRA RATING FOR IOWA: $\underline{\text { Satisfactory }}$

## The Lending Test is rated: Low Satisfactory <br> The Investment Test is rated: <br> The Service Test is rated: <br> High Satisfactory <br> Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas and is occasionally in a leadership position in response to the community development needs of the assessment areas.
- Retail services are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment areas.
- The bank provides an adequate level of community development services throughout the assessment areas.


## SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in the State of Iowa:

- Des Moines
- Waterloo

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

- Cedar Rapids
- Fayette - Tama (non-MSA)
- Iowa City

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 IOWA

As of December 31, 2011, Regions Bank operated 13 branch offices in Iowa representing $0.8 \%$ of the bank’s total branches. As of June 30, 2011, the bank had $\$ 385.8$ million in deposits in Iowa representing $0.4 \%$ of Regions Bank's total deposits. Additionally, as of June 30, 2011, the bank ranked $28^{\text {th }}$, among 371 insured institutions, in deposit market share with $0.6 \%$ of the deposits within the state. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 514 ( $0.6 \%$ ) were in the Iowa assessment areas. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 440 ( $0.4 \%$ ) were in Iowa.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating within the Iowa assessment areas is Low Satisfactory. Lending activity reflects good responsiveness to assessment area credit needs of both full-scope assessment areas.

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

Although Regions Bank is both a small business and HMDA lender, HMDA lending was given greater consideration in determining the lending test rating for Iowa because the bank originated more HMDA loans by number than small business loans. Additionally, the bank's performance in the Waterloo assessment area was given greater consideration because it contained the largest percentage of the bank's branches, deposits, and lending in the state of Iowa. Furthermore, although a larger percentage of small farm loans were originated in Iowa than in the rest of the bank's footprint, small farm lending is not a significant loan product for Regions Bank; therefore, no detailed discussion of these loans is included in this section of the report.

## Lending Activity

Lending levels reflect good responsiveness to the credit needs of the Iowa assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

## Iowa

## Statewide Summary of Lending Activity

Assessment Areas Located in

| Iowa |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: |
| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s})$ | $\mathbf{\%}$ |
| HMDA Home Purchase | 149 | $15.6 \%$ | $\$ 20,834$ | $18.3 \%$ |
| HMDA Refinance | 352 | $36.9 \%$ | $\$ 51,495$ | $45.1 \%$ |
| HMDA Home Improvement | 13 | $1.4 \%$ | $\$ 85$ | $0.1 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{5 1 4}$ | $\mathbf{5 3 . 9 \%}$ | $\mathbf{\$ 7 2 , 4 1 4}$ | $\mathbf{6 3 . 5} \%$ |
| Total Small Business | $\mathbf{3 0 2}$ | $\mathbf{3 1 . 7 \%}$ | $\mathbf{\$ 2 5 , 5 4 6}$ | $\mathbf{2 2 . 4 \%}$ |
| Total Farm | $\mathbf{1 3 8}$ | $\mathbf{1 4 . 5 \%}$ | $\mathbf{\$ 1 6 , 1 1 4}$ | $\mathbf{1 4 . 1 \%}$ |
| TOTAL LOANS | $\mathbf{9 5 4}$ | $\mathbf{1 0 0 . 0 \%}$ | $\mathbf{\$ 1 1 4 , 0 7 4}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

Overall, the distribution of loans among geographies is adequate. The geographic distribution was adequate in both full-scope assessment areas in the state. Because of the minimal volume of HMDA lending in both fullscope assessment areas, conducting a meaningful analysis was challenging. Although large lending gaps were noted, low-income and moderate-income tracts generally represented a larger share of tracts without lending than middle-income and upper-income tracts. In most of these tracts, the housing units were rental and a larger percentage of the families in these tracts lived below the poverty level, which may have impacted the bank's ability to originate HMDA-related loans in these tracts.

Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered adequate in both full-scope assessment areas.

A detailed discussion of the borrower and geographic distribution is included in the analysis for each full-scope assessment area.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Iowa assessment areas. The bank made six community development loans totaling $\$ 34.5$ million during the review period, which represented $0.9 \%$ by number and $2.5 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the purpose of affordable housing. The bank was considered a leader in community development lending in Waterloo. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating is High Satisfactory when considering the bank's statewide performance in Iowa. The bank made significant use of qualified investments and contributions and exhibited excellent responsiveness to some of the identified credit and community development needs through its investment activities in the Waterloo assessment area, while performance in the Des Moines assessment area was adequate.

The bank made 18 qualified investments of approximately $\$ 16.6$ million and contributions of $\$ 2,882$ within the Iowa assessment areas. The bank had three current period investments in the state totaling $\$ 12.9$ million. Most of the investments provided support for community development and affordable housing through HUD bonds, FHMA investment instruments, and LIHTC projects. The bank also had investments that benefitted a broader regional area that includes Iowa. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs. The bank also made contributions to national organizations that provided indirect benefit to low- and moderate-income individuals or communities within the Iowa assessment areas.

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

## Service Test

The service test rating is Low Satisfactory when considering the bank's statewide performance in Iowa.

## Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderateincome geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

## Community Development Services

The bank provides an adequate level of community development services that benefit residents and small businesses of the assessment areas. Out of the two full-scope assessment areas, community development services were adequate in the Waterloo assessment area and poor in the Des Moines assessment area.

## METROPOLITAN AREA

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DES MOINES, IOWA ASSESSMENT AREA

The Des Moines-West Des Moines MSA includes Polk, Dallas, Warren, Madison and Guthrie counties in Iowa. Regions Bank’s Des Moines assessment area includes only Polk and Warren counties. There are 92 census tracts in the assessment area, which includes 6 low-income and 20 moderate-income tracts. The bank operates two branches in the assessment area, both in middle-income tracts.

The Des Moines assessment area is an active banking market dominated by a few large institutions. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 38 financial institutions operating 176 branch locations with a total of $\$ 14.8$ billion in deposits. Regions Bank ranked $23^{\text {rd }}$ in deposit market share with $0.5 \%$ ( $\$ 80.4$ million) of all deposits. Bank of America had the largest deposit market share at $22.7 \%$, followed by Wells Fargo Bank with 17.0\% and Principal Bank with 14.8\%.

Regions Bank is not an active HMDA or small business lender in the assessment area. In 2010, the bank ranked $16^{\text {th }}$ out of 54 small business loan reporters by originating $1.1 \%$ of all small business loans. In 2011, Regions Bank ranked $17^{\text {th }}$ out of 62 small business loan reporters by originating $1.1 \%$ of all loans. From 2010 to 2011, the bank's small business loans increased from 78 to 86 . For HMDA lending, Regions Bank ranked $37^{\text {th }}$ in 2010 with less than $1 \%$ of all HMDA loans and $38^{\text {th }}$ in 2011, also with less than $1 \%$. Wells Fargo Bank and US Bank were consistently the top HMDA lenders in the assessment area.

## Demographic Characteristics

The assessment area population is growing at a relatively rapid pace. According to census data, the population of the assessment area in 2000 was 415,272 people, which grew to 476,865 by 2010, a growth rate of $14.8 \%$. Polk County, home to the state's most populous city, Des Moines, was the larger of the two counties in the assessment area with a population of 430,640 in 2010. Polk County's population grew by $15 \%$ from 2000 to 2010, compared to Warren County at $13.7 \%$, and the state of Iowa at $4.1 \%$. Net migration in the assessment area has been positive since 2005 but declining in recent years, indicating the majority of the growth came in the first half of the decade. Net migration is defined as the number of in-migrants less the number of outmigrants and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns from the present year to the previous year. ${ }^{419}$

The table below shows selected demographic information for the Des Moines assessment area.

[^133]
## Des Moines, Iowa

## Combined Demographics Report

Assessment Area: IA Des Moines

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 6 | 6.5 |  | 3.4 | 974 | 26.4 | 18,532 | 17.1 |
| Moderate-income | 20 | 21.7 |  | 18.1 | 1,920 | 9.8 | 20,090 | 18.5 |
| Middle-income | 49 | 53.3 |  | 53.0 | 2,237 | 3.9 | 27,463 | 25.3 |
| Upper-income | 17 | 18.5 |  | 25.6 | 435 | 1.6 | 42,365 | 39.1 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 92 | 100.0 |  | 100.0 | 5,566 | 5.1 | 108,450 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 9,264 |  |  | 24.3 | 6,029 | 65.1 | 981 | 10.6 |
| Moderate-income | 31,731 |  |  | 64.3 | 9,507 | 30.0 | 1,831 | 5.8 |
| Middle-income | 90,931 |  |  | 68.3 | 25,365 | 27.9 | 3,494 | 3.8 |
| Upper-income | 39,810 |  |  | 74.5 | 8,546 | 21.5 | 1,610 | 4.0 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 171,736 | 114,373 |  | 66.6 | 49,447 | 28.8 | 7,916 | 4.6 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2,323 | 10.9 |  | 9.4 | 301 | 20.2 | 277 | 22.5 |
| Moderate-income | 2,129 | 10.0 |  | 10.0 | 134 | 9.0 | 127 | 10.3 |
| Middle-income | 10,802 | 50.6 |  | 51.6 | 647 | 43.4 | 530 | 43.1 |
| Upper-income | 6,108 | 28.6 |  | 29.0 | 410 | 27.5 | 295 | 24.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 21,362 | 100.0 |  | 100.0 | 1,492 | 100.0 | 1,229 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 87.3 |  | 7.0 |  | 5.8 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 4 | 0.5 |  | 0.5 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 11 | 1.4 |  | 1.3 | 1 | 16.7 | 0 | 0.0 |
| Middle-income | 594 | 76.8 |  | 77.2 | 3 | 50.0 | 2 | 50.0 |
| Upper-income | 164 | 21.2 |  | 21.0 | 2 | 33.3 | 2 | 50.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 773 | 100.0 |  | 100.0 | 6 | 100.0 | 4 | 100.0 |
|  | Percentage of Total Farms: |  |  | 98.7 |  | . 8 |  | . 5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

Food stamp usage has increased across the assessment and statewide. As of 2009, the statewide percentage of the population receiving food stamps was $11 \%$. Polk County had a higher percentage of its population receiving food stamps at $12.3 \%$, whereas Warren County was much lower at $6.3 \%$. The largest increases in the number of food stamp recipients for both counties and statewide occurred in 2008 and 2009.

Free and reduced price lunch program usage is also on the rise. Of the eight school districts in the assessment area, all experienced an increase in the percentage of students receiving free or reduced price lunch benefits from 2000 to 2010, including five that increased by more than $100 \%$, but only two of the eight districts had more than $50 \%$ of their students receiving these benefits in 2010 . Both of these school districts are located in Polk County.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the Des Moines MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper).

## Borrower Income Levels Des Moines-West Des Moines, IA MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 - 49.99\% |  |  | 50\% | 79.99\% |  | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$73,200 | 0 | - | \$36,599 | \$36,600 | - | \$58,559 | \$58,560 | - | \$87,839 | \$87,840 | - | \& above |
| 2011 | \$74,500 | 0 | - | \$37,249 | \$37,250 | - | \$59,599 | \$59,600 | - | \$89,399 | \$89,400 | - | \& above |

## Housing Characteristics

Home prices in the assessment area have remained relatively flat in recent years despite price volatility in other markets across the nation. According to the National Association of Realtors, the 2011 median sales price of an existing single-family home in the Des Moines MSA was $\$ 151,100 .{ }^{420}$ This represents a slight increase from previous years: $\$ 150,900$ in 2010 and $\$ 149,300$ in 2009. Comparatively, the statewide median home price in 2011 was $\$ 118,900 .{ }^{421}$

Census data show that there were 171,736 housing units in the assessment area in 2000, of which $66.6 \%$ were owner-occupied, $28.8 \%$ were rental units and $4.6 \%$ were vacant. While the majority of housing units across the assessment area were owner-occupied, more than three-fourths of housing units in low-income census tracts were rentals or vacant, indicating limited lending opportunity in these areas. The median age of housing stock across the assessment area was 33 years, but this figure increased to 57 years in low-income tracts and 47 years in moderate-income tracts. ${ }^{422}$ Single-family housing permits experienced declines from 2005 to 2009, falling by $63 \%$, but rebounded in 2010 and 2011. Multi-family permits reached their peak in 2002 at 93 and have been in steady decline since, with only 19 multi-family permits issued in $2011 .{ }^{423}$

Mortgage delinquencies have had an adverse impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from 4.9\% in January 2010 to

[^134]$9.6 \%$ in December 2011. HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to decline. Both counties in the assessment area have experienced continuous year-over-year reductions in the number of home purchase loans originated between 2005 and 2011, with Polk County’s annual loan volume declining by 42.7\%, and Warren County's declining by $43.3 \%$. Conversely, refinance activity has seen increased activity in recent years.

## Employment and Economic Conditions

The city of Des Moines, located in Polk County, is the county seat, the state capital, and the most populous city in Iowa. With a broad-based economy, relatively affordable housing and reasonable commute times, Des Moines attracts people from throughout Iowa seeking employment opportunities and city amenities. ${ }^{424}$ As of 2010, total employment in the assessment area was 400,429. The largest private sector employment industries included finance and insurance, retail trade, and health care and social assistance. Combined, these industries account for $40.9 \%$ of private sector employment and $35.8 \%$ of total employment. Government and government enterprises are also a large employment sector in the assessment area with more than 45,000 jobs, accounting for nearly $11.3 \%$ of total employment. ${ }^{425}$ Major non-government employers include but are not limited to Wells Fargo, Mercy Medical Center - Des Moines, Principal Financial Group, and Iowa Health - Des Moines. ${ }^{426}$

In 2011, the John Deer Company, which employs more than 2,800 people in the greater Des Moines area, said it plans to invest $\$ 85$ million in capital improvements to add a new 300,000-square-foot building for product assembly at its John Deer Des Moines Works facility located in Polk County. In partnership with the City of Ankeny, Iowa and the Iowa Economic Development Authority (IEDA), the company committed to retaining 400 jobs as a direct result of its expansion plans. Total employment at the John Deere Des Moines Works is approximately 1,900 , an increase of nearly 500 employees during 2010 and $2011 .{ }^{427}$

Hewlett-Packard also has a presence in the assessment area. In 2011, the company announced plans to expand into a 300,000 -square-foot facility adjacent to its existing 408,000 square foot facility in Polk County. This expansion is part of a national consolidation of the company's logistics operation. Through the expansion, HP is creating approximately 150 new jobs and retaining the existing 440 full-time positions at its Des Moines facility. ${ }^{428}$

Polk County is also home to the Des Moines Military Entrance Processing Station (MEPS). The Des Moines MEPS is one of a network of 65 MEPS nationwide. Its mission is to process individuals for enlistment or induction into the armed services, based on Department of Defense-approved peacetime and mobilization standards. The Des Moines MEPS has enlistment responsibility for 73 counties in Iowa, 4 counties in Illinois and one in Wisconsin. The station has an identified financial impact on the local community of more than $\$ 3$ million annually which includes payroll, living expenses, facilities, and services administration. ${ }^{429}$

Des Moines is home to several institutions of higher learning, including the main campuses of Drake University and Grand View University. Drake University is a private institution that enrolls approximately 3,500 undergraduate students. In addition to the educational benefits, the university reports that it generates 3,200

[^135]
## Des Moines, Iowa

jobs and contributes more than $\$ 260$ million annually to the regional economy. ${ }^{430}$ Grand View University is a not-for-profit liberal arts university offering bachelors and masters degrees with approximately 2,300 students. The Des Moines Area Community College (DMACC) and American Institute of Business (AIB) College of Business are also located in the assessment area. DMACC is Iowa's largest two-year institution of higher learning. As of 2011 it enrolled more than 25,000 students, making it the $15^{\text {th }}$ fastest growing community college in the nation. ${ }^{431}$

The Des Moines area has received several accolades in recent years recognizing it as a desirable place to live and work. In 2010, Forbes listed Des Moines as the number one best place for business and careers. ${ }^{432}$ The rankings considered several data points including education, income, employment, and housing. In 2011, Forbes favored the Des Moines area once again, this time ranking it as the best American city for young professionals, citing, among other things, high business concentration, low business costs, low unemployment, and high projected job rates as the basis for its ranking. ${ }^{433}$

Kiplinger also finds Des Moines to be a highly desirable destination. In 2010, it ranked Des Moines $7^{\text {th }}$ for the Best Cities for the Next Decade, labeling it as a fertile ground for new jobs. Among its many accolades, Kiplinger noted that civic leaders are developing the downtown area and promoting jobs that are available in the many industries that flourish there. Additionally, low-cost housing, family-friendliness and short commute times were highlighted. With regard to economic development, the news source noted that Pioneer Hi-Bred International, a top agricultural-seed company, is investing $\$ 154$ million on an expansion that will create 400 jobs over 3 years. Over the previous two-year period, Pioneer added nearly 500 jobs in central Iowa, where it employs nearly 2,400 workers. ${ }^{434}$

In 2012, credit rating agency Moody's reported on the Des Moines area economy, stating that its outlook is improving and the economy will strengthen as the financial services industry accelerates. Agricultural and consumer-based industries will be the leaders, while the public sector will be a laggard as the state government has pushed for deep spending cuts. Moody's indicates that the long-term economic growth prospects are upbeat as a result of the area's diverse industrial base, favorable business costs, and skilled workforce, which lay the foundation for above-average growth over the long run. ${ }^{435}$

Due to relatively strong job growth, the assessment area's unemployment is in line with the state. The table below shows that the Des Moines MSA's unemployment rate fell to $5.9 \%$ in 2011 from $6.2 \%$ in 2010. The 2011 nationwide average unemployment rate was $8.9 \%{ }^{436}$

[^136]
## Des Moines, Iowa

## Unemployment Rates

| Assessment Area: IA Des Moines |
| :--- | :---: | :---: |
| Area Years - Annualized  <br>  $\mathbf{2 0 1 0}$ $\mathbf{2 0 1 1}$ <br> Des Moines MSA 6.2 5.9 <br> Polk County 6.3 6.1 <br> Warren County 6.0 5.5 <br> Iowa $\mathbf{6 . 3}$ $\mathbf{5 . 9}$ |

Not Seasonally Adjusted

From an economic perspective, the assessment area appears to be in good shape. The unemployment is relatively low, housing remains affordable, job growth is strong and the metro area remains a popular destination for job seekers and employers. While mortgage delinquency rates remain high and loan volumes somewhat low, the economy appears to be growing its way out of the recent recession.

## Community Contacts and Community Development Opportunities

One community contact specializing in affordable housing finance was interviewed to discuss the local community development landscape. The contact discussed foreclosure mitigation and employment as the two most pressing issues for the community. While Des Moines has not been impacted by foreclosures to the same extent as many large cities around the country, vacant foreclosed properties are having a destabilizing effect on neighborhoods. The contact also noted that it continues to be a challenge for lower-income and lower-skilled residents to find a job. For those who do have a job and are looking to purchase a home, the contact recommended that more education be provided by local financial institutions to inform potential buyers about the logistics and importance of buying a home. The contact added that most local financial institutions are proactive in developing relationships with local community organizations.

For a variety of reasons, some assessment area residents are unable to access traditional banking product and services. Bank On is a national initiative focused on connecting unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $8.1 \%$ of households in the metro area are unbanked relative to $4.7 \%$ in Iowa. Additionally, $17.8 \%$ of households in the assessment area are listed as underbanked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-toown agreements or pawn shops. This compares to $16.8 \%$ of underbanked households in Iowa. ${ }^{437}$

The state of Iowa received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. The Iowa allocation under NSP1 was more than $\$ 21.6$ million and $\$ 5$ million under the NSP3 funding allocation process. Qualified projects inside the assessment area are eligible to receive funds under both of these allocations.

There are eight community development financial institutions (CDFIs) in the state of Iowa, one of which is an affordable housing lender that manages a loan pool located inside the assessment area. Other community

[^137]
## Des Moines, Iowa

development opportunities include participation in the Low Income Housing Tax Credit (LIHTC) Program. In 2011, the state of Iowa allocated approximately $\$ 10.5$ million in federal LIHTCs. ${ }^{438}$ These tax credits are managed locally by the Iowa Finance Authority.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Des Moines assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 217 (66.6\%) HMDA loans compared to 109 (33.4\%) small business loans in the Des Moines, Iowa assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Des Moines assessment area contains $0.2 \%$ of the bank's small business and HMDA lending by number of loans and $0.2 \%$ by dollar volume totaling $\$ 44.3$ million. In comparison, $0.1 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderate-income census tracts, were issues considered when assessing the bank's performance; in addition, the performance of the aggregate lenders was considered. Considering all of these factors, the bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Home Purchase Loans

The bank's home purchase lending in low-income tracts is poor. Regions Bank originated no home purchase loans in low-income tracts. The aggregate lenders had levels of lending comparable to the percentage of owneroccupied units, which was only $2.0 \%$.

The bank's home purchase lending in moderate-income tracts is also poor. Regions Bank originated only five home purchase loans in moderate-income tracts. The bank's performance at $7.9 \%$ was less than the area demographic at $17.8 \%$. With three loans originated in 2010, the bank's performance was comparable to the aggregate. However, the bank's lending decreased to two loans in 2011, and the bank's performance was less than the aggregate.

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

[^138]
## Home Refinance Loans

Regions Bank's home refinance lending in low-income tracts is adequate. Although Regions Bank originated only three home refinance loans in low-income tracts during the review period, the bank's performance was equal to the area demographic and exceeded the aggregate's performance in 2010 and 2011.

Regions Bank’s home refinance lending in moderate-income tracts is adequate. During the review period, the bank originated $5.4 \%$ of its home refinance loans in moderate-income tracts, where $17.8 \%$ of the owneroccupied units are located. The bank's performance was below the aggregate in 2010 and better than the aggregate in 2011.

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

## Home Improvement Loans

The bank's home improvement lending in low-income tracts is poor. Regions Bank originated no home improvement loans in low-income tracts. The aggregate lenders had levels of lending comparable to the percentage of owner-occupied units, which was only $2.0 \%$.

The bank's home improvement lending in moderate-income tracts is also poor. Regions Bank originated only one home improvement loan in a moderate-income tract. The bank's performance at $14.3 \%$ was less than the area demographic at $17.8 \%$. With the one loan originated in 2010, the bank's performance exceeded the aggregate. However, Regions Bank originated no loans in 2011 and thus its performance was less than the aggregate.

The bank's home improvement lending in middle-income tracts was greater than the percentage of owneroccupied units in these tracts. There was no home improvement lending by the bank in upper-income tracts.

## Small Business Loans

Regions Bank's small business lending in low-income tracts is poor. Regions Bank originated $5.5 \%$ of its small business loans in low-income tracts, where $9.4 \%$ of the small businesses in the assessment area are located. With only six small business loans originated during the review period, the bank's performance was less than the aggregate in both 2010 and 2011.

Regions Bank’s small business lending in moderate-income tracts is good. During the review period, the bank originated $11.0 \%$ of its small business loans in moderate-income tracts, where $10.0 \%$ of the small businesses in the assessment area are located. The bank performed above the aggregate in 2010 and equal to the aggregate in 2011.

The bank's small business lending in middle-income tracts was greater than the percentage of small businesses in these tracts, while lending in upper-income tracts was less than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower income or gross annual revenues is good. For this analysis, the distribution of small business lending across business revenue size 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- and moderate-income borrowers is excellent. Regions Bank's performance exceeded both the area demographics and the aggregate performance in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is excellent when compared to the aggregate lenders. The bank's percentage of home refinance lending to low-income borrowers at $12.9 \%$ was less than the percentage of low-income families in the assessment area at $17.1 \%$; however, Regions Bank's performance was better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is adequate. The bank made $13.6 \%$ of its refinance loans to moderate-income borrowers. Moderate-income families make up $18.5 \%$ of total families in the assessment area. Regions Bank's performance was better than aggregate in 2010 but less than the aggregate in 2011.

The bank's refinance lending to middle-income borrowers was greater than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was less than the percentage of upperincome families.

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is adequate. During the review period, the bank originated only seven home improvement loans of which two were to low-income borrowers. The bank made $28.6 \%$ of its refinance loans to low-income borrowers. Low-income families make up $17.1 \%$ of total families in the assessment area. Regions Bank's performance was better than aggregate in both 2010 and 2011.

The bank's home improvement lending to moderate-income borrowers is very poor. Moderate-income families constitute $18.5 \%$ of the families in the assessment area, but the bank originated no home improvement loans to moderate-income borrowers. The aggregate lending in this segment of the market was greater than the demographic in 2010 and comparable to the demographic in 2011.

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

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's performance was better than the aggregate in 2010 and less than the aggregate in 2011. The bank originated $44.0 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $87.3 \%$. However, of the 109 small business loans originated during the review period, 44 loans (40.4\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $73.8 \%$, which is less than the percentage of businesses in the Des Moines assessment area that are considered small businesses at $87.3 \%$. However, $76.1 \%$ of the 109 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in both 2010 and 2011.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Des Moines assessment area. The bank originated one community development loan for $\$ 2.5$ million during the review period. This loan provides financing to a business located in a moderate-income geography that received funding under the State of Iowa's Community Economic Betterment Account and High Quality Jobs Creation Program to create jobs. This lending is responsive to the area's community development needs, which also include affordable housing for low- and moderate-income individuals and neighborhood stabilization tied to foreclosure mitigation. The assessment area is also positively impacted by a $\$ 25$ million loan to support the Iowa Community Development Corporation, a statewide organization formed to create jobs and stabilize the statewide economy through, among other things, participation in the New Markets Tax Credit Program and focus on the distressed areas of Iowa. The bank's community development loan portfolio exhibits adequate responsiveness to the credit needs of the assessment area given its presence in the market.

## Investment Test

The bank's performance in the Des Moines assessment area under the investment test is adequate. The bank had two investments totaling $\$ 469,103$. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Prior period direct investments in the assessment area provided support for economic development and for affordable housing through an investment in a fund that finances the purchase and rehabilitation of multi-family housing for low- and moderate-income individuals. Regional investments primarily funded small businesses and startup companies through investments in SBICs. Community development needs identified in the community include, but are not limited to, affordable housing for low- and moderate-income individuals, small business finance, job creation, and community revitalization. The dollar volume of Regions Bank's total investments is adequate given the bank's limited presence in the assessment area.

The bank also made two contributions totaling $\$ 1,089$. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities. The bank's investment portfolio and contributions are not considered highly responsive to community development needs in the assessment area.

## Service Test

The bank's service test performance in the Des Moines assessment area is poor. Its retail and community development services reflect adequate responsiveness to the needs of the Des Moines assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the two branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed two branches (both in middle-income tracts) in the Des Moines assessment area. The bank does not have any branches located in low- and moderate-income geographies. The bank did not open or close any branches in low- or moderate-income tracts during the review period.

## Des Moines, Iowa

## Geographic Distribution of Branches

## Assessment Area: IA Des Moines



## Community Development Services

Regions Bank provides a limited level of community development services in the assessment area, and improvement is needed. During the review period, Regions Bank employees provided two service hours for a community development organization by participating in one community development service. According to information obtained from community contacts, there are opportunities for financial institutions to participate in community development services in the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

## METROPOLITAN AREA

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WATERLOO, IOWA ASSESSMENT AREA

The Waterloo-Cedar Falls MSA includes Blackhawk, Bremer and Grundy counties in Iowa. Regions Bank’s Waterloo assessment area is limited to Black Hawk County. There are 37 census tracts in the assessment area, including 2 low-income and 12 moderate-income tracts. The bank operates seven branches in the assessment area, four of which are in low- or moderate-income tracts.

The assessment area is a relatively small banking market. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 12 financial institutions operating 44 branch locations with a total of $\$ 1.7$ billion in deposits in Black Hawk County, Iowa. Regions Bank ranked $4^{\text {th }}$ in deposit market share with $12.5 \%$ (\$206.3 million) of all deposits. Wells Fargo Bank had the largest deposit market share at 19.7\%, followed by US Bank with $18.1 \%$ and Farmers State Bank with $14.7 \%$.

Regions Bank is not a HMDA or small business lending leader in the assessment area. In 2010, the bank ranked $9^{\text {th }}$ out of 29 small business loan reporters by originating $3.1 \%$ of all loans. In 2011, the bank ranked $6^{\text {th }}$ out of 39 small business loan reporters by generating $5.9 \%$ of all loans. From 2010 to 2011, the bank's small business lending increased from 51 loans to 104, primarily through the purchase of loans. For HMDA lending, Regions Bank ranked $13^{\text {th }}$ in 2010 with $2.3 \%$ of all HMDA loans and $15^{\text {th }}$ in 2011 with $1.6 \%$. HMDA loan production decreased from 138 loans in 2010 to 84 loans in 2011. Veridian Credit Union, PPH Mortgage Company, and US Bank were the top HMDA lenders in the assessment area.

## Demographic Characteristics

The assessment area population is growing slowly relative to the statewide population. According to census data, the population for Black Hawk County in 2000 was 128,012 people, which grew to 131,090 by 2010, a growth rate of $2.4 \%$. During this time period, the statewide population grew by $4.1 \%$. Waterloo was the most populous city in assessment area as of 2010, although its population decreased by $0.3 \%$ to 68,406 from 2000 to 2010. Assessment area net migration has been mostly negative since 2005, although 2008 and 2009 showed a positive net inflow of people to the assessment area. Net migration is defined as the number of in-migrants less the number of out-migrants and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns from the present year to the previous year. ${ }^{439}$

The table below shows selected demographic information for the Waterloo assessment area.

[^139]
## Waterloo, Iowa

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

Food stamp usage has increased across the assessment and statewide at a rate faster than the population, indicating that the percentage of low- and moderate-income earners is growing. As of 2009, the statewide percentage of the population receiving food stamps was $11 \%$ compared to $12.9 \%$ inside the assessment area. Decreasing incomes inside the assessment area are also evident via the percentage of students qualifying for free or reduced price lunches. Of the 11 school districts in the assessment area, all but 2 experienced an increase in the percentage of students receiving free and reduced price lunch program benefits from 2000 to 2010, but only one district had more than $50 \%$ of its students qualifying for the program as of 2010.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the Waterloo-Cedar Falls MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper).

## Borrower Income Levels <br> Waterloo-Cedar Falls, IA MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | 0 - 49.99\% |  | 50\% | 79.99\% |  | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$60,500 | 0 | - | \$30,249 | \$30,250 | - | \$48,399 | \$48,400 | - | \$72,599 | \$72,600 | - | \& above |
| 2011 | \$62,100 | 0 | - | \$31,049 | \$31,050 | - | \$49,679 | \$49,680 | - | \$74,519 | \$74,520 | - | \& above |

## Housing Characteristics

Home prices in the assessment area have remained relatively flat in recent years despite price volatility in other markets across the nation. According to the National Association of Realtors, the 2011 median sales price of an existing single-family home in the Waterloo-Cedar Falls MSA was $\$ 112,800 .{ }^{440}$ This represents a slight increase from previous years: $\$ 112,100$ in 2010 and $\$ 110,600$ in 2009. Comparatively, the statewide median home price in 2011 was $\$ 118,900$. ${ }^{441}$

Census data show that there were 51,759 housing units in the assessment area in 2000 , of which $66.2 \%$ were owner-occupied, $29.8 \%$ were rental units and $4.0 \%$ were vacant. While the majority of housing units across the combined assessment area were owner-occupied, more than three-quarters of housing units in low-income census tracts were rentals or vacant, indicating limited lending opportunity in these areas. The median age of housing stock across the assessment area was 43 years, but this figure increased to 48 years in low-income tracts and 52 years in moderate-income tracts. ${ }^{442}$ Single-family housing permits experienced declines from 2005 to 2009, falling by $55.1 \%$ from their peak in 2005 to their recent low in 2009, but have stabilized in recent years. Multi-family development is not a significant source of housing inside the assessment area. ${ }^{443}$

Mortgage delinquencies have had an adverse impact on the local housing market in recent years. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $2.7 \%$

[^140]
## Waterloo, Iowa

in January 2010 to $7.0 \%$ in December 2011. While this remains lower than many metro areas across the nation, it continues to present challenges for the stability of the local economy. HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to decline. The assessment area has experienced continuous reductions in the number of home purchase loans originated annually between 2005 and 2011, with total annual origination volume declining by $36.7 \%$ from 2006 to 2011. Conversely, home loan refinancing has seen increased activity in recent years and continues to remain well above pre-recession annual loan volume totals.

## Employment and Economic Conditions

The Waterloo assessment area is located in the Waterloo-Cedar Rapids MSA in the northeast corner of the Iowa. The city of Waterloo is the largest city in the assessment area with approximately 68,000 people. As of 2010, total employment in the assessment area was 90,240 . The largest private sector employment industries included manufacturing, health care and social assistance, and retail trade. Combined, these industries accounted for $46.9 \%$ of private sector employment and $39.7 \%$ of total employment. Government and government enterprises is also a large employment sector with more than 13,000 jobs, nearly $14.5 \%$ of total employment. ${ }^{444}$ The city of Waterloo is home to a diverse employer base with the area's top employers including John Deere, Tyson, Covenant Health Systems, Allen Memorial Hospital, Waterloo Community Schools, and GMAC. ${ }^{445}$

In 2010, Forbes ranked the City of Waterloo at number 13 on its list of Best Small Places for Business and Careers. Twelve metrics relating to job growth (past and projected), costs (business and living), income growth over the past five years, educational attainment, and projected economic growth were considered in the ranking. ${ }^{446}$ As of 2012, the area moved down to $21^{\text {st }}$ on the list with the publication noting that Waterloo boasts a broad and diversifying industrial economic base. ${ }^{447}$

Each year, the Iowa Northland Regional Council of Governments (INRCOG) prepares or updates a Comprehensive Economic Development Strategy (CEDS) for the region, which is made up of six counties including Black Hawk County. According to the organization, the purpose of the CEDS is to establish a process that will help create jobs, attract public and private investments, foster a more stable and diversified economy, and improve living conditions in the region. ${ }^{448}$

The 2012 CEDS notes that the region is recovering from the devastation of flooding and tornadoes in 2008, which was followed by a national and global economic downturn. While the short-term outlook remains uncertain, the region is exhibiting positive signs of improvement. Businesses have begun to expand and rehire, but certain skilled labor remains in short supply, which is impacting the expansion decisions of some companies. The agricultural economy had been strong until the summer of 2012, when drought conditions appear to have had a significant impact on crops. ${ }^{449}$

[^141]
## Waterloo, Iowa

To maintain the region's ability to compete with more populated areas, continued emphasis on infrastructure improvements, including transportation assets, will be necessary. The region has identified certain asset clusters to spur the region's economic progress, including advanced manufacturing, bio-fuels and alternative energy, food processing, information technology, logistics and distribution, and wind power. Each of these areas has significant assets within the region that have previously been important in development decisions of local and relocating businesses. Additionally, the development and recruitment of workers to fill existing and new positions is a primary concern. Companies are experiencing difficulties filling higher-skilled positions in light of the area's relatively low unemployment rate. ${ }^{450}$

Unemployment inside the assessment area is in line with the state. The table below shows that the assessment area unemployment rate fell to $5.9 \%$ in 2011 from $6.2 \%$ in 2010. The 2011 nationwide average unemployment rate was $8.9 \%{ }^{451}$

## Unemployment Rates

Assessment Area: IA Waterloo

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Waterloo MSA | 6.0 | 5.6 |
| Black Hawk County | 6.2 | 5.9 |
| Iowa | $\mathbf{6 . 3}$ | $\mathbf{5 . 9}$ |

Not Seasonally Adjusted

## Community Contacts and Community Development Opportunities

Two community contacts specializing in consumer credit issues and support services for homeless populations were interviewed to discuss the local community development landscape. Generally speaking, both contacts felt that the local economy remains challenging for low- and moderate-income residents. Housing and employment are top concerns. For low- and moderate-income individuals looking to access credit, strict underwriting criteria by banks make qualifying for a loan very difficult and can oftentimes drive people to highcost credit sources such as payday loans. Both contacts commented positively on the engagement of banks with the local community and noted that this is primarily accomplished through outreach activities such as financial education, but more support of nonprofit service providers via grants is necessary.

The need for financial stability for residents of the City of Waterloo is acute. Bank On, a national initiative focused on connecting unbanked and under-banked individuals with traditional banking products and services in order to reduce costs and increase financial stability, estimates that $8.3 \%$ of households are unbanked compared to $4.7 \%$ statewide. Additionally, $18.3 \%$ of households in the assessment area are listed as underbanked, meaning they have a bank account but continue to rely on alternative financial services, like checkcashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $16.8 \%$ of underbanked households in Iowa. ${ }^{452}$

[^142]
## Waterloo, Iowa

To create small businesses and support job growth, the University of Northern Iowa launched the Innovation Incubator in 2011 as part of the Iowa Startup Alliance. The small business development facility is designed to be a gateway between the private sector, the business community and the expertise of faculty and staff on campus. The Innovation Incubator offers emerging businesses a comprehensive array of market research services, technical business assistance and training and an advisory team made up of campus and business professionals. This small business incubator helps further the objectives of local and regional economic development initiatives while mitigating some of the risks associated with starting a business. ${ }^{453}$

Affordable housing for low- and moderate-income individuals is also a challenge inside the assessment area. The City of Waterloo's 2011 Housing Needs Assessment indicates 8,051 households (38\%) with either a rent or mortgage payment spend more than $30 \%$ of their household income on housing, indicating that there is a significant need for affordable housing. Additionally, of those that are cost-burdened, nearly half spend more than $50 \%$ of their income on housing. HUD generally considers housing affordable if a household spends no more than $30 \%$ of its income on housing. Households that spend more than $30 \%$ on housing are considered cost burdened. ${ }^{454}$ In response, the city's Community Development Board approved the expenditure of $\$ 1.64$ million in CDBG and HOME Program funds in 2012, with funding earmarked for single-family owner-occupied home rehab, emergency home repairs and neighborhood revitalization. ${ }^{455}$

The state of Iowa received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. The Iowa allocation under NSP1 was more than $\$ 21.6$ million and $\$ 5$ million under the NSP3 funding allocation process. Qualified projects inside the assessment area are eligible to receive funds under both of these allocations.

There are eight community development financial institutions (CDFIs) in the state of Iowa, none of which are located inside the assessment area. Other community development opportunities include participation in the Low Income Housing Tax Credit (LIHTC) Program. In 2011, the state of Iowa allocated approximately \$10.5 million in federal LIHTCs. ${ }^{456}$ These tax credits are managed locally by the Iowa Finance Authority.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Waterloo assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

[^143]Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 222 (62.4\%) HMDA loans compared to 134 (37.6\%) small business loans in the Waterloo assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Waterloo assessment area contains $0.2 \%$ of the bank's small business and HMDA lending by number of loans and $0.2 \%$ by dollar volume totaling $\$ 43.0$ million. In comparison, $0.2 \%$ of the bank's total deposits are in this assessment area

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderate-income census tracts, were issues considered when assessing the bank's performance; in addition, the performance of the aggregate lenders was considered. Considering all of these factors, the bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Home Purchase Loans

The bank's home purchase lending in low-income census tracts is poor. Regions Bank originated no home purchase loans in low-income census tracts. The aggregate lenders had levels of lending that equaled or exceeded the percentage of owner-occupied units, which was only $1.0 \%$; minimal weight was given to home purchase lending in low-income tracts. The bank's home purchase lending in moderate-income tracts is adequate. The bank's performance at $16.9 \%$ was less than the area demographic at $25.3 \%$. With six loans originated in 2010, the bank's performance was less than the aggregate. In 2011, with six additional loans originated, the bank's performance was equal to the aggregate.

The bank's home purchase lending in middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Home Refinance Loans

The bank's home refinance lending in low-income census tracts is poor. Regions Bank originated no home refinance loans in low-income census tracts. The aggregate lenders had levels of lending that equaled or exceeded the percentage of owner-occupied units, which was only $1.0 \%$; minimal weight was given to home refinance lending in low-income tracts. Regions Bank's home refinance lending in moderate-income tracts is adequate. During the review period, the bank originated $12.2 \%$ of its home refinance loans in moderate-income tracts, which contain $25.3 \%$ of the owner-occupied units. The bank's performance was comparable to the aggregate in 2010 and greater than the aggregate in 2011.

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

## Home Improvement Loans

Regions Bank originated no home improvement loans in low-income tracts. The aggregate lenders also had no home improvement lending activity in low-income tracts, indicating limited opportunity for home improvement lending in these tracts; minimal weight was given to home improvement lending in low-income tracts. The percentage of owner-occupied units in low-income tracts is very low, at only $1.0 \%$. The bank's home

## Waterloo, Iowa

improvement lending in moderate-income tracts is adequate. Regions Bank originated a total of three home improvement loans, which all were in a moderate-income tract. Therefore, the bank's performance at 100.0\% exceeded both the area demographics and the aggregate's performance.

Additionally, the bank had no home improvement lending activity in middle- and upper-income tracts.

## Small Business Loans

Regions Bank’s small business lending in low-income tracts is good. During the review period, the bank originated $17.9 \%$ of its small business loans in low-income tracts, where $9.3 \%$ of the small businesses in the assessment area are located. The bank performed below the aggregate in 2010 and above the aggregate in 2011.

The bank's small business lending in moderate-income tracts is adequate. During the review period, the bank originated $14.9 \%$ of its small business loans in moderate-income tracts, where $17.9 \%$ of the small businesses in the assessment area are located. The bank's performance was greater than the aggregate in 2010 and less than the aggregate in 2011.

The bank's small business lending in middle-income tracts was greater than the percentage of small businesses in these tracts, while lending in upper-income tracts was less than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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 borrower is good. At 18.3\%, the bank's percentage of home purchase lending to low-income borrowers was greater than the percentage of low-income families in the assessment area at $17.6 \%$; the bank's performance exceeded the aggregate in 2010 and was less than the aggregate in 2011.

Home purchase lending to moderate-income borrowers is adequate. At 18.3\%, the bank's percentage of home purchase lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area at 20.6\%. Regions Bank's performance was also less than aggregate in 2010 and 2011.

The bank's home purchase lending to middle- and upper-income borrowers was slightly greater than the percentage of middle- and upper-income families in the assessment area.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good when compared to the aggregate lenders. The bank's percentage of home refinance lending to low-income borrowers at $8.1 \%$ was less than the percentage of low-income families in the assessment area at $17.6 \%$; however, Regions Bank's performance was better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is adequate. The bank made $17.6 \%$ of its refinance loans to moderate-income borrowers. Moderate-income families make up 20.6\% of total families in the assessment area. Also, Regions Bank’s performance was better than aggregate in 2010 and 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is very poor. Low-income families constitute $17.6 \%$ of the families in the assessment area, but the bank did not make any home improvement loans to lowincome borrowers. The aggregate lending in this segment of the market was less than the area demographic.

The bank's home improvement lending to moderate-income borrowers is adequate. During the review period, the bank originated a total of three home improvement loans, of which all were to moderate-income borrowers. As such, the bank's performance exceeded both the area demographics and the aggregate's performance in 2010 and 2011.

Additionally, Regions Bank originated no home improvement loans to middle- and upper-income borrowers.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's performance was greater than the aggregate in 2010 and less than the aggregate in 2011. The bank originated $34.3 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $87.8 \%$. However, of the 134 small business loans originated during the review period, 70 loans (52.2\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $71.9 \%$, which is less than the percentage of businesses in the Waterloo assessment area that are considered small businesses at $87.8 \%$. However, $86.6 \%$ of the 134 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was below the aggregate in 2010 and better than the aggregate in 2011.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Waterloo assessment area. The bank originated three community development loans totaling $\$ 5.5$ million during the review period. Two of the loans supported the development of 42 income-restricted units of affordable housing in conjunction with Low Income Housing Tax Credits, and one loan provided construction financing for a business located in a moderate-income census tract that is part of the Waterloo Enterprise Zone. Local community development needs include but are not limited to affordable housing for low- and moderate-income individuals, small business development, neighborhood revitalization and stabilization activities, and financial stability for residents. The bank's community development loan portfolio inside the assessment area represents good responsiveness to the credit needs of low- and moderate-income individuals and geographies and small business. The dollar amount of community development loans is excellent considering the bank's presence in the market.

## Investment Test

The bank's performance in the Waterloo assessment area under the investment test is excellent. The bank had four investments totaling $\$ 6.1$ million. Two of the four investments were current period investments, which comprised the majority of the total dollar volume of the investment portfolio in the assessment area. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through FNMA investment instruments and LIHTCs. Regional investments primarily funded small businesses and startup companies

## Waterloo, Iowa

through investments in SBICs. Affordable housing for low- and moderate-income individuals, neighborhood revitalization and stabilization, small business financing, and household financial stability are some of the area's top community development needs. The dollar volume of Regions Bank's current and total investments is excellent given the bank's presence in the assessment area.

The bank also made seven contributions totaling $\$ 5,417$. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities and affordable housing.

- Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include LIHTCs, including one current period project totaling 42 units that provides housing affordable to low- and moderate-income residents.


## Service Test

The bank's service test performance in the Waterloo assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Waterloo assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of seven branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open any branches and closed one branch (located in a middle-income tract) in the Waterloo assessment area. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in low- or moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

## Waterloo, Iowa

## Geographic Distribution of Branches

Assessment Area: IA Waterloo

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branch <br> \% | $\begin{gathered} \text { Open } \\ \# \end{gathered}$ | Closed \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Weekend Hours \# | Census <br> Tracts |  | House holds \% | Total Businesses \% |
| Low | Total | 3 | 42.9\% | 0 | 0 | 2 | 1 | 2 |  |  |  |  |
|  | DTO LS | 1 0 |  | 0 | 0 0 | 1 |  |  | 2 | 5.4\% | 3.4\% | 10.3\% |
| Moderate | Total | 1 | 14.3\% | 0 | 0 | 1 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 12 | 32.4\% | 26.3\% | 17.9\% |
| Middle | Total | 2 | 28.6\% | 0 | 1 | 2 | 0 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 |  | 0 | 0 | 0 |  |  | 16 | 43.2\% | 47.4\% | 49.2\% |
| Upper | Total | 1 | 14.3\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 7 | 18.9\% | 22.8\% | 22.6\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 7 | 100.0\% | 0 | 1 | 6 | 2 | 6 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 1 0 |  | 0 | 0 0 | 1 |  |  | 37 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 106 service hours in various capacities for community development organizations by participating in 10 community development services. Several of the community development services focused on education, affordable housing, and youth services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by providing financial and technical expertise to community organizations whose purpose is to provide affordable housing to low- and moderate-income individuals.

## Metropolitan Areas (Limited Review)

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

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

- Cedar Rapids Assessment Area (Benton, Jones and Linn Counties)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $15.4 \%$ of its branches in Iowa.
o As of June 30, 2011, the bank had $\$ 50.8$ million in deposits in this assessment area, representing a market share of $1.1 \%$ and $13.2 \%$ of Regions Bank's total deposits in Iowa.
- Iowa City Assessment Area (Johnson County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $7.7 \%$ of its branches in Iowa.
o As of June 30, 2011, the bank had $\$ 9.4$ million in deposits in this assessment area, representing a market share of $0.4 \%$ and $2.4 \%$ of Regions Bank's total deposits in Iowa.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Cedar Rapids | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Above) |
| Iowa City | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |

The Des Moines and Waterloo assessment areas received full-scope reviews, and the bank's performance in the Waterloo assessment area was given greater consideration in determining the overall rating for the state. Waterloo is by far the bank's largest market in Iowa in terms of deposits and branches. The full-scope areas selected together represent $74.3 \%$ of the deposits in the assessment areas in Iowa as well as $69.2 \%$ of the branches. The full-scope assessment areas also represent $85.4 \%$ of the HMDA loans and $80.5 \%$ of the small business loans in the state.

Therefore, the two full-scope assessment areas represent more than half of the deposits, branches and loans in the State of Iowa.

For the Lending Test, performance was weaker than the bank's performance in the state in both of the limitedscope assessment areas (Cedar Rapids and Iowa City). Lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in these assessment areas. The distribution of loans by borrower's income was an additional factor in weaker performance in the Iowa City assessment area.

## Metropolitan Areas (Limited Review)

For the Investment Test, the performance in both limited-scope assessment areas was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in the Cedar Rapids limited-scope assessment area was stronger than the bank's performance in the state. The performance in the Iowa City limited-scope assessment area was consistent with the bank's performance in the state.

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

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

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE IOWA NON-METROPOLITAN ASSESSMENT AREA

- Fayette-Tama Assessment Area (Fayette and Tama Counties)

O As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing 7.7\% of its branches in Iowa.
o As of June 30, 2011, the bank had $\$ 38.9$ million in deposits in this assessment area, representing a market share of $5.0 \%$ and $10.1 \%$ of Regions Bank's total deposits in Iowa.

## 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 tables below. Please refer to the tables in Appendix G for information regarding this area.

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Fayette-Tama | Consistent | Not Consistent <br> (Below) | Consistent |

As stated earlier, the Des Moines and Waterloo assessment areas received full-scope reviews, and the bank's performance in the Waterloo assessment area was given greater consideration in determining the overall rating for the state. Waterloo is by far the bank's largest market in Iowa in terms of deposits and branches. The fullscope areas selected together represent $74.3 \%$ of the deposits in the assessment areas in Iowa as well as $69.2 \%$ of the branches. The full-scope assessment areas also represent $85.4 \%$ of the HMDA loans and $80.5 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits, branches and loans in the State of Iowa.

For the Lending Test and the Service Test, performance in the Fayette-Tama limited-scope assessment area was consistent with the bank's performance in the state. For the Investment Test, the performance in the limitedscope assessment area was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment area.

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

## Kentucky

## CRA RATING FOR KENTUCKY:

## Needs to Improve

The Lending Test is rated:
The Investment Test is rated:
Low Satisfactory
Needs to Improve
The Service Test is rated:

Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans within the assessment areas.
- The bank provides a poor level of qualified community development investments and grants in the assessment areas.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides an adequate level of community development services throughout the assessment areas.


## Kentucky

## SCOPE OF EXAMINATION

A full-scope review was conducted for one assessment area in the State of Kentucky:

- Southwest Kentucky (non-MSA)

A limited-scope review was conducted for the remaining assessment area:

- Simpson County (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 KENTUCKY

Lending activity in Kentucky accounted for $0.7 \%$ of the bank's total lending activity. HMDA lending in Kentucky represented $0.9 \%$ of the bank's total HMDA, while small business lending represented $0.4 \%$ of the bank's total small business lending. As of June 30, 2011, the bank had $\$ 785.3$ million in deposits in Kentucky, accounting for $0.8 \%$ of Regions Bank's total deposits. Additionally, as of June 30, 2011, the bank ranked $17^{\text {th }}$, among 224 insured institutions, in deposit market share with $1.1 \%$ of the deposits within the state. As of December 31, 2011, Regions Bank operated 16 branch offices in Kentucky representing $0.9 \%$ of the bank’s total branches.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of Kentucky is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs.

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

Although Regions Bank is both a small business and HMDA lender, HMDA lending was given greater consideration in determining the lending test rating for Kentucky because the bank originated more HMDA loans by number than small business loans. The bank’s performance in the Southwest Kentucky assessment area was given greater consideration because it contained the largest percentage of the bank's branches, deposits, and lending in the state of Kentucky. Additionally, Regions Bank originated only 110 small farm loans in Kentucky during the review period; therefore, no detailed discussion of these loans is included in this section of the report.

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Kentucky assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

# Statewide Summary of Lending Activity 

Assessment Areas Located in
Kentucky

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s})$ | $\%$ |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 229 | $17.3 \%$ | $\$ 24,021$ | $19.5 \%$ |
| HMDA Refinance | 480 | $36.3 \%$ | $\$ 54,179$ | $43.9 \%$ |
| HMDA Home Improvement | 63 | $4.8 \%$ | $\$ 438$ | $0.4 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{7 7 2}$ | $\mathbf{5 8 . 4} \%$ | $\mathbf{\$ 7 8 , 6 3 8}$ | $\mathbf{6 3 . 7 \%}$ |
| Total Small Business | $\mathbf{4 4 0}$ | $\mathbf{3 3 . 3} \%$ | $\mathbf{\$ 3 0 , 2 1 5}$ | $\mathbf{2 4 . 5 \%}$ |
| Total Farm | $\mathbf{1 1 0}$ | $\mathbf{8 . 3 \%}$ | $\mathbf{\$ 1 4 , 6 1 3}$ | $\mathbf{1 1 . 8 \%}$ |
| TOTAL LOANS | $\mathbf{1 , 3 2 2}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 1 2 3 , 4 6 6}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank's HMDA and small business loans is adequate. Overall, the distribution of loans by borrower's income and revenue size of business is good. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment area is included in the next section of this report.

## Community Development Lending

Regions Bank makes few, if any, community development loans in the Kentucky assessment areas. The bank made no community development loans during the review period. More information on community development lending can be found in the full-scope assessment area section.

## Investment Test

The investment test rating is Needs to Improve when considering the bank's statewide performance in Kentucky. The bank made poor use of qualified investments and contributions and exhibited poor responsiveness to credit and community development needs through its investment activities in the Southwest Kentucky assessment area.

The bank made seven qualified investments of approximately $\$ 1.3$ million and contributions of $\$ 17,060$ within the Kentucky assessment areas. The bank had no current period investments in the state. Most of the prior period investments provided support for community development and affordable housing through HUD bonds and GNMA investment instruments. The bank also had investments that benefitted a broader regional area that includes Kentucky. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs. The bank also made contributions to national organizations that may provide indirect benefit to low- and moderate-income individuals or communities within the Kentucky assessment areas.

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

## Kentucky

## Service Test

The service test rating is Low Satisfactory when considering the bank’s statewide performance in Kentucky.

## Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies or low- and moderate-income individuals.

## Community Development Services

The bank provides an adequate level of community development services that benefit residents and small businesses of the assessment areas. Community development services were adequate in the one full-scope assessment area.

# NON-METROPOLITAN STATEWIDE AREA 

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SOUTHWEST KENTUCKY ASSESSMENT AREA

The Southwest Kentucky assessment area consists of Ballard, Calloway, Graves, Livingston, McCracken, and Marshall counties. Within the assessment area there are no low-, 6 moderate-, 16 middle-, and 22 upper-income tracts. As of December 31, 2011, Regions Bank operated 15 branches in the assessment area, including two in a moderate-income tract and six in middle-income tracts.

According to the June 30, 2011 FDIC Summary of Deposits Report, Regions was $1^{\text {st }}$ in deposit market share, with $\$ 740.2$ million, or $22.3 \%$ of the total. There were 17 financial institutions operating 78 branches in the assessment area. Community Financial Services Bank, US Bank, and Paducah Bank and Trust Company each held more than $10 \%$ of deposits. The other institutions active in the market are primarily community banks.

Regions ranked $5^{\text {th }}$ out of 43 small business loan reporters in 2010 with $7.7 \%$ of the small business loans. In 2011, Regions significantly increased small business lending and was the top ranked lender with $14.3 \%$ of the market. US Bank, American Express, Citibank, and BB\&T were the larger primary small business lenders in market.

Regions ranked $4^{\text {th }}$ out of 156 HMDA reporters in 2010 with $9.3 \%$ of total loans; Bank of America was the market leader with $11.7 \%$ of all loans. HMDA lending declined in 2011 and Regions was ranked $5^{\text {th }}$ out of 162 lenders with $7.5 \%$ of all loans. US Bank was the leading HMDA lender in 2011 with $12.4 \%$ of the loans; the other leading HMDA lenders were primarily large national banks.

## Demographic Characteristics

The population in the assessment area grew by $2.25 \%$ between 2000 and 2010, well below the state growth rate of $7.4 \%$. Population growth was uneven across the counties in the assessment area, with the largest increase in Calloway (8.8\%) and Marshall (4.4\%), while Livingston County lost $2.9 \%$ of its population. McCracken County is the most populous county in the assessment area with 65,565 residents in 2010. Paducah, the county seat of McCracken County, is the largest city in the assessment area with a population of 25,024 . Murray and Mayfield are the only other cities in the assessment area with a population over 10,000; Murray, located in Calloway County, is the fastest growing city in the assessment area. Overall, the population in the assessment area in 2010 was $189,093 .{ }^{457}$

The following table provides demographic characteristics of the bank's assessment area based on the 2000 U.S. census data used to analyze the bank's CRA performance.

[^144]
## Southwest Kentucky

## Combined Demographics Report

Assessment Area: KY Southwest KY

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 7,886 | 15.1 |
| Moderate-income | 6 | 13.6 |  | 5.9 | 913 | 29.6 | 7,156 | 13.7 |
| Middle-income | 16 | 36.4 |  | 32.7 | 2,369 | 13.9 | 9,775 | 18.8 |
| Upper-income | 22 | 50.0 |  | 61.4 | 2,149 | 6.7 | 27,295 | 52.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 44 | 100.0 |  | 100.0 | 5,431 | 10.4 | 52,112 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 6,783 |  |  | 40.0 | 3,143 | 46.3 | 926 | 13.7 |
| Middle-income | 30,490 |  |  | 58.9 | 8,751 | 28.7 | 3,773 | 12.4 |
| Upper-income | 48,836 |  |  | 73.4 | 7,824 | 16.0 | 5,168 | 10.6 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 86,109 | 56,524 |  | 65.6 | 19,718 | 22.9 | 9,867 | 11.5 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 1,052 | 10.7 |  | 9.9 | 107 | 21.5 | 56 | 14.7 |
| Middle-income | 3,402 | 34.6 |  | 34.6 | 176 | 35.3 | 123 | 32.4 |
| Upper-income | 5,387 | 54.7 |  | 55.5 | 215 | 43.2 | 201 | 52.9 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 9,841 | 100.0 |  | 100.0 | 498 | 100.0 | 380 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 91.1 |  | 5.1 |  | 3.9 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \text { \$1 Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 256 | 36.5 |  | 36.3 | 4 | 80.0 | 0 | 0.0 |
| Upper-income | 445 | 63.5 |  | 63.7 | 1 | 20.0 | 1 | 100.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 701 | 100.0 |  | 100.0 | 5 | 100.0 | 1 | 100.0 |
|  | Percentage of | Total F |  | 99.1 |  | . 7 |  | . 1 |

## Income Characteristics

For this analysis, HUD's median family income for the non-metro areas in Kentucky is used. As shown, the median family income increased slightly from $\$ 42,500$ in 2010 to $\$ 43,000$ in 2011, but was well below the median family income for Kentucky, which was $\$ 52,300$ in 2011. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

Borrower Income Levels
Kentucky State Non-Metro

| HUD Estimated Median <br> Family Income |  | Low |  |  | Moderate |  | Middle |  | Upper |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\mathbf{2 0 1 0}$ | $\mathbf{\$ 4 2 , 5 0 0}$ | 0 | - | $49.99 \%$ | $50 \%$ | -249 | $\$ 21,250$ | - | $\$ 33,999$ | $\$ 34,000$ | - | $\$ 50,999$ |
| $\mathbf{2 0 1 1}$ | $\mathbf{\$ 4 3 , 0 0 0}$ | 0 | - | $\$ 21,499$ | $\$ 21,500$ | - | $\$ 34,399$ | $\$ 34,400$ | - | $\$ 51,599$ | $\$ 51,600$ | - |

According to US census estimates, the 2010 median family income in the assessment area ranged from \$45,307 in Graves County to $\$ 55,789$ in McCracken County. ${ }^{458}$

Rural Kentucky is historically very poor. The poverty rates throughout the assessment area range from a low of $11.2 \%$ in Livingston County to about $20 \%$ in Graves County. $15 \%$ of the population in McCracken County was estimated to live below the federal poverty line in 2010. ${ }^{459}$ Food stamp usage, another indicator of financial distress, has also been increasing in the assessment area. The percentage of the population receiving food stamps in 2009 ranged from a low of $10 \%$ in Calloway County to $15.9 \%$ in McCracken County. ${ }^{460}$

## Housing Characteristics

The housing market in Southwest Kentucky has weakened over the past few years with housing prices falling, home sales slowing, and foreclosures rising. All counties have seen some decline in housing prices over the past decade but to a lesser extent than in some other counties in the state. According to the Kentucky Association of Realtors, home prices in Paducah-McCracken County increased from \$117,000 in 2010 to $\$ 126,875$ in 2011. In Murray-Calloway County, home prices fell between 2010 and 2011 from $\$ 124,750$ to $\$ 119,500$. Home prices in Mayfield-Graves County were relatively stable at about $\$ 73,500$ in 2010 and 2011. ${ }^{461}$ Home sales, however, have fluctuated throughout the assessment area. Sales in Paducah-McCracken County and Murray-Calloway County fell between 2010 and 2011 (by 6\% and 10\%) while sales in MayfieldGraves County increased by over $30 \%$.

New home construction in the region has also slowed. Building permits for single family homes fell by 48\% between 2007 and 2011, and in 2011, only 146 new residential building permits were issued in the entire assessment area. The decline in new construction was most significant in McCracken and Calloway Counties. ${ }^{462}$

[^145]Mortgage delinquencies and foreclosures have risen dramatically in the assessment area in the past few years. The percent of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) was highest in Livingston County (18.4\%) and Graves County (11.4\%). The percent of seriously delinquent mortgages in the remaining counties in the assessment area was over $9 \%$ at the end of $2011 .{ }^{463}$

Similar to many other rural areas, the homeownership rate in Southwest Kentucky is relatively high. In the assessment area, the homeownership rate ranged from a low of $62.5 \%$ in Calloway County to $82.3 \%$ in Livingston. ${ }^{464}$ Housing stock in the assessment area is older, and the median age of the housing units in all counties is at least 32 years. There are a significant number of mobile homes in the more rural counties in the assessment area, and in all counties, substandard housing conditions are a concern. ${ }^{465}$

Housing in the assessment area is considered affordable. While incomes are lower, the housing prices are also lower. In 2009, the median housing prices were approximately 2.2 to 2.7 times the median household income, compared to the U.S. average of 3.7. Thus, housing affordability is an important draw to the area. ${ }^{466}$

## Employment and Economic Conditions

The economy in Southwest Kentucky is defined mostly by agriculture, with a number of mid-sized businesses. 2010 REIS data indicate that in Ballard, Graves, Livingston and Marshall Counties, government, manufacturing, retail and transportation, and warehousing are the largest employment sectors. The economy in McCracken and Calloway Counties is more diverse, with employment concentrations in health care, administrative services, accommodations and food services, and professional services, in addition to the employment sectors found in the more rural counties. Some of the largest employers in the region include Ingram Barge, Western Baptist Hospital, Lourdes Hospital, USEC and the McCracken County school system. ${ }^{467}$

All of the counties experienced a significant increase in unemployment starting in 2009. Unemployment rates were highest in the more rural counties of Livingston and Marshall. In 2010, the unemployment rate in these counties was above $10.5 \%$, and exceeded the statewide unemployment rate of $10.2 \%$. McCracken and Calloway Counties fared the best in the assessment area, with unemployment rates reaching a high of $8.8 \%$ and $8.4 \%$, respectively. In all assessment areas, there was an improvement in the unemployment rates between 2010 and 2011; however Ballard and Marshall Counties remained at, or above, the statewide average. Job loss was greatest in the manufacturing sector and the largest growth sector was health care. ${ }^{468}$

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## Southwest Kentucky

## Unemployment Rates

Assessment Area: KY Southwest KY

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Ballard County | 9.7 | 9.5 |
| Calloway County | 8.4 | 8.0 |
| Graves County | 9.7 | 9.3 |
| Livingston County | 10.5 | 9.2 |
| Marshall County | 10.9 | 9.8 |
| McCracken County | 8.8 | 8.5 |
| Kentucky | $\mathbf{1 0 . 2}$ | $\mathbf{9 . 5}$ |

Not Seasonally Adjusted

Small businesses play an important role in the Southwest Kentucky economy. The majority of the businesses in the area are classified as "micro" with fewer than 10 employees. Supporting small businesses and entrepreneurship is an important focus for economic development in Southwest Kentucky and across the state. There are a number of local and state programs to assist small businesses in the region including a small business development center (SBDC) and business incubator at Murray State and a state-supported Innovation and Commercialization Center (ICC). There are several programs to increase access to capital for small businesses, including several micro loan programs and state-level funds to support innovative new businesses by providing equity financing and other types assistance, particularly for businesses that cannot access bank financing. EntrePaducah is an effort in McCracken County to foster a more supportive environment for entrepreneurs by providing counseling and training, and working collaboratively to address structural challenges to entrepreneurship. ${ }^{469}$

Tourism is also an important contributor to the region's economy. Paducah is well known for its historic downtown and concentration of artisans and art studios as well as the National Quilters Museum. While many of the jobs in the tourism industry are low-wage, capitalizing on the tourist draw to the region is seen as a major economic development strategy. ${ }^{470}$

## Community Contacts and Community Development Opportunities

Affordable housing, and particularly affordable rental housing, is needed in the assessment area. According to Kentucky Youth Advocates data, $50 \%$ of the renters in McCracken County were unable to afford the fair market rent in the county of $\$ 559$. In Calloway County, $56 \%$ of renters are unable to afford the fair market rent in 2012. ${ }^{471}$ There are approximately 4,200 subsidized units in the assessment area counties, with the majority in

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## Southwest Kentucky

McCracken County. ${ }^{472}$ However, the waiting lists are temporarily closed for all Section 8 housing in the assessment area.

Foreclosures have increased within the assessment area, and vacant and blighted properties are a concern in certain communities. To assist with the stabilization of these neighborhoods, the state directed a portion of the Neighborhood Stabilization Program funds to several Southwestern Kentucky counties, with a specific emphasis on Paducah. The region received about $\$ 1.4$ million in NSP funds that were used to rehab and resell 11 blighted and foreclosed properties to individuals earning less than $120 \%$ of the area median income.

The financial stability of low- and moderate-income individuals is a large concern in Southwest Kentucky. In McCracken and Calloway counties, approximately $20 \%$ of the population is eligible for the earned income tax credit (EITC), which provides financial assistance to lower-income working families. ${ }^{473}$ In addition, approximately $10.7 \%$ of the households in McCracken County are unbanked, meaning they have no type of deposit account with a mainstream financial institution; $19.9 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower-income and minority households. ${ }^{474}$

There are a number of housing counseling and homeownership programs, particularly in Paducah. The Paducah Housing Authority offers a homeownership program in McCracken County, and there are similar programs offered by the Kentucky Housing Corporation in the rural counties. The Purchase Area Development District, which provides services to the entire assessment area, offers homeownership counseling.

As discussed earlier, there are also a number of programs to assist small businesses, which is an important community and economic development strategy for the area. However, there is a need to expand the nonprofit capacity in the area to address housing and financial stability needs of local residents.

According to a community contact specializing in affordable housing in McCracken County, the biggest need in the community is an economic development strategy to bring in higher-paying jobs. Many of the residents work for small companies and are paid minimum wage, making it very difficult for them to afford housing. However, the contact indicated there is a much more aggressive economic development program in place and was optimistic that there would be better job growth. Overall, the contact felt the banks were engaged in the community, providing appropriate lending products and serving community needs by supporting financial counseling and other programs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending performance in the Southwest Kentucky assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. However, the bank makes few, if any, community development loans.

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## Southwest Kentucky

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 772 (63.7\%) HMDA loans compared to 440 (36.3\%) small business loans in the Southwest Kentucky assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Southwest Kentucky assessment area contains $0.6 \%$ of the bank's small business and HMDA lending by number of loans and $0.5 \%$ by dollar volume totaling $\$ 106.5$ million. In comparison, $0.8 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. There are no low-income tracts in the assessment area. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, Regions Bank’s geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Home Purchase Loans

Home purchase lending in moderate-income tracts is good. The bank's percentage of home purchase lending in moderate-income tracts at $4.1 \%$ was comparable to the percentage of owner-occupied units in these tracts at 4.8\%. Regions Bank's performance was less than aggregate in 2010; however, the bank's performance exceeded the aggregate in 2011.

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

## Home Refinance Loans

Regions Bank’s home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $2.8 \%$ of its home refinance loans in moderate-income census tracts, which contain $4.8 \%$ of the owner-occupied units. The bank performed better than the aggregate in 2010 and 2011.

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

## Home Improvement Loans

Regions Bank's home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated 3.3\% of its home improvement loans in moderate-income tracts, which contain $4.8 \%$ of the owner-occupied units in the assessment area. One home improvement loan was originated in a moderate-income tract each year in 2010 and 2011. The bank’s performance was greater than the aggregate lenders in 2010 and slightly below the aggregate in 2011.

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

## Small Business Loans

Regions Bank's small business lending in moderate-income tracts is good. The bank's performance exceeded both the area demographic and the aggregate performance. During the review period, Regions Bank originated $13.3 \%$ of its small business loans in moderate-income census tracts, which contain $9.9 \%$ of the small businesses in the assessment area.

The bank's small business lending in middle-income tracts was greater than the percentage of small businesses in these tracts, while lending in upper-income tracts was less than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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

The bank's home purchase lending to low-income borrowers is excellent. The bank made $8.6 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $15.1 \%$ of total families in the assessment area. The bank outperformed the aggregate in both 2010 and 2011.

Home purchase lending to moderate-income borrowers is excellent. At 18.1\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $13.7 \%$. In addition, the bank outperformed the aggregate in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is excellent. The bank's percentage of home refinance lending to low-income borrowers at $7.5 \%$ was less than the percentage of low-income families in the assessment area at $15.1 \%$; however, Regions Bank's performance was above aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is excellent when compared to the percentage of moderate-income families in the assessment area and to aggregate performance. The bank's percentage of home refinance lending to moderate-income borrowers at $12.2 \%$ was comparable to the percentage of moderate-income families in the assessment area at $13.7 \%$. In addition, the bank outperformed the aggregate in both 2010 and 2011.

The bank's refinance lending to middle-income borrowers was slightly less than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is adequate. The bank made $8.3 \%$ of its home improvement loans to low-income borrowers. Low-income families make up $15.1 \%$ of total families in the assessment area. The aggregate also had low levels of home improvement loans compared to the percentage of
low-income families in the assessment area. The bank's performance was greater than the aggregate in 2010 and was comparable to the aggregate in 2011.

Home improvement lending to moderate-income borrowers is excellent. At 25.0\%, the bank's percentage of home improvement lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at 13.7\%. In addition, the bank outperformed the aggregate in both 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses was better than the aggregate in 2010 and less than the aggregate in 2011. The bank originated $24.7 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $91.1 \%$. However, of the 421 small business loans originated during the review period, 248 loans (58.9\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $60.1 \%$, which is less than the percentage of businesses in the Southwest Kentucky assessment area that are considered small businesses at $91.1 \%$. However, $86.2 \%$ of the 421 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses, and was noted by a community contact as a particular need in the assessment area. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was comparable to the aggregate.

## Community Development Lending

Regions Bank makes few, if any, community development loans in the Southwest Kentucky assessment area. The bank did not originate any community development loans during the review period. Affordable housing for low- and moderate-income individuals, neighborhood stabilization resulting from foreclosures, and credit for small businesses are some of the community's top credit needs, none of which have been responded to by the bank through community development lending.

## Investment Test

The bank's performance in the Southwest Kentucky assessment area under the investment test is poor. The bank had six investments totaling $\$ 1.3$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Prior period direct investments in the assessment area provided support for affordable housing and community development through investments in HUD bonds and GNMA and FHMA investment instruments. Regional investments primarily funded small businesses and startup companies through investments in SBICs. Community development needs identified in the community include, but are not limited to, affordable housing for low- and moderate-income individuals, small business finance, job creation, community revitalization, and household financial stability. The dollar volume of Regions Bank's total investments is poor given the bank's presence in the assessment area.

The bank also made five contributions totaling $\$ 15,560$. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities, including one local community college where most students are considered low- or moderate-

## Southwest Kentucky

income. The bank's investment portfolio and contributions are not considered highly responsive to community development needs in the assessment area.

## Service Test

The bank's service test performance in the Southwest Kentucky assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Southwest Kentucky assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 15 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank closed one branch (located in an upper-income tract) in the Southwest Kentucky assessment area since the previous evaluation period. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers weekend or extended hours at many of its branch offices, including those located in moderate-income tracts. Bank products, services, and standard business hours are consistent throughout the assessment area.

## Southwest Kentucky

## Geographic Distribution of Branches

Assessment Area: KY Southwest KY

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branc <br> \% | $\begin{gathered} \text { Open } \\ \# \end{gathered}$ | Closed | Drive thrus <br> \# | Extended Hours \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Moderate | Total | 2 | 13.3\% | 0 | 0 | 2 | 1 | 0 |  |  |  |  |
|  | DTO LS | 1 0 |  | 0 0 | 0 0 | 1 |  |  | 6 | 13.6\% | 7.7\% | 10.7\% |
| Middle | Total | 6 | 40.0\% | 0 | 0 | 6 | 5 | 3 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 0 | 0 |  |  | 16 | 36.4\% | 35.0\% | 34.6\% |
| Upper | Total | 7 | 46.7\% | 0 | 1 | 7 | 7 | 4 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 22 | 50.0\% | 57.3\% | 54.7\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $0$ |  | 0 | 0 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 15 | 100.0\% | 0 | 1 | 15 | 13 | 7 |  |  |  |  |
|  | DTO LS | 1 0 |  | 0 | 0 0 | 1 |  |  | 44 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 275 service hours in various capacities to community development organizations by participating in 21 community development services. The majority of the services offered in the assessment area aided small businesses. In particular, Regions Bank employees volunteered at a community organization whose primary mission is to revitalize distressed communities through economic development in order to support small businesses in the area.

## Non-Metropolitan Areas (Limited Review)

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

## DESCRIPTIONS OF INSTITUTION'S OPERATIONS IN THE KENTUCKY NON-METROPOLITAN ASSESSMENT AREA

## - Simpson Assessment Area (Simpson County)

o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $6.3 \%$ of its branches in Kentucky.
o As of June 30, 2011, the bank had $\$ 45.1$ million in deposits in this assessment area, representing a market share of $11.7 \%$ and $5.7 \%$ of Regions Bank's total deposits in Kentucky.

## 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 tables below. Please refer to the tables in Appendix G for information regarding this area.

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Simpson | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Above) |

The Southwest Kentucky assessment area received a full-scope review, and the bank's performance in that assessment area determined the overall rating for the state. Southwest Kentucky is by far the bank's largest market in Kentucky in terms of deposits, loans, and branches. The full-scope area represents $94.3 \%$ of the deposits in the assessment areas in Kentucky as well as $93.8 \%$ of the branches. The full-scope assessment area also represents $96.8 \%$ of the HMDA loans and $95.7 \%$ of the small business loans in the state. Therefore, the Southwest Kentucky assessment area represents most of the deposits, branches and loans in the State of Kentucky.

For the lending test, performance in the Simpson assessment area was weaker than the bank's performance in the state due to the distribution of loans by borrower's income.

For the investment test, the performance in the Simpson limited-scope assessment area was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the service test, performance in the Simpson limited-scope assessment area was stronger than the bank's performance in the state.

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

## Louisiana

## CRA RATING FOR LOUISIANA:

## The Lending Test is rated: <br> The Investment Test is rated: <br> The Service Test is rated:

## Satisfactory

## Low Satisfactory

High Satisfactory
Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas and is occasionally in a leadership position in response to the community development needs of the assessment areas.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides an adequate level of community development services throughout the assessment areas.


## SCOPE OF EXAMINATION

Full-scope reviews were conducted for four assessment areas in the State of Louisiana:

- Baton Rouge
- Monroe
- Shreveport
- Southern Louisiana (non-MSA)

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

- Alexandria
- Northwest Louisiana (non-MSA)
- Houma
- Morehouse (non-MSA)
- Lafayette
- New Orleans
- Tangipahoa (non-MSA)
- St. James (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

Regions Bank operates 114 branch offices in its assessment areas in Louisiana representing 6.6\% of the bank's total branches. As of June 30, 2011, the bank had $\$ 7.3$ billion in deposits in Louisiana representing $7.4 \%$ of Regions Bank's total deposits in all the assessment areas. The bank ranked fourth in total deposits in the state with a market share of $8.4 \%$. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 5,975 ( $6.9 \%$ ) were in the Louisiana assessment areas. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 7,524 (6.8\%) were in the Louisiana assessment areas.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of Louisiana is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs in all four full-scope assessment areas in the state.

Although Regions Bank is both a small business and HMDA lender, small business lending was given greater consideration in determining the lending test rating for Louisiana because the bank originated more small business loans by number than HMDA loans. Additionally, the Baton Rouge assessment area received the greatest consideration when determining the rating because it holds a greater percentage of the bank's deposits, loans, and branches in the state of Louisiana than the other full-scope assessment areas. Furthermore, Regions Bank originated only 135 small farm loans in Louisiana during the review period; therefore, no detailed discussion of these loans is included in this section of the report.

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

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Louisiana assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

## Statewide Summary of Lending Activity

Assessment Areas Located in
Louisiana

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | $\%$ |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 2,150 | $15.9 \%$ | $\$ 373,524$ | $23.9 \%$ |
| HMDA Refinance | 3,382 | $25.1 \%$ | $\$ 563,661$ | $36.0 \%$ |
| HMDA Home Improvement | 443 | $3.3 \%$ | $\$ 4,414$ | $0.3 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{5 , 9 7 5}$ | $\mathbf{4 4 . 3} \%$ | $\mathbf{\$ 9 4 1 , 5 9 9}$ | $\mathbf{6 0 . 2 \%}$ |
| Total Small Business | $\mathbf{7 , 3 8 9}$ | $\mathbf{5 4 . 7} \%$ | $\mathbf{\$ 6 0 3 , 5 2 8}$ | $\mathbf{3 8 . 6 \%}$ |
| Total Farm | $\mathbf{1 3 5}$ | $\mathbf{1 . 0 \%}$ | $\mathbf{\$ 2 0 , 0 7 9}$ | $\mathbf{1 . 3 \%}$ |
| TOTAL LOANS | $\mathbf{1 3 , 4 9 9}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 1 , 5 6 5 , 2 0 6}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank's HMDA and small business loans is adequate. The geographic distribution was adequate in the Baton Rouge, Monroe and Southern Louisiana assessment areas, and was good in the Shreveport assessment area. Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered adequate in all four full-scope assessment areas in the state. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Louisiana assessment areas. The bank made 32 community development loans totaling $\$ 62.9$ million during the review period, which represented $4.7 \%$ by number and $4.5 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the purpose of promoting economic development by financing small businesses and small farms. Although the bank made a good level of community development loans in Baton Rouge and Southern Louisiana, the bank's community development lending performance was poor in Shreveport. The bank did not originate any community development loans in the Monroe assessment area. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating for the State of Louisiana is High Satisfactory when considering the bank's statewide performance and its overall presence in the state. The bank made significant use of qualified investments and contributions. The bank exhibited excellent responsiveness to credit and community development needs through its investment activities in the Shreveport assessment area, while performance in the Baton Rouge and Monroe assessment areas was good and performance in Southern Louisiana was poor.

The bank made 62 qualified investments of approximately $\$ 134.0$ million and contributions of $\$ 197,405$ within the Louisiana assessment areas. Nearly $\$ 94,600$ of the contributions was given in the New Orleans assessment area (a limited-scope assessment area) to support a diverse group of organizations engaged in community

## Louisiana

services, affordable housing and economic development. Of the 62 investments, 8 totaling $\$ 28.5$ million were current period investments. Most of the investments provided support for community development and affordable housing through HUD bonds, GNMA and FNMA investment instruments and the purchase of Low Income Housing Tax Credits (LIHTCs) or investments in LIHTC funds. The bank also had investments that benefitted its footprint or a broader regional area that includes Louisiana. The broader regional investments primarily funded community services and small businesses and startup companies through SBICs. In addition to the contributions specific to the assessment areas, the bank made a $\$ 1000$ statewide contribution to support affordable housing, which positively impacts the bank's assessment areas.

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

## Service Test

The Service Test rating is Low Satisfactory when considering the bank's statewide performance.

## Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderateincome geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

## Community Development Services

The bank provides an adequate level of community development services that benefit residents and small businesses of the assessment areas. Out of the four full-scope assessment areas, community development services were good in the Shreveport assessment area, adequate in the Baton Rouge assessment area, and poor in the Monroe and Southern Louisiana assessment areas.

METROPOLITAN AREA<br>(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BATON ROUGE, LOUISIANA ASSESSMENT AREA

The Baton Rouge, Louisiana assessment area includes Ascension, East Baton Rouge, Livingston and Pointe Coupee parishes in Louisiana, which are located in the nine-parish Baton Rouge MSA. The assessment area contains a total of 122 census tracts, including 15 low-income and 28 moderate-income tracts. Regions Bank operates 27 branch offices in the Baton Rouge assessment area representing $23.7 \%$ of its branches in Louisiana. Two branches are in low-income tracts, four branches are in moderate-income tracts, and six border at least one low- or moderate-income tract.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 1,429 (1.6\%) were in the Baton Rouge assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 1,970 (1.8\%) were in the Baton Rouge assessment area.

## Population and Income Characteristics

The Baton Rouge area experienced a dramatic increase in population after Hurricane Katrina, primarily due to net in-migration of victims of the hurricane relocating from New Orleans. However, by 2006, net in-migration had slowed to a more normal pace, as many evacuees returned to New Orleans or other cities. Overall, population in the Baton Rouge area has increased since 2000, and the total population in the assessment area in 2010 was 698,214 . East Baton Rouge Parish accounts for $63 \%$ of the assessment area population. ${ }^{475}$ The fastest growth in the assessment area has occurred in East Baton Rouge Parish, outside the city of Baton Rouge, and to the south and east of East Baton Rouge. Livingston and Ascension parishes are two of the fastest growing parishes in the state, each growing by more than 39\% between 2000 and 2010. Population growth has occurred significantly faster in the Baton Rouge area than elsewhere in the state, which only grew by about $1.4 \%$ between 2000 and 2010.

Median family income in Baton Rouge is higher than the median family income for the state. There is significant variation in the median family income in the parishes in the assessment area, with the highest median family incomes in Ascension Parish. For the purposes of this analysis, HUD's median family income for the Baton Rouge MSA for 2010 and 2011 is used. As shown, the median family income increased between 2010 and 2011, from $\$ 60,600$ to $\$ 62,100$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels

Baton Rouge, LA MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% |  | 79.99\% | 80\% |  | 119.99\% | 120\% | - | \& above |
| 2010 | \$60,600 | 0 | - | \$30,299 | \$30,300 | - | \$48,479 | \$48,480 | - | \$72,719 | \$72,720 | - | \& above |
| 2011 | \$62,100 | 0 | - | \$31,049 | \$31,050 | - | \$49,679 | \$49,680 | - | \$74,519 | \$74,520 | - | \& above |

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## Baton Rouge, Louisiana

Poverty is a significant concern in the Baton Rouge MSA, where $17 \%$ of the population was estimated to live below the federal poverty line in 2009. Poverty is concentrated in the city of Baton Rouge, where $27 \%$ of the population was estimated to live in poverty in 2009. ${ }^{476}$ Food stamp usage, another indicator of financial distress, has also increased throughout the assessment area. In 2009, 16.7\% of the population in East Baton Rouge Parish received food stamps compared to $17.9 \%$ of the population statewide. ${ }^{477}$

## Housing Characteristics

The Baton Rouge housing market changed dramatically after Hurricane Katrina, when evacuees relocated to the area and purchased and rented available homes. New home construction and home sales increased to unusually high levels during the immediate aftermath of the storm. However, in the past few years, the market weakened as a result of the high rate of net out-migration and the general economic downturn.

Home prices in the Baton Rouge MSA have been relatively stable over the past several years. According to the National Association of Realtors, the median home price in the Baton Rouge MSA was about the same in 2010 and 2011 at $\$ 163,000 .{ }^{478}$ Throughout the Baton Rouge assessment area, there is significant variation in housing prices. The median home price in Ascension Parish in December 2011 was $\$ 189,000$ compared to $\$ 158,000$ in East Baton Rouge, \$141,000 in Livingston, and \$108,000 in Pointe Coupee. ${ }^{479}$

New home construction declined significantly between 2006 and 2011, though the residential market did show signs of recovery in 2012. Building permits for new single-family residential units fell by $60 \%$ between 2006 and 2011, and approximately 2,500 new single-family permits were issued in 2011. ${ }^{480}$ Home sales have also declined since 2006 throughout the assessment area, but started rising again in 2011. Almost half of the home sales since 2006 have been in East Baton Rouge Parish, but the share of total sales in the parish has been declining and a greater share of the sales has been occurring in Ascension Parish. ${ }^{481}$

Foreclosures are a significant issue in the assessment area. The percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) has increased from 4.8\% in January 2010 to $10.0 \%$ in December 2011. ${ }^{482}$ The problem is more acute in Ascension Parish, where the percentage of seriously delinquent mortgages has almost doubled since January 2010 to $12.6 \%$ in December 2011. Statewide, only $1.2 \%$ of mortgages were seriously delinquent at the end of 2011. Bank-owned real estate (REO) represents an increasing share of total home sales in the assessment area. In East Baton Rouge Parish, one in five home sales was a foreclosure in 2011, which contributes to the lower housing prices. ${ }^{483}$

The homeownership rate varies among the parishes in the assessment area. The homeownership rate is significantly higher in Ascension and Livingston parishes at about 80\%, while in East Baton Rouge Parish, only $60 \%$ of households are homeowners. Housing is still considered relatively affordable in the Baton Rouge area. In East Baton Rouge, approximately $51 \%$ of the housing was considered affordable to a family earning less than

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## Baton Rouge, Louisiana

$80 \%$ of the area median income in 2009, while $46 \%$ of the housing was considered affordable in Ascension Parish. ${ }^{484}$

## Employment and Economic Conditions

The economy of the Baton Rouge area was historically based on the oil and gas industries, but as the region has grown, a more diverse economy has developed. Baton Rouge is the state capital and also home to Louisiana State University. Therefore, government is the largest employment sector in the region. According to a recent study by LSU, the university enrolls more than 28,000 students and employs 6,100 full-time and 9,400 part-time employees. The university is the largest employer in the region and generated an annual economic impact of about $\$ 1.2$ billion in the greater Baton Rouge area. Other major employers in the area include Turner Industries Group, Exxon Mobile Corporation, the Shaw Group and Our Lady of the Lake Regional Medical Center. Education and health services, professional and business services, and financial activities are also significant employment sectors in the region. ${ }^{485}$

The Baton Rouge economy is growing. Nonfarm employment declined after 2007, but started showing signs of stability in late 2010. Most of the growth has occurred in the education and health services and construction sectors. Construction is the primary growth sector for the region, and new opportunities in this sector will continue because of several large-scale, multi-billion dollar investments in infrastructure. Manufacturing growth is also expected due to the growth in the chemical sector. Finally, additional investment in health care facilities is expected to drive more employment in the health care sector. ${ }^{486}$

Overall, Louisiana has fared better than the rest of the nation during the recession. In the Baton Rouge MSA, unemployment rose significantly during the recession, but remained well below the national average. Unemployment in the MSA declined slightly between 2010 and 2011, from $7.5 \%$ to 7.4\%. In East Baton Rouge Parish, the largest employment center, the unemployment rate is below the state average at $7.2 \%{ }^{487}$

Unemployment Rates
Assessment Area: LA Baton Rouge

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Baton Rouge MSA | 7.5 | 7.4 |
| Ascension Parish | 7.1 | 6.8 |
| East Baton Rouge Parish | 7.2 | 7.2 |
| Livingston Parish | 7.2 | 7.0 |
| Pointe Coupee Parish | 8.6 | 9.0 |
| Louisiana | 7.5 | $\mathbf{7 . 3}$ |

Not Seasonally Adjusted

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## Baton Rouge, Louisiana

The Baton Rouge area had several major economic development announcements in 2011. Orment announced a new manufacturing plant in Ascension Parish, along with G.S. Electronic Arts (EA) in East Baton Rouge Parish and Cinatra in Iberville Parish. Economic development efforts in the Baton Rouge area are also focused on entrepreneurship, small business, and leveraging the innovation and tech transfer from LSU and other major universities in the area. The region has received national recognition in the past two years for strong job and income growth, as well as its relatively "recession-proof" economy. ${ }^{488}$

The City of Baton Rouge and East Baton Rouge Parish also have a heavy focus on redevelopment of blighted communities and the downtown area. East Baton Rouge Parish adopted FUTREBR, a new comprehensive plan for the parish in 2011. The new comprehensive plan was the culmination of a three-year planning process and provides a strategy for addressing land use, infrastructure, housing, economic development, transportation, parks and public services. In addition, the parish created the East Baton Rouge Redevelopment Authority, which has identified a number of redevelopment districts in the parish and brought new resources to support economic and community development efforts. Finally, in the downtown area, a major new development effort is underway that will include new hotels, public space, restaurants and other amenities. The redevelopment plans also call for a significant investment in new infrastructure. ${ }^{489}$

## Competition

According to the June 30, 2011 FDIC Summary of Deposits Report, there were 37 financial institutions operating 222 branches in 4-parish assessment area. Regions Bank was ranked $4^{\text {th }}$ in deposit market share with $11.6 \%$ ( $\$ 1.7$ billion). JPMorgan Chase was the market leader, with a deposit share of $38.8 \%$, followed by Capital One (17.4\%) and Whitney Bank (13.9\%).

Regions ranked $3^{\text {rd }}$ out of 53 small business loan reporters in 2010 with $8.2 \%$ of the small business loans. Regions significantly increased the number of small business loans in 2011, primarily by purchasing loans, and was again the $3^{\text {rd }}$ ranked small business lender, with $11.8 \%$ of all loans. Overall small business loan volume increase significantly between 2010 and 2011. American Express Bank, Chase, Capital One and Whitney Bank were the other top ranked small business lenders in the market.

Regions ranked $6^{\text {th }}$ out of 313 HMDA reporters in 2010 with $2.7 \%$ of total loans. Overall HMDA lending in the assessment area declined between 2010 and 2011, and Regions Bank's HMDA lending followed the same trend. Regions was ranked $7^{\text {th }}$ out of 323 lenders with $2.5 \%$ of all HMDA loans. Wells Fargo Bank, Bank of America and JP Morgan Chase are the leading HMDA lenders in the market.

## Community Development

Most community development activity in the assessment area is in East Baton Rouge Parish, and there are numerous opportunities to support low- and moderate-income communities and individuals. As discussed earlier, East Baton Rouge Parish has adopted a long-term comprehensive plan that includes affordable rental housing and single-family homeownership, neighborhood revitalization, and economic development strategies that will target distressed communities in the parish. ${ }^{490}$

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## Baton Rouge, Louisiana

In addition, the East Baton Rouge Redevelopment Authority (RDA) was created in 2007 to focus on returning blighted properties to productive use, in an effort to reverse the disinvestment that has occurred in many lowincome communities over the past several decades. The RDA, in conjunction with local residents, has developed community improvement plans for five neighborhoods in East Baton Rouge Parish. The RDA is working to encourage new business development in commercial and neighborhood corridors and to promote new affordable rental and homeownership opportunities. In addition, the RDA is working to bring fresh food options into identified food deserts, which lack access to healthy foods. To accomplish these goals, the RDA has created a number of new financing programs, including gap financing for community development and housing projects. The RDA also created a community development entity and received a $\$ 60$ million New Markets Tax Credit allocation to support redevelopment efforts. Finally, the RDA has created a land bank to acquire blighted and abandoned property. For all of the projects underway through the RDA, partnerships with community, business, government, and financial organizations are critical to their success. ${ }^{491}$

According to the Louisiana Housing Corporation 2010 Housing Needs Assessment, affordable housing is a critical need in the Baton Rouge MSA, particularly affordable rental housing for the lowest income households. About half of the renters that need affordable housing earn less than $30 \%$ of the area median income, so creative partnerships are critical to develop housing for the lowest income households. ${ }^{492}$

There has been significant investment in subsidized housing in the Baton Rouge MSA. Overall, the Louisiana Housing Corporation reports that in 2010, there were 10,079 subsidized units and 3,330 Section 8 vouchers. The majority of the subsidized units are Low Income Housing Tax Credit (LIHTC) projects $(7,521)$ and public housing units $(1,219)$. The Louisiana Housing Corporation has identified several target areas for affordable housing in Baton Rouge, including more rental housing opportunities for individuals earning less than $50 \%$ of the area median income and more affordable homeownership opportunities for individuals earning less than $80 \%$ of the area median income. In addition, there is a need to tie affordable housing development to any major economic development announcements in order to ensure there are adequate housing options for any new employees.

Foreclosure rates in Baton Rouge are not as high as elsewhere in the country, but are still a concern. To stabilize impacted communities, Baton Rouge received a direct allocation of about $\$ 2.3$ million in Neighborhood Stabilization Program funds as well as some additional funds through the state. These funds were used primarily to purchase and rehabilitate homes for affordable rental or homeownership.

The financial stability of low- and moderate-income individuals is a significant concern in the Baton Rouge assessment area, and particularly in the city of Baton Rouge. Approximately $12.1 \%$ of households are unbanked in the city of Baton Rouge, meaning they have no type of deposit account with a mainstream financial institution. In addition, 25.2\% of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower income and minority households. ${ }^{493}$ Bank On Baton Rouge, a collaborative effort led by the mayor's office, banks, nonprofits, and regulatory agencies, was recently launched to try to create new banking products and outreach strategies to encourage the unbanked and underbanked to utilize mainstream financial institutions. There is also an active coalition in Baton Rouge supporting free tax assistance and the Earned Income Tax Credit, as well as Individual Development Accounts (IDAs).

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## Baton Rouge, Louisiana

A community contact in the area confirmed that access to affordable housing is an important need in the area, but quality homeownership counseling is the cornerstone to all community development efforts. The contact indicated that banks are involved in community developing initiatives, but there were always opportunities to do more, particularly in terms of providing more support to nonprofit organizations, and by providing more flexible products for low- and moderate-income homebuyers. Most banks in the area want to support financial education efforts, but few banks are interested in small business outreach. However, the contact did note that several banks, specifically Chase and Capital One, had been very creative in developing targeted community development initiatives in specific Baton Rouge neighborhoods.

## Demographic Characteristics by Census Tract

The following table provides demographic characteristics of the bank’s assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

## Baton Rouge, Louisiana

## Combined Demographics Report

Assessment Area: LA Baton Rouge

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 15 | 12.3 |  | 7.1 | 4,348 | 39.0 | 34,825 | 22.3 |
| Moderate-income | 28 | 23.0 |  | 18.1 | 7,104 | 25.1 | 25,167 | 16.1 |
| Middle-income | 43 | 35.2 |  | 41.2 | 6,029 | 9.4 | 29,939 | 19.2 |
| Upper-income | 36 | 29.5 |  | 33.5 | 1,929 | 3.7 | 66,303 | 42.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 122 | 100.0 |  | 100.0 | 19,410 | 12.4 | 156,234 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 21,618 | 7,171 |  | 33.2 | 10,851 | 50.2 | 3,596 | 16.6 |
| Moderate-income | 45,642 | 23,726 |  | 52.0 | 17,808 | 39.0 | 4,108 | 9.0 |
| Middle-income | 96,340 | 65,403 |  | 67.9 | 22,520 | 23.4 | 8,417 | 8.7 |
| Upper-income | 81,154 | 55,817 |  | 68.8 | 20,787 | 25.6 | 4,550 | 5.6 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 244,754 | 152,117 |  | 62.2 | 71,966 | 29.4 | 20,671 | 8.4 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,761 | 5.4 |  | 5.4 | 95 | 5.2 | 78 | 4.7 |
| Moderate-income | 5,366 | 16.4 |  | 16.1 | 334 | 18.2 | 317 | 19.1 |
| Middle-income | 13,031 | 39.7 |  | 40.4 | 642 | 34.9 | 546 | 32.8 |
| Upper-income | 12,656 | 38.6 |  | 38.1 | 768 | 41.8 | 723 | 43.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 32,814 | 100.0 |  | 100.0 | 1,839 | 100.0 | 1,664 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.3 |  | 5.6 |  | 5.1 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 28 | 10.7 |  | 10.8 | 1 | 11.1 | 0 | 0.0 |
| Moderate-income | 30 | 11.5 |  | 10.0 | 3 | 33.3 | 2 | 66.7 |
| Middle-income | 131 | 50.0 |  | 50.8 | 4 | 44.4 | 0 | 0.0 |
| Upper-income | 73 | 27.9 |  | 28.4 | 1 | 11.1 | 1 | 33.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 262 | 100.0 |  | 100.0 | 9 | 100.0 | 3 | 100.0 |
|  | Percentage of Total Farms: |  |  | 95.4 |  | 3.4 |  | 1.1 |

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## Baton Rouge, Louisiana

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Baton Rouge assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 1,970 (58.0\%) small business loans compared to 1,429 (42.0\%) HMDA loans in the Baton Rouge, Louisiana assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $1.7 \%$ of the bank's small business and HMDA lending by number of loans and $2.1 \%$ by dollar volume totaling $\$ 469.9$ million are located in the Baton Rouge assessment area. The percentage of the bank's total lending at $1.7 \%$ is comparable to the percentage of deposits at $1.7 \%$ in this area. The bank also originated 15 community development loans in the Baton Rouge assessment area. Regions Bank is a major competitor in this market, ranking $7^{\text {th }}$ in HMDA loans and $3^{\text {rd }}$ in small business loans in 2011.

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

## Geographic Distribution of Loans

Regions Bank's geographic distribution of loans reflects adequate penetration throughout the assessment area. For this analysis the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, and the number of owner-occupied units in low- and moderate-income census tracts, were considered when determining the bank's lending performance. The performance of aggregate lenders was also considered.

## Small Business Loans

Regions Bank’s small business lending in low-income census tracts is adequate. During the review period, Regions Bank originated 3.1\% of its small business loans in low-income tracts, which contain $5.4 \%$ of the small businesses in the assessment area. The bank's performance was comparable to aggregate in both 2010 and 2011.

Regions Bank’s small business lending in moderate-income tracts is also adequate. During the review period, Regions Bank originated $11.2 \%$ of its small business loans in moderate-income census tracts, which contain $16.1 \%$ of the small businesses in the assessment area. The bank's performance was comparable to aggregate in both 2010 and 2011.

The bank's small business lending in middle- and upper-income tracts was greater than the percentage of small businesses located in these tracts.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. Regions Bank originated $1.2 \%$ of home purchase loans in low-income tracts, which contain $4.7 \%$ of the owner-occupied units. However, aggregate lenders also had low penetration of home purchase lending in low-income tracts. Nonetheless, the bank's performance was greater than the aggregate in 2010 and slightly less than aggregate in 2011.

## Baton Rouge, Louisiana

Home purchase lending in moderate-income tracts is also adequate. During the review period, Regions Bank originated $6.9 \%$ of home purchase loans in moderate-income tracts, which contain $15.6 \%$ of the owneroccupied units in the assessment area. Regions Bank's performance was slightly above aggregate for both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending in low-income tracts is adequate. The bank made $0.8 \%$ of its home refinance loans in low-income tracts, which contain $4.7 \%$ of owner-occupied units. Aggregate home refinance lending in low-income tracts was also less than the percentage of owner-occupied units in these tracts, suggesting that there might be limited opportunities for home refinance lending in low-income tracts; the bank's lending percentage was slightly below aggregate for both years.

Home refinance lending in moderate-income tracts is also adequate. During the review period, Regions Bank originated $6.7 \%$ of home refinance loans in moderate-income tracts, which contain $15.6 \%$ of the owneroccupied units in the assessment area. Regions Bank's performance was slightly above aggregate for both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in low-income tracts is adequate. Regions Bank originated $2.1 \%$ of home improvement loans in low-income tracts, which contain $4.7 \%$ of the owner-occupied units. However, aggregate lenders also had low penetration of home improvement lending in low-income tracts. Nonetheless, the bank's performance was greater than the aggregate in 2010, but less than aggregate in 2011.

Home improvement lending in moderate-income tracts is adequate. The bank's percentage of home improvement loans in moderate-income tracts at $7.3 \%$ was less than the percentage of owner-occupied units in those tracts at $15.6 \%$. The bank's level of lending in these tracts was less than the aggregate for both 2010 and 2011.

Home improvement lending in middle-income tracts was greater than the percentage of owner-occupied units in those tracts while home improvement lending in upper-income tracts was less than the percentage of owneroccupied units located in those tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment and poverty rates, were considered, as well as the performance of other banks.

## Baton Rouge, Louisiana

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank exceeded the aggregate in lending to small businesses in 2010, but was less than aggregate in 2011. The bank originated $32.3 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.3 \%$. However, of the 1,970 small business loans originated during the review period, 935 loans (47.5\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $61.5 \%$, which is still below the percentage of small businesses in the assessment area. However, $80.2 \%$ of the 1,970 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and comparable to the aggregate in 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is adequate. The bank made $8.8 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $22.3 \%$ of the total families in the assessment area. Regions Bank performed similarly to aggregate in 2010 and slightly above aggregate in 2011.

Home purchase lending to moderate-income borrowers is good. At 23.6\%, the bank’s percentage of home purchase loans to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at 16.1\%. The bank performed slightly below aggregate in 2010 and similarly to aggregate in 2011.

The bank’s home purchase lending to middle- and upper-income borrowers was greater than the percentage of middle- and upper-income families in the assessment area.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is adequate. The bank made $4.0 \%$ of its refinance loans to low-income borrowers. Low-income families make up 22.3\% of the total families in the assessment area. The bank's performance was slightly less than aggregate in 2010 and greater than aggregate in 2011.

Home refinance lending to moderate-income borrowers is adequate. The bank's percentage of home refinance lending to moderate-income borrowers at $9.7 \%$ was less than the percentage of moderate-income families in the assessment area at $16.1 \%$. Regions Bank's performance was slightly less than aggregate in 2010 and comparable to aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Although Regions Bank's percentage of loans at $15.6 \%$ was less than the percentage of low-income families in the assessment area, the bank's performance was slightly greater than the aggregate in 2010 and significantly greater than the aggregate in 2011.

Home improvement lending to moderate-income borrowers is good. The bank's percentage of loans to moderate-income borrowers at $16.7 \%$ was greater than the $16.1 \%$ of moderate-income families in the assessment area. The bank's performance was comparable to aggregate in 2010 and slightly less than the aggregate in 2010.

## Baton Rouge, Louisiana

Regions Bank's home improvement lending to middle-income borrowers was greater than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Baton Rouge assessment area. The bank originated 15 community development loans totaling $\$ 23.3$ million during the review period. The majority of the bank's loans financed community services for low- and moderate-income individuals and promoted economic development by financing small business or farms. Local community development needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization and revitalization, small business development, and financial stability for residents. The bank's portfolio of community development loans inside the assessment area exhibits good responsiveness to the credit needs of low- and moderate-income individuals and geographies and small business. The dollar amount of community development loans is good given the bank's presence in the local market.

Examples of the bank's community development lending include the following:

- An $\$ 8.1$ million loan to support the repair and renovation of seven school buildings where the majority of students are low- or moderate-income;
- $\$ 1.2$ million in loans to support the development of 81 units of low-income tax credit supported affordable housing; and
- Nearly $\$ 9$ million in loans that promote economic development by financing small farms.


## Investment Test

The bank's investment test performance in the Baton Rouge assessment area is good. The bank had 13 investments totaling $\$ 18.1$ million, including three current period investments totaling $\$ 5.1$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through FNMA and GNMA investment instruments, LIHTCs and LIHTC funds. The assessment area was also positively impacted by a community development program investment in a CDFI that provides small business financing assistance. The broader regional investments primarily funded small businesses and startup companies through SBICs. Local community development credit needs include but are not limited to neighborhood revitalization and stabilization activities, affordable housing for low- and moderate-income individuals, household financial stability and financing for small businesses. The dollar volume of Regions Bank's current and total investments exhibits good responsiveness to some of the identified community needs, given the bank's presence in the assessment area.

The bank also made 13 contributions totaling $\$ 46,086$. In addition, the bank made several contributions to statewide and national organizations that indirectly benefit the assessment area. Contributions were given primarily to organizations involved in economic development or providing community services targeted to lowand moderate-income individuals and communities.

## Service Test

The bank's service test performance in the Baton Rouge assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Baton Rouge assessment area.

## Baton Rouge, Louisiana

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 27 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed four branches (one in a low-income tract, one in a middleincome tract, and two in upper-income tracts) in the Baton Rouge assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderateincome geographies or to low- and moderate-income individuals. Weekend hours are offered at many of the bank's branches, including those in low- and moderate-income geographies. The level of services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Geographic Distribution of Branches

## Assessment Area: LA Baton Rouge

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branc <br> \% | $\begin{aligned} & \text { hes } \\ & \text { Open } \\ & \# \end{aligned}$ | Closed <br> \# | Drive thrus \# | Extend- <br> ed <br> Hours <br> \# | Weekend Hours \# | Census <br> Tracts |  | Households <br> \% | Total Businesses $\%$ |
|  | Total | 2 | 7.4\% | 0 | 1 | 2 | 2 | 1 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 15 | 12.3\% | 8.0\% | 5.4\% |
| Moderate | Total | 4 | 14.8\% | 0 | 0 | 3 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 1 \\ & 0 \end{aligned}$ |  | $0$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 1 |  |  | 28 | 23.0\% | 18.5\% | 16.4\% |
| Middle | Total | 11 | 40.7\% | 0 | 1 | 11 | 8 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 43 | 35.2\% | 39.2\% | 39.7\% |
| Upper | Total | 10 | 37.0\% | 0 | 2 | 10 | 10 | 4 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 36 | 29.5\% | 34.2\% | 38.6\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \\ & \hline \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $0$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
|  | Total | 27 | 100.0\% | 0 | 4 | 26 | 20 | 8 |  |  |  |  |
| Total | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 1 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 1 |  |  | 122 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 487 service hours in various capacities for community development organizations, and completed 74 community development services. Many of the community

## Baton Rouge, Louisiana

development services focused on education, affordable housing, youth services, and other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes to middle and high school students. The majority of these schools have a high number of students on free or reduced price lunch programs. Furthermore, the majority of these schools are located in low- and moderate-income geographies. In addition, Regions Bank employees served on boards of directors and committees of various community organizations which provide services in low- and moderate-income geographies or to low- and moderateincome individuals.

# METROPOLITAN AREA <br> (Full-scope Review) 

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

The Monroe, Louisiana assessment area consists of Ouachita Parish, which is part of the two-parish Monroe MSA. There are 41 census tracts in the assessment area, of which seven are low-income and nine are moderateincome. Regions Bank operates four branches in the Monroe assessment area, one of which is located in a moderate-income tract. These branches represent $3.5 \%$ of the bank's total branches in Louisiana.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 276 ( $0.3 \%$ ) were in the Monroe assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 325 ( $0.3 \%$ ) were in the Monroe assessment area.

## Population and Income Characteristics

Ouachita Parish is located in northeast Louisiana. Population in the parish grew by $4.4 \%$ between 2000 and 2010, exceeding the population growth rate for the state of $1.4 \%$ over the same time period. In 2010, the population of Ouachita Parish was $153,720 .{ }^{494}$ Monroe is the principal city in the parish with a population of 48,815 in 2010. However, population growth is occurring outside the city, which actually lost $8.5 \%$ of its population between 2000 and 2010.

Median family income in Monroe is slightly below median family income for the state. For the purposes of this analysis, HUD's median family income for the Monroe MSA for 2010 and 2011 is used. As shown, the median family income decreased slightly between 2010 and 2011, from $\$ 51,400$ to $\$ 51,100$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels Monroe, LA MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% |  | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$51,400 | 0 | - | \$25,699 | \$25,700 | - | \$41,119 | \$41,120 | - | \$61,679 | \$61,680 | - | \& above |
| 2011 | \$51,100 | 0 | - | \$25,549 | \$25,550 | - | \$40,879 | \$40,880 | - | \$61,319 | \$61,320 | - | \& above |

Poverty is a significant concern in the Monroe assessment area, particularly in the city of Monroe where 33.5\% of the population lived below the federal poverty line in 2010. In Ouachita Parish, $21.7 \%$ of the population lived below the poverty line, which is higher than the poverty rate for the state of $18.4 \%{ }^{495}$ Food stamp usage, another indicator of financial distress, has also increased in Ouachita Parish. In 2009, 23.3\% of the population in the parish received food stamps compared to $17.9 \%$ of the population statewide. ${ }^{496}$

[^155]
## Housing Characteristics

The Monroe housing market has weakened, but not to the same degree that many other areas have seen. In fact, home prices in the Monroe MSA increased by $4.9 \%$ between 2008 and 2010, while statewide, home prices increased by $2.6 \%$. The median home price in the Monroe MSA in 2010 was $\$ 135,000 .{ }^{497}$

New home permits and sales have declined. Building permits have fallen by $62 \%$ since 2005, and in 2010, only 219 new residential building permits were issued. Home sales have also declined modestly by about 13\% between 2006 and 2010. However, since 2008, home sales for homes priced above $\$ 200,000$ have actually increased. ${ }^{498}$

Foreclosures are an issue Ouachita Parish but to a lesser degree than other markets. The number of home foreclosures reached the highest point in 2009 and then started to decline in 2010. However, the percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) has increased from $5.3 \%$ in January 2010 to $8.9 \%$ in December 2011. ${ }^{499}$ Ouachita Parish has an aging housing stock, with the median housing age at 35 years old in 2011; the age of the housing stock is even older in Monroe with a median age of $44 .{ }^{500}$

The homeownership rate in Ouachita Parish has declined over the past decade and is lower than the homeownership rate statewide. In 2010, $61 \%$ of households owned homes compared to $67 \%$ statewide. Housing is still considered relatively affordable in the Monroe market, where approximately $48 \%$ of the housing was considered affordable to a family earning less than $80 \%$ of the area median income in $2009 .{ }^{501}$

## Employment and Economic Conditions

Ouachita Parish was historically dependent on the agriculture and timber industries. However, it also has a history tied to some of the largest companies in the US today. Coca Cola opened its first bottling plant in Monroe in 1913, and Delta Air Lines can trace its roots back to Monroe in the late 1920s.

Ouachita Parish has worked to diversify its economy and today, the parish is a hub for medical, retail and higher education in Northeast Louisiana. 2010 REIS data indicates that primary employment concentrations in the assessment area are retail trade, health care and social assistance, accommodation and food services, other services, and local government. ${ }^{502}$ Major employers in the area include JPMorgan Chase, St. Francis Medical Center, CenturyLink, Graphic Packaging, Foster Farms, Wal-Mart, and Glenwood Regional Medical Center. CenturyLink is the $3^{\text {rd }}$ largest telecommunications provider and the largest independent telecommunications provider in the US. ${ }^{503}$

Louisiana fared better than other states during the recession but did see an increase in unemployment. Unemployment in the Monroe MSA increased from $4.4 \%$ to $7.8 \%$ in 2010, which was the highest rate in the

[^156]state. Unemployment rates improved slightly in 2011, falling to $7.7 \%$. Unemployment statewide decreased between 2010 and 2011 from 7.5 to $7.3 \%$. ${ }^{504}$

## Unemployment Rates

Assessment Area: LA Monroe

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Monroe MSA | 7.8 | 7.7 |
| Ouachita Parish | 7.7 | 7.7 |
| Louisiana | $\mathbf{7 . 5}$ | $\mathbf{7 . 3}$ |

Not Seasonally Adjusted

Minor job losses occurred in most industry sectors in 2010 compared to 2009. Finance, retail, educational services and government were the four sectors that registered small employment gains. ${ }^{505}$ The sectors that appeared poised for some future growth include manufacturing (food processing and autos), telecommunications and finance. However, the economy of the entire Northeast Louisiana area is also at risk if there are significant state budget cuts to higher education, given the presence of three larger higher education institutions in the region. ${ }^{506}$ Ouachita Parish was looking forward to a major new investment in a shuttered auto manufacturing plant, which was going to be repurposed to produce affordable, highly fuel efficient cars. The plant would eventually employ up to 1,400 , which would have been a tremendous opportunity for Monroe residents. ${ }^{507}$ However, due to financing and other issues, the plans for the plant were withdrawn in 2011. ${ }^{508}$

In 2011, CenturyLink announced plans to expand its Monroe operations and bring an additional 800 jobs (average annual compensation of $\$ 65,000$ ) to the area over the next 5 to 10 years. This expansion is on top of the local consolidation of 300 jobs the company announced previously in 2009. The estimated economic impact of the current ( 800 job ) expansion is in excess of $\$ 100$ million of annual household income and more than 2,000 jobs created from both direct hiring by CenturyLink and secondary effects. Assuming that average compensation rates reflect mortgage qualifying income suggests an eventual increase in demand for new and existing homes in Northeast Louisiana as well as the possibility of in-migration, something this area has lacked for the past 10 years.

## Competition

According to the June 30, 2011 FDIC Summary of Deposits Report, there were 13 financial institutions operating 57 branches in Ouachita Parish. Regions Bank was ranked $4^{\text {th }}$ in deposit market share with $11.4 \%$ ( $\$ 287.7$ million). JPMorgan Chase was the market leader, with a deposit share of $21.5 \%$, followed by Community Trust Bank (13.8\%) and IBERIABANK (12.6\%). The other institutions active in the market are primarily small community banks.

[^157]Regions Bank ranked $7^{\text {th }}$ out of 34 small business loan reporters in 2010 with $5.1 \%$ of the loans. Regions significantly increased the number of small business loans in 2011, primarily by purchasing loans. In 2011, Regions was the $3^{\text {rd }}$ ranked small business lender out of 36 reporters with $8.7 \%$ of all loans. American Express Bank and Community Trust Bank are the leading small business lenders in Ouachita Parish.

Regions ranked $8^{\text {th }}$ out of 135 HMDA reporters in 2010 with $3.2 \%$ of total loans. Regions Bank's HMDA lending declined in 2011, and the bank was ranked $9^{\text {th }}$ out of 135 lenders with $2.5 \%$ of all HMDA loans. Wells Fargo Bank, Bank of America and JPMorgan Chase are among the leading HMDA lenders in the market.

## Community Development

According to the Louisiana Housing Corporation 2010 Housing Needs Assessment, affordable housing is a critical need in the Monroe MSA. Ouachita Parish ranks at the top statewide in terms of the percentage of households with some affordable housing need. In the Monroe MSA, approximately $30 \%$ of all households are in need of affordable housing, of which half are owners and the other half renters. Households earning less than $50 \%$ of the area median income, and particularly the lowest income households that earn less than $30 \%$ of the area median income, are most likely to be living in housing with problems and are in the greatest need of decent affordable housing. Monroe also has one of the highest unemployment rates in the state, exacerbating the need for affordable housing. ${ }^{509}$

There has been limited investment in subsidized housing in the Monroe MSA. Overall, the Louisiana Housing Corporation reports in 2010, there were 3,944 subsidized units and 2,316 Section 8 vouchers. The majority of the subsidized units are Low Income Housing Tax Credit (LIHTC) projects $(2,450)$ and public housing units $(1,285)$. The Louisiana Housing Corporation has identified several target areas for affordable housing in Monroe, including more rental housing opportunities for individuals earning less than $50 \%$ of the area median income and more affordable homeownership opportunities for individuals in this same income bracket. In addition, there is a need to tie affordable housing development to any major economic development announcements in order to ensure there are adequate housing options for any new employees.

One community contact in the area indicated that the Monroe housing market was slowly coming back, but lowto moderate-income individuals were still struggling because they were unable to secure access to credit. The contact also said that there was demand for more homeownership counseling to help lower-income individuals obtain credit. The interviewee reported that he did not see much involvement from financial institutions in community development work in Monroe, and specifically, few banks are involved in community development lending. However, there are opportunities for community and regional banks to get more engaged, particularly with the smaller nonprofits in the market.

Foreclosure rates in Ouachita Parish are not as high as elsewhere in the country, but are still above the statewide rates. To stabilize impacted communities, Ouachita Parish received about $\$ 2.6$ million in Neighborhood Stabilization Program funds through the state's allocation to purchase and rehabilitate homes for affordable rental or homeownership. Additional funds were allocated to Northeast Louisiana to land bank foreclosed properties for future affordable housing use. ${ }^{510}$

[^158]
## Monroe, Louisiana

The financial stability of low- and moderate-income individuals is a concern in Monroe. Approximately 9.4\% of households are unbanked in Ouachita Parish, meaning they have no type of deposit account with a mainstream financial institution. In addition, $22.8 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower-income and minority households. ${ }^{511}$ There are several organizations in the Monroe MSA that provide financial education, free tax assistance, Individual Development Accounts and other services designed to target the unbanked and underbanked population.

Demographic Characteristics by Census Tract
The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

[^159]
## Combined Demographics Report

Assessment Area: LA Monroe

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 7 | 17.1 |  | 10.6 | 1,941 | 47.5 | 8,939 | 23.2 |
| Moderate-income | 9 | 22.0 |  | 17.4 | 1,935 | 28.8 | 6,207 | 16.1 |
| Middle-income | 14 | 34.1 |  | 40.0 | 1,572 | 10.2 | 7,126 | 18.5 |
| Upper-income | 11 | 26.8 |  | 31.9 | 644 | 5.2 | 16,264 | 42.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 41 | 100.0 |  | 100.0 | 6,092 | 15.8 | 38,536 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 6,755 | 2,467 |  | 36.5 | 3,549 | 52.5 | 739 | 10.9 |
| Moderate-income | 10,588 | 5,311 |  | 50.2 | 4,059 | 38.3 | 1,218 | 11.5 |
| Middle-income | 23,883 | 15,391 |  | 64.4 | 6,460 | 27.0 | 2,032 | 8.5 |
| Upper-income | 18,928 | 12,243 |  | 64.7 | 5,736 | 30.3 | 949 | 5.0 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 60,154 | 35,412 |  | 58.9 | 19,804 | 32.9 | 4,938 | 8.2 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 869 | 10.5 |  | 10.1 | 71 | 14.7 | 50 | 14.0 |
| Moderate-income | 1,540 | 18.7 |  | 17.8 | 140 | 29.0 | 80 | 22.5 |
| Middle-income | 3,021 | 36.6 |  | 37.8 | 132 | 27.3 | 91 | 25.6 |
| Upper-income | 2,816 | 34.1 |  | 34.3 | 140 | 29.0 | 135 | 37.9 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 8,246 | 100.0 |  | 100.0 | 483 | 100.0 | 356 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.8 |  | 5.9 |  | 4.3 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \text { \$1 Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2 | 2.1 |  | 2.1 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 6 | 6.3 |  | 6.4 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 52 | 54.7 |  | 55.3 | 0 | 0.0 | 0 | 0.0 |
| Upper-income | 35 | 36.8 |  | 36.2 | 0 | 0.0 | 1 | 100.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 95 | 100.0 |  | 100.0 | 0 | . 0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 98.9 |  | . 0 |  | 1.1 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Monroe, Louisiana

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Monroe assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area; the distribution of borrowers also reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. However, the bank makes few, if any, community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 325 (54.1\%) small business loans compared to 276 (45.9\%) HMDA loans in the Monroe, Louisiana assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $0.3 \%$ of the bank's small business and HMDA lending by number of loans and $0.3 \%$ by dollar volume totaling $\$ 60.2$ million are located in the Monroe assessment area. The percentage of the bank's total lending at $0.3 \%$ is comparable to the percentage of deposits at $0.3 \%$ in this area. Additionally, the bank did not originate any community development loans in the Monroe assessment area. Regions Bank is a major competitor in this market, ranking $9^{\text {th }}$ in HMDA loans and $3^{\text {rd }}$ in small business loans in 2011.

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

## Geographic Distribution of Loans

Regions Bank's geographic distribution of loans reflects adequate penetration throughout the assessment area. For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates and the number of owner-occupied units in low- and moderate-income census tracts, were considered when determining the bank's lending performance. The performance of aggregate lenders was also considered.

## Small Business Loans

Regions Bank’s small business lending in low-income census tracts is poor. During the review period, Regions Bank originated $6.5 \%$ of its small business loans in low-income tracts, which contain $10.1 \%$ of the small businesses in the assessment area. In comparison to aggregate data, the bank performed less than the aggregate for both 2010 and 2011.

Regions Bank's small business lending in moderate-income census tracts is good. During the review period, the bank originated $17.8 \%$ of its small business loans in moderate-income census tracts, which contain $17.8 \%$ of the small businesses in the assessment area. The bank's performance was less than the aggregate in 2010 and greater than the aggregate in 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts while the lending in upper-income tracts was greater than the percentage of small businesses in upper-income tracts.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, Regions Bank originated two ( $2.0 \%$ ) of its home purchase loans in low-income census tracts, which contain $7.0 \%$ of the owner-occupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at a

## Monroe, Louisiana

level comparable to the demographic. This may suggest that there are limited opportunities for home purchase lending in low-income tracts. Regions Bank’s performance was less than the aggregate in 2010 and greater than the aggregate in 2011.

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $6.0 \%$ of its home purchase loans in moderate-income census tracts, which contain $15.0 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was greater than the aggregate in 2010 and 2011.

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

## Home Refinance Loans

Home refinance lending in low-income tracts is adequate. During the review period, Regions Bank originated one ( $0.6 \%$ ) of its home refinance loans in low-income census tracts, which contain $7.0 \%$ of the owner-occupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at a level comparable to the demographic. This may suggest that there are limited opportunities for home refinance lending in low-income tracts. Regions Bank's performance was greater than the aggregate in 2010 and less than the aggregate in 2011.

Home refinance lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $6.4 \%$ of its home refinance loans in moderate-income census tracts, which contain $15.0 \%$ of the owner-occupied units in the assessment area. Regions Bank performed slightly above the aggregate for both years of the review period.

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

## Home Improvement Loans

Home improvement lending in low-income tracts is adequate. During the review period, Regions Bank did not originate any of its home improvement loans in low-income census tracts, which contain $7.0 \%$ of the owneroccupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at a level comparable to the demographic. This may suggest that there are limited opportunities for home improvement lending in low-income tracts. Regions Bank’s performance was less than the aggregate in both 2010 and 2011.

Home improvement lending in moderate-income tracts is adequate. During the review period, Regions Bank originated four ( $21.1 \%$ ) of its home improvement loans in moderate-income census tracts, which contain 15.0\% of the owner-occupied units in the assessment area. Regions Bank performed less than the aggregate for 2010 and greater than the aggregate for 2011.

The bank's home improvement lending in middle-income tracts was greater than the percentage of owneroccupied units in these tracts while the lending in upper-income tracts was less than the percentage of owneroccupied units.

## Monroe, Louisiana

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment and poverty rates were considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank exceeded the aggregate in lending to small businesses in 2010, but was less than aggregate in 2011. The bank originated $26.2 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.8 \%$. However, of the 325 small business loans originated during the review period, 201 (61.8\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $68.5 \%$, which was still less than the percentage of small businesses in the Monroe assessment area. However, $88.3 \%$ of the 325 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of \$100,000 or less, Regions Bank's performance was comparable to the aggregate in 2010 and 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is adequate. The bank made $7.0 \%$ of its home purchase loans to low-income borrowers. Low-income families make up 23.2\% of total families in the assessment area. Regions Bank performed significantly greater than the aggregate in 2010 but less than the aggregate in 2011.

The bank's home purchase lending to moderate-income borrowers is good. At $18.0 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $16.1 \%$. The bank's performance was greater than the aggregate in 2010 but less than the aggregate in 2011.

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

## Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. During the review period, Regions Bank originated $2.5 \%$ of its home refinance loans to low-income borrowers. Low-income families make up $23.2 \%$ of the total families in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at a level comparable to the demographic. Regions Bank's performance was less than the aggregate in 2010 but greater than the aggregate in 2011.

The bank's home refinance lending to moderate-income borrowers is adequate when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $9.6 \%$ was less than the percentage of moderate-income families in the assessment area at $16.1 \%$. Regions Bank's performance was comparable to the aggregate in 2010 and greater than the aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of loans at $10.5 \%$ was less than the percentage of low-income families in the assessment area at $23.2 \%$. The bank's lending to low-income borrowers was less than the aggregate in 2010 but significantly greater than the aggregate in 2011.

Home improvement lending to moderate-income borrowers is good. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $31.6 \%$ exceeded the percentage of moderate-income families in the assessment area at $16.1 \%$. Additionally, the bank's performance exceeded aggregate in both 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while home improvement lending to upper-income borrowers was less than the percentage of upper-income families in the assessment area.

## Community Development Lending

Regions Bank makes few, if any, community development loans in the Monroe assessment area. The bank did not originate any community development loans during the review period. Local community development needs include but are not limited to affordable housing for low- and moderate-income individuals, financial stability for low- and moderate-income consumers and neighborhood stability tied to foreclosure mitigation, none of which have been responded to by the bank with community development lending.

## Investment Test

The bank's investment test performance in the Monroe assessment area is good. The bank had seven investments totaling $\$ 3.0$ million. The bank had no current period investments. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through LIHTCs and LIHTC investment funds. The broader regional investments primarily funded small businesses and startup companies through SBICs. Local community development credit needs include but are not limited to neighborhood revitalization and stabilization activities, affordable housing for low- and moderate-income individuals, household financial stability and financing for small businesses. The dollar volume of Regions Bank's current and total investments exhibits good responsiveness to some of the identified community needs, given the bank's presence in the assessment area.

The bank also made six contributions totaling $\$ 5,000$. In addition, the bank made several contributions to statewide and national organizations that indirectly benefit the assessment area. Contributions were given primarily to organizations involved in small business assistance, affordable housing and provision of community services targeted to low- and moderate-income individuals and communities.

## Service Test

The bank's service test performance in the Monroe assessment area is poor. Its retail and community development services reflect poor responsiveness to the needs of the Monroe assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Regions Bank's four branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the

## Monroe, Louisiana

assessment area. The bank did not open any branches and closed one branch (located in a middle-income tract) in the Monroe assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. Weekend hours are offered at all the bank's branches, including the one branch located in a moderate-income geography. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Geographic Distribution of Branches

Assessment Area: LA Monroe

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branc <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive <br> thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 0 | 0 |  |  | 7 | 17.1\% | 10.9\% | 10.5\% |
| Moderate | Total | 1 | 25.0\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 | 0 |  |  | 9 | 22.0\% | 17.0\% | 18.7\% |
| Middle | Total | 2 | 50.0\% | 0 | 1 | 2 | 2 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 | 0 |  |  | 14 | 34.1\% | 39.6\% | 36.6\% |
| Upper | Total | 1 | 25.0\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 11 | 26.8\% | 32.5\% | 34.1\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $0$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 4 | 100.0\% | 0 | 1 | 4 | 4 | 4 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 0 | 0 |  |  | 41 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

Community Development Services
Regions Bank provides a limited level of community development services in the assessment area, and improvement is needed. During the review period, Regions Bank employees provided 49 hours of service for community development organizations by participating in five community development services. According to information obtained from community contacts, there are opportunities for financial institutions to participate in community development services in the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

METROPOLITAN AREA<br>(Full-scope Review)

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

The Shreveport assessment area consists of Caddo and Bossier parishes, which are part of the three-parish Shreveport MSA. Shreveport and Bossier City are the principal cities in the assessment area. The assessment area contains a total of 83 tracts, including 10 low-income and 23 moderate-income tracts. Regions operates 13 branches in the Shreveport assessment area, with one branch each located in a low- and moderate-income tract, respectively, and another six bordering at least one low- or moderate-income tract. These branches represent $11.4 \%$ of the bank's branches in Louisiana.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 1,034 (1.2\%) were in the Shreveport assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 1,602 (1.5\%) were in the Shreveport assessment area.

## Population and Income Characteristics

Population in the Shreveport assessment area grew by about $6 \%$ between 2000 and 2010 with most of the growth occurring in Bossier Parish. The city of Shreveport lost about 1\% of its population between 2000 and 2010, while Bossier Parish increased by almost 19\%. Overall population in the assessment area was 371,948 in 2010. Population growth in the assessment area greatly exceeded the growth rate statewide of about $1.4 \%$ between 2000 and 2010. ${ }^{512}$

Median family income in the Shreveport MSA is comparable to the median family income for the state. Within the assessment area, however, median family income is much higher in Bossier Parish than Caddo Parish. For the purposes of this analysis, HUD's median family income for the Shreveport MSA for 2010 and 2011 is used. As shown, the median family income increased between 2010 and 2011, from $\$ 52,600$ to $\$ 54,300$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels <br> Shreveport- Bossier City, LA MSA

| HUD Estimated Median <br> Family Income |  | Low |  |  | Moderate |  | Middle |  | Upper |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\mathbf{2 0 1 0}$ | $\$ 52,600$ | 0 | - | $\$ 26,299$ | $\$ 26,300$ | - | $\$ 42,079$ | $\$ 42,080$ | - | $\$ 63,119$ | $\$ 63,120$ | - |
| $\mathbf{2 0 1 1}$ | $\mathbf{\$ 5 4 , 3 0 0}$ | 0 | - | $\$ 27,149$ | $\$ 27,150$ | - | $\$ 43,439$ | $\$ 43,440$ | - | $\$ 65,159$ | $\$ 65,160$ | - |

The number of people living in poverty in the assessment area has increased since 2000 and is a particular concern in the city of Shreveport and Caddo Parish. Between 2005 and 2009, over $21 \%$ of the population in Caddo Parish was estimated to live below the federal poverty line. ${ }^{513}$ The poverty rate in Bossier Parish is much lower, but the number of people living in poverty has increased, primarily due to some migration from

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Caddo Parish by individuals looking for more affordable housing. ${ }^{514}$ Food stamp usage, another indicator of financial distress, has also increased, particularly in Caddo Parish. In 2009, 20.8\% of the population in Caddo Parish received food stamps compared to $17.9 \%$ of the population statewide. ${ }^{515}$

## Housing Characteristics

The housing market in the Shreveport MSA experienced many of the challenges felt nationwide as a result of the economic downturn, though to a lesser extent. Over the past few years, the market has weakened, with slower sales and declining new construction.

Home prices in the Shreveport MSA actually increased during the national recession, to a peak in 2010. Since then, home prices have been relatively steady. According to the National Association of Realtors, the median home price in the Shreveport MSA increased from $\$ 147,000$ to $\$ 156,600$ between 2009 and 2010, and remained stable at $\$ 156,200$ in 2011. ${ }^{516}$ Housing is considered more affordable in Bossier Parish than the state of Louisiana.

New home construction declined significantly between 2006 and 2011, but the market showed some signs of stabilization into 2012. For the 12-month period ending June 2012, 1,125 new residential permits were issued in the Shreveport MSA, representing a $4.3 \%$ increase over the same period a year earlier. However, the total number of new building permits is still about $15 \%$ below the long-term ( 8 -year) average for new units built in the area. ${ }^{517}$ Until 2009, more of the new construction occurred in Shreveport, but since that time, more new units have been permitted in Bossier City, providing another indication of the changing population growth patterns in the region.

Home sales in the area have also declined. In 2006, over 5,000 homes sold in the Shreveport area, but the number of sales fell to under 3,000 by 2011. The most dramatic drop in sales occurred between 2010 and $2011 .{ }^{518}$

Foreclosures are a significant issue in the assessment area. The percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) has been rising steadily, from $5.1 \%$ in January 2010 to $9.5 \%$ in December 2011. ${ }^{519}$ The problem is more acute in Caddo Parish, where the percentage of seriously delinquent mortgages has almost doubled since January 2010 to $10.7 \%$ in December 2011. Statewide, only $1.2 \%$ of mortgages were seriously delinquent at the end of $2011 .{ }^{520}$

Housing is still considered affordable in the Shreveport area compared to other markets around the country. In Caddo Parish, approximately $47 \%$ of the housing was considered affordable to a family earning less than $80 \%$

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## Shreveport, Louisiana

of the area median income (AMI) in 2009, while 39\% of the housing was considered affordable in Bossier Parish. Approximately 69\% of all households in Bossier Parish and 64\% of households in Caddo Parish are homeowners. ${ }^{521}$

## Employment and Economic Conditions

The Shreveport-Bossier City area was historically a trading center because of its location along the Red River. The area was primarily agricultural, though lumber and manufacturing became the primary sectors by the early 1900's. Today, the area is the trade and cultural hub for the area known as Ark-La-Tex. Shreveport is the second largest tourist destination in the state, after New Orleans, largely because of the new recreational gaming opportunities in both Shreveport and Bossier City.

The Shreveport MSA is home to several major institutions, including Louisiana State University at Shreveport and Barksdale Air Force Base. Barksdale is the largest employer in the Shreveport-Bossier MSA, located south of Bossier City. Barksdale employs nearly 11,000 people and generates an annual economic impact of \$753.8 million for the economy of Bossier Parish and the surrounding communities. In 2009, the Air Force's newest command, Global Strike Command, was activated at Barksdale, increasing the base's importance as a military facility and economic engine. Launched to support the Global Strike Command, the Cyber Innovation Center (CIC) is a joint project between Bossier City, Bossier Parish and the State of Louisiana. CIC anchors a 3,000acre National Cyber Research Park and serves as catalyst for the development and expansion of a knowledgebased workforce throughout the region. ${ }^{522}$

Other major employers in the assessment area include the Caddo and Bossier Parish school districts, the LSU Shreveport Health Sciences Center, and the Willis Knighton Health Care System. There are five casinos located in Caddo and Bossier parishes, which are also significant employers. Government, health care, and retail are the primary employment sectors in the region. ${ }^{523}$ Shreveport has become known as an important center for independent film making and has seen growth in the motion picture and film industry in recent years.

The Shreveport area has been one of the fastest growing areas in the state, and overall, the economy has fared better than the rest of the nation during the recession. Much of the recent job growth in the region has occurred in the transportation, trade and utilities sector, with the largest growth in wholesale and retail trade. The region has seen job loss primarily in the manufacturing and construction sectors.

Unemployment rates did increase in the Shreveport MSA during the recession, but only reached a high of 7.4\% in 2009, well below the national unemployment rate at that time. Unemployment is slightly higher in Caddo Parish, but has remained low in Bossier Parish. ${ }^{524}$ Between 2010 and 2011, unemployment in the MSA declined slightly, from $7.0 \%$ to $6.8 \%{ }^{525}$

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## Unemployment Rates

Assessment Area: LA Shreveport

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Shreveport MSA | 7.0 | 6.8 |
| Bossier Parish | 5.7 | 5.7 |
| Caddo Parish | 7.5 | 7.2 |
| Louisiana | $\mathbf{7 . 5}$ | $\mathbf{7 . 3}$ |

Not Seasonally Adjusted

## Competition

According to the June 30, 2011 FDIC Summary of Deposits Report, there were 24 financial institutions operating 110 branches in assessment area. Regions Bank was ranked $2^{\text {nd }}$ in deposit market share with $23.1 \%$ ( $\$ 1.4$ billion). Capital One was the market leader with a deposit share of $23.7 \%$; JPMorgan Chase was ranked $3^{\text {rd }}$ with $13.3 \%$.

Regions ranked $2^{\text {nd }}$ out of 41 small business loan reporters in 2010 with $12.8 \%$ of the loans. Small business lending increased in the assessment area between 2010 and 2011, and Regions ranked $2^{\text {nd }}$ again in 2011 out of 52 reporters with $17.8 \%$ of all loans. American Express Bank was the top ranked small business lender in the market.

Regions ranked $5^{\text {th }}$ out of 213 HMDA reporters in 2010 with $4.6 \%$ of total loans. Overall HMDA lending in the assessment area declined between 2010 and 2011, and Regions Bank’s HMDA lending followed the same trend. Regions was ranked $5^{\text {th }}$ out of 218 lenders with $3.8 \%$ of all HMDA loans. Wells Fargo Bank, Bank of America, JPMorgan Chase and Home Federal are the leading HMDA lenders in the market.

## Community Development

According to the Louisiana Housing Corporation 2010 Housing Needs Assessment, affordable housing is a critical need in the Shreveport MSA, and particularly affordable rental housing. The workforce housing needs in the area are rooted in the hospitality and service industries. Downtown casinos and restaurants are an economic engine for the region yet the majority of the workers earn less than $80 \%$ AMI. Housing costs are significantly lower in Shreveport than in other metropolitan areas, but there are still a substantial number of households with housing problems, notably renters earning less than 50\% AMI. ${ }^{526}$

There has been significant investment in subsidized housing in the Shreveport MSA. Overall, the Louisiana Housing Corporation reports in 2010, there were 5,913 subsidized units and 2,666 Section 8 vouchers. The majority of the subsidized units are Low Income Housing Tax Credit (LIHTC) projects $(4,556)$. The Louisiana Housing Corporation has identified several target areas for affordable housing in Shreveport, including more workforce development housing, more rental housing opportunities for individuals earning less 50\% AMI and more affordable homeownership opportunities for individuals earning less than $80 \%$ AMI. In addition, there is a need for more support of foreclosure counseling programs. ${ }^{527}$

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## Shreveport, Louisiana

Foreclosure rates in Shreveport are higher than elsewhere in the state, and stabilizing neighborhoods that have experienced significant disinvestment is a need in the area. Shreveport did not receive a direct allocation of funds through the Neighborhood Stabilization Program, but communities in the Shreveport MSA have been targeted for NSP-related activities by the Habitat for Humanity organization for the state. The State of Louisiana allocated a portion of its NSP funds to Habitat for targeted work in certain communities. These funds have been used primarily to purchase and rehabilitate homes for affordable housing.

The financial stability of low- and moderate-income individuals is a significant concern in the Shreveport assessment area and particularly in the city of Shreveport. Approximately $9.3 \%$ of households are unbanked in the Shreveport MSA, meaning they have no type of deposit account with a mainstream financial institution. In addition, $23.9 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower income and minority households. ${ }^{528}$

A community contact in the area confirmed that there is a need for more financial assistance to support affordable housing and small business programs. However, the contact felt that overall, banks were meeting the credit needs of the market.

Demographic Characteristics by Census Tract
The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

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## Shreveport, Louisiana

## Combined Demographics Report

Assessment Area: LA Shreveport

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 10 | 12.0 |  | 6.8 | 2,875 | 45.8 | 21,686 | 23.5 |
| Moderate-income | 23 | 27.7 |  | 21.3 | 5,115 | 26.0 | 14,649 | 15.9 |
| Middle-income | 25 | 30.1 |  | 31.3 | 3,816 | 13.2 | 17,861 | 19.3 |
| Upper-income | 25 | 30.1 |  | 40.7 | 2,275 | 6.1 | 38,214 | 41.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 83 | 100.0 |  | 100.0 | 14,081 | 15.2 | 92,410 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 11,696 | 4,172 |  | 35.7 | 5,901 | 50.5 | 1,623 | 13.9 |
| Moderate-income | 33,897 | 16,345 |  | 48.2 | 13,322 | 39.3 | 4,230 | 12.5 |
| Middle-income | 46,511 | 26,884 |  | 57.8 | 15,547 | 33.4 | 4,080 | 8.8 |
| Upper-income | 56,478 | 40,587 |  | 71.9 | 11,844 | 21.0 | 4,047 | 7.2 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 148,582 | 87,988 |  | 59.2 | 46,614 | 31.4 | 13,980 | 9.4 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,275 | 7.1 |  | 6.9 | 96 | 9.9 | 64 | 8.5 |
| Moderate-income | 4,063 | 22.8 |  | 22.3 | 274 | 28.3 | 198 | 26.2 |
| Middle-income | 5,654 | 31.7 |  | 31.2 | 342 | 35.3 | 292 | 38.6 |
| Upper-income | 6,842 | 38.4 |  | 39.6 | 256 | 26.4 | 203 | 26.8 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 17,834 | 100.0 |  | 100.0 | 968 | 100.0 | 757 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 90.3 |  | 5.4 |  | 4.2 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 5 | 2.6 |  | 2.7 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 15 | 7.7 |  | 8.1 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 66 | 33.8 |  | 33.3 | 3 | 50.0 | 1 | 33.3 |
| Upper-income | 109 | 55.9 |  | 55.9 | 3 | 50.0 | 2 | 66.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 195 | 100.0 |  | 100.0 | 6 | 100.0 | 3 | 100.0 |
|  | Percentage of Total Farms: |  |  | 95.4 |  | 3.1 |  | 1.5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Shreveport assessment area is adequate. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. However, the bank makes a low level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 1,602 (60.8\%) small business loans compared to 1,034 (39.2\%) HMDA loans in the Shreveport assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $1.4 \%$ of the bank's small business and HMDA lending by number of loans and $1.2 \%$ by dollar volume totaling $\$ 271.1$ million are located in the Shreveport assessment area. The percentage of the bank's total lending at $1.4 \%$ is comparable to the percentage of deposits at $1.4 \%$ in this area. The bank also originated two community development loans in the Shreveport assessment area. Regions Bank is a major competitor in this market, ranking $5^{\text {th }}$ in HMDA originations and $2^{\text {nd }}$ in small business originations.

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

## Geographic Distribution of Loans

Regions Bank's geographic distribution of loans reflects good penetration throughout the assessment area. For this analysis the geographic distribution of small business lending and HMDA lending, including both originations and purchases was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, and the number of owner-occupied units in low- and moderateincome census tracts were considered when determining the bank's lending performance. The performance of aggregate lenders was also considered.

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is good. During the review period, Regions Bank originated $5.7 \%$ of its small business loans in low-income tracts, which contain $6.9 \%$ of the small businesses in the assessment area. In comparison to aggregate data, the bank performed better than the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income census tracts is also good. During the review period, Regions Bank originated $18.8 \%$ of its small business loans in moderate-income tracts, which contain $22.3 \%$ of the small businesses in the assessment area. The bank's performance was better than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts while the lending in upper-income tracts was greater than the percentage of small businesses in these tracts.

## Home Purchase Loans

Home purchase lending in low-income census tracts is adequate. Regions Bank originated 2.0\% of its home purchase loans in low-income census tracts, which contain 4.7\% of owner-occupied units. However, aggregate

## Shreveport, Louisiana

lenders also had low penetration of home purchase loans in low-income census tracts. The bank's performance was greater than the aggregate in 2010, but less than the aggregate in 2011.

Home purchase lending in moderate-income census tracts is excellent. During the review period, Regions Bank originated $11.9 \%$ of its home purchase loans in moderate-income census tracts, which contain $18.6 \%$ of the owner-occupied units in the assessment area. The bank's performance was significantly greater than the aggregate for both 2010 and 2011.

The bank's home purchase lending in middle-income tracts was comparable to the percentage of owneroccupied units in these tracts, while home purchase lending in upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Home Refinance Loans

Home refinance lending in low-income census tracts is adequate. Regions Bank originated $1.5 \%$ of its home refinance loans in low-income census tracts, which contain $4.7 \%$ of owner-occupied units. However, the aggregate lenders had low penetration of home refinance loans in low-income census tracts as well. The bank's performance was greater than the aggregate in both 2010 and 2011.

Home refinance lending in moderate-income census tracts is poor. During the review period, Regions Bank originated $3.6 \%$ of its home refinance loans in moderate-income census tracts, which contain $18.6 \%$ of the owner-occupied units in the assessment area. The bank's performance was less than the aggregate for both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in low-income census tracts is poor. Regions Bank originated 1.7\% (one loan) of its home improvement loans in low-income census tracts which contain $4.7 \%$ of owner-occupied units. The bank performed below the aggregate in 2010 but slightly greater than the aggregate in 2011.

Home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated $13.8 \%$ of its home improvement loans in moderate-income census tracts, which contain $18.6 \%$ of owner-occupied units in the assessment area. Regions Bank performed slightly below the aggregate for both 2010 and 2011.

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

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment and poverty rates, were considered, as well as the performance of other banks.

## Shreveport, Louisiana

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank exceeded the aggregate in lending to small businesses in 2010 but was below aggregate in 2011. The bank originated $35.1 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $90.3 \%$. However, of the 1,602 small business loans originated during the review period, 809 loans (50.5\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $70.9 \%$, which is still below the percentage of small businesses in the assessment area. However, $88.3 \%$ of the 1,602 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank’s performance was comparable to the aggregate in both 2010 and 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is excellent. The bank made $11.0 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $23.5 \%$ of the total families in the assessment area. Although the bank fell short of the demographic, Regions performed significantly greater than the aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is excellent. At $25.2 \%$, the bank's percentage of home purchase loans to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at 15.9\%. Regions Bank performed greater than the aggregate in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while the home purchase lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made $4.1 \%$ of its home refinance loans to low-income borrowers, while low-income families make up $23.5 \%$ of the total families in the assessment area. Regions Bank's performance was comparable to the aggregate in 2010 and greater than the aggregate in 2011.

The bank's home refinance lending to moderate-income borrowers is adequate when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $10.4 \%$ was less than the percentage of moderate-income families in the assessment area at $15.9 \%$. Regions Bank's performance was greater than the aggregate in 2010 and comparable to the aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of loans at $12.1 \%$ was less than the percentage of low-income families in the assessment area at $23.5 \%$. However, the bank's lending to low-income borrowers was comparable to the aggregate in 2010 and greater than the aggregate in 2011.

## Shreveport, Louisiana

Home improvement lending to moderate-income borrowers is poor. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $10.3 \%$ was less than the percentage of moderate-income families in the assessment area at $15.9 \%$. The bank's lending to moderate-income borrowers was less than aggregate in both 2010 and 2011.

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

## Community Development Lending

Regions Bank makes a low level of community development loans in the Shreveport assessment area. The bank originated two community development loans totaling $\$ 1.5$ million during the review period. One loan promotes economic development by financing a small farm while the other provides affordable housing for low- and moderate-income individuals. Local community development needs include but are not limited to affordable housing for low- and moderate-income workers, neighborhood stabilization resulting from elevated foreclosure rates, financing for small businesses and small farms, and financial stability for low- and moderateincome residents. While both of the bank's loans are responsive to some community credit needs, the total number and the dollar amount of the community development loan portfolio inside the assessment are poor given the bank's presence in the market.

## Investment Test

The bank's investment test performance in the Shreveport assessment area is excellent. The bank had nine investments totaling $\$ 20.5$ million, including two current period investments totaling $\$ 16.9$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through FNMA and GNMA investment instruments, LIHTCs and LIHTC investment funds. The bank also has an investment in a fund to support community revitalization in low-income areas in Northwest Louisiana. The broader regional investments primarily funded small businesses and startup companies through SBICs. Local community credit needs include but are not limited to affordable housing for low- and moderate-income workers, neighborhood stabilization resulting from elevated foreclosure rates, financing for small businesses and small farms, and financial stability for low- and moderate-income residents. The dollar volume of Regions Bank’s current and total investments exhibits excellent responsiveness to some of the identified community needs, given the bank's presence in the assessment area.

The bank also made nine contributions totaling $\$ 12,050$. In addition, the bank made several contributions to statewide and national organizations that indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities.

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include LIHTCs, including one current period project that will provide a total of 180 housing units affordable to low- and moderate-income residents.

## Service Test

The bank's service test performance in the Shreveport assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Shreveport assessment area.

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## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 13 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open any branches and closed two branches (one in a middle-income tract and one in an upper-income tract) in the Shreveport assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderateincome geographies or low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Shreveport, Louisiana

## Geographic Distribution of Branches

Assessment Area: LA Shreveport

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | l Branch <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Week end Hours \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  |  | 1 | 7.7\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 10 | 12.0\% | 7.4\% | 7.1\% |
| Moderate | Total | 1 | 7.7\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $0$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 23 | 27.7\% | 22.1\% | 22.8\% |
| Middle | Total | 5 | 38.5\% | 0 | 1 | 4 | 3 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 25 | 30.1\% | 31.5\% | 31.7\% |
| Upper | Total | 6 | 46.2\% | 0 | 1 | 6 | 6 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 25 | 30.1\% | 38.9\% | 38.4\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 13 | 100.0\% | 0 | 2 | 12 | 11 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 83 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 493 hours of service in various capacities for community development organizations, participating in 54 community development service activities. Many of the community development services focused on education, affordable housing, and various other services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by teaching financial education classes throughout the assessment area. The majority of the students partaking in the classes are eligible for free or reduced-price lunch programs; furthermore, the majority of the schools in which the classes take place are located in low- and moderateincome geographies.

## Metropolitan Areas (Limited Review)

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

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

- Alexandria Assessment Area (Rapides Parish)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing $4.4 \%$ of its branches in Louisiana.
o As of June 30, 2011, the bank had $\$ 142.2$ million in deposits in this assessment area, representing a market share of $7.0 \%$ and $1.9 \%$ of Regions Bank's total deposits in Louisiana.
- Houma Assessment Area (Lafourche and Terrebonne Parishes)
o As of December 31, 2011, Regions Bank operated six branches in the assessment area, representing $5.3 \%$ of its branches in Louisiana.
o As of June 30, 2011, the bank had $\$ 205.1$ million in deposits in this assessment area, representing a market share of $4.8 \%$ and $2.8 \%$ of Regions Bank’s total deposits in Louisiana.
- Lafayette Assessment Area (Lafayette Parish)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $3.5 \%$ of its branches in Louisiana.
o As of June 30, 2011, the bank had $\$ 159.4$ million in deposits in this assessment area, representing a market share of $3.2 \%$ and $2.2 \%$ of Regions Bank’s total deposits in Louisiana.
- New Orleans Assessment Area (Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. John the Baptist and St. Tammany Parishes)

O As of December 31, 2011, Regions Bank operated 32 branches in the assessment area, representing $28.1 \%$ of its branches in Louisiana.
o As of June 30, 2011, the bank had $\$ 2.4$ billion in deposits in this assessment area, representing a market share of $8.3 \%$ and $33.0 \%$ of Regions Bank'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 tables below. Please refer to the tables in Appendix G for information regarding these areas.

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Alexandria | Consistent | Not Consistent (Above) | Consistent |
| Houma | Not Consistent <br> (Below) | Not Consistent (Above) | Not Consistent (Above) |
| Lafayette | Consistent | Not Consistent (Above) | Consistent |
| New Orleans | Consistent | Not Consistent (Above) | Not Consistent (Above) |

## Metropolitan Areas (Limited Review)

The Baton Rouge, Monroe, Shreveport, and Southern Louisiana assessment areas received full-scope reviews, and the bank's performance in the Baton Rouge and Shreveport assessment areas was given greater consideration in determining the overall rating for the state. Baton Rouge and Shreveport are two of the bank's largest markets in Louisiana in terms of deposits, loans, and branches. The full-scope areas selected together represent $51.4 \%$ of the deposits in the assessment areas in Louisiana as well as $44.70 \%$ of the branches. The full-scope assessment areas also represent $50.1 \%$ of the HMDA loans and $58.0 \%$ of the small business loans in the state. Therefore, the four full-scope assessment areas represent more than half of the deposits and loans and a large portion of branches in the State of Louisiana.

For the lending test, performance was weaker than the bank's performance in the state in one of the limitedscope assessment areas (Houma) and consistent in the bank's performance in the remaining assessment areas (Alexandria, Lafayette and New Orleans). The lower levels of community development loans relative to the bank's operations in the assessment area contributed to weaker performance in the Houma assessment area.

For the investment test, the performance in all four limited-scope assessment areas (Alexandria, Houma, Lafayette and New Orleans) was stronger than the bank’s performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas.

For the service test, the performance in two limited-scope assessment areas (Houma and New Orleans) was stronger than the bank's performance in the state. The performance in the remaining two assessment areas (Alexandria and Lafayette) was consistent with the bank's performance in the state.

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

## NON-METROPOLITAN STATEWIDE AREA <br> (Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SOUTHERN LOUISIANA ASSESSMENT AREA

The Southern Louisiana assessment area consists of Iberia and St. Mary parishes. The assessment area contains a total of 31 tracts, including two low-income and eight moderate-income tracts. Regions Bank operates seven branches in the Southern Louisiana assessment area, with one located in a moderate-income tract. These branches represent 6.1\% of the bank's branches in Louisiana.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 254 ( $0.3 \%$ ) were in the Southern Louisiana assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 383 (0.4\%) were in the Southern Louisiana assessment area.

## Population and Income Characteristics

Iberia and St. Mary parishes are two coastal parishes located in southern Louisiana outside any metropolitan statistical area. The largest city in Iberia Parish is New Iberia; Morgan City is the largest in St. Mary Parish. The assessment area lies just south of the Lafayette, Louisiana MSA.

The population in the two parishes was 127,980 in 2010. Population increased by less than $1 \%$ between 2000 and 2010, with the only growth occurring in St. Mary Parish. The two largest cities in the assessment area actually lost population over the last decade. ${ }^{529}$

For the purposes of this analysis, HUD's median family income for non-metro areas in Louisiana was used. As shown, the median family income increased between 2010 and 2011, from $\$ 44,100$ to $\$ 46,300$. The median family income in the non-metro areas is well below the median family income for the state of Louisiana, which was $\$ 55,000$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels <br> Louisiana State Non-Metro

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 - 49.99\% |  |  | 50\% | 79.99\% |  | 80\% | - | 119.99\% | 120\% |  | \& above |
| 2010 | \$44,100 | 0 | - | \$22,049 | \$22,050 | - | \$35,279 | \$35,280 | - | \$52,919 | \$52,920 | - | \& above |
| 2011 | \$46,300 | 0 | - | \$23,149 | \$23,150 | - | \$37,039 | \$37,040 |  | \$55,559 | \$55,560 | - | \& above |

According to US census estimates, the median family income in 2010 in Iberia Parish was \$49,631 and \$46,628 in St. Mary Parish. ${ }^{530}$

Poverty is a significant concern in the assessment area. $21 \%$ of the population in each parish was estimated to live below the federal poverty line in 2010 compared to $18 \%$ statewide. The poverty rates in New Iberia and

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Morgan City were even higher. ${ }^{531}$ Food stamp usage, another indicator of financial distress, has also been increasing in the assessment area. In 2009, $22.6 \%$ of the population in Iberia Parish and $23.8 \%$ of the population in St. Mary Parish received food stamps compared to $17.9 \%$ of the population statewide. ${ }^{532}$

## Housing Characteristics

The housing market in Southern Louisiana has been impacted by the recent economic downturn, but because the region did not experience a dramatic buildup prior to the recession, the decline has been less pronounced. Home prices did fall starting in 2007, but began to stabilize in 2010. Median home prices in Iberia Parish varied greatly in 2010 and 2011, with monthly figures ranging from $\$ 41,000$ to $\$ 167,339$. Home prices in St. Mary Parish are much higher and generally more stable, with monthly median housing prices ranging from $\$ 208,000$ to $\$ 270,000$ over the same two-year period. ${ }^{533}$

New home construction and sales have declined. Building permits for single-family homes have fallen by $58 \%$ since 2006, and in 2010, only 158 new residential building permits were issued in the assessment area. ${ }^{534}$ Home sales have also declined but most sharply in St. Mary Parish. In 2011, only 140 residential homes sold in the parish, representing an $89 \%$ decline since peak sales in 2006. ${ }^{535}$ Declining sales and new construction, particularly in St. Mary Parish, will significantly impact demand for any HMDA lending in the assessment area.

Mortgage delinquencies and foreclosures are impacting the economic climate of the region. The percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) increased from 7.2\% in January 2010 to $11.9 \%$ in December 2011. In St. Mary Parish, $14.7 \%$ of mortgages were seriously delinquent at the end of $2011 .{ }^{536}$

The assessment area is characterized by a much higher rental rate than other rural parishes in the state. This is largely due to the significant number of transitory workers in the agricultural and oil and gas industries that dominate the economy in the region. Approximately $29 \%$ of all households were renters in the assessment area in 2010. In New Iberia, $41 \%$ of the households were renters in $2010 .{ }^{537}$ Many of the renters are lower-income, and it is particularly challenging in rural coastal communities to develop affordable rental units.

## Employment and Economic Conditions

Southern Louisiana has been hard hit by natural and man-made disasters over the last seven years. Both Iberia and St. Mary parishes were devastated by Hurricanes Rita, Gustave and Ike, and are still rebuilding. The area was also affected by the Deepwater Horizon oil spill and the resulting impact on the oil and gas and fishing industries, which fuel the local economy.

The economic anchors of Iberia and St. Mary parishes are a mix of agriculture and industry. Iberia Parish is primarily agriculture and is the largest producer of sugar cane in Louisiana. Fishing is also a major industry but has been declining as many of the fishermen have been unable to recover from the succession of hurricanes. Food processing is another important sector, and Iberia Parish is home to Avery Island and the Tabasco Food Products. The economy in St. Mary Parish is a bit more industrial, with a significant employment concentration

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## Southern Louisiana

in oil and gas extraction and related support industries like shipbuilding and underwater services. ${ }^{538} 2010$ REIS data indicates that primary employment concentrations in the assessment area are mining, manufacturing, construction, transportation, health care, and state and local government.

The region has a number of strategic assets. First, the Port of Iberia, with 5,000 employees and a $\$ 160$ million payroll, generates $\$ 1$ billion in economic impact for the region. The Port is a regional center for oil and gas services, manufacturing/fabrication, and maintenance and repair. It is estimated that approximately $90 \%$ of the 100 businesses in the Port are related to the oil and gas industry and that Port employees commute from seven surrounding parishes. ${ }^{539}$

Second, the assessment area is strategically located between New Orleans and Houston, with a strong transportation infrastructure. Iberia Parish has intermodal transportation facilities, with the Port of Iberia, Acadiana Regional Airport, and a rail-to-truck facility. These facilities could serve as an important driver of economic diversification, as other types of industry need this transportation access. Economic diversification is a goal for residents in southern Louisiana, given the ongoing threat of hurricanes to the dominant industries in the area. However, the lack of affordable housing and the skill set of the available workforce are two of the challenges limiting diversification.

The unemployment rate in Southern Louisiana has increased significantly and was particularly volatile after the Deepwater Horizon oil spill. Unemployment in St. Mary Parish increased from 4.4\% in 2008 to 9.5\% in 2010. In Iberia Parish, unemployment increased from 3.9\% in 2008 to $7.7 \%$ in 2010. The unemployment rate in both parishes declined between 2010 and 2011, though in St. Mary Parish, it is still well above the unemployment rate in the state. ${ }^{540}$

## Unemployment Rates

Assessment Area: LA Southern LA

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Iberia Parish | 7.7 | 7.0 |
| St. Mary Parish | 9.5 | 9.2 |
| Louisiana | $\mathbf{7 . 5}$ | $\mathbf{7 . 3}$ |

Not Seasonally Adjusted

## Competition

According to the June 30, 2011 FDIC Summary of Deposits Report, there were 12 financial institutions operating 52 branches in Iberia and St. Mary parishes. IBERIABANK, which is headquartered in southern Louisiana, held $27.3 \%$ of the deposits in the market. Regions Bank was ranked $2^{\text {nd }}$ in deposit market share with $12.3 \%$ ( $\$ 354.8$ million), followed by Whitney Bank with $11.7 \%$. A combination of national banks and local community banks hold the remainder of the deposits in the market.

[^167]Regions Bank ranked $5^{\text {th }}$ out of 27 small business loan reporters in 2010 with $8.2 \%$ of the loans. Regions significantly increased the number of small business loans in 2011, primarily by purchasing loans. In 2011, Regions was the $2^{\text {nd }}$ ranked small business lender out of 31 reporters with $13.6 \%$ of all loans. American Express, MidSouth Bank, Whitney Bank, and Chase are the other leading small business lenders in market.

Regions ranked $5^{\text {th }}$ out of 129 HMDA reporters in 2010 with $5.7 \%$ of total loans. Regions Bank's HMDA lending declined in 2011, and the bank was ranked $7^{\text {th }}$ out of 141 lenders with $4.8 \%$ of all HMDA loans. Bank of America, IBERIABANK Mortgage, Teche Federal Bank, Community First Bank, Wells Fargo and JPMorgan Chase are the other leading HMDA lenders in the market.

## Community Development

According to the Louisiana Housing Corporation 2010 Housing Needs Assessment, affordable rental housing is the most important housing need in the rural, coastal parishes, including Iberia and St. Mary. $75 \%$ of the renters with housing problems are classified as very low-income. In addition, as discussed earlier, there is a higher concentration of renters in coastal parishes than in other rural parishes, due to the nature of the economy and the workforce. Many of the workers in the oil and gas and agriculture sectors are younger and more migratory, so temporary rental housing is preferable to this population. However, rising insurance costs, among other factors, are making new rental housing development cost-prohibitive.

The parishes are still rebuilding from the hurricanes, and there are many homes that are in disrepair. There is also a need to remove or renovate blighted properties and to assist low-income homeowners with repairs. ${ }^{51}$ Rising insurance costs are also a significant barrier to low-income homeownership and development.

There has been limited investment in subsidized housing in Iberia and St. Mary parishes. Overall, the Louisiana Housing Corporation reports that in 2010, there were 2,284 subsidized units and 717 Section 8 vouchers. The majority of the subsidized units are Low Income Housing Tax Credit (LIHTC) projects (1,107). ${ }^{542}$

Small businesses play a very important role in the economy of Southern Louisiana. In Iberia Parish, $97 \%$ of the businesses qualify as a small business by SBA standards. There have been a number of recovery planning efforts in the region as a result of the hurricanes and the oil spill, and support for small businesses consistently ranks as a top issue. Specifically, community stakeholders have identified the need for more technical assistance services (by expanding the capacity of the Small Business Development Center), access to capital, and a business incubator. Promoting entrepreneurship was another important economic development strategy noted by area residents. Finally, participants in the oil spill recovery planning suggested the need for more coordination of economic development organization and initiatives. ${ }^{543}$

The financial stability of low- and moderate-income individuals is large concern in Southern Louisiana. Approximately $16 \%$ of households in Iberia Parish and $17 \%$ of households in St. Mary Parish are unbanked, meaning they have no type of deposit account with a mainstream financial institution. In addition, $33.6 \%$ of households in Iberia Parish and 34.5\% of households in St. Mary Parish are considered underbanked, meaning

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they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower-income and minority households. ${ }^{544}$

There are limited resources in the Southern Louisiana area to address the different community development needs. There is a need to expand the nonprofit capacity in the area, or to find external partners, to address the housing and financial stability needs of local residents.

One community contact that served the Southern Louisiana region indicated that the economy was recovering from the Deepwater Horizon oil spill, and tourism and commercial fishing were returning. The contact confirmed that there is a need for more support for affordable housing and small businesses in the region. While the contact thought banks were meeting the basic community needs, she also suggested that they could always do more, and there were many opportunities for banks to get more engaged in the local communities.

## Demographic Characteristics by Census Tract

The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

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## Combined Demographics Report

Assessment Area: LA Southern LA


Based on 2010 D\&B information according to 2000 Census Boundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Regions Bank's lending performance in the Southern Louisiana assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 383 (60.1\%) small business loans compared to 254 (39.9\%) HMDA loans in the Southern Louisiana assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $0.3 \%$ of the bank's total small business and HMDA lending by number of loans and $0.3 \%$ by dollar volume totaling $\$ 59.2$ million are located in the Southern Louisiana assessment area. The percentage of the bank's total lending at $0.3 \%$ is comparable to the percentage of deposits at $0.4 \%$ in this area. The bank also originated three community development loans in the Southern Louisiana assessment area. Regions Bank is a major competitor in this market, ranking $7^{\text {th }}$ in HMDA loans and $2^{\text {nd }}$ in small business loans in 2011.

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

## Geographic Distribution of Loans

Regions Bank's geographic distribution of loans reflects adequate penetration throughout the assessment area. For this analysis the geographic distribution of small business and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues such as unemployment and poverty rates, as well as the number of owner-occupied units in the assessment area, were considered. Aggregate lending data was also taken into consideration.

## Small Business Loans

Small business lending in low-income tracts is adequate. During the review period, Regions Bank originated three $(0.8 \%)$ of its small business loans in low-income census tracts, which contain $2.5 \%$ of the small businesses in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at a level comparable to the demographic. This may suggest that there are limited opportunities for small business lending in low-income tracts. Due to the low level of lending by the bank and the aggregate, minimal weight was given to this area. Regions Bank's performance was less than the aggregate in 2010 and greater than the aggregate in 2011.

Regions Bank’s small business lending in moderate-income census tracts is adequate. During the review period, the bank originated $10.7 \%$ of its small business loans in moderate-income tracts, which contain $13.7 \%$ of the small businesses in the assessment area. In comparison to aggregate data, the bank performed similarly to aggregate in 2010, and slightly below the aggregate in 2011.

The bank's small business lending in middle-income tracts was greater than the percentage of small businesses located in middle-income tracts, while lending in upper-income tracts was slightly less than the percentage of small businesses in upper-income tracts.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, Regions Bank did not originate any of its home purchase loans in low-income census tracts, which contain only $3.2 \%$ of owneroccupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at a level comparable to the demographic. This may suggest that there are limited opportunities for home purchase lending in low-income tracts. . Due to the low level of lending by the bank and the aggregate, minimal weight was given to this area. Regions Bank’s performance was below the aggregate in 2010 and 2011.

Home purchase lending in moderate-income census tracts is poor. During the review period, Regions Bank originated $7.4 \%$ of its home purchase loans in moderate-income census tracts, which contain $19.0 \%$ of the owner-occupied units in the assessment area. The bank's performance was slightly greater than the aggregate in 2010 and less than the aggregate in 2011.

The bank's home purchase lending in middle- and upper-income tracts was greater than the percentage of owner-occupied units located in those tracts.

## Home Refinance Loans

Home refinance lending in low-income tracts is adequate. During the review period, Regions Bank did not originate any of its home refinance loans in low-income census tracts, which contain only $3.2 \%$ of owneroccupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at a level comparable to the demographic. This may suggest that there are limited opportunities for home refinance lending in low-income tracts. . Due to the low level of lending by the bank and the aggregate, minimal weight was given to this area. Regions Bank's performance was less than the aggregate in 2010 and 2011.

Home refinance lending in moderate-income census tracts is adequate. During the review period, Regions Bank originated $13.3 \%$ of its home refinance loans in moderate-income tracts, which contain $19.0 \%$ of the owneroccupied units in the assessment area. The bank's performance was greater than the aggregate in 2010 but was below the aggregate in 2011.

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

## Home Improvement Loans

Home improvement lending in low-income tracts is adequate. During the review period, Regions Bank originated one (2.4\%) of its home improvement loans in low-income census tracts, which contain only $3.2 \%$ of owner-occupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at a level comparable to the demographic. This may suggest that there are limited opportunities for home improvement lending in low-income tracts. Due to the low level of lending by the bank and the aggregate, minimal weight was given to this area. Regions Bank's performance was slightly greater than the aggregate in 2010 but was below the aggregate in 2011.

Home improvement lending in moderate-income census tracts is excellent when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated 28.6\% of its home improvement loan in moderate-income tracts, which contain $19.0 \%$ of the assessment area's owner-occupied units. The bank's performance was greater than the aggregate in both 2010 and 2011.

## Southern Louisiana

Regions Bank's home improvement lending in both middle- and upper-income tracts was less than the percentage of owner-occupied units located in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment and poverty rates, were considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 but was less than the aggregate in 2011. The bank originated $31.1 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.2 \%$. However, of the 383 small business loans originated during the review period, 190 loans (49.6\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $61.7 \%$, which is still below the percentage of small businesses in the assessment area. However, $80.2 \%$ of the 383 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was below the aggregate in 2010 and comparable to the aggregate in 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is poor. The bank made $1.9 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $24.4 \%$ of the total families in the assessment area. Regions Bank performed below the aggregate in 2010 and similarly to the aggregate in 2011.

Regions Bank's home purchase lending to moderate-income borrowers is adequate. The bank made $13.0 \%$ of its home purchase loans to moderate-income borrowers. Moderate-income families make up $14.0 \%$ of the total families in the assessment area. Regions Bank performed better than the aggregate in 2010 but below the aggregate in 2011.

The bank's home purchase lending to both middle- and upper-income borrowers was greater than the percentage of middle- and upper-income families in the assessment area.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is adequate. The bank made $2.5 \%$ of its home refinance loans to low-income borrowers. Low-income families make up $24.4 \%$ of the total families in the assessment area. Regions Bank performed better than the aggregate in 2010 but below the aggregate in 2011.

Regions Bank's home refinance lending to moderate-income borrowers is excellent. The bank made $10.8 \%$ of its home refinance loans to moderate-income borrowers, while these families make up $14.0 \%$ of the total families in the assessment area. Regions Bank performed better than the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of loans at 9.5\% was less than the percentage of low-income families in the assessment area at $24.4 \%$. The bank's home improvement lending to low-income borrowers was comparable to the aggregate for both 2010 and 2011.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $31.0 \%$ far exceeded the percentage of moderate-income families in the assessment area at $14.0 \%$. Additionally, the bank's performance was significantly better than the aggregate in both 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Community Development Lending

Regions Bank makes a relatively high level of community development loans in the Southern Louisiana assessment area. The bank originated three community development loans totaling $\$ 3.6$ million during the review period. These loans promoted economic development by financing small farms or supported the development of affordable housing, both of which are responsive to community credit needs. Other local community development needs include but are not limited to neighborhood stabilization, job growth, small business finance and home repair. The bank's community development loan portfolio inside the assessment area exhibits adequate responsiveness to the credit needs of low- and moderate-income individuals and geographies and small businesses.

## Investment Test

The bank's investment test performance in the Southern Louisiana assessment area is poor. The bank had one investment for approximately $\$ 500,000$ and no current period investments. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for community development and affordable housing through HUD bonds. The broader regional investments primarily funded small businesses and startup companies through SBICs. Local community credit needs include but are not limited to small business financing, job creation, affordable housing for low- and moderate-income workers and financial stability for low- and moderate-income residents. The dollar volume of Regions Bank's total investments is not responsive to the identified community needs, given the bank's presence in the assessment area.

The bank also made four contributions totaling $\$ 1,450$. In addition, the bank made several contributions to statewide and national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities and economic development.

## Service Test

The bank's service test performance in the Southern Louisiana assessment area is poor. Its retail and community development services reflect poor responsiveness to the needs of the Southern Louisiana assessment area.

## Southern Louisiana

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of Regions Bank's seven branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open or close any branches in the Southern Louisiana assessment area. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Geographic Distribution of Branches

Assessment Area: LA Southern LA

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | al Branch <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 2 | 6.5\% | 4.1\% | 2.4\% |
| Moderate | Total | 1 | 14.3\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 8 | 25.8\% | 20.8\% | 13.3\% |
| Middle | Total | 3 | 42.9\% | 0 | 0 | 3 | 3 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 11 | 35.5\% | 40.1\% | 45.6\% |
| Upper | Total | 3 | 42.9\% | 0 | 0 | 3 | 3 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 9 | 29.0\% | 35.0\% | 38.8\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $0$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 1 | 3.2\% | 0.0\% | 0.0\% |
|  | Total | 7 | 100.0\% | 0 | 0 | 7 | 7 | 0 |  |  |  |  |
| Total | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 31 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a limited level of community development services in the assessment area, and improvement is needed. During the review period, Regions Bank employees provided 73 service hours for community development organizations, participating in 19 community development services. According to information obtained from community contacts, there are opportunities for financial institutions to participate in community development services in the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

## Non-Metropolitan Areas (Limited Review)

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

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

- Morehouse Assessment Area (Madison, Morehouse, Richland and West Carroll Parishes)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing $2.6 \%$ of its branches in Louisiana.
o As of June 30, 2011, the bank had $\$ 109.8$ million in deposits in this assessment area, representing a market share of $12.8 \%$ and $1.5 \%$ of Regions Bank's total deposits in Louisiana.
- Northwest Louisiana Assessment Area (Claiborne, Lincoln and Webster Parishes)
o As of December 31, 2011, Regions Bank operated seven branches in the assessment area, representing $6.1 \%$ of its branches in Louisiana.
o As of June 30, 2011, the bank had $\$ 244.4$ million in deposits in this assessment area, representing a market share of $13.6 \%$ and $3.3 \%$ of Regions Bank's total deposits in Louisiana.
- St. James Assessment Area (St. James Parish)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $1.8 \%$ of its branches in Louisiana.
o As of June 30, 2011, the bank had $\$ 132.7$ million in deposits in this assessment area, representing a market share of $35.7 \%$ and $1.8 \%$ of Regions Bank's total deposits in Louisiana.
- Tangipahoa Assessment Area (Tangipahoa Parish)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $3.5 \%$ of its branches in Louisiana.
o As of June 30, 2011, the bank had $\$ 151.5$ million in deposits in this assessment area, representing a market share of $10.1 \%$ and $2.1 \%$ of Regions Bank'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 tables below. Please refer to the tables in Appendix G for information regarding these areas.

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Morehouse | Consistent | Not Consistent <br> (Above) | Consistent |
| Northwest <br> Louisiana | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Above) |
| St. James | Consistent | Not Consistent <br> (Below) | Consistent |
| Tangipahoa | Consistent | Not Consistent <br> (Above) | Not Consistent (Above) |

## Non-Metropolitan Areas (Limited Review)

As stated earlier, the Baton Rouge, Monroe, Shreveport, and Southern Louisiana assessment areas received fullscope reviews, and the bank's performance in the Baton Rouge and Shreveport assessment areas was given greater consideration in determining the overall rating for the state. Baton Rouge and Shreveport are two of the bank's largest markets in Louisiana in terms of deposits, loans, and branches. The full-scope areas selected together represent $51.4 \%$ of the deposits in the assessment areas in Louisiana as well as $44.70 \%$ of the branches. The full-scope assessment areas also represent $50.1 \%$ of the HMDA loans and $58.0 \%$ of the small business loans in the state. Therefore, the four full-scope assessment areas represent more than half of the deposits and loans and a large portion of branches in the State of Louisiana.

For the Lending Test, performance was weaker than the bank's performance in the state in one of the limitedscope assessment areas (Northwest Louisiana). The lower levels of community development loans relative to the bank's operations in the assessment area contributed to weaker performance in the Northwest Louisiana assessment area.

For the Investment Test, the performance in two limited-scope assessment areas (Morehouse and Tangipahoa) was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas. The performance in two limited-scope assessment areas (Northwest Louisiana and St. James) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in two limited-scope assessment areas (Northwest Louisiana and Tangipahoa) was stronger than the bank's performance in the state. The performance in the remaining two assessment areas (Morehouse and St. James) was consistent with the bank's performance in the state.

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

## Mississippi

## CRA RATING FOR MISSISSIPPI: Satisfactory ${ }^{545}$

## The Lending Test is rated: <br> The Investment Test is rated: <br> The Service Test is rated: <br> Low Satisfactory <br> High Satisfactory <br> High Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment areas. In addition, the distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas and is occasionally in a leadership position in response to the community development needs of the assessment areas.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides a relatively high level of community development services throughout the assessment areas.

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## SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in the State of Mississippi:

- Jackson
- Central Mississippi (non-MSA)

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

- Gulfport
- Hattiesburg
- Pascagoula
- Northern Mississippi (non-MSA)
- Northwest Mississippi (non-MSA)
- Yazoo-Warren (non-MSA)
- Adams-Wilkinson (non-MSA)
- Southeast Mississippi (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 MISSISSIPPI

As of December 31, 2011, Regions Bank operated 140 branch offices in Mississippi representing $8.1 \%$ of the bank's total branches. As of June 30, 2011, the bank had $\$ 7.0$ billion in deposits in Mississippi representing $7.1 \%$ of Regions Bank’s total deposits. Additionally, as of June 30, 2011, the bank ranked $1^{\text {st }}$ among 104 insured institutions in deposit market share with $15.6 \%$ of the deposits within the state. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 6,028 (7.0\%) were in Mississippi. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 6,276 (5.7\%) were in Mississippi.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of Mississippi is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs in both full-scope assessment areas.

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

Although Regions Bank is both a small business and HMDA lender, HMDA lending was given greater consideration in determining the lending test rating for Mississippi because the bank originated more HMDA loans by number than small business loans. Additionally, the Jackson assessment area received greater consideration when determining the rating because it holds a greater percentage of the bank's deposits, lending activity, and branch offices in Mississippi than the other full-scope assessment area. Furthermore, fewer than $4 \%$ of all loans in Mississippi were small farm loans; therefore, no detailed discussion of small farm loans appears in this report.

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Mississippi assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

## Statewide Summary of Lending Activity

Assessment Areas Located in
Mississippi

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s})$ | \% |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 2,048 | $16.6 \%$ | $\$ 272,078$ | $21.6 \%$ |
| HMDA Refinance | 3,330 | $27.1 \%$ | $\$ 474,862$ | $37.7 \%$ |
| HMDA Home Improvement | 650 | $5.3 \%$ | $\$ 5,290$ | $0.4 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{6 , 0 2 8}$ | $\mathbf{4 9 . 0 \%}$ | $\$ 752,230$ | $\mathbf{5 9 . 7} \%$ |
| Total Small Business | $\mathbf{5 , 7 9 5}$ | $\mathbf{4 7 . 1} \%$ | $\$ \mathbf{4 3 2 , 5 6 4}$ | $\mathbf{3 4 . 3} \%$ |
| Total Farm | $\mathbf{4 8 1}$ | $\mathbf{3 . 9 \%}$ | $\mathbf{\$ 7 5 , 2 7 1}$ | $\mathbf{6 . 0 \%}$ |
| TOTAL LOANS | $\mathbf{1 2 , 3 0 4}$ | $\mathbf{1 0 0 . 0 \%}$ | $\mathbf{\$ 1 , 2 6 0 , 0 6 5}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank’s HMDA and small business loans is good. The geographic distribution was good in the Jackson assessment area, while it was considered adequate in the Central Mississippi assessment area.

Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered adequate in both full-scope assessment areas. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Mississippi assessment areas. The bank made 120 community development loans totaling $\$ 204.4$ million during the review period, which represented $17.7 \%$ by number and $14.6 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the purpose of affordable housing. Although the bank is a leader in making community development loans in the Central Mississippi assessment area, it had a low level of community development lending in the Jackson assessment area. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating for the State of Mississippi is High Satisfactory when considering the bank's statewide performance and its overall presence in the state. The bank made significant use of qualified investments and contributions. The bank exhibited excellent responsiveness to credit and community development needs through its investment activities in the Central Mississippi assessment area, while performance in the Jackson assessment area was good.

The bank made 41 qualified investments of approximately $\$ 118.9$ million and contributions of $\$ 159,260$ within the Mississippi assessment areas. Of the 41 investments, 4 totaling $\$ 20.1$ million were current period

## Mississippi

investments. Most of the investments provided support for affordable housing through GNMA and FNMA investment instruments and the purchase of Low Income Housing Tax Credits (LIHTCs) or investments in LIHTC funds. The bank also had several prior period community development project investments in community development financial institutions (CDFIs) serving the state. The bank also had investments that benefitted its footprint or a broader regional area that includes Mississippi. The broader regional investments primarily funded small businesses, startup companies, and community revitalization.

The bank is a leader in affordable housing in the state, providing equity investments for 19 LIHTC projects, in addition to investments in several funds that finance LIHTC projects. Several of the LIHTC projects have been part of the Gulf Coast recovery efforts after Hurricane Katrina. For instance, in Pascagoula, Mississippi, a limited-scope assessment area, the bank has invested $\$ 44.6$ million in 4 LIHTC projects since 2008.

In addition to the contributions specific to the assessment areas, the bank made statewide contributions of $\$ 21,750$ that positively impact all of the bank's assessment areas in the state. These contributions provided support for affordable housing and community services.

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

## Service Test

The service test rating is High Satisfactory when considering the bank's statewide performance.

## Retail Services

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

## Community Development Services

The bank provides a relatively high level of community development services that benefit residents and small businesses of the assessment areas. Out of the two full-scope assessment areas, community development services were good in the Jackson assessment area and adequate in the Central Mississippi assessment area.

## METROPOLITAN AREA

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JACKSON, MISSISSIPPI ASSESSMENT AREA

The Jackson assessment area consists of four counties: Hinds, Rankin, Madison and Copiah. The assessment area is the majority of the Jackson, Mississippi MSA, which also includes Simpson County. Within the assessment area there are 14 low-, 29 moderate-, 35 middle-, and 32 upper-income tracts. As of December 31, 2011, Regions operated 35 branches in the Jackson assessment area: three in low-income, nine in moderate-income, 10 in middle-income, and 13 in upper-income tracts. The majority of the low- and moderate-income tracts are in the city of Jackson.

The Jackson banking sector is comprised primarily of regional and community banks that are based in Mississippi. Regions is one of the largest banks active in the market and, according to the FDIC's June 30, 2011 Summary of Deposits Report, ranked second in deposit market share, with approximately 26\% (\$2.8 billion). There were 24 banks active in the market, operating 213 branches. Trustmark, which is headquartered in Jackson, had the largest market share of deposits, with $35 \%$. BankPlus and BancorpSouth also have significant deposit holdings in the market.

Regions ranked $7^{\text {th }}$ out of 230 HMDA reporters in 2010 with $4 \%$ of total loans. HMDA lending in the assessment area declined by 18\% between 2010 and 2011, and while Regions Bank's HMDA lending also declined, the bank maintained $4 \%$ of all loans. Trustmark was the leading HMDA lender in the market in 2011, followed by Wells Fargo Bank, BancorpSouth and BankPlus. Regions ranked $4{ }^{\text {th }}$ out of 56 small business loan reporters in 2010 with $10 \%$ of the loans. Small business lending in the market increased in 2011, and Regions was ranked $3^{\text {rd }}$ with $15 \%$ of total loans. American Express Bank, Trustmark and BankPlus were the other leading small business lenders in the market.

## Demographic Characteristics

Jackson is the state capital and the largest city in Mississippi, with a population of 173,500 . The population in the assessment area grew by almost $9 \%$ between 2000 and 2010, exceeding the growth rate for the state of $4.3 \%$. However, the city of Jackson and Hinds County have been losing population, and all of the population growth has been occurring in the surrounding Madison and Rankin counties. Between 2000 and 2010, the population in Hinds County declined by $2.2 \%$, and in Jackson, by $5.7 \%$. During the same time period, population increased by $22.8 \%$ in Rankin County and $27.5 \%$ in Madison County. However, Hinds County still accounts for approximately $48 \%$ of the total population in the assessment area, which was 511,554 in $2010 .{ }^{546}$

The following table provides demographic characteristics of the bank's assessment area based on the 2000 U.S. census data used to analyze the bank's CRA performance.

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## Jackson, Mississippi

## Combined Demographics Report

Assessment Area: MS Jackson

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 14 | 12.7 |  | 6.1 | 2,740 | 37.0 | 27,509 | 22.7 |
| Moderate-income | 29 | 26.4 |  | 23.2 | 7,133 | 25.4 | 19,414 | 16.0 |
| Middle-income | 35 | 31.8 |  | 36.9 | 4,517 | 10.1 | 23,303 | 19.2 |
| Upper-income | 32 | 29.1 |  | 33.8 | 1,778 | 4.3 | 51,016 | 42.1 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 110 | 100.0 |  | 100.0 | 16,168 | 13.3 | 121,242 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 14,232 |  |  | 34.2 | 6,930 | 48.7 | 2,436 | 17.1 |
| Moderate-income | 45,229 |  |  | 50.2 | 17,950 | 39.7 | 4,586 | 10.1 |
| Middle-income | 66,171 |  |  | 69.1 | 16,054 | 24.3 | 4,390 | 6.6 |
| Upper-income | 59,607 |  |  | 75.0 | 11,550 | 19.4 | 3,347 | 5.6 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 185,239 | 117,996 |  | 63.7 | 52,484 | 28.3 | 14,759 | 8.0 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2,080 | 7.8 |  | 7.3 | 183 | 12.8 | 168 | 13.1 |
| Moderate-income | 5,502 | 20.8 |  | 20.8 | 314 | 21.9 | 251 | 19.6 |
| Middle-income | 8,546 | 32.2 |  | 32.9 | 379 | 26.4 | 340 | 26.6 |
| Upper-income | 10,378 | 39.2 |  | 39.1 | 559 | 39.0 | 520 | 40.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 26,506 | 100.0 |  | 100.0 | 1,435 | 100.0 | 1,279 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.8 |  | 5.4 |  | 4.8 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 7 | 1.4 |  | 1.5 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 45 | 9.1 |  | 9.0 | 2 | 20.0 | 0 | 0.0 |
| Middle-income | 310 | 63.0 |  | 63.1 | 6 | 60.0 | 1 | 50.0 |
| Upper-income | 130 | 26.4 |  | 26.5 | 2 | 20.0 | 1 | 50.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 492 | 100.0 |  | 100.0 | 10 | 100.0 | 2 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.6 |  | 2.0 |  | . 4 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

Median family income in the Jackson MSA is higher than the median family income for the state, which was $\$ 48,000$ in 2011. For this analysis, HUD's median family income for the MSA is used. As shown, the median family income increased slightly between 2010 and 2011, from $\$ 57,400$ to $\$ 58,000$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

## Borrower Income Levels Jackson, MS MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$57,400 | 0 | - | \$28,699 | \$28,700 | - | \$45,919 | \$45,920 |  | \$68,879 | \$68,880 |  | \& above |
| 2011 | \$58,000 | 0 | - | \$28,999 | \$29,000 | - | \$46,399 | \$46,400 | - | \$69,599 | \$69,600 |  | \& above |

There is significant variation in the median family income across the assessment area. According to U.S. census estimates for 2006-2010, income is lowest in the city of Jackson $(\$ 41,570)$ and highest in Madison County $(\$ 73,140)$.

Mississippi is historically one of the poorest states in the country, and poverty is a significant concern in several communities within the assessment area. In Hinds County, $22 \%$ of the population and $26 \%$ of the population in Jackson was estimated to live below the federal poverty line in 2009. Copiah County also had a high poverty rate of $22.6 \%$. Another indicator of financial distress is food stamp utilization, and in Hinds County, 24\% of the population received food stamps in 2009. ${ }^{547}$ The shift in population and income out of the urban center into the suburban areas will impact overall lending patterns and community development opportunities in the assessment area.

## Housing Characteristics

The Jackson housing market weakened during the economic downturn, but the challenges were very different throughout the assessment area. Home prices in Hinds County, and particularly Jackson, are much lower than in surrounding Madison and Rankin counties. The stronger housing market in Madison County is driven primarily by the Nissan plant, located in Canton. The housing market in Jackson has also been decimated by high foreclosure inventories and a rising number of delinquent mortgages.

According to the Jackson, Mississippi Association of Realtors, home prices declined but show some sign of stabilization. The median home price in the three-county core of the Jackson MSA (Hinds, Rankin and Madison) increased from $\$ 139,900$ in 2010 to $\$ 145,900$ in 2012. Housing prices in Copiah County have also started to recover though prices remain much lower than elsewhere in the MSA. There is a wide range in housing prices in the assessment area, from a low of $\$ 68,900$ in Copiah County to $\$ 209,000$ in Madison County. In Hinds County, the median sales price in 2012 was $\$ 87,750$, representing a $19 \%$ increase over the previous year. ${ }^{548}$

[^172]
## Jackson, Mississippi

New home construction in the assessment area has declined, with building permits for single-family residential units falling by $66 \%$ between 2006 and 2011. The decline in new construction was most pronounced in Rankin County, where building permits fell by $77 \%$. In 2011, 1,182 single-family permits were issued in the assessment area. ${ }^{549}$ Home sales have also declined throughout the assessment area, but started rising again in 2011 in Rankin and Madison counties. In Hinds and Copiah counties, sales continued to decline through 2012. ${ }^{550}$

Foreclosures are a significant problem in the assessment area, and particularly in Hinds and Copiah counties. The percentage of seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) in the assessment area has increased from $8.0 \%$ in January 2010 to $13.2 \%$ in December 2011. ${ }^{551}$ In Hinds County, the percentage of mortgages that are considered seriously delinquent has increased to over $17 \%$. Statewide, only $1.6 \%$ of mortgages were seriously delinquent at the end of 2011. According to the City of Jackson Neighborhood Stabilization Program application, the high rate of foreclosure activity in Jackson was driven by subprime lending and investors purchasing and subsequently abandoning homes in aging neighborhoods. As a result, vacant and blighted homes are a posing a challenge to neighborhood revitalization in Jackson. ${ }^{552}$

The homeownership rate has declined in all counties in the assessment area since 2000, but over 70\% of households are still homeowners in Madison, Rankin and Copiah counties. The majority of the rental activity is in Jackson, where 47\% of households were renters in 2010. Housing is still considered relatively affordable in Hinds and Copiah counties, but in Rankin and Madison counties, fewer than $31 \%$ of the housing units were considered affordable for a family earning less than $80 \%$ of the area median income in 2009. However, renter affordability is a concern. In Jackson, almost $80 \%$ of renters earning less than $\$ 20,000$ and $63 \%$ of renters earning less than $\$ 50,000$ were considered cost burdened, meaning their gross rent represented more than $30 \%$ of their household income. ${ }^{553}$

## Employment and Economic Conditions

Because Jackson is the state capital, the region is a center for government, legal and financial activity. The local economy has also been strengthened by the expanding automobile manufacturing sector, led by Nissan, which operates a plant in Canton (in Madison County). Other economic drivers in the region include the health care sector and the concentration of higher education institutions.

Government is the largest employment sector in the region, but the overall MSA has a fairly diverse economic base. There are significant employment concentrations in manufacturing, retail, health care and social services, accommodation and food services, administration and waste services, and other services. Construction is also an important source of employment in the MSA, though as a result of the recession, there has been significant job loss in the sector. The state government, with over 31,000 employees, is the largest employer in the region. Other major employers include the University of Mississippi Medical Center, the US government, Nissan, and the Jackson and Rankin County school districts. ${ }^{554}$

[^173]The Jackson MSA economy experienced relatively steady growth between 2000 and 2007 but like most metro areas, the economy suffered during the national recession. Unemployment started to rise in 2007 in all counties in the assessment area and peaked in 2010, with the exception of Copiah County. As shown the table below, there is wide variation across the counties, with unemployment highest in Hinds and Copiah counties. Overall, unemployment in the MSA was relatively stable between 2010 and 2011, and in all counties other than Copiah, the unemployment rate is below the statewide average. The presence of the government along with the number of hospitals and higher education institutions gives the region some economic stability, even during challenging years. However, the heavy dependence on public sector employment is also a risk in light of the continued threat of state budget cuts.

## Unemployment Rates

Assessment Area: MS Jackson

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Jackson MSA | 8.4 | 8.4 |
| Copiah County | 11.1 | 11.9 |
| Hinds County | 9.5 | 9.5 |
| Madison County | 7.5 | 7.4 |
| Rankin County | 6.7 | 6.6 |
| Mississppi | $\mathbf{1 0 . 5}$ | $\mathbf{1 0 . 7}$ |

Not Seasonally Adjusted

The Nissan plant has fueled significant growth in the automobile manufacturing sector in the Jackson MSA and has helped create many higher paying jobs. Since the plant was opened in 2003, Nissan has invested over \$2.6 billion and now employs more than 5,000 . When the plant was opened, it produced just one car line, and it is now up to seven. ${ }^{555}$ Nissan continues to target the plant for investment and expansion. Nissan's presence has also encouraged more auto suppliers to invest in the area, making it a critical economic anchor for the MSA.

The Greater Jackson Area has seen a number of other economic investments in the past few years. In 2011, Lockheed Martin announced a $\$ 5$ million investment that will create 350 new jobs, and Unified Brands announced a $\$ 1$ million investment that will create 45 new jobs. However, the region has had a number of closures or layoff announcements, including DG Foods, a food processing plant in Copiah County that eliminated over 160 jobs. Johnson Controls, an auto parts manufacturer, closed its plant in 2011, eliminating over 260 jobs, and the Mississippi Department of Human Services laid off 150. ${ }^{556}$

[^174]The Greater Jackson Chamber Partnership recently released Vision 2011, a 10-year strategic plan to guide longterm planning and economic development efforts for the region. The plan focuses on "Creating Places, Wealth, Talent and Connections" as the crucial components for a more vibrant region. From an economic development perspective, the plan focuses on health care and aerospace as significant opportunities for the region. Other targeted sectors include distribution, food processing, general and advanced manufacturing, and information technology. There are a number of initiatives already underway that create a foundation for the economic development planning, including the Mississippi Healthcare Corridor. The Mississippi Healthcare Corridor is a large-scale redevelopment project of a major thoroughfare across the city into a regional and national destination for health care, as well as creating new commercial, residential and recreational space.

Another focus area in the long-range plan is a more vibrant downtown Jackson and an effort to spur more investment in declining neighborhoods and new housing opportunities. While Jackson has struggled with population and income loss, over $\$ 500$ million has been invested in new projects in the downtown area since 2005 , and another $\$ 2.0$ billion in projects are underway or in the planning stages. Some of the projects completed to date are mixed-use developments with housing and retail, new and renovated federal buildings, new office space, and hotels. A $\$ 100$ million investment in a new entertainment district is underway along with plans for a $\$ 1.1$ billion redevelopment project of a 14-block area. The downtown Jackson area appears poised for significant growth, but to date, that growth is not targeting the lower-income neighborhoods.

## Community Contacts and Community Development Opportunities

Most community development activity in the assessment area is in Jackson, and there are numerous opportunities to support low- and moderate-income communities and individuals. As discussed earlier, the city of Jackson has a problem with a rising number of foreclosures and mortgage delinquencies, as well as the impact of blighted abandoned properties in low-income communities. The high rates of foreclosures and mortgage delinquencies indicate that there is still a great need for foreclosure prevention counseling and investments in organizations that are helping victims of foreclosure find housing and get back on sound financial footing. There is also a need for more affordable rental housing, particularly since so many of the renters in Jackson are already considered cost burdened.

To help stabilize some of the impacted neighborhoods in Jackson, the city received a direct allocation of about \$3.1 million in Neighborhood Stabilization Program (NSP) funds as well as some additional funds through the state. These funds were used primarily to purchase and rehabilitate homes for affordable rental or homeownership. The city is working with Habitat for Humanity and the Voices of Calvary Ministries to implement the NSP program, and as of the end of 2012, all of the funds had been dispersed.

Mississippi is historically one of the very poorest states in the country, and the economic security of its residents is a significant issue. Over $20 \%$ of the state's population lives in poverty according to the 2010 census. While the Jackson MSA has experienced some growth, it still faces the same challenges in helping the lowest income residents improve their financial condition. There are widespread efforts to encourage more education (from pre-k, K-12, technical schools and higher education) and to improve the overall workforce development system. ${ }^{557}$

There are a number of efforts in the Jackson area to encourage lower-income individuals to stop using high-cost financial service providers and to help these individuals build some financial security. In the Jackson MSA, $12.8 \%$ of households are unbanked, meaning they have no type of deposit account with a mainstream financial institution. In addition, 24.7\% of households are considered underbanked, meaning they have a deposit account

[^175]but they also rely on alternative financial services providers on a regular basis. In city of Jackson, the numbers are much higher. Almost $19 \%$ of households are unbanked and $30 \%$ are underbanked. The unbanked are disproportionately lower-income and minority households. ${ }^{558}$ Several local financial institutions (including two that are also community development financial institutions) have designed new products, outreach and financial education to address the needs of the unbanked. Several nonprofits operate matched-savings account programs for low- and moderate-income individuals, and most recently, a new national pilot initiative was launched in several Mississippi cities, including Jackson, to help low-income children start saving for college.

A community contact that specializes in financial access and community development financing stated that access to affordable financial products was a critical need throughout Mississippi. Banks have either closed branches or shifted away from consumer lending, leaving a void in retail and consumer banking products in some low-wealth or high-minority communities. The contact stated this was an issue in both urban and rural areas. There are some local community banks and credit unions trying to serve these communities that the larger banks have vacated, but the closure of bank branches in some communities has created a real hardship.

The contact said that banks were somewhat engaged in community development efforts, but there were many opportunities for them to increase their involvement. One of the specific areas of need is more capital for community development financial institutions and greater support for alternative financial services that are filling the void in lower-income communities. There is also a need for more support of equity funds for developing Low Income Housing Tax Credit projects and general operating support for nonprofit organizations. Overall, the contact indicated that banks were not very innovative and were not taking a leadership role in addressing the community development needs in lower-income communities.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance is adequate. The geographic distribution of loans reflects good penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a low level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 2,119 (59.3\%) small business loans compared to 1,454 (40.7\%) HMDA loans in the Jackson assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The Jackson assessment area contains $1.8 \%$ of the bank's small business and HMDA lending by number of loans and $1.7 \%$ by dollar volume totaling $\$ 386.9$ million. In comparison, $2.9 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of lending in the Jackson assessment area is good. For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was

[^176]compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in low- and moderateincome census tracts, were issues considered when assessing the bank's performance. In addition, the performance of the aggregate lenders was considered when assessing the bank's performance.

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is good. During the review period, Regions Bank originated $8.2 \%$ of its small business loans in low-income tracts, which contain $7.3 \%$ of the small businesses in the assessment area. The bank's performance also exceeded the aggregate in both 2010 and 2011.

Regions Bank’s small business lending in moderate-income tracts is also good. During the review period, Regions Bank originated $15.6 \%$ of its small business loans in moderate-income census tracts, which contain $20.8 \%$ of the small businesses in the assessment area. Additionally, the bank's performance was greater than the aggregate in both 2010 and 2011.

## Home Purchase Loans

Home purchase lending in low-income census tracts is adequate. Regions Bank originated three (0.7\%) home purchase loans in low-income tracts, which contain $4.1 \%$ of the owner-occupied units. Although the aggregate did not originate home purchase loans at a level comparable to the percentage of owner-occupied units in lowincome census tracts, Regions Bank’s performance was comparable to the aggregate in 2010 and slightly greater than the aggregate in 2011. Due to the low level of activity, this rating was given minimal weighting when considering the overall geographic distribution.

Home purchase lending in moderate-income census tracts is adequate. Regions Bank originated 6.3\% of its home purchase loans in moderate-income tracts, which contain $19.2 \%$ of the owner-occupied units. However, it appears that the aggregate also had low penetration of home purchase loans in moderate-income census tracts as well, indicating limited opportunity for home purchase lending in these tracts. Nonetheless, the bank's performance was slightly below the aggregate in 2010 and greater than the aggregate in 2011.

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

## Home Refinance Loans

Home refinance lending in low-income census tracts is adequate. Regions Bank originated two (0.2\%) home refinance loans in low-income tracts, which contain $4.1 \%$ of the owner-occupied units. However, it appears that the aggregate also had low penetration of home refinance loans in low-income census tracts as well, indicating limited opportunity for home refinance lending in these tracts. The bank's two loans were originated in 2010 and the bank's performance was equal to the aggregate. However, the bank originated no home refinance loans in low-income census tracts in 2011. Due to the low level of activity, this rating was given minimal weighting when considering the overall geographic distribution.

Home refinance lending in moderate-income census tracts is adequate. During the review period, Regions Bank originated $5.3 \%$ of its refinance loans in moderate-income census tracts, which contain $19.2 \%$ of the owneroccupied units in the assessment area. Although the aggregate did not originate home refinance loans at a level comparable to the percentage of owner-occupied units in moderate-income census tracts, Regions Bank's performance was similar to the aggregate in 2010 and greater than the aggregate in 2011.

The bank's refinance lending in middle-income tracts was less than the percentage of owner-occupied units in these tracts while the lending in upper-income tracts was greater than the percentage of owner-occupied units. Home Improvement Loans
Regions Bank's home improvement lending in low-income census tracts is excellent when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated $5.8 \%$ of its home improvement loans in low-income tracts, which contain $4.1 \%$ of the owner-occupied units in the assessment area. Additionally, Regions Bank's performance exceeded the aggregate in both 2010 and 2011.

Regions Bank's home improvement lending in moderate-income census tracts is good when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated $25.1 \%$ of its home improvement loans in moderate-income tracts, which contain $19.2 \%$ of the owner-occupied units in the assessment area. Additionally, Regions Bank's performance exceeded the aggregate in 2010 and was comparable to the aggregate in 2011.

The bank's home improvement lending in both middle-income and upper-income tracts was less than the percentage of owner-occupied units in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. For this analysis, the distribution of HMDA lending across borrower income levels and small business lending across business revenue sizes was compared to available demographic information. Performance context issues were also considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to demographic and aggregate data, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 but was less than aggregate in 2011. The bank originated $29.1 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.8 \%$. However, of the 2,119 small business loans originated during the review period, 1,158 (54.6\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $64.2 \%$, which was still less than the percentage of small businesses in the Jackson assessment area. However, 1,827 ( $86.2 \%$ ) of the 2,119 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of \$100,000 or less, Regions Bank's performance was less than the aggregate in 2010 and slightly greater than the aggregate in 2011.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is adequate. The bank made $6.1 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $22.7 \%$ of total families in the assessment area. Regions Bank's performance was similar to the aggregate in 2010 but less than the aggregate in 2011.

Home purchase lending to moderate-income borrowers is good. At 21.7\%, the bank’s percentage of home purchase lending to moderate-income borrowers exceeded the percentage of moderate-income families in the assessment area at 16.0\%. Regions Bank's performance was greater than aggregate in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made $4.9 \%$ of its refinance loans to low-income borrowers. Low-income families make up $22.7 \%$ of total families in the assessment area. However, the bank's performance was greater than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is also good. The bank's percentage of home refinance lending to moderate-income borrowers at $13.4 \%$ was less than the percentage of moderateincome families in the assessment area at $16.0 \%$. However, Regions Bank's performance was greater than aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of loans at $13.5 \%$ was less than the percentage of low-income families in the assessment area at $22.7 \%$. However, the bank's lending to low-income borrowers was greater than the aggregate performance in 2010 and less than aggregate in 2011.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans to moderate-income borrowers at $31.6 \%$ far exceeded the percentage of moderate-income families in the assessment area at $16.0 \%$. Additionally, the bank's performance was greater than the aggregate in both 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Community Development Lending

Regions Bank makes a low level of community development loans in the Jackson assessment area. The bank originated four community development loans totaling $\$ 3.8$ million during the review period. Two of the loans supported affordable housing by providing financing for a Low Income Housing Tax Credit (LIHTC), singlefamily residential development with 45 affordable units restricted to low- and moderate-income individuals in Canton, Mississippi. Two loans promoted economic development by financing small businesses, one of which was to a nonprofit organization that provides non-traditional financing and technical assistance to small businesses that are typically unable to obtain credit through traditional channels. Local community development needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization resulting from elevated foreclosure rates, downtown revitalization, and small business finance. The bank's loans exhibit an adequate level of responsiveness to community credit needs, but the number and dollar amounts are poor given the bank's presence in the market.

## Investment Test

The bank's performance in the Jackson assessment area under the investment test is good. The bank had 20 investments totaling $\$ 8.6$ million, including one current period investment of $\$ 5.3$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing through LIHTC projects, investing in funds that
finance LIHTC projects and FNMA and GNMA investment instruments. The assessment area was also positively impacted by several prior period community development program investments in regional CDFIs. The broader regional investments primarily funded small businesses and startup companies through SBICs. Local community development credit needs include but are not limited to financing for community and neighborhood revitalization due to elevated foreclosure and unemployment rates, affordable housing for lowand moderate-income individuals, small business finance, job creation, and household financial stability. The dollar volume of Regions Bank's current and total investments exhibits responsiveness to some of the identified community needs, given the bank's presence in the assessment area.

The bank also made 36 contributions totaling $\$ 84,842$. In addition, the bank made several contributions to statewide and national organizations that benefit the assessment area. Contributions were given primarily to organizations involved in economic development, affordable housing and provision of community services targeted to low- and moderate-income individuals and communities.

Regions Bank's investment portfolio and contributions are responsive to several of the identified community development needs. Examples include the following:

- LIHTCs, including one current period project totaling 45 units that provides housing affordable to lowand moderate-income residents;
- A contribution to support a major revitalization plan for the urban core of Jackson, Mississippi;
- Several contributions to support small businesses, including financial support for small business workshops and donations to a nonprofit organization that provides nontraditional lending for women business owners; and
- Contributions to nonprofit organizations that provide financial and homeownership counseling for lowand moderate-income individuals.


## Service Test

The bank's service test performance in the Jackson assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Jackson assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 35 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open any branches and closed one branch (located in a middle-income tract) in the Jackson assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area. Extended hours are offered at the majority of the bank's branches, including those located in low- and moderate-income geographies.

## Jackson, Mississippi

## Geographic Distribution of Branches

Assessment Area: MS Jackson

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | Branch <br> \% | $\begin{gathered} \text { Open } \\ \# \end{gathered}$ | Closed \# | Drive thrus | Extend- <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 3 | 8.6\% | 0 | 0 | 3 | 1 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 14 | 12.7\% | 6.9\% | 7.8\% |
| Moderate | Total | 9 | 25.7\% | 0 | 0 | 8 | 7 | 0 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 29 | 26.4\% | 23.8\% | 20.8\% |
| Middle | Total | 10 | 28.6\% | 0 | 1 | 10 | 9 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 35 | 31.8\% | 36.2\% | 32.2\% |
| Upper | Total | 13 | 37.1\% | 0 | 0 | 13 | 13 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 32 | 29.1\% | 33.0\% | 39.2\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 35 | 100.0\% | 0 | 1 | 34 | 30 | 1 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 110 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 1,563 service hours in various capacities for community development organizations, by participating in 203 different service activities. Many of the community development services focused on education and affordable housing for community organizations that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by providing services to an organization whose mission is to provide low- and moderate-income individuals with safe and affordable neighborhoods.

## Metropolitan Areas (Limited Review)

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

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

- Gulfport Assessment Area (Hancock and Harrison Counties)
o As of December 31, 2011, Regions Bank operated nine branches in the assessment area, representing 6.4\% of its branches in Mississippi.
o As of June 30, 2011, the bank had $\$ 208.7$ million in deposits in this assessment area, representing a market share of $5.9 \%$ and $3.0 \%$ of Regions Bank's total deposits in Mississippi.
- Hattiesburg Assessment Area (Forrest and Lamar Counties)
o As of December 31, 2011, Regions Bank operated seven branches in the assessment area, representing $5.0 \%$ of its branches in Mississippi.
o As of June 30, 2011, the bank had $\$ 335.7$ million in deposits in this assessment area, representing a market share of $14.1 \%$ and $4.8 \%$ of Regions Bank's total deposits in Mississippi.
- Pascagoula Assessment Area (Jackson County)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $1.4 \%$ of its branches in Mississippi.
o As of June 30, 2011, the bank had $\$ 83.8$ million in deposits in this assessment area, representing a market share of $5.2 \%$ and $1.2 \%$ of Regions Bank's total deposits in Mississippi.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Gulfport | Consistent | Not Consistent (Above) | Not Consistent (Above) |
| Hattiesburg | Consistent | Not Consistent (Below) | Consistent |
| Pascagoula | Not Consistent <br> (Above) | Not Consistent (Above) | Consistent |

The Central Mississippi and Jackson assessment areas received full-scope reviews, and the bank's performance in the Jackson assessment area was given greater consideration in determining the overall rating for the state. Jackson is by far the bank's largest market in Mississippi in terms of deposits, loans, and branches. The fullscope areas selected together represent $53.1 \%$ of the deposits in the assessment areas in Mississippi as well as $42.9 \%$ of the branches. The full-scope assessment areas also represent $38.8 \%$ of the HMDA loans and $52.1 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits and a large portion of the branches and loans in the State of Mississippi.

## Metropolitan Areas (Limited Review)

For the Lending Test, performance was stronger than the bank's performance in the state in one of the limitedscope assessment areas (Pascagoula) and consistent with the bank's performance in the remaining limited-scope assessment areas (Gulfport and Hattiesburg).
For the Investment Test, the performance in two limited-scope assessment areas (Gulfport and Pascagoula) was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas. The performance in the Hattiesburg limited-scope assessment areas was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment area.

For the Service Test, the performance in one limited-scope assessment area (Gulfport) was stronger than the bank's performance in the state, while the performance in the other two assessment areas was consistent with the bank's performance in the state.

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

## NON-METROPOLITAN STATEWIDE AREA (Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CENTRAL MISSISSIPPI ASSESSMENT AREA

The Central Mississippi assessment area includes the following 11 counties: Attalla, Choctaw, Clay, Lowndes, Montgomery, Oktibbeha, Webster, Winston, Lauderdale, Neshoba and Newton. There are 74 census tracts in the assessment area, including 15 low- or moderate-income tracts. As of December 31, 2011, Regions Bank operated 25 branch offices in the Central Mississippi assessment area representing $17.9 \%$ of the branches in the Mississippi assessment areas. The bank has two branches in low-income census tracts and four in moderateincome census tracts; five branches border at least one low- or moderate-income census tract.

The Central Mississippi assessment area is an active banking market where Regions Bank is a market share leader. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 20 financial institutions operating 140 branch locations with a total of $\$ 5$ billion in deposits inside the assessment area. Regions Bank ranked $1^{\text {st }}$ with deposit market share of $17.8 \%$ ( $\$ 883$ million). Cadence Bank had the second largest deposit share at $13.5 \%$, followed by Citizens National Bank of Meridian, at 11.1\%.

Regions Bank is also a lending leader inside the assessment area. In 2010, the bank ranked $3^{\text {rd }}$ out of 46 small business and small farm loan reporters by originating $9.8 \%$ of all loans. In 2011, the bank ranked $1^{\text {st }}$ out of 50 reporters with $12.9 \%$ of all loans. From 2010 to 2011, the bank increased its loans from 418 to 586, through the purchase of small business loans. For HMDA lending, Regions Bank ranked $3^{\text {rd }}$ in 2010 and 2011 with 6.5\% and $6.4 \%$ of all HMDA loans, respectively. Loan production decreased from 471 units in 2010 to 413 units in 2011. BancorpSouth Bank was consistently the top ranked HMDA lender in the assessment area.

## Demographic Characteristics

The population of the Central Mississippi assessment area is not growing. According to census data, the population of the assessment area in 2000 was 327,212 people, representing $11.5 \%$ of the total statewide population. From 2000 to 2010, the assessment area population increased by only $0.3 \%$, while the statewide population grew by $4.3 \%$. Additionally, the assessment area experienced population declines from 2005 to 2010, with net migration declining, on average, by nearly 1,000 people per year during this time period. Net migration is defined as the number of in-migrant households, less the number of out-migrant households and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns for a particular year. ${ }^{559}$

The table below shows selected demographic information for the Central Mississippi assessment area.

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## Central Mississippi

## Combined Demographics Report

Assessment Area: MS Central MS


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## Central Mississippi

## Income Characteristics

Food stamp usage in the assessment area is also on the rise. From 2000 to 2009, the percentage of assessment area residents receiving food stamps increased by $94.7 \%$, which was comparable to the statewide rate. As of 2009, more than $19 \%$ of the statewide population was on food stamps while eight of the 11 counties in the assessment area exceeded $20 \%$, and more than $28 \%$ of Clay County residents used food stamps. ${ }^{560}$ Additionally, from 2000 to 2009, the estimated percentage of people living in poverty in the assessment area increased by $4.2 \%$, which was below the increase at the state level of $10.2 \%$. However, when comparing the increase in the percentage of people living in poverty to the marginal population increase inside the assessment area and the percentage of people accessing food stamp benefits during the same time period, it becomes evident that an increasing number of assessment area residents have lower incomes, forcing them to rely on government assistance to meet basic needs.

Participation in the free or reduced price lunch program can also be used to understand the income characteristics of the population. The program is typically offered to students of low- or moderate-income means. As of 2010, there were 20 school districts inside the Central Mississippi assessment area, and each district had more than $50 \%$ of students participating in the lunch program. Half of the districts had more than $75 \%$ of students participating in the program, which is another indicator that many families have reduced incomes and need to rely on government assistance to meet some of their daily financial obligations. ${ }^{561}$

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 and 2011 for the non-metro areas in Mississippi. It provides a range of the estimated annual family income for each income category (low, moderate, middle and upper) and shows that the median income for the non-metro areas declined from 2010 to 2011 by $\$ 800$, or nearly $2 \%$.

Borrower Income Levels
Mississippi State Non-Metro

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 49.99\% |  |  | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$42,400 | 0 | - | \$21,199 | \$21,200 | - | \$33,919 | \$33,920 | - | \$50,879 | \$50,880 | - | \& above |
| 2011 | \$41,600 | 0 | - | \$20,799 | \$20,800 | - | \$33,279 | \$33,280 |  | \$49,919 | \$49,920 |  | \& above |

## Housing Characteristics

The Central Mississippi housing market moves in tandem with the broader, statewide market. From 2000 to 2009, the median value of an owner-occupied home inside the assessment area increased between 25 and 50\% based on census data estimates, compared to the state of Mississippi, which increased by $41.3 \%$. The two most populous counties in the assessment area, Lauderdale and Lowndes, experienced increases of $29 \%$ and $35 \%$, respectively. Between 2005 and 2009, all but two counties in the assessment had an estimated median value lower than the state median value of $\$ 91,400$, which was significantly below the national median value of $\$ 185,400 .{ }^{562}$

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## Central Mississippi

Census data shows that there were 137,021 housing units in the assessment area in 2000, of which $63.7 \%$ were owner-occupied, $26.3 \%$ were rental units, and $10.0 \%$ were vacant. While a majority of the assessment area's housing units were owner-occupied, a disproportionately higher percentage of housing units in low- and moderate-income tracts were rental units or vacant, indicating reduced opportunities for mortgage origination in these geographies. The median age of housing stock across the assessment area was 26 years, but this figure increased to 39 years in low-income tracts and 33 years in moderate-income tracts. Housing permits are on the decline, with single-family permits declining by $61 \%$ between 2006 and 2011. The reduction in multi-family permits was more dramatic, declining $90 \%$ from their peak in 2007, to $2011 .^{563}$

Mortgage delinquencies and lack of loan demand have also had an impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $6.1 \%$ in January 2010 to $10.5 \%$ in December 2011. Furthermore, HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to be weak, declining from a high of 2,418 loans in 2006 to 1,251 loans in $2010 .{ }^{564}$ Refinance activity, on the other hand, did not decline as drastically, likely due to the current low interest rate environment.

## Employment and Economic Conditions

The economy of the Central Mississippi assessment area is relatively stable, but activity is limited. Lauderdale County has the largest number of workers in the 11-county assessment area, followed by Oktibbeha and Neshoba counties. In Lauderdale County, the largest private sector employment industries are health care and social services, retail trade, and accommodation and food services, which account for $46 \%$ of private sector employment. Government is the largest employment industry, employing more than 8,200 people. Meridian is the county seat of Lauderdale County and is home to several large employers, including Peavey Electronics, Avery Dennison Corporation, Atlas Roofing Company, and Sara Lee Bakery Corporation.

In January 2011, the State of Mississippi released its Blueprint Mississippi 2011, presented as an objective review of Mississippi’s economic opportunities with recommended actions for putting Mississippi in the place of greatest opportunity. This was a statewide, public-private partnership that resulted in a final report outlining nine goals. Of significance to this analysis are two goals relating to workforce development and one addressing increased availability of financial capital. Workforce development is a primary focus of the business community in and around the assessment area, and these sections in the report assert the importance of workforce development at the state level as an economic development strategy. Under the heading of increasing the availability of financial capital, the report recommends the development of tools and incentives to increase capital to support minority and rural businesses, specifically mentioning the Mississippi banking community in conjunction with the SBA as key partners in this effort. ${ }^{565}$
Mississippi has multiple SBA Historically Underutilized Business (HUB) zones across the state and in the assessment area. The HUBZone Program creates economic development through government contracting opportunities in geographic regions that have been historically underutilized as business zones. Nationally in Fiscal Year 2010, businesses in the HUBZone program were awarded approximately $\$ 12$ billion in prime contracting, including approximately $\$ 3$ billion in HUBZone set-asides. In Fiscal Year 2011, Mississippi HUBZone firms were awarded more than $\$ 98.3$ million. ${ }^{566}$

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## Central Mississippi

One current boost to the local economy is the construction of a new gasification plant by Mississippi Power in Kemper County, which is adjacent to the assessment area. The power company reports that its investment in this facility will greatly expand local tax revenue and create approximately 300 permanent jobs from the plant mine operations, which will include the hiring of skilled workers from the local area. Additionally, about 1,000 jobs will be created during construction, with as many as 2,000 workers at the peak of construction. ${ }^{567}$

Agriculture is also an important part of the regional economy. Webster County contains the largest percentage of farm workers at $10 \%$ of total employment. Montgomery and Choctaw counties, both of which are adjacent to Webster County, have more than $8 \%$ of their respective workforce employed in the farming industry. ${ }^{568}$ Cotton farming in particular has seen a recent surge in interest due to favorable conditions. Area farmers have reported successful harvests of the crop in recent years, and a state-of-the-art cotton gin is being constructed in nearby Noxubee County that will provide employment opportunities and generate economic activity through trucking, sales and other related services. ${ }^{569}$

Workforce reductions have also had an impact on the assessment area. Employers that have engaged in workforce reductions include a maker of military vehicles that laid off more than 300 employees in 2009 from a production facility in Clay County. ${ }^{570}$ The nonpartisan, nonprofit Mississippi Economic Policy Center reports that in July 2012, the state of Mississippi had 77,100 fewer jobs than when employment peaked before the recession in February 2008. As a result, the statewide unemployment rate remains over $10 \%$ since peaking in January 2010 at $11.9 \%$. Many of the individual counties in the assessment area are encountering even greater unemployment challenges, with Clay and Winston Counties experiencing unemployment rates greater than 15\% in 2011.

The following chart shows unemployment rates for the assessment area relevant to the State of Mississippi for 2010 and 2011.

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## Central Mississippi

## Unemployment Rates

Assessment Area: MS Central MS

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Attala County | 14.0 | 13.1 |
| Choctaw County | 12.7 | 11.6 |
| Clay County | 19.5 | 18.7 |
| Lauderdale County | 11.0 | 11.2 |
| Lowndes County | 12.2 | 11.6 |
| Montgomery County | 14.0 | 13.3 |
| Neshoba County | 9.3 | 8.7 |
| Newton County | 10.2 | 10.0 |
| Oktibbeha County | 11.0 | 10.9 |
| Webster County | 14.5 | 13.8 |
| Winston County | $\mathbf{1 8 . 1}$ | 15.1 |
| Mississppi |  | $\mathbf{1 0 . 5}$ |

Not Seasonally Adjusted

Although the unemployment rates across the assessment area are decreasing, they remain high relative to the state and nation. And while housing values have maintained relative stability in recent years, local and statewide median home sale prices declined from 2010 to 2011, and building permit activity remained at low levels. Combined with elevated mortgage delinquencies and weak loan demand, the local economy remains fragile and will likely need continued strategic development initiatives to maintain stability and eventually increase the pace of recovery.

## Community Contacts and Community Development Opportunities

One community contact specializing in regional business development and entrepreneurship was interviewed for the Central Mississippi assessment area and indicated the need for workforce development activities. Current initiatives are underway to match workforce skills with industry needs, with a particular focus on preparing youth for high tech jobs with local businesses. The contact noted that while economic conditions are generally stable, many area businesses have adopted a wait and see approach before engaging in new investments. Generally speaking, access to capital was noted as not being an issue based on the contact's conversations with local businesses. Farming and agriculture were also noted as growing segments of the economy.

The State of Mississippi received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. Mississippi received $\$ 43.1$ million under the NSP1 allocation process and $\$ 5$ million under NSP3. The NSP1 funds are being used for multiple projects across the state, including home buyer assistance for communities inside the assessment area. Under this program, one-time down payment assistance

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grants are being offered to individuals and families whose incomes are $120 \%$ or less of the area median income to assist with purchasing abandoned and/or foreclosed homes. ${ }^{571}$

There are 38 certified community development financial institutions (CDFIs) located in Mississippi, the majority of which are banks, credit unions, or depository institution holding companies. There are also several CDFIs operating revolving loan funds for small business development across the state, one of which is located inside the assessment area. Other community development opportunities include participation in the Low Income Housing Tax Credit (LIHTC) Program, which provides an estimated $\$ 6.4$ million in tax credits to the state of Mississippi in 2012 for the provision of affordable housing. ${ }^{572}$

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending performance is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 896 (50.3\%) small business loans compared to 884 (49.7\%) HMDA loans in the Central Mississippi assessment area. Therefore, small business lending and HMDA lending were considered equally in determining the bank's lending test rating in the assessment area. The Central Mississippi assessment area contains $0.9 \%$ of the bank's small business and HMDA lending by number of loans and $0.8 \%$ by dollar volume, totaling $\$ 169.2$ million. In comparison, $0.9 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of lending in the Central Mississippi assessment area is adequate. For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates, the level of owner-occupied units, and the number of small businesses in lowand moderate-income census tracts, were issues considered when assessing the bank's performance. In addition, the performance of the aggregate lenders was considered when assessing the bank's performance.

## Home Purchase Loans

Home purchase lending in low-income census tracts is adequate. Regions Bank originated no home purchase loans in low-income tracts, which contain $1.6 \%$ of the owner-occupied units. However, the aggregate as also unable to lend at a level comparable to the demographic in low-income census tracts, indicating limited opportunity for home purchase lending in these tracts. Therefore, the bank's performance was given minimal weight in determining the overall geographic distribution of loans.

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## Central Mississippi

Home purchase lending in moderate-income tracts is poor. During the review period, Regions Bank originated $4.0 \%$ of its home purchase loans in moderate-income census tracts, which contain $9.8 \%$ of the owner-occupied units in the assessment area. Regions Bank’s performance was less than the aggregate in 2010 and slightly below the aggregate in 2011.

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

## Home Refinance Loans

Home refinance lending in low-income census tracts is adequate. Regions Bank originated no home refinance loans in low-income tracts, which contain $1.6 \%$ of the owner-occupied units. However, the aggregate as also unable to lend at a level comparable to the demographic in low-income census tracts, indicating limited opportunity for home refinance lending in these tracts. Therefore, the bank's performance was given minimal weight in determining the overall geographic distribution of loans.

Home refinance lending in moderate-income census tracts is adequate. During the review period, Regions Bank originated $5.4 \%$ of its refinance loans in moderate-income census tracts, which contain $9.8 \%$ of the owneroccupied units in the assessment area. Regions Bank's performance was less than the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending in low-income census tracts is adequate. Regions Bank originated one home improvement loan in a low-income tract. Although it appears that the aggregate also had low penetration of home improvement loans in low-income census tracts, its level of lending was comparable to the percentage of owner-occupied units in the low-income census tracts. Therefore, the bank's performance was given minimal weight in determining the overall geographic distribution of loans.

Home improvement lending in moderate-income tracts is poor. During the review period, Regions Bank originated six (5.5\%) of its home improvement loans in moderate-income census tracts, which contain $9.8 \%$ of the owner-occupied units in the assessment area. The aggregate originated home improvement loans at a level comparable to or greater than the percentage of owner-occupied units in moderate-income census tracts in 2010 and 2011, respectively. Regions Bank’s performance was below the aggregate in both 2010 and 2011.

The bank's home improvement lending in both middle-income and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Small Business Loans

Regions Bank’s small business lending in low-income tracts is adequate. During the review period, Regions Bank originated $3.8 \%$ of its small business loans in low-income census tracts, which contain $5.3 \%$ of the small businesses in the assessment area. The bank's performance was less than the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $10.0 \%$ of its small business loans in moderate-income census tracts, which contain

## Central Mississippi

$14.5 \%$ of the small businesses in the assessment area. However, the bank's performance was less than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while the lending in upper-income tracts was greater than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. For this analysis, the distribution of HMDA lending across borrower income levels and small business lending across business revenue sizes was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is adequate. The bank made $4.6 \%$ of its home purchase loans to low-income borrowers. Low-income families make up $22.9 \%$ of total families in the assessment area. Regions Bank’s performance was greater than the aggregate in both 2010 and 2011.

Home purchase lending to moderate-income borrowers is good. At $14.0 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was similar to the percentage of moderate-income families in the assessment area at $14.6 \%$. Regions Bank's performance was slightly greater than aggregate in both 2010 and 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is adequate. The bank's percentage of home refinance lending to low-income borrowers at $3.4 \%$ was less than the percentage of low-income families in the assessment area at $22.9 \%$. Regions Bank's performance was similar to the aggregate in 2010 and greater than the aggregate in 2011.

The bank's home refinance lending to moderate-income borrowers is good. The bank's percentage of home refinance lending to moderate-income borrowers at $9.2 \%$ was less than the percentage of moderate-income families in the assessment area at $14.6 \%$. However, Regions Bank's performance exceeded the aggregate in both 2010 and 2011.

The bank's home refinance lending to middle-income borrowers was slightly less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is good. Regions Bank's percentage of home improvement loans at $14.5 \%$ was less than the percentage of low-income families in the assessment area at $22.9 \%$. However, the bank's performance was greater than the aggregate in 2010 and less than the aggregate in 2011.

Home improvement lending to moderate-income borrowers is adequate. Regions Bank's percentage of loans at $15.5 \%$ was greater than the percentage of moderate-income families in the assessment area at $14.6 \%$. The

## Central Mississippi

bank's lending to moderate-income borrowers was less than the aggregate performance in 2010 and greater than aggregate in 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to demographic and aggregate data, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 but was less than aggregate in 2011. The bank originated $41.4 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $91.2 \%$. However, of the 896 small business loans originated during the review period, 377 (42.1\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $71.5 \%$, which was still less than the percentage of small businesses in the Central Mississippi assessment area. However, 768 (85.7\%) of the 896 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was below the aggregate in both 2010 and 2011.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Central Mississippi assessment area. The bank originated 25 community development loans totaling $\$ 96.7$ million during the review period. The majority of the loans revitalize and/or stabilize low- and moderate-income geographies, promote economic development by financing small farms or finance affordable housing for low- and moderate-income individuals, all of which are responsive to local community credit needs. Workforce development, job growth and small business finance are also important community development needs for the local area. The bank's community development loan portfolio exhibits excellent responsiveness to the credit needs of low- and moderate-income individuals and small businesses/small farms. The number and the dollar amount of loans are excellent, and a higher level of innovativeness is present in some of the transactions.

Examples of community development lending include the following:

- Four loans for $\$ 8$ million to support multi-family LIHTC affordable housing, resulting in the development of 36 units restricted to tenants making up to $60 \%$ of the area median income;
- Multiple loans to a loan consortium dedicated to assisting developers in the construction or development of residential housing in Mississippi for low- and moderate-income individuals;
- Numerous loans that promote economic development by financing small farms; and
- Multiple loans that support job growth and community stabilization by financing farms located in or adjacent to low- and moderate-income geographies, designated disaster areas and/or the West-Central Mississippi Renewal Community.


## Investment Test

The bank's performance in the Central Mississippi assessment area under the investment test is excellent. The bank had eight investments totaling $\$ 27.8$ million, including three current period investments totaling $\$ 14.8$ million. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. Direct investments in the assessment area provided support for affordable housing by providing equity for LIHTC projects or investing in funds that finance LIHTC projects. The bank has provided direct investments in LIHTC projects to support 355 units of housing affordable to low- and moderate-income

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individuals. The assessment area was also positively impacted by several community development program investments in statewide CDFIs. The broader regional investments primarily funded small businesses and startup companies through SBICs. Local community development credit needs include but are not limited to financing for small business and small farms, job creation, affordable housing for low- and moderate-income individuals, and household financial stability. The dollar volume of Regions Bank's current and total investments exhibits excellent responsiveness to some of the identified community needs, given the bank's presence in the assessment area.

The bank also made 14 contributions totaling $\$ 24,687$. In addition, the bank made several contributions to statewide and national organizations that benefit the assessment area. Contributions were given primarily to organizations involved in economic development and provision of community services targeted to low- and moderate-income individuals and communities.

## Service Test

The bank's service test performance in the Central Mississippi assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Central Mississippi assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 25 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open any branches and closed two branches (one in a moderate-income tract and one in a middle-income tract) in the Central Mississippi assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies or low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Central Mississippi

## Geographic Distribution of Branches

Assessment Area: MS Central MS


## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 223 service hours in various capacities for community development organizations, by participating in 20 different service activities. Many of the community development services focused on education and affordable housing that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered by providing financial education to low- and moderate-income individuals who qualified for no-interest mortgages.

## Non-Metropolitan Areas (Limited Review)

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

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

- Adams-Wilkinson Assessment Area (Adams and Wilkinson Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $2.9 \%$ of its branches in Mississippi.
o As of June 30, 2011, the bank had $\$ 467.6$ million in deposits in this assessment area, representing a market share of $45.2 \%$ and $6.7 \%$ of Regions Bank’s total deposits in Mississippi.
- Northern Mississippi Assessment Area (Alcorn, Benton, Tippah, Union, Lee, Prentiss, Calhoun, Chickasaw, Grenada, Lafayette, Panola and Yalobusha Counties)
o As of December 31, 2011, Regions Bank operated 21 branches in the assessment area, representing $15.0 \%$ of its branches in Mississippi.
o As of June 30, 2011, the bank had $\$ 911.9$ million in deposits in this assessment area, representing a market share of $15.7 \%$ and $13.0 \%$ of Regions Bank's total deposits in Mississippi.
- Northwest Mississippi Assessment Area (Bolivar, Coahoma, Leflore, Sunflower, Tallahatchie and Washington Counties)
o As of December 31, 2011, Regions Bank operated 17 branches in the assessment area, representing $12.1 \%$ of its branches in Mississippi.
o As of June 30, 2011, the bank had $\$ 456.4$ million in deposits in this assessment area, representing a market share of $15.7 \%$ and $6.5 \%$ of Regions Bank's total deposits in Mississippi.
- Southeast Mississippi Assessment Area (Lawrence, Lincoln, Pike, Covington, Jefferson Davis, Jones, Marion, Pearl River and Wayne Counties)
o As of December 31, 2011, Regions Bank operated 16 branches in the assessment area, representing $11.4 \%$ of its branches in Mississippi.
o As of June 30, 2011, the bank had $\$ 649.0$ million in deposits in this assessment area, representing a market share of $15.0 \%$ and $9.2 \%$ of Regions Bank's total deposits in Mississippi.
- Yazoo-Warren Assessment Area (Yazoo and Warren Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $2.9 \%$ of its branches in Mississippi.
o As of June 30, 2011, the bank had $\$ 179.1$ million in deposits in this assessment area, representing a market share of $17.5 \%$ and $2.6 \%$ of Regions Bank's total deposits in Mississippi.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

## Non-Metropolitan Areas (Limited Review)

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Adams-Wilkinson | Consistent | Not Consistent <br> (Below) | Not Consistent (Below) |
| Northern <br> Mississippi | Not Consistent <br> (Above) | Not Consistent <br> (Below) | Consistent |
| Northwest <br> Mississippi | Not Consistent <br> (Above) | Not Consistent <br> (Below) | Not Consistent (Below) |
| Southeast <br> Mississippi | Consistent | Not Consistent <br> (Above) | Not Consistent (Below) |
| Yazoo-Warren | Not Consistent <br> (Above) | Not Consistent <br> (Below) | Not Consistent (Below) |

As stated earlier, the Central Mississippi and Jackson assessment areas received full-scope reviews, and the bank's performance in the Jackson assessment area was given greater consideration in determining the overall rating for the state. Jackson is by far the bank’s largest market in Mississippi in terms of deposits, loans, and branches. The full-scope areas selected together represent $53.1 \%$ of the deposits in the assessment areas in Mississippi as well as $42.9 \%$ of the branches. The full-scope assessment areas also represent $38.8 \%$ of the HMDA loans and $52.1 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits and a large portion of the branches and loans in the State of Mississippi.

For the Lending Test, performance was stronger than the bank's performance in the state in three of the limitedscope assessment areas (Northern Mississippi, Northwest Mississippi, and Yazoo-Warren) and consistent in the remaining limited-scope assessment areas (Adams-Wilkinson and Southeast Mississippi).

For the Investment Test, the performance in the Southeast Mississippi limited-scope assessment area was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment area. The performance in four limited-scope assessment areas (AdamsWilkinson, Northern Mississippi, Northwest Mississippi and Yazoo-Warren) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in four limited-scope assessment areas (Adams-Wilkinson, Northwest Mississippi, Southeast Mississippi and Yazoo-Warren) was weaker than the bank's performance in the state. Weaker performance in the four assessment areas was primarily attributable to fewer community development services, while the accessibility of delivery services was an additional factor in the Adams-Wilkinson and Southeast Missouri assessment areas. The performance in the Northern Mississippi assessment area was consistent with the bank's performance in the state.

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

## Missouri

## CRA RATING FOR MISSOURI: Satisfactory ${ }^{573}$

## The Lending Test is rated: Low Satisfactory <br> The Investment Test is rated: <br> The Service Test is rated: <br> Low Satisfactory <br> Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides an adequate level of qualified community development investments and grants in the assessment areas although rarely in a leadership position in response to the community development needs of the assessment areas.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides an adequate level of community development services throughout the assessment areas.

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## SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in the State of Missouri:

- St. Genevieve-Perry (non-MSA)
- Southeast Missouri (non-MSA)

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

- Cape Girardeau
- Central Missouri (non-MSA)
- Columbia
- Jefferson City
- Lawrence (non-MSA)
- Springfield
- Taney (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 MISSOURI

As of December 31, 2011, Regions Bank operated 33 branch offices in Missouri representing $1.9 \%$ of the bank's total branches. As of June 30, 2011, the bank had $\$ 753.3$ million in deposits in Missouri representing $0.8 \%$ of Regions Bank’s total deposits. Additionally, as of June 30, 2011, the bank ranked $7^{\text {th }}$ among 382 insured institutions in deposit market share, with $1.8 \%$ of the deposits within the state. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 1,459 (1.7\%) were in Missouri. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 744 (0.7\%) were in Missouri.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test performance in Missouri is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs in both the Southeast Missouri and St. Genevieve-Perry assessment areas.

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

Although Regions Bank is both a small business and HMDA lender, HMDA lending was given greater consideration in determining the lending test rating for Missouri because the bank originated more HMDA loans by number than small business loans. Additionally, the Southeast Missouri assessment area received slightly greater consideration when determining the rating because it holds a greater percentage of the bank’s deposits and branch offices in the state of Missouri than the other full-scope assessment area. Furthermore, Regions Bank originated only 98 small farm loans in Missouri during the review period; therefore, no detailed discussion of these loans is included in this section of the report.

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Missouri assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

# Statewide Summary of Lending Activity 

## Assessment Areas Located in <br> Missouri

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | $\mathbf{\%}$ |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 351 | $15.9 \%$ | $\$ 42,702$ | $18.8 \%$ |
| HMDA Refinance | 1,051 | $47.7 \%$ | $\$ 127,850$ | $56.2 \%$ |
| HMDA Home Improvement | 57 | $2.6 \%$ | $\$ 576$ | $0.3 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{1 , 4 5 9}$ | $\mathbf{6 6 . 2 \%}$ | $\mathbf{\$ 1 7 1 , 1 2 8}$ | $\mathbf{7 5 . 2 \%}$ |
| Total Small Business | $\mathbf{6 4 6}$ | $\mathbf{2 9 . 3} \%$ | $\mathbf{\$ 4 5 , 1 9 9}$ | $\mathbf{1 9 . 9 \%}$ |
| Total Farm | $\mathbf{9 8}$ | $\mathbf{4 . 4 \%}$ | $\mathbf{\$ 1 1 , 1 2 2}$ | $\mathbf{4 . 9 \%}$ |
| TOTAL LOANS | $\mathbf{2 , 2 0 3}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 2 2 7 , 4 4 9}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank's HMDA and small business loans is adequate. The geographic distribution was adequate in the Southeast Missouri assessment area. Although there are no low- or moderateincome census tracts in the St. Genevieve-Perry assessment area, an evaluation of the geographic distribution was conducted based on lending in middle- and upper-income tracts. The bank's geographic distribution performance in St. Genevieve-Perry was adequate.

Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered good in St. Genevieve-Perry, while it is considered adequate in Southeast Missouri. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes a low level of community development loans in the Missouri assessment areas. The bank made one community development loan for $\$ 1.2$ million during the review period, which represented $0.1 \%$ by number and $0.1 \%$ by dollar amount of the bank's community development lending. The one loan promoted economic development and was originated in the Southeast Missouri assessment area. There was no community development lending in the St. Genevieve-Perry assessment area. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating for the State of Missouri is Low Satisfactory when considering the bank’s statewide performance and its overall presence in the state. The bank made adequate use of qualified investments and contributions and exhibited adequate responsiveness to credit and community development needs through its investment activities in the Southeast Missouri assessment area, although performance in St. Genevieve-Perry was poor.

## Missouri

The bank made 11 qualified investments of approximately $\$ 5.3$ million and contributions of $\$ 11,350$ within the Missouri assessment areas. Of the 11 investments, 2 totaling $\$ 3.6$ million were current period investments. Most of the investments provided support for affordable housing through HUD bonds, GNMA investment instruments and the purchase of Low Income Housing Tax Credits (LIHTCs) or investments in LIHTC funds. The bank also had investments that benefitted a broader regional area that includes Missouri. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs. The bank also made contributions to national organizations that may provide indirect benefit to low- and moderate-income individuals or communities within the Missouri assessment areas.

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

## Service Test

The service test rating is High Satisfactory when considering the bank's statewide performance in Missouri.

## Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank’s geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

## Community Development Services

The bank provides an adequate level of community development services that benefit residents and small businesses of the assessment areas. Out of the two full-scope assessment areas, community development services were good in the Southeast Missouri assessment area and poor in the St. Genevieve-Perry 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 MISSOURI METROPOLITAN ASSESSMENT AREAS

- Cape Girardeau Assessment Area (Cape Girardeau County)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $12.1 \%$ of its branches in Missouri.
o As of June 30, 2011, the bank had $\$ 168.7$ million in deposits in this assessment area, representing a market share of $10.8 \%$ and $22.4 \%$ of Regions Bank's total deposits in Missouri.
- Columbia Assessment Area (Boone County)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $12.1 \%$ of its branches in Missouri.
o As of June 30, 2011, the bank had $\$ 69.1$ million in deposits in this assessment area, representing a market share of $2.5 \%$ and $9.2 \%$ of Regions Bank's total deposits in Missouri.
- Jefferson City Assessment Area (Callaway and Cole Counties)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $6.1 \%$ of its branches in Missouri.
o As of June 30, 2011, the bank had $\$ 48.3$ million in deposits in this assessment area, representing a market share of $1.4 \%$ and $6.4 \%$ of Regions Bank's total deposits in Missouri.
- Springfield Assessment Area (Christian, Greene and Polk Counties)
o As of December 31, 2011, Regions Bank operated six branches in the assessment area, representing 18.2\% of its branches in Missouri.
o As of June 30, 2011, the bank had $\$ 107.3$ million in deposits in this assessment area, representing a market share of $1.6 \%$ and $14.2 \%$ of Regions Bank's total deposits in Missouri.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Cape <br> Girardeau | Not Consistent <br> (Below) | Not Consistent (Above) | Consistent |
| Columbia | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |
| Jefferson <br> City | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Springfield | Not Consistent <br> (Below) | Consistent | Not Consistent (Below) |

## Metropolitan Areas (Limited Review)

The Southeast Missouri and St. Genevieve-Perry assessment areas received full-scope reviews, and the bank's performance in both the Southeast Missouri and St. Genevieve-Perry assessment areas were given similar consideration in determining the overall rating for the state. Southeast Missouri is one of the bank's largest markets in Missouri in terms of deposits, loans, and branches. The full-scope areas selected together represent $28.0 \%$ of the deposits in the assessment areas in Missouri as well as $27.3 \%$ of the branches. The full-scope assessment areas also represent $22.1 \%$ of the HMDA loans and $32.3 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent a large portion of the deposits, branches and loans in the State of Missouri.

For the Lending Test, performance in all four limited-scope assessment areas was weaker than the bank's performance in the state. Weaker performance was attributable to the geographic distribution of loans and lower levels of community development loans relative to the bank's operations in the assessment areas.

For the Investment Test, the performance in the Cape Girardeau limited-scope assessment area was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment area. The performance in two limited-scope assessment areas (Columbia and Jefferson City) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas. The performance in the Springfield limited-scope assessment area was consistent with the bank's performance in the state.

For the Service Test, the performance in two limited-scope assessment areas (Cape Girardeau and Jefferson City) was consistent with the bank's performance in the state. The performance in both the Columbia and Springfield assessment areas was weaker than the bank's performance in the state due fewer community development services.

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

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. GENEVIEVE-PERRY ASSESSMENT AREA

The St. Genevieve-Perry assessment area includes two counties: Perry and St. Genevieve. There are nine census tracts, all middle- and upper-income; there are no low- or moderate-income tracts inside the assessment area. The bank operates two branches in the assessment area.

## Population and Income Characteristics

Population growth in the St. Genevieve-Perry assessment area was modest from 2000 to 2010 compared to the state of Missouri. Statewide, the population grew by 7\% during this time period while the assessment area grew by only $3.2 \%$. According to census data, the population of the assessment area in 2010 was 37,116, representing less than $1 \%$ of the total statewide population. Roughly half of the assessment population lives in each county. Additionally, net migration in the assessment area was negative from 2008 to 2010. Net migration is defined as the number of in-migrant individuals less the number of out-migrant individuals and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns for a particular year. ${ }^{574}$

Food stamp usage in the assessment is trending upward. From 2000 to 2009, the percentage of assessment area residents receiving food stamps increased by $139 \%$, which is greater than the statewide increase of $99 \%$. As of 2009, $14.2 \%$ of Perry County residents and $12.9 \%$ of St. Genevieve County residents received food stamps, compared to $14.7 \%$ statewide. Regarding people living in poverty, the statewide poverty rate as of 2009 was $13.7 \%$, which was nearly three percentage points higher than St. Genevieve County and four percentage points higher than Perry County.

Participation in the free and reduced price lunch programs can also be used to understand the income characteristics of a population. As of 2010, there were four school districts inside the assessment area, and only one in St. Genevieve County had more than $50 \%$ of its students receiving free or reduced price lunch benefits. While participation in the program has increased over the 10-year period, only the one school district in St. Genevieve County had more than $50 \%$ of its students receiving free or reduced price lunch benefits in 2000.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 and 2011 for the non-metro areas in Missouri. It provides a range of the estimated annual family income for each income category (low, moderate, middle and upper) and shows that the median income for the non-metro areas increased by $\$ 1,500$ or $3.3 \%$ from 2010 to 2011.

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## St. Genevieve-Perry Missouri

## Borrower Income Levels <br> Missouri State Non-Metro

| HUD Estimated Median <br> Family Income | Low |  |  | Moderate |  | Middle |  |  | Upper |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\mathbf{2 0 1 0}$ | $\mathbf{\$ 4 5 , 7 0 0}$ | 0 | - | $49.99 \%$ | $50 \%$ | - | $79.99 \%$ | $80 \%$ | - | $119.99 \%$ | $120 \%$ | - |
| $\mathbf{2 0 1 1}$ | $\mathbf{\$ 4 7 , 2 0 0}$ | 0 | - | $\$ 23,849$ | $\$ 22,850$ | - | $\$ 36,559$ | $\$ 36,560$ | - | $\$ 54,839$ | $\$ 54,840$ | - |

## Housing Characteristics

Housing in the assessment area was impacted by the recent recession but remains stable and affordable relative to the state of Missouri and the United States. Between 2005 and 2009, the estimated median value of an owner-occupied housing unit was between $\$ 115,000$ and $\$ 127,000$. This compares to $\$ 134,500$ for the state of Missouri and $\$ 185,400$ nationwide. Both the state of Missouri and the United States also saw more drastic increases in home values than each of the counties in the assessment area from 2000 to 2009. During this time period, the median value of an owner-occupied home inside the assessment area increased between $42 \%$ and $50 \%$ compared to $55 \%$ statewide and $66 \%$ nationwide. ${ }^{575}$

Census data shows that there were 15,883 housing units in the assessment area in 2000, of which $69.1 \%$ were owner-occupied, $16.1 \%$ were rental units and $14.8 \%$ were vacant. There are no low- or moderate-income tracts in the assessment area. The median age of housing stock across the assessment area was 29 years. Singlefamily housing permit activity was not substantial from 2000 to 2010. The largest decrease in activity occurred between 2007 and 2008 when permits issued dropped from 47 to $17 .{ }^{576}$ Twenty single-family permits were issued in 2011. Multi-family residential development is not a significant source of housing inside the assessment area.

Mortgage delinquencies and reduced loan demand also impacted the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $3 \%$ in January 2010 to $5 \%$ in December 2011. ${ }^{577}$ While this creates challenges for the local economy, these mortgage delinquency figures are lower than many other areas of the country. Regarding lending activity, HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings was weak, declining from a high of 353 loans in 2006 to 176 in 2010, a reduction of $50 \%$. In St. Genevieve County, home purchase loan activity saw a sizeable increase from 2009 to 2010. Refinance activity, on the other hand, has remained strong, actually experiencing an increase of $15 \%$ from 2006 to 2010, although activity was down in 2008 compared to other years.

## Employment and Economic Conditions

The economy of Southeast Missouri has been relatively stable, but economic activity is limited. Based on total employment, Perry County is the employment center of the assessment area with nearly 13,000 jobs. Leading private sector industries in the county include manufacturing and retail trade. Local government is also a key employer. St. Genevieve County exhibits a similar employment sector framework. Some of the largest area employers include Gilster-Mary Lee Corporation, TG Missouri Corporation, Mississippi Lime Company and St.

[^185]
## St. Genevieve-Perry Missouri

Genevieve County Memorial Hospital. The assessment area also benefits from Southeast Missouri State University, which is located in adjacent Cape Girardeau County

In 2007, the Southeast Missouri Regional Planning and Economic Development Commission produced a Comprehensive Economic Development Strategy document that outlined numerous challenges and opportunities for the region with regard to economic development. Seven goals are outlined in the plan, including increased employment opportunities; improvements to infrastructure and transportation networks; increased regional unity; the development of affordable housing and enhanced quality of life measures such as health care, education and recreation; and the development of a revolving loan pool to finance local development projects for which grant or other public programs may not be available. ${ }^{578}$ The plan also outlines several opportunities for private sector and community involvement in development projects.

Workforce development has been a recent focus for the regional economy. In 2007, the US Labor Department awarded the region a $\$ 5$ million grant for the Workforce Innovation in Regional Economic Development Initiative, or WIRED, which was managed by Workforce Investment Board of Southeast Missouri. Overall, the money funded 79 projects in 14 counties, including both counties in the assessment area. The program provided for education and business-driven programs at area institutions of higher learning including Southeast Missouri State University as well as workforce certification programs, green technology initiatives and health care education programs. ${ }^{579}$ These themes of workforce development are reinforced in the Workforce Investment Board's Strategic Plan for 2010.

The Southeast Workforce Investment Area (WIA) consists of 13 counties in the southeastern corner of Missouri. It accounts for $5 \%$ of the state's workforce. The region is a mix of farms, small towns, and historical landmarks bordered to the east by the Mississippi River. Missouri’s Bootheel has some of the richest farmland in the state. The fastest growing industries in the region include oil/gas extraction, motion picture/sound recording, social assistance, and waste management. The highest paying industries include pipeline transportation, beverage/tobacco product manufacturing, and federal civilian. ${ }^{580}$

The following chart shows unemployment rates for the assessment area relevant to the State of Missouri for 2010 and 2011.

## Unemployment Rates

Assessment Area: MO St. Genevieve-Perry

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Perry County | 6.4 | 6.2 |
| Ste. Genevieve County | 9.4 | 8.8 |
| Missouri | $\mathbf{9 . 4}$ | $\mathbf{8 . 6}$ |

Not Seasonally Adjusted

[^186]
## St. Genevieve-Perry Missouri

Unemployment remains a challenge for the region and counties comprising the assessment area, but home prices remain relatively affordable while loan demand has not decreased to the same degree of many other markets across the state and nation. The assessment area economy appears to be in a stable position, but lack of population growth many present a challenge to its future development.

## Community Contacts and Community Development Opportunities

One community contact specializing in community services for low-income individuals and families was interviewed to discuss local community development issues. The contact noted that the local economy has experienced challenges in recent years but it is improving. Manufacturing has been a hard hit sector of the economy as a result of recent recession and as a result, a primary economic development need for the community is job development for low- and moderate-income individuals. The contact added that many municipal governments are engaged in initiatives to incentivize companies to locate and hire in the local area. Additionally, local universities are looking to expand their scope in order to provide educational services to the local workforce. Regarding financial institution participation in local community development initiatives, the contact noted that while banks are doing their best to be responsive, more assistance is needed with programs such as Individual Development Accounts, Head Start programs and pay cards.

Bank On is a national initiative with local programs focused on connecting unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $5.8 \%$ of households in St. Genevieve are unbanked compared to 8.2\% statewide. Additionally, $18.6 \%$ of households in St. Genevieve are listed as underbanked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $19.3 \%$ of underbanked households statewide. ${ }^{581}$

The state of Missouri received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. Missouri received nearly $\$ 43$ million under the NSP1 allocation process and $\$ 5$ million under NSP3. While funds are available for various affordable housing and disaster recovery projects, the majority of dollars are earmarked for projects outside of the assessment area. ${ }^{582}$

There are 10 certified community development financial institutions (CDFIs) located in Missouri comprised of credit unions and loan funds. All of the CDFIs in the state are located in St. Louis and Kansas City; none are located inside the assessment area. Community development opportunity also includes participation in the Low Income Housing Tax Credit (LIHTC) Program, which provided an estimated $\$ 12.5$ million in tax credits to the state of Missouri in 2012 for the provision of affordable housing. ${ }^{583}$ The state of Missouri also offers a separate LIHTC program for affordable housing development.

## Competition

The St. Genevieve-Perry assessment area is a small banking market with several local institutions. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 10 financial institutions operating 17

[^187]
## St. Genevieve-Perry Missouri

branch locations with a total of $\$ 895$ million in deposits inside the assessment area. Regions Bank ranked $5^{\text {th }}$ with deposit market share of $8.4 \%$ ( $\$ 75$ million). The Bank of Missouri had the largest deposit market share at 32.2\% followed by Bank of Bloomsdale with 15.0\% and First Bank with 9.7\%.

Regions Bank is a lending leader inside the assessment area. In 2010, the bank was the number one lender out of 26 small business and small farm loan reporters by originating $17.2 \%$ of all loans. In 2011, the bank was again ranked first out of 29 reporters with $18.6 \%$ of the loans. From 2010 to 2011, the bank increased its loans from 65 to 87. For HMDA lending, Regions Bank ranked fourth in 2010 with $6.7 \%$ of all HMDA loans and sixth in 2011 with $4.8 \%$. Loan production decreased from 84 units in 2010 to 59 units in 2011. Bank of Bloomsdale, Bank of America and US Bank were consistently the top HMDA lenders in the assessment area.

Demographic Characteristics
The following table shows selected demographic information for the St. Genevieve-Perry assessment area.

## St. Genevieve-Perry Missouri

## Combined Demographics Report

Assessment Area: MO St. Genevieve-Perry

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 1,087 | 11.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 1,527 | 15.4 |
| Middle-income | 3 | 33.3 |  | 25.3 | 136 | 5.4 | 2,194 | 22.2 |
| Upper-income | 6 | 66.7 |  | 74.7 | 418 | 5.6 | 5,094 | 51.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 9 | 100.0 |  | 100.0 | 554 | 5.6 | 9,902 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 3,967 |  |  | 68.5 | 777 | 19.6 | 474 | 11.9 |
| Upper-income | 11,866 |  |  | 69.3 | 1,771 | 14.9 | 1,869 | 15.8 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 15,833 | 10,942 |  | 69.1 | 2,548 | 16.1 | 2,343 | 14.8 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 374 | 22.9 |  | 23.7 | 13 | 13.0 | 14 | 19.4 |
| Upper-income | 1,261 | 77.1 |  | 76.3 | 87 | 87.0 | 58 | 80.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 1,635 | 100.0 |  | 100.0 | 100 | 100.0 | 72 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.5 |  | 6.1 | 4.4 |  |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 78 | 31.8 |  | 31.8 | 0 | 0.0 | 0 | 0.0 |
| Upper-income | 167 | 68.2 |  | 68.2 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 245 | 100.0 |  | 100.0 | 0 | . 0 | 0 | . 0 |
|  | Percentage of Total Farms: |  |  | 100.0 |  | . 0 |  | . 0 |

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Regions Bank's lending performance in the St. Genevieve-Perry assessment area is adequate. There are no lowor moderate-income census tracts in this assessment area. The distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes few, if any, community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 143 (55.0\%) HMDA loans compared to 117 (45.0\%) small business loans in the St. Genevieve-Perry assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The St. Genevieve-Perry assessment area contains $0.1 \%$ of the bank's small business and HMDA lending by number of loans and $0.1 \%$ by dollar volume totaling $\$ 21.3$ million. In comparison, $0.1 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

Although there are no low- or moderate-income census tracts in the St. Genevieve-Perry assessment area, an evaluation of the geographic distribution was conducted based on lending in middle- and upper-income tracts. The bank's geographic distribution performance in the assessment area was adequate.

## HMDA Lending

Generally, the bank's HMDA lending to middle-income geographies was comparable to the percentage of owner-occupied units in middle-income tracts, as well as the aggregate lending in those tracts. The bank's HMDA lending to upper-income geographies was either greater than or comparable to the percentage of owneroccupied units in upper-income tracts. The bank's performance was also comparable to the aggregate lenders’ performance in upper-income tracts.

## Small Business Lending

The bank's small business lending in middle-income tracts was greater than both the percentage of small businesses in those tracts, as well as aggregate lenders' performance. The bank's performance in upper-income tracts was comparable to the percentage of small businesses located in those tracts. The bank's performance was also comparable to aggregate performance in upper-income tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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. During the review period, the bank originated four loans to low-income borrowers. However, at $13.8 \%$, the bank's percentage of home purchase lending to low-income borrowers exceeded the percentage of low-income families in the assessment area at $11.0 \%$. Given that there were no loans originated in 2010, the bank’s performance was less than the aggregate. However, with its four loans, Regions Bank's performance exceeded the aggregate in 2011.

## St. Genevieve-Perry Missouri

Home purchase lending to moderate-income borrowers is excellent. At $34.5 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at 15.4\%; also, the bank's performance exceeded the aggregate performance in both 2010 and in 2011.

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

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is excellent when compared to the percentage of low-income families in the assessment area and to the aggregate lenders. The bank's percentage of home refinance lending to low-income borrowers at $8.3 \%$ was less than the percentage of low-income families in the assessment area at $11.0 \%$; however, Regions Bank's performance was better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is adequate. The bank made $13.0 \%$ of its refinance loans to moderate-income borrowers. Moderate-income families make up $15.4 \%$ of total families in the assessment area. Regions Bank’s performance was comparable to the aggregate in 2010 and greater than aggregate in 2011.

The bank's refinance lending to middle-income borrowers was equal to the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is poor. Low-income families constitute $11.0 \%$ of the families in the assessment area, but the bank originated no home improvement loans to lowincome borrowers. The aggregate lending in this segment of the market was also less than the area demographic.

The bank's home improvement lending to moderate-income borrowers is adequate. During the review period, the bank originated a total of six home improvement loans of which two (33.3\%) were to moderate-income borrowers. As such, the bank's performance exceeded both the area demographic and the aggregate performance in 2010 and 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is good. The bank's performance was better than the aggregate in 2010 but below the aggregate in 2011. The bank originated $50.4 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.5 \%$. However, of the 117 small business loans originated during the review period, 41 loans ( $35.0 \%$ ) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $77.6 \%$, which is less than the percentage of businesses in the St. Genevieve-Perry assessment area that are considered small businesses at $89.5 \%$. However, $90.6 \%$ of the 117 originated small business loans were in amounts of $\$ 100,000$

## St. Genevieve-Perry Missouri

or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was slightly better than the aggregate in both 2010 and 2011.

## Community Development Lending

Regions Bank makes few, if any, community development loans in the St. Genevieve-Perry assessment area. The bank originated no community development loans during the review period. Local community development credit needs include but are not limited to neighborhood stabilization, financing for small businesses and small farms, job growth, and workforce development, none of which have been responded to by the bank through community development lending.

## Investment Test

Regions Bank's investment test performance in the St. Genevieve-Perry assessment area is poor. The bank had one investment of approximately $\$ 100,000$ and no current period investments. The bank's prior period investment in the assessment area supported affordable housing and community development through a HUD bond. The bank also had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs.

The bank made one contribution for $\$ 500$ to an organization that provides community services targeted to lowand moderate-income individuals. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area.

Community development needs include, but are not limited to, affordable housing for low- and moderateincome individuals, neighborhood stabilization, job growth, and workforce development. Regions Bank's investments and contributions are not considered responsive to the identified community needs, given the bank's presence in the assessment area.

## Service Test

The bank's service test performance in the St. Genevieve-Perry assessment area is poor. Its retail and community development services reflect poor responsiveness to the needs of the St. Genevieve-Perry, assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. There are no low- or moderate-income geographies located in the St. Genevieve-Perry assessment area. The distribution of the two branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open or close any branches in the St. Genevieve-Perry assessment area. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

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## Geographic Distribution of Branches

Assessment Area: MO St. Genevieve-Perry

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | al Branch \% | $\begin{gathered} \text { Open } \\ \# \end{gathered}$ | Closed \# | Drive <br> thrus <br> \# | Extend- <br> ed <br> Hours <br> \# | Weekend Hours \# | Census <br> Tracts |  | Households $\%$ | Total <br> Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Moderate | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Middle | Total | 1 | 50.0\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 3 | 33.3\% | 25.9\% | 22.9\% |
| Upper | Total | 1 | 50.0\% | 0 | 0 | 1 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 6 | 66.7\% | 74.1\% | 77.1\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 2 | 100.0\% | 0 | 0 | 2 | 2 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 9 | 100.0\% | 100.0\% | 100.0\% |
| DTO - Drive Thru Only <br> LS - Limited Service |  |  |  |  |  |  |  |  |  |  |  |  |

## Community Development Services

Regions Bank provides a limited level of community development services in the assessment area, and improvement is needed. Regions Bank has limited exposure in the St. Genevieve-Perry assessment area; nevertheless, the bank should identify community organizations serving low- and moderate-income individuals or families and determine what opportunities for participation may be available. According to information obtained from community contacts, there are opportunities for financial institutions to participate in community development services in the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

## NON-METROPOLITAN STATEWIDE AREA

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SOUTHEAST MISSOURI ASSESSMENT AREA

The Southeast Missouri assessment area includes the following five counties: Butler, Mississippi, New Madrid, Scott and Stoddard. There are 37 census tracts in the assessment area, of which seven are moderate-income tracts, 29 are middle-income tracts and one is an upper-income tract. There are no low-income census tracts in the assessment area. The bank has seven branches located in the assessment area, of which two (29\%) are in moderate-income tracts.

The Southeast Missouri assessment area is a relatively small banking market with many smaller, local institutions. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 23 financial institutions operating 78 branch locations with a total of $\$ 2.7$ billion in deposits. Regions Bank ranked $11^{\text {th }}$ with deposit market share of $5.0 \%$ ( $\$ 135.7$ million). Southern Bank had the largest deposit market share at $9.7 \%$ followed by Montgomery Bank with $9.6 \%$ and Focus Bank with $8.1 \%$.

This lending market is dominated by a few relatively high volume lenders, and Regions Bank is an active participant. In 2010, the bank ranked $11^{\text {th }}$ out of 31 small business and small farm loan reporters by originating $3.6 \%$ of all loans. In 2011, the bank was $6^{\text {th }}$ out of 37 reporters and increased its CRA lending performance to $6.1 \%$ of the loans. From 2010 to 2011, the bank's loans increased from 43 to 86 loans. For HMDA lending, Regions Bank ranked $9^{\text {th }}$ in 2010 with $3.5 \%$ of all HMDA loans and $10^{\text {th }}$ in 2011 with $3.1 \%$. Loan production decreased from 96 units in 2010 to 83 units in 2011. JPMorgan Chase Bank, US Bank, and Southern Bank were consistently the top HMDA lenders in the assessment area.

## Demographic Characteristics

Population growth in the Southeast Missouri assessment area remained relatively flat from 2000 to 2010 compared to the state of Missouri, which experienced a population growth rate of $7 \%$. According to census data, the population of the assessment area in 2010 was 145,267 , representing $2.4 \%$ of the total statewide population. The most populous county in the assessment area, Butler County, grew by $4.7 \%$ from 2000 to 2010, while Scott and New Madrid counties experienced population declines. Additionally, net migration in the assessment area was negative across the assessment area from 2005 to 2009, peaking in 2008 with a loss of 493 people. Net migration is defined as the number of in-migrant households less the number of out-migrant households and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns for a particular year. ${ }^{584}$

The following table shows selected demographic information for the Southeast Missouri assessment area.

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## Combined Demographics Report

Assessment Area: MO Southeast MO


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Income Characteristics

Food stamp usage in the assessment area was on the rise. From 2000 to 2009, the percentage of assessment area residents receiving food stamps increased by $53.2 \%$, which was less than the statewide increase of $99 \%$. As of 2009, Stoddard County had the lowest number of residents receiving food stamps at $19.1 \%$, and Mississippi County had the highest number at $30.1 \%$. Nearly $26 \%$ of residents in the relatively densely populated Butler County received food stamps in 2009, up $77 \%$ from 2000. With regard to people living in poverty, the statewide poverty rate increased at a faster rate than that nationally as a whole from 2000 to 2009, while the counties comprising the assessment area fluctuated between increases and decreases. At the high end, the poverty rate in Scott County increased by 23\% from 2000 to 2009, compared to an $8 \%$ decrease in New Madrid County. ${ }^{585}$

Participation in the free and reduced price lunch programs can also be used to understand the income characteristics of a population. As of 2010, there were 25 school districts inside the Southeast Missouri assessment area, and all but three had more than $50 \%$ of students participating in the free or reduced price lunch program. The percentage of students receiving benefits in Butler County school districts in 2010 ranged from a low of $57 \%$ to a high of $73 \% .{ }^{586}$ These statistics are an indicator that many families have been impacted by reduced incomes and are relying on government assistance to meet basic needs.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 and 2011 for the non-metro areas in Missouri. It provides a range of the estimated annual family income for each income category (low, moderate, middle and upper) and shows that the median income for the non-metro areas increased by \$1,500 or 3.3\% from 2010 to 2011.

## Borrower Income Levels

Missouri State Non-Metro

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$45,700 | 0 | - | \$22,849 | \$22,850 | - | \$36,559 | \$36,560 | - | \$54,839 | \$54,840 | - | \& above |
| 2011 | \$47,200 | 0 | - | \$23,599 | \$23,600 | - | \$37,759 | \$37,760 | - | \$56,639 | \$56,640 | - | \& above |

## Housing Characteristics

Census data estimates indicate that home values in the Southeast Missouri assessment area are affordable relative to the state of Missouri and the nation as a whole. Between 2005 and 2009, the estimated median value of an owner-occupied housing unit ranged from a low of $\$ 63,800$ in New Madrid County to a high of $\$ 92,100$ in Scott County. This compares to $\$ 134,500$ for the state of Missouri and $\$ 185,400$ nationwide. Both the state of Missouri and the United States saw more drastic increases in home values than each of the counties in the

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## Southeast Missouri

assessment area from 2000 to 2009. During this time period, the median value of an owner-occupied home inside the assessment area increased between $40 \%$ and $46 \%$ compared to $55 \%$ statewide and $66 \%$ nationwide. ${ }^{587}$

Census data shows that there were 63,319 housing units in the assessment area in 2000, of which $62.7 \%$ were owner-occupied, $28.3 \%$ were rental units and $9.0 \%$ were vacant. While a majority of units were owneroccupied, more than $50 \%$ of housing units in moderate-income tracts were rental units and vacant, indicating reduced opportunities for mortgage origination in these geographies. There are no low-income tracts in the assessment area. The median age of housing stock across the assessment area was 30 years, but this figure increased to 38 years in moderate-income tracts and 40 years in upper-income tracts. Housing permits declined, with single-family permits down by $55 \%$ from 2005 and 2011. ${ }^{588}$ Multi-family residential development was not a significant source of housing inside the assessment area.

Mortgage delinquencies and reduced loan demand also impacted the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $5.3 \%$ in January 2010 to $8.7 \%$ in December 2011. ${ }^{589}$ Furthermore, HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings was weak, declining from a high of 937 loans in 2005 to 560 in 2010, a reduction of more than $40 \%$. Refinance activity, on the other hand, has not declined as drastically, likely due to the current low interest-rate environment. ${ }^{590}$

## Employment and Economic Conditions

The economy of Southeast Missouri has been relatively stable, but economic activity is limited. Much of the region is agricultural-based, and drought conditions have created challenges for the agriculture-based economy. Butler and Scott counties have the largest concentration of economic activity, accounting for approximately $63 \%$ of jobs inside the assessment area in 2010. Health care and social assistance, retail trade, and manufacturing made up the largest private sector industries across the two counties.

In 2007, the Southeast Missouri Regional Planning and Economic Development Commission produced a Comprehensive Economic Development Strategy document that outlined numerous challenges and opportunities for the region with regard to economic development. Seven goals are outlined in the plan, including increased employment opportunities; improvements to infrastructure and transportation networks; increased regional unity; the development of affordable housing and enhanced quality of life measures such as health care, education and recreation; and the development of a revolving loan pool to finance local development projects for which grant or other public programs may not be available. ${ }^{591}$ The plan also outlines several opportunities for private sector and community involvement in development projects.

Workforce development has been a recent focus for the regional economy. In 2007, the US Labor Department awarded the region a $\$ 5$ million grant for the Workforce Innovation in Regional Economic Development Initiative, or WIRED, which was managed by Workforce Investment Board of Southeast Missouri. Overall, the money funded 79 projects in 14 counties, including all five counties in the assessment area. The program provided for education and business-driven programs at area institutions of higher learning, including Southeast

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## Southeast Missouri

Missouri State University, as well as workforce certification programs, green technology initiatives, and health care education programs. ${ }^{592}$

Each of the five counties in the assessment area participates in the state's enhanced enterprise zone program. While the standard enterprise zone program was phased out in 2004, the enhanced program provides tax credits to new or expanding businesses in specified geographic areas designated by local governments and certified by the Department of Economic Development. Zone designation is based on certain demographic criteria, the potential to create sustainable jobs in a targeted industry, and a demonstrated impact on local industry cluster development. The state offers numerous other development-oriented programs under the headings of business development, community development, housing development, redevelopment, workforce training, disaster relief, infrastructure and site development, and small business development. ${ }^{593}$

The following chart shows unemployment rates for the assessment area relevant to the state of Missouri for 2010 and 2011.

## Unemployment Rates

Assessment Area: MO Southeast MO

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Butler County | 8.2 | 8.2 |
| Mississippi County | 10.0 | 10.5 |
| New Madrid County | 8.9 | 9.5 |
| Scott County | 8.8 | 8.6 |
| Stoddard County | 8.9 | 9.0 |
| Missouri | $\mathbf{9 . 4}$ | $\mathbf{8 . 6}$ |

Not Seasonally Adjusted

Unemployment remains a challenge for the region and counties comprising the assessment area. While home values have maintained their affordability, building permit activity continues at low levels. Like many other areas, mortgage delinquencies and weak loan demand continue to create challenges for the local economy, but numerous economic development initiatives are in place at the local and state levels to provide economic stability and aid in continued recovery.

## Community Contacts and Community Development Opportunities

One community contact specializing in regional economic development was interviewed for the Southeast Missouri assessment area and discussed the area's growing need for affordable housing and additional workforce development programs. Due to the changing demographics of the region, the need for affordable housing units presents an opportunity for financial institutions to get more engaged in the local community, although the contact noted that generally speaking, community development needs are being met by banks. Additionally, the contact focused on the need for training at local jobs and cross training so that employees have room for growth and expansion to other areas within an organization. With the population decreasing in some

[^192]areas, youth workforce development and interaction with local businesses are important to keep younger people in the community.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending performance in the Southeast Missouri assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 179 (66.1\%) HMDA loans compared to 92 (33.9\%) small business loans in the Southeast Missouri assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Southeast Missouri assessment area contains $0.1 \%$ of the bank's small business and HMDA lending by number of loans and by dollar volume totaling $\$ 23.7$ million. In comparison, $0.1 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were also taken into consideration. Considering all of these factors, Regions Bank’s geographic distribution of small business and HMDA loans reflects adequate penetration throughout the assessment area.

## Home Purchase Loans

Regions Bank's home purchase lending in moderate-income census tracts is poor. The bank's performance was less than both the area demographics and the aggregate performance. During the review period, the bank originated $7.3 \%$ of its home purchase loans in moderate-income census tracts, which contain $13.9 \%$ of the owner-occupied units. Aggregate lenders originated home purchase loans at a level greater than the percentage of owner-occupied units in moderate-income tracts.

The bank's home purchase lending in both middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $8.5 \%$ of its home refinance loans in moderate-income census tracts, which contain $13.9 \%$ of the owner-occupied units in the assessment area. The bank's performance was less than the aggregate in 2010 but exceeded the aggregate in 2011.

The bank's home refinance lending in middle- and upper-income tracts was greater than the percentage of owner-occupied units in these tracts.

## Southeast Missouri

## Home Improvement Loans

Regions Bank's home improvement lending in moderate-income census tracts is good when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated 33.3\% of its home improvement loans in moderate-income tracts, which contain $13.9 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was better than the aggregate in both 2010 and 2011.

The bank's home improvement lending in middle-income tracts was less than the percentage of owner-occupied units in these tracts; the bank had no lending in upper-income tracts.

## Small Business Loans

Regions Bank's small business lending in moderate-income census tracts is good. The bank's performance was slightly greater than the area demographic. During the review period, Regions Bank originated $19.6 \%$ of its small business loans in moderate-income tracts, which contain $19.3 \%$ of the small businesses in the assessment area. Additionally, the bank's performance was much greater than the aggregate in 2010 and slightly better than the aggregate in 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses in these tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of loans based on borrower's income or gross annual revenues 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

The bank's home purchase lending to low-income borrowers is adequate. At 4.9\%, the bank's percentage of home purchase lending to low-income borrowers was less than the percentage of low-income families in the assessment area at $22.4 \%$. The bank's performance was greater than the aggregate in 2010, but was less than the aggregate in 2011.

Home purchase lending to moderate-income borrowers is good. At 31.7\%, the bank's percentage of home purchase lending to moderate-income borrowers exceeded the percentage of moderate-income families in the assessment area at $18.6 \%$. Additionally, the bank performed greater than the aggregate in 2010, but less than the aggregate in 2011.

The bank's home purchase lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while the lending to upper-income borrowers was less than the percentage of upper-income families.

## Home Refinance Loans

Regions Bank’s home refinance lending to low-income borrowers is good. During the review period, Regions Bank originated $6.0 \%$ of its home refinance loans to low-income borrowers, which represent $22.4 \%$ of the total families in the assessment area. The bank's performance was greater than the aggregate's performance in both 2010 and 2011.

## Southeast Missouri

Regions Bank's home refinance lending to moderate-income borrowers is also good. During the review period, Regions Bank originated $17.1 \%$ of its home refinance loans to moderate-income borrowers, which comprise $18.6 \%$ of the total families in the assessment area. The bank's performance exceeded the aggregate's performance in both 2010 and 2011.

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

## Home Improvement Loans

The bank's home improvement lending to low-income borrowers is very poor. Low-income families constitute $22.4 \%$ of the families in the assessment area, but the bank originated no home improvement loans to lowincome borrowers. Although aggregate lending in this segment of the market was also less than the area demographic, the aggregate lenders were able to lend at a level much higher than the bank in both 2010 and 2011.

The bank's home improvement lending to moderate-income borrowers is very poor. Moderate-income families constitute $18.6 \%$ of the families in the assessment area, but the bank only originated one home improvement loan to a moderate-income borrower. The aggregate lending in this segment of the market was greater than or comparable to the demographic in both 2010 and 2011.

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

## Small Business Lending

Considering the bank's performance when compared to the area demographic and the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses was higher than the aggregate in 2010, but much lower than the aggregate in 2011. The bank originated $25.0 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.3 \%$. However, of the 92 small business loans originated during the review period, 53 (57.6\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $59.0 \%$, which is less than the percentage of businesses in the Southeast Missouri assessment area that are considered small businesses, at $89.3 \%$. However, $82.6 \%$ of the 92 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank performed below the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Southeast Missouri assessment area. The bank originated one community development loan for $\$ 1.2$ million during the review period. The loan promotes economic development by financing the expansion of a farm that is located in a moderate-income census tract and will create new jobs for local residents. This activity exhibits adequate responsiveness to local community credit needs given the bank's presence in the market. Other community development needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization, job growth, and workforce development.

## Investment Test

The bank's performance in the Southeast Missouri assessment area under the investment test is adequate. The bank had two investments totaling $\$ 678,800$, including one current period investment of $\$ 488,000$. The current

## Southeast Missouri

period investment was a Low Income Housing Tax Credit (LIHTC) project located 25 miles outside the assessment area in Pocahontas, Arkansas. However, due to limited community development investment opportunities in the assessment area and the need for affordable housing in rural Southeast Missouri and Northeast Arkansas, this investment was included in the Southeast Missouri evaluation. In addition to LIHTC credits, direct investments in the assessment area included a prior period investment in a LIHTC investment fund. The bank also had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs.

The bank also made one contribution of $\$ 1,900$. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities.

Community development needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization, job growth and workforce development. Regions Bank's investments and contributions are not considered very responsive to the identified community needs, given the bank's presence in the assessment area.

## Service Test

The bank's service test performance in the Southeast Missouri assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Southeast Missouri assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the seven branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open or close any branches in the Southeast Missouri assessment area. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Southeast Missouri

## Geographic Distribution of Branches

Assessment Area: MO Southeast MO

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | al Branch $\%$ | $\begin{gathered} \text { hes } \\ \text { Open } \\ \# \end{gathered}$ | Closed \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Weekend Hours \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Moderate | Total | 2 | 28.6\% | 0 | 0 | 2 | 0 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 7 | 18.9\% | 17.8\% | 19.7\% |
| Middle | Total | 4 | 57.1\% | 0 | 0 | 4 | 3 | 3 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $0$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 29 | 78.4\% | 79.9\% | 75.7\% |
| Upper | Total | 1 | 14.3\% | 0 | 0 | 1 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 1 | 2.7\% | 2.3\% | 4.6\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
|  | Total | 7 | 100.0\% | 0 | 0 | 7 | 3 | 6 |  |  |  |  |
| Total | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 37 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 479 service hours in various capacities for community development organizations, by participating in 58 different service activities. Many of the community development services focused on education and affordable housing that aided low- and moderateincome geographies and low- and moderate-income individuals. In particular, Regions Bank employees provided services to organizations whose mission is to revitalize and stabilize low- and moderate-income geographies that have suffered from foreclosures and abandonment. In return, these organizations purchase and redevelop these properties in order to rehab them for low- and moderate-income individuals.

## Non-Metropolitan Areas (Limited Review)

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

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

- Central Missouri Assessment Area (Miller, Gasconade and Phelps Counties)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing $9.1 \%$ of its branches in Missouri.
o As of June 30, 2011, the bank had $\$ 60.6$ million in deposits in this assessment area, representing a market share of $4.4 \%$ and $8.0 \%$ of Regions Bank's total deposits in Missouri.
- Lawrence Assessment Area (Lawrence County)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $6.1 \%$ of its branches in Missouri.
o As of June 30, 2011, the bank had $\$ 48.5$ million in deposits in this assessment area, representing a market share of $12.3 \%$ and $6.4 \%$ of Regions Bank's total deposits in Missouri.
- Taney Assessment Area (Taney County)
o As of December 31, 2011, Regions Bank operated three branches in the assessment area, representing $9.1 \%$ of its branches in Missouri.
o As of June 30, 2011, the bank had $\$ 40.2$ million in deposits in this assessment area, representing a market share of $5.0 \%$ and $5.3 \%$ of Regions Bank's total deposits in Missouri.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Central Missouri | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Consistent |
| Lawrence | Not Consistent <br> (Below) | Not Consistent <br> (Above) | Not Consistent (Below) |
| Taney | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Below) |

As stated earlier, the Southeast Missouri and St. Genevieve-Perry assessment areas received full-scope reviews, and the bank's performance in both the Southeast Missouri and St. Genevieve-Perry assessment areas were given similar consideration in determining the overall rating for the state. Southeast Missouri is one of the bank's largest markets in Missouri in terms of deposits, loans, and branches. The full-scope areas selected together represent $28.0 \%$ of the deposits in the assessment areas in Missouri as well as $27.3 \%$ of the branches. The full-scope assessment areas also represent $22.1 \%$ of the HMDA loans and $32.3 \%$ of the small business

## Non-Metropolitan Areas (Limited Review)

loans in the state. Therefore, the two full-scope assessment areas represent a large portion of the deposits, branches and loans in the State of Missouri.

For the Lending Test, performance in all three limited-scope assessment areas was weaker than the bank's performance in the state. The distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in all three assessment areas, while the geographic distribution of loans was an additional factor in the Central Missouri assessment area.

For the Investment Test, the performance in the Lawrence limited-scope assessment area was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment area. The performance in two limited-scope assessment areas (Central Missouri and Taney) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas.

For the Service Test, the performance in one limited-scope assessment area (Central Missouri) was consistent with the bank's performance in the state. The performance in two limited-scope assessment areas (Lawrence and Taney) was weaker than the bank's performance in the state due to fewer community development services.

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

## North Carolina

## CRA RATING FOR NORTH CAROLINA: Satisfactory

## The Lending Test is rated: Low Satisfactory <br> The Investment Test is rated: <br> The Service Test is rated: <br> High Satisfactory <br> Needs to Improve

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas, although rarely in a leadership position, in response to the community development needs of the assessment areas.
- Retail services are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment areas.
- The bank provides a limited level of community development services throughout the assessment areas.


## North Carolina

## SCOPE OF EXAMINATION

A full-scope review was conducted for one assessment area in the State of North Carolina:

- Charlotte

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

- Greensboro
- Raleigh
- Wilmington
- Macon (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 NORTH CAROLINA

As of December 31, 2011, Regions Bank operated seven branch offices in North Carolina representing $0.4 \%$ of the bank's total branches. As of June 30, 2011, the bank had $\$ 394.2$ million in deposits in North Carolina representing $0.4 \%$ of Regions Bank's total deposits. Additionally, as of June 30, 2011, the bank ranked $45^{\text {th }}$, among 128 insured institutions, in deposit market share with $0.1 \%$ of the deposits within the state. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 804 ( $0.9 \%$ ) were in the North Carolina assessment areas. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 402 (0.4\%) were in the North Carolina assessment areas.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of North Carolina is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs.

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

Given that the largest percentage of the bank's branches, deposits, and lending is in the Charlotte assessment area, the performance in this assessment area produced the overall statewide rating. Additionally, HMDA lending performance was given the most weight followed by small business loans. Regions Bank originated only one small farm loan in North Carolina during the review period; therefore, small farm lending is not discussed in this report due to the bank's minimal lending activity in North Carolina for this product.

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the North Carolina assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

## Statewide Summary of Lending Activity

Assessment Areas Located in
North Carolina

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | \% |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 316 | $26.2 \%$ | $\$ 77,144$ | $28.5 \%$ |
| HMDA Refinance | 485 | $40.2 \%$ | $\$ 128,027$ | $47.2 \%$ |
| HMDA Home Improvement | 3 | $0.2 \%$ | $\$ 44$ | $0.0 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{8 0 4}$ | $\mathbf{6 6 . 7} \%$ | $\mathbf{\$ 2 0 5 , 2 1 5}$ | $\mathbf{7 5 . 7 \%}$ |
| Total Small Business | $\mathbf{4 0 1}$ | $\mathbf{3 3 . 3} \%$ | $\mathbf{\$ 6 5 , 8 3 4}$ | $\mathbf{2 4 . 3 \%}$ |
| Total Farm | $\mathbf{1}$ | $\mathbf{0 . 1 \%}$ | $\mathbf{\$ 1 2}$ | $\mathbf{0 . 0 \%}$ |
| TOTAL LOANS | $\mathbf{1 , 2 0 6}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 2 7 1 , 0 6 1}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank's HMDA and small business loans is adequate. Overall, the distribution of loans by borrower's income and revenue size of business is poor. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment area is included in the next section of this report.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in North Carolina. The bank originated two community development loans totaling $\$ 1.1$ million during the review period. The loans promoted economic development by financing a small business and creating jobs in a moderate-income census tract, which is considered responsive to local credit needs. Other local community development credit needs include affordable housing for low- and moderate-income individuals, neighborhood stabilization resulting from elevated foreclosure rates, and small business development. While the number and the dollar amount of community development loans are small, the bank's community development loan portfolio exhibits adequate responsiveness to assessment area credit needs given its presence in the market.

## Investment Test

The investment test rating for the State of North Carolina is High Satisfactory when considering the bank's statewide performance and its overall presence in the state. The bank made significant use of qualified investments and contributions. The bank exhibited good responsiveness to credit and community development needs through its investment activities in the Charlotte assessment area.

The bank made 10 qualified investments of approximately $\$ 14.5$ million and contributions of $\$ 10,300$ within the North Carolina assessment areas. Of the 10 investments, three totaling $\$ 3.8$ million were current period investments. All current period investments were in the Raleigh assessment area. Most of the investments provided support for affordable housing through GNMA investment instruments, Low Income Housing Tax Credits (LIHTCs), and funds that finance LIHTC projects and other multi-family housing for low- and moderate-income individuals. The bank also had investments that benefitted its footprint or a broader regional

## North Carolina

area that includes North Carolina. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs and community revitalization through a New Markets Tax Credit fund.

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

## Service Test

The service test rating is Needs to Improve when considering the bank's statewide performance in North Carolina.

## Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderateincome geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies or low- and moderate-income individuals.

## Community Development Services

The bank provides a limited level of community development services that benefit residents and small businesses of the assessment areas. Community development services were poor in the one full-scope assessment area reviewed.

## METROPOLITAN AREA

(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLOTTE, NORTH CAROLINA ASSESSMENT AREA

The Charlotte, North Carolina assessment area includes Mecklenburg County, just one county from the sixcounty Charlotte, North Carolina MSA. Within the assessment area there are 14 low-, 30 moderate-, 46 middle, and 53 upper-income tracts. The city of Charlotte is located in Mecklenburg County and serves as the county seat. Charlotte is the largest city in the state of North Carolina, with a population estimated at 751,087 (which constitutes approximately 79.5\% of Mecklenburg County's total population). ${ }^{594}$ As of December 31, 2011, Regions Bank operated three branches in the assessment area, none of which are located in low- or moderateincome census tracts.

Regions Bank operates in a highly competitive environment in the Charlotte assessment area; furthermore, the bank has a very small presence in the area. Charlotte is a banking hub that is also home to Bank of America; the deposit market reflects Bank of America’s significant presence in the market. According to the June 30, 2011 FDIC Summary of Deposits Report, there are 28 financial institutions operating 243 branch locations in the Charlotte assessment area. Bank of America was the clear leader in the Charlotte market with $83.5 \%$ of total deposits in Mecklenburg County, while Wells Fargo ranked $2^{\text {nd }}$ with $10.9 \%$; therefore, the two top financial institutions constituted $94.4 \%$ of all deposits in Mecklenburg County. Regions Bank ranked $12^{\text {th }}$ with a deposit market share of $0.2 \%$.

Lending in the Charlotte assessment area is also dominated by large, national and multi-regional financial institutions. The top small business loan reporters in 2010 and 2011 were American Express, Wells Fargo, Citibank, FIA Card Services, Branch Banking \& Trust, and Capital One, among others. Regions Bank ranked $21^{\text {st }}$ and $16^{\text {th }}$ in 2010 and 2011, respectively, in small business lending in the area, capturing just $0.9 \%$ of the market share in 2011. The top HMDA loan reporters in 2010 and 2011 were Wells Fargo, Bank of America, Branch Banking \& Trust, JPMorgan Chase Bank, SunTrust Mortgage, and Fifth Third Mortgage. Regions Bank ranked $28^{\text {th }}$ in HMDA lending in the Charlotte area for both 2010 and 2011, with just $0.5 \%$ of the HMDA market share in 2011.

## Demographic Characteristics

North Carolina, and Charlotte in particular, has been one of the fastest growing areas in the country over the past decade. North Carolina's population experienced rapid growth during the decade, growing $16.5 \%$ from 8,049,313 in 2000 to $9,380,804$ in 2009. Charlotte has grown even faster. The 2000 census indicated the total population of Mecklenburg County (Charlotte's primary county) was 695,454. As of July 1, 2009, census estimates show significant growth with a total population of 913,639 , representing $31.4 \%$ growth during that timeframe. Mecklenburg County has continued to grow, albeit at a slower pace. US census estimates for July 1, 2011, show an annual growth rate of $1.7 \%$ for Mecklenburg County in the two years since July 1, 2009, with the estimated population as of 2011 at $944,373 .{ }^{595}$

The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

[^193]
## Charlotte, North Carolina

## Combined Demographics Report

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 14 | 9.7 |  | 4.7 | 2,556 | 30.5 | 30,606 | 17.3 |
| Moderate-income | 30 | 20.8 |  | 16.8 | 3,938 | 13.3 | 28,606 | 16.2 |
| Middle-income | 46 | 31.9 |  | 38.1 | 3,618 | 5.4 | 36,961 | 20.9 |
| Upper-income | 53 | 36.8 |  | 40.4 | 1,460 | 2.0 | 80,448 | 45.5 |
| Unknown-income | 1 | 0.7 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 144 | 100.0 |  | 100.0 | 11,572 | 6.6 | 176,621 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 13,641 | 3,383 |  | 24.8 | 8,820 | 64.7 | 1,438 | 10.5 |
| Moderate-income | 53,963 | 21,182 |  | 39.3 | 29,287 | 54.3 | 3,494 | 6.5 |
| Middle-income | 115,637 | 67,862 |  | 58.7 | 40,690 | 35.2 | 7,085 | 6.1 |
| Upper-income | 109,539 | 77,965 |  | 71.2 | 24,227 | 22.1 | 7,347 | 6.7 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 292,780 | 170,392 |  | 58.2 | 103,024 | 35.2 | 19,364 | 6.6 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2,369 | 4.7 |  | 4.4 | 269 | 8.9 | 150 | 5.6 |
| Moderate-income | 6,526 | 13.0 |  | 12.8 | 462 | 15.3 | 367 | 13.6 |
| Middle-income | 18,518 | 36.8 |  | 36.2 | 1,198 | 39.6 | 1,169 | 43.4 |
| Upper-income | 22,827 | 45.4 |  | 46.5 | 1,089 | 36.0 | 1,005 | 37.3 |
| Unknown-income | 64 | 0.1 |  | 0.1 | 9 | 0.3 | 5 | 0.2 |
| Total Assessment Area | 50,304 | 100.0 |  | 100.0 | 3,027 | 100.0 | 2,696 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 88.6 |  | 6.0 |  | 5.4 |
|  | Total Farms by <br> Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 5 | 2.8 |  | 2.9 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 12 | 6.7 |  | 6.4 | 1 | 25.0 | 0 | 0.0 |
| Middle-income | 52 | 28.9 |  | 26.3 | 3 | 75.0 | 4 | 80.0 |
| Upper-income | 111 | 61.7 |  | 64.3 | 0 | 0.0 | 1 | 20.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 180 | 100.0 |  | 100.0 | 4 | 100.0 | 5 | 100.0 |
|  | Percentage of Total Farms: |  |  | 95.0 |  | 2.2 |  | 2.8 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Charlotte, North Carolina

## Income Characteristics

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following table sets forth the estimated median family income for 2010 and 2011 for the Charlotte-Gastonia-Rock Hill, NC-SC MSA and also provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). The table indicates that the HUD estimated median family income for the Charlotte area in 2010 was $\$ 67,200$ and $\$ 67,500$ for 2011.

## Borrower Income Levels Charlotte-Gastonia-Rock Hill, NC-SC MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | 0 - 49.99\% |  | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$67,200 | 0 | - | \$33,599 | \$33,600 | - | \$53,759 | \$53,760 | - | \$80,639 | \$80,640 | - | \& above |
| 2011 | \$67,500 | 0 | - | \$33,749 | \$33,750 | - | \$53,999 | \$54,000 | - | \$80,999 | \$81,000 | - | \& above |

According to the 2000 US census data, there were 176,621 families in the assessment area. Of those families, $17.3 \%$ were low-income, $16.2 \%$ were moderate-income, $20.9 \%$ were middle-income, and $45.5 \%$ were upperincome. Of the total families, 11,572 (6.6\%) had incomes below the poverty level.

## Housing Characteristics

Charlotte was a booming area for population and housing growth leading up to the housing market collapse and subsequent recession. While Charlotte suffered like much of the country, the Charlotte area began to experience stabilization in the housing market in 2010 and 2011. The median sales price of existing singlefamily homes in the Charlotte metropolitan area increased modestly from \$189,100 in 2009 to $\$ 191,000$ in $2010{ }^{596}$ Quarterly sales data from 2011 indicates the pricing trend continues upward with median sales prices of $\$ 195,100$ and $\$ 211,100$ for the first quarter and second quarter, respectively.

The number of residential homes sold fell dramatically (57.1\%) in Mecklenburg County during the recession years, from pre-recession sales levels of 31,662 in 2006 to 13,594 in 2009. ${ }^{597}$ Home sales had a better year in 2010, increasing 11.2\% from 2009 levels. However, it appears sales were again down in 2011 with third quarter 2011 data indicating a 36.4\% drop in home sales from the third quarter of 2010.

Residential building permits plummeted in the Charlotte area, including Mecklenburg County, during the recession. Single-family residential building permits in Mecklenburg County dropped 85.8\% from 9,287 in 2006 to 1,315 in $2009 .{ }^{598}$ However, residential building permits have already shown signs of recovering with $42.1 \%$ growth from 2009 to 2010 and 4.2\% growth the following year. In 2011, single-family residential building permits in Mecklenburg County totaled 1,949, still far less than pre-recession levels yet no longer in a decline. Mortgage delinquencies and foreclosures are a significant concern in the area. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) increased

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## Charlotte, North Carolina

from $5.4 \%$ in January 2010 to $9.7 \%$ in December 2011. Statewide in North Carolina, just $1.2 \%$ of mortgages were seriously delinquent as of December 2011. ${ }^{599}$

The 2000 US census data indicates that there were 292,780 housing units in the assessment area, of which 170,392 (58.2\%) were owner-occupied. Of total housing units, there was a high percentage ( $35.2 \%$ ) of rental units. The majority of housing units in low- and moderate-income tracts were rental units, at $64.7 \%$ and $52.3 \%$, respectively. The median housing value in the assessment area was $\$ 139,041$, which was $45.1 \%$ higher than the median housing value for the state of North Carolina at $\$ 95,800$. The median age of housing stock in the assessment area was 19 years compared to 22 years for the state of North Carolina.

## Employment and Economic Conditions

According to 2010 REIS data, primary employment sectors in Mecklenburg County included the following: finance and insurance, state and local government, retail trade, and administrative and waste management services. Charlotte is known as a banking center and is home to the headquarters of Bank of America, NA. The finance and insurance sector represents the largest concentration of employment in Mecklenburg County with $9.5 \%$ of total nonfarm jobs in this sector. While this concentration is significant, Charlotte has a diverse economy with substantial employment figures in nearly every industry sector.

Several industries suffered significantly through the recession years in the Charlotte area. According to BLS statistics, the Charlotte MSA financial activities sector lost approximately $10.0 \%$ of its total jobs, from 77,400 in 2007 to 69,700 in 2010. In 2011, the financial sector saw an uptick in jobs to $71,900 .{ }^{600}$ The area and its housing market grew rapidly prior to the recession, but growth slowed during the recession years as is reflected in the construction employment numbers. The mining, logging, and construction sector in the Charlotte MSA lost approximately 22,000 jobs from pre-recession highs in 2007 of 59,500 jobs to 37,500 in 2011; the sector has yet to recover. The manufacturing and trade, transportation, and utilities sectors also experienced significant decline from 2007 to 2010; however, both experienced slight recoveries in 2011. Sectors that did not experience job loss, continued to grow through the recession, or have already recovered past pre-recession levels include government, leisure and hospitality, education and health services, professional and business services, and information.

The significant job loss in multiple industries is reflected in the area's unemployment rate, which more than doubled from pre-recession levels for both Mecklenburg County and for the Charlotte MSA. In 2007, the Charlotte MSA had an unemployment rate of $4.8 \%$, while just three years later the unemployment rate was up to $11.9 \%$. In 2011, the area began to see some employment stabilization as the unemployment rate declined. As shown on the following table, unemployment rates for the Charlotte MSA and Mecklenburg County were $10.9 \%$ and $10.7 \%$, respectively, in 2011. This is also reflected in total nonfarm jobs, which increased $2.4 \%$ from 2010 and 2011, the first sign of growth since 2007-2008. The Charlotte market's unemployment rates were slightly above the statewide rates for North Carolina during the review period.

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## Charlotte, North Carolina

## Unemployment Rates

Assessment Area: NC Charlotte

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Charlotte MSA | 11.9 | 10.9 |
| Mecklenburg County | 11.2 | 10.7 |
| North Carolina | $\mathbf{1 0 . 9}$ | $\mathbf{1 0 . 5}$ |

Not Seasonally Adjusted

## Community Contacts and Community Development Opportunities

Low- and moderate-income communities in the Charlotte market have been adversely affected by the recession. The percentage of individuals living below the poverty line has increased over the past decade. In 2000, 9.0\% of individuals in Mecklenburg County lived below the poverty line, while $12.5 \%$ lived below the poverty line as of $2010 .{ }^{601}$ In addition, the percentage of Mecklenburg County's population receiving food stamps increased during the recession, but remains slightly below the levels for the state of North Carolina. As of 2009, 13.5\% of the population received food stamps, while $13.8 \%$ of the state's population received food stamps. ${ }^{602}$

Low- and moderate-income individuals have many different needs in the area; however, Regions Bank faces challenges in providing community development activities in the area due to its aforementioned small presence in the market coupled with the domination by two national banks with extensive market saturation. Additionally, the Charlotte area is home to just two community development financial institutions (CDFIs), which provide alternative financing initiatives such as affordable housing, small businesses and community facilities. ${ }^{603}$

While there are challenges in the area, there are also community needs and opportunities in the Charlotte market. According to a community contact from a local housing agency in the Charlotte assessment area, the Charlotte area economy continues to struggle. Affordable housing is a need in the community, but there are several obstacles in developing affordable housing. First, Charlotte zoning laws make it difficult to develop affordable housing projects. Also, the community contact indicated there appears to be a lost desire on part of the community to support these efforts. Another area of need is providing housing for the homeless population in the area.

Foreclosure prevention and neighborhood stabilization are other concerns for the area. The Charlotte area received a significant allocation in Neighborhood Stabilization Program (NSP) funds. The funds are available to help stabilize communities hard hit by the foreclosure crisis.

Charlotte received $\$ 5.4$ million in NSP funds, which have been used primarily for the acquisition of and rehabilitation of residential foreclosed properties. ${ }^{604}$ The Charlotte area also has a significant percentage of

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## Charlotte, North Carolina

unbanked and underbanked individuals. According to the FDIC's 2009 National Survey of Unbanked and Underbanked Households, $7.4 \%$ of households in Mecklenburg County are unbanked, meaning they have no type of deposit account with a mainstream financial institution. ${ }^{605}$ In addition, $20.1 \%$ of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower-income and minority households.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Charlotte assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area; however, the distribution of borrowers reflects poor penetration among borrowers of different income levels and businesses of different revenue sizes. Also, the bank makes an adequate level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 405 (65.3\%) HMDA loans compared to 215 (34.7\%) small business loans in the Charlotte assessment area. Therefore, HMDA lending was given more weight than small business lending in determining the bank's lending test rating in the assessment area. The Charlotte assessment area contains $0.3 \%$ of the bank's small business and HMDA lending by number of loans and $0.7 \%$ by dollar volume totaling $\$ 145.1$ million. In comparison, $0.2 \%$ of the bank's total deposits are in this assessment area.

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

## Geographic Distribution of Loans

The geographic distribution of lending in the Charlotte assessment is adequate. For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues, such as the unemployment and poverty rates and the level of owner-occupied units and the number of small businesses in low- and moderateincome census tracts, were issues considered when assessing the bank's performance; the performance of the aggregate lenders was also considered.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, Regions Bank did not originate any of its home purchase loans in low-income census tracts, which contain only $2.0 \%$ of owneroccupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at the level of the demographic. This may suggest that there are limited opportunities for home purchase lending in low-income tracts. Although Regions Bank's performance was less than the aggregate in 2010 and 2011, minimal weight was given to this area of lending when determining the overall geographic distribution rating.

Regions Bank's home purchase lending in moderate-income census tracts is excellent when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated 11.9\% of its home purchase loans in moderate-income tracts, which contain $12.4 \%$ of

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## Charlotte, North Carolina

the owner-occupied units in the assessment area. Additionally, Regions Bank's performance exceeded the aggregate in both 2010 and 2011.
The bank's home purchase lending in middle-income tracts was greater than the percentage of owner-occupied units in these tracts while the lending in upper-income tracts was less than the percentage of owner-occupied units.

## Home Refinance Loans

Home refinance lending in low-income tracts is adequate. During the review period, Regions Bank originated two home refinance loans ( $0.9 \%$ ) in low-income census tracts. Although the bank's level of lending was low, the aggregate also failed to lend at the level of the demographic. This may suggest that there are limited opportunities for home refinance lending in low-income tracts. Although Regions Bank's performance was equal to the aggregate in 2010 and greater than the aggregate in 2011, minimal weight was given to this area of lending when determining the overall geographic distribution rating.

Home refinance lending in moderate-income census tracts is adequate. During the review period, Regions Bank originated $5.5 \%$ of its refinance loans in moderate-income census tracts, which contain $12.4 \%$ of the owneroccupied units in the assessment area. Regions Bank’s performance was below the aggregate in 2010 and greater than the aggregate in 2011.

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

## Home Improvement Loans

Regions Bank did not originate any home improvement loans in the Charlotte assessment area. Although Regions Bank did not originate any home improvement loans in low-income census tracts, the level of lending is considered adequate. Low-income tracts contain only $2.0 \%$ of the owner-occupied units. Although it appears that the aggregate also had low penetration of home improvement loans in low-income census tracts, its lending was at a level greater than the percentage of owner-occupied units in low-income census tracts in 2010 and 2011.

Home improvement lending in moderate-income tracts is adequate. During the review period, Regions Bank originated no home improvement loans in moderate-income census tracts, which contain $12.4 \%$ of the owneroccupied units in the assessment area. As such, the bank's performance was less than both the area demographics and the aggregate's performance. The aggregate originated home improvement loans at a level less than the percentage of owner-occupied units in moderate-income census tracts in both 2010 and 2011.

The bank had no home improvement lending in both middle- and upper-income census tracts.

## Small Business Loans

Regions Bank’s small business lending in low-income census tracts is excellent. During the review period, Regions Bank originated 7.9\% of its small business loans in low-income tracts, which contain $4.4 \%$ of the small businesses in the assessment area. The bank's performance also exceeded the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $9.3 \%$ of its small business loans in moderate-income census tracts, which contain $12.8 \%$ of the small businesses in the assessment area. However, the bank's performance was greater than the aggregate in 2010 but less than the aggregate in 2011.

## Charlotte, North Carolina

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects poor penetration throughout the assessment area. For this analysis, the distribution of HMDA lending across borrower income levels and small business lending across business revenue sizes was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is poor. The bank's percentage of home purchase lending to low-income borrowers at $3.8 \%$ was less than the percentage of low-income families in the assessment area at $17.3 \%$. Although the bank has very limited presence in the Charlotte assessment area, the bank made only seven purchase loans to low-income borrowers in 2010 and performed below the aggregate that year, and made no home purchase loans to low-income borrowers in 2011.

The bank's home purchase lending to moderate-income borrowers is adequate when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home purchase lending to moderate-income borrowers at $14.1 \%$ was comparable to the percentage of moderate-income families in the assessment area at $16.2 \%$. However, the aggregate lending in this segment of the market was greater than the demographic and the bank’s performance in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Refinance Loans

Home refinance lending to low-income borrowers is poor. The bank's percentage of home refinance lending to low-income borrowers at $3.2 \%$ was less than the percentage of low-income families in the assessment area at $17.3 \%$. The bank made six refinance loans to low-income borrowers in 2010 and performed slightly above the aggregate that year, but only made one refinance loan to low-income borrowers in 2011 and performed below the aggregate that year.

The bank's home refinance lending to moderate-income borrowers is adequate. The bank made $9.5 \%$ of its refinance loans to moderate-income borrowers. Moderate-income families make up $16.2 \%$ of total families in the assessment area. Regions Bank’s performance was less than the aggregate in 2010 and greater than the aggregate in 2011.

The bank's refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Regions Bank did not originate any home improvement loans in the Charlotte assessment area. During the review period, Regions Bank did not originate any home improvement loans to low-income borrowers, and the level of lending is considered very poor. Although the bank's level of lending was low, the aggregate also failed to lend at the level of the demographic. This may suggest that there are limited opportunities for home

## Charlotte, North Carolina

improvement lending to low-income borrowers. Regions Bank’s performance was less than the aggregate in 2010 and 2011.

The bank's home improvement lending to moderate-income borrowers is also very poor. Moderate-income families constitute $16.2 \%$ of the families in the assessment area, but the bank originated no home improvement loans to a moderate-income borrower. The aggregate lending in this segment of the market was greater than or comparable to the demographic in both 2010 and 2011.

## Small Business Lending

Considering the bank's performance when compared to the demographic and aggregate data, the distribution of small business lending by business revenue size is adequate. The bank originated $28.8 \%$ of its loans to small businesses, compared to the percentage of small businesses in the assessment area at $88.6 \%$. However, of the 215 small business loans originated during the review period, 89 loans (41.4\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $49.2 \%$. Additionally, the bank significantly exceeded the aggregate in lending to small businesses in 2010, but was significantly below the aggregate in 2011. Also, 63.3\% of the 215 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and 2011.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Charlotte assessment area. The bank originated two community development loans totaling $\$ 1.1$ million during the review period. The loans promoted economic development by financing a small business and creating jobs in a moderate-income census tract, a responsive activity. Other local community development credit needs include affordable housing for low- and moderate-income individuals, neighborhood stabilization resulting from elevated foreclosure rates, and small business development. While the number and the dollar amount of community development loans are small, the bank's community development loan portfolio exhibits adequate responsiveness to assessment area credit needs given its presence in the market.

## Investment Test

The bank's performance under the investment test in the Charlotte assessment area is good. The bank had four investments totaling $\$ 7.1$ million. The bank had no current period investments. Direct investments in the assessment area provided support for affordable housing through Low Income Housing Tax Credits (LIHTCs) and LIHTC investment funds. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and community revitalization through a regional New Markets Tax Credit fund. Local community credit needs include but are not limited to affordable housing for low- and moderate-income workers, neighborhood stabilization resulting from elevated foreclosure rates, financing for small businesses, and financial stability for low- and moderate-income residents. The dollar volume of Regions Bank's current and total investments exhibits responsiveness to some of the identified community needs, given the bank's limited presence in the assessment area and the competitive nature of the banking market in Charlotte.

The bank also made five contributions totaling $\$ 2,070$. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. Contributions were given primarily to organizations involved in providing affordable housing or community services targeted to low- and moderateincome individuals and communities.

## Charlotte, North Carolina

## Service Test

The bank's service test performance in the Charlotte assessment area is poor. Its retail and community development services reflect poor responsiveness to the needs of the Charlotte assessment area.

## Retail Services

The bank's delivery systems are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in its assessment area. The distribution of the three branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open any branches and closed one branch (located in an upper-income tract) in the Charlotte assessment area. The bank does not have any branches located in low- and moderate-income geographies.

## Geographic Distribution of Branches

Assessment Area: NC Charlotte

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | I Branch <br> \% | $\begin{aligned} & \text { 1es } \\ & \text { Open } \\ & \# \end{aligned}$ | Closed \# | Drive thrus \# | Extend- <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 0 | 0 0 | 0 |  |  | 14 | 9.7\% | 4.5\% | 4.7\% |
| Moderate | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 0 | 0 |  |  | 30 | 20.8\% | 18.4\% | 13.0\% |
| Middle | Total | 2 | 66.7\% | 0 | 0 | 2 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 46 | 31.9\% | 39.7\% | 36.8\% |
| Upper | Total | 1 | 33.3\% | 0 | 1 | 1 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 0 | 0 |  |  | 53 | 36.8\% | 37.4\% | 45.4\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 0 | 0 |  |  | 1 | 0.7\% | 0.0\% | 0.1\% |
| Total | Total | 3 | 100.0\% | 0 | 1 | 3 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 0 | 0 | 0 |  |  | 144 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a limited level of community development services in the assessment area, and improvement is needed. During the review period, Regions Bank employees provided 28 hours of service for community development organizations by participating in 16 community development services. According to information obtained from community contacts, there are opportunities for financial institutions to participate in

## Charlotte, North Carolina

community development services in the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

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

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

- Raleigh Assessment Area (Wake County)
o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $28.6 \%$ of its branches in North Carolina.
o As of June 30, 2011, the bank had $\$ 102.2$ million in deposits in this assessment area, representing a market share of $0.5 \%$ and $25.9 \%$ of Regions Bank's total deposits in North Carolina.
- Wilmington Assessment Area (New Hanover County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $14.3 \%$ of its branches in North Carolina.
o As of June 30, 2011, the bank had $\$ 21.4$ million in deposits in this assessment area, representing a market share of $0.6 \%$ and $5.4 \%$ of Regions Bank's total deposits in North Carolina.
- Greensboro Assessment Area (Guilford County)
o The bank closed its one branch in the assessment area during the review period, in September, 2011.
o As of December 31, 2011, Regions Bank operated no branches in the assessment area.
o As of June 30, 2011, the bank had $\$ 14.0$ million in deposits in this assessment area, representing a market share of $0.2 \%$ and $3.5 \%$ of Regions Bank's total deposits in North Carolina.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Metropolitan Assessment Areas |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |  |
| Raleigh | Not Consistent <br> (Below) | Not Consistent (Above) | Not Consistent (Above) |  |
| Wilmington | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Above) |  |
| Greensboro | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |  |

The Charlotte assessment area received a full-scope review, and the bank's performance in that assessment area determined the overall rating for the state. Charlotte is by far the bank's largest market in North Carolina in terms of deposits and loans. The full-scope area represents $61.8 \%$ of the deposits in the assessment areas in North Carolina as well as $42.9 \%$ of the branches. The full-scope assessment area also represents $50.4 \%$ of the HMDA loans and $53.6 \%$ of the small business loans in the state. Therefore, the Charlotte assessment area

## Metropolitan Areas (Limited Review)

represents more than half of the deposits and loans and a large portion of the branches in the State of North Carolina.

For the Lending Test, performance was weaker than the bank's performance in the state in all three limitedscope assessment areas (Raleigh, Wilmington and Greensboro). Weaker performance in the Wilmington assessment area was primarily attributable to lower levels of community development loans relative to the bank's operations in the assessment area. The lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Raleigh and Greensboro assessment areas.

For the Investment Test, the performance in the Raleigh limited-scope assessment area was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment area. The performance in the Wilmington limited-scope assessment area was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment area. Performance was weaker in the Greensboro limited-scope assessment area due to a lack of overall presence in the assessment area, which was caused by the closure of the bank's one branch in September, 2011.

For the Service Test, the performance in two limited-scope assessment areas (Raleigh and Wilmington) was stronger than the bank’s performance in the state. Performance was weaker in the Greensboro limited-scope assessment area due to a lack of overall presence in the assessment area, which was caused by the closure of the bank's one branch in September, 2011.

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

## Non-Metropolitan Areas (Limited Review)

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

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NORTH CAROLINA NONMETROPOLITAN ASSESSMENT AREA

## - Macon Assessment Area (Macon County)

o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $14.3 \%$ of its branches in North Carolina.
o As of June 30, 2011, the bank had $\$ 12.9$ million in deposits in this assessment area, representing a market share of $1.6 \%$ and $3.3 \%$ of Regions Bank's total deposits in North Carolina.

## 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 tables below. Please refer to the tables in Appendix G for information regarding this area.

| Nonmetropolitan Assessment Areas |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |  |
| Macon | Not Consistent <br> (Below) | Not Consistent <br> (Above) | Consistent |  |

As stated earlier, the Charlotte assessment area received a full-scope review, and the bank's performance in that assessment area determined the overall rating for the state. Charlotte is by far the bank's largest market in North Carolina in terms of deposits and loans. The full-scope area represents $61.8 \%$ of the deposits in the assessment areas in North Carolina as well as $42.9 \%$ of the branches. The full-scope assessment area also represents $50.4 \%$ of the HMDA loans and $53.6 \%$ of the small business loans in the state. Therefore, the Charlotte assessment area represents more than half of the deposits and loans and a large portion of the branches in the State of North Carolina.

For the Lending Test, performance in the Macon limited-scope assessment area was weaker than the bank's performance in the state. The distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment area contributed to the weaker performance.

For the Investment Test, the performance in the Macon assessment area was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment area.

For the Service Test, the performance in the Macon assessment area was consistent with the bank's performance in the state.

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

## South Carolina

## CRA RATING FOR SOUTH CAROLINA: Satisfactory ${ }^{606}$

## The Lending Test is rated: <br> The Investment Test is rated: <br> Low Satisfactory <br> High Satisfactory <br> Needs to Improve

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides a significant level of qualified community development investments and grants in the assessment areas and is occasionally in a leadership position in response to the community development needs of the assessment areas.
- Retail services are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides a limited level of community development services throughout the assessment areas.

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## SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in the State of South Carolina:

- Columbia
- Hampton-Jasper-Beaufort (non-MSA)

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

- Anderson
- Charleston
- Greenville
- Spartanburg
- Myrtle Beach
- McCormick-Barnwell (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 SOUTH CAROLINA

Regions Bank operates 25 branch offices in its assessment areas in South Carolina representing 1.5\% of the bank's total branches. As of June 30, 2011, the bank had $\$ 1.1$ billion in deposits in South Carolina representing $1.1 \%$ of Regions Bank's total deposits in all the assessment areas. The bank ranked $10^{\text {th }}$ in total deposits in the state with a market share of $1.9 \%$. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 1,705 (2.0\%) were in the South Carolina assessment areas. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 1,043 ( $0.9 \%$ ) were in the South Carolina assessment areas.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of South Carolina is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs in both full-scope assessment areas. The bank's performance with regard to the geographic distribution of loans reflects adequate penetration throughout the assessment areas. Also, the distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes. The bank makes an low level of community development loans.

Although Regions Bank is both a small business and HMDA lender, HMDA lending was given greater consideration in determining the lending test rating for South Carolina because the bank originated more HMDA loans by number than small business loans. Additionally, the Hampton-Jasper-Beaufort assessment area received slightly greater consideration when determining the rating because it holds a greater percentage of the bank's loans and branches in the state of South Carolina than the other full-scope assessment area. Furthermore, Regions Bank originated only ten small farm loans in South Carolina during the review period; therefore, no detailed discussion of these loans is included in this section of the report.

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

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the South Carolina assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

## Statewide Summary of Lending Activity

## Assessment Areas Located in South Carolina

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | \% |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 535 | $19.5 \%$ | $\$ 113,029$ | $24.7 \%$ |
| HMDA Refinance | 1,106 | $40.2 \%$ | $\$ 214,295$ | $46.7 \%$ |
| HMDA Home Improvement | 64 | $2.3 \%$ | $\$ 860$ | $0.2 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{1 , 7 0 5}$ | $\mathbf{6 2 . 0 \%}$ | $\mathbf{\$ 3 2 8 , 1 8 4}$ | $\mathbf{7 1 . 6 \%}$ |
| Total Small Business | $\mathbf{1 , 0 3 3}$ | $\mathbf{3 7 . 6} \%$ | $\mathbf{\$ 1 2 8 , 8 9 0}$ | $\mathbf{2 8 . 1 \%}$ |
| Total Farm | $\mathbf{1 0}$ | $\mathbf{0 . 4 \%}$ | $\mathbf{\$ 1 , 3 3 6}$ | $\mathbf{0 . 3 \%}$ |
| TOTAL LOANS | $\mathbf{2 , 7 4 8}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 4 5 8 , 4 1 0}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank's HMDA and small business loans is adequate. The geographic distribution was adequate in both full-scope assessment areas in the state. Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered adequate in both full-scope assessment areas in the state. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes a low level of community development loans in the South Carolina assessment areas. The bank made 10 community development loans totaling $\$ 13.2$ million during the review period, which represented $1.5 \%$ by number and $1.0 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the purpose of revitalization and stabilization of low- and moderate-income geographies and disaster areas. Although the bank made an adequate level of community development loans in Columbia, the bank made no loans in Hampton-Jasper-Beaufort. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating is High Satisfactory when considering the bank's statewide performance in South Carolina. The bank made significant use of qualified investments and contributions. The bank exhibited good responsiveness to credit and community development needs through its investment activities in the Columbia assessment area, while performance in the Hampton-Jasper-Beaufort assessment area was adequate. The bank made 12 qualified investments of approximately $\$ 31.1$ million and contributions of $\$ 7,878$ within the South Carolina assessment areas. Of the 12 investments, 5 totaling $\$ 21.0$ million were current period investments. Most of the investments provided support for affordable housing through GNMA and FNMA investment instruments, HUD bonds and Low Income Housing Tax Credits (LIHTCs). The bank also had investments that benefitted its footprint or a broader regional area that includes South Carolina. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs and community

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revitalization through a New Markets Tax Credit fund. Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections.

## Service Test

The service test rating is Needs to Improve when considering the bank's statewide performance in South Carolina.

## Retail Services

Delivery systems, including ATMs and branch office locations, are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including lowand moderate-income geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies or low- and moderate-income individuals.

## Community Development Services

The bank provides a limited level of community development services that benefit residents and small businesses of the assessment areas. Community development services are poor in both assessment areas.

METROPOLITAN AREA<br>(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBIA, SOUTH CAROLINA ASSESSMENT AREA

The Columbia assessment area includes the two central counties of the six-county Columbia, SC MSA: Richland and Lexington counties. The city of Columbia is the principal city of the metropolitan area and also serves as the county seat of Richland County as well as the state capital of South Carolina. There are 121 census tracts in the assessment area which includes 42 low- and moderate-income tracts. Regions Bank operates four branches in the assessment area, none of which are located in a low- or moderate-income census tract. These branches represent $16 \%$ of the bank's total branches in South Carolina.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 261 ( $0.3 \%$ ) were in the Columbia assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 159 (0.1\%) were in the Columbia assessment area.

## Population and Income Characteristics

The Columbia MSA is South Carolina's largest with a total population of 767,598 as of the 2010 census. Richland and Lexington counties comprise a substantial majority of the Columbia MSA, with a population of 646,895 as of 2010 , which also represents a $20.5 \%$ growth since 2000 (or $2.1 \%$ annual growth rate). ${ }^{607}$ Over the same time period, the state of South Carolina experienced growth of $15.3 \%$ from $4,012,012$ in 2000 to 4,625,364 in 2010. The Columbia area is one of the fastest growing parts of a high growth state. The area continued to grow in 2010 and 2011. According to US Census Bureau estimates, Lexington County grew 1.8\% between April 1, 2010 and July 1, 2011, while Richland County grew at a $1.2 \%$ pace over the same time period. ${ }^{608}$

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following table sets forth the estimated median family income for 2010 and 2011 for the Columbia, SC MSA and also provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). The table indicates that the HUD estimated median family income for the Columbia MSA in 2010 was $\$ 62,400$ and \$63,600 for 2011.

## Borrower Income Levels Columbia, SC MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | 0 - 49 |  | 50\% - 79.99\% |  |  | 80\% - 119.99\% |  |  | 120\% - \& above |  |  |
| 2010 | \$62,400 | 0 | - | \$31,199 | \$31,200 | - | \$49,919 | \$49,920 |  | \$74,879 | \$74,880 |  | \& above |
| 2011 | \$63,600 | 0 | - | \$31,799 | \$31,800 | - | \$50,879 | \$50,880 |  | \$76,319 | \$76,320 |  | \& above |

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## Columbia, South Carolina

According to the 2000 U.S. census data, there were 137,049 families in the assessment area. Of those families, $19.3 \%$ were low-income, $17.1 \%$ were moderate-income, $21.8 \%$ were middle-income, and $41.7 \%$ were upperincome. Of the total families, 11,559 (8.4\%) had incomes below the poverty level.

## Housing Characteristics

Housing sales have declined significantly during the recession, from 17,669 residential homes sold in 2006 to 8,936 homes sold in 2010, a $49.4 \%$ decline from pre-recession levels. ${ }^{609}$ Housing sales in 2011 still showed signs of the slowdown in the market with $3^{\text {rd }}$ quarter 2011 residential home sales down $31.0 \%$ from the $3^{\text {rd }}$ quarter of 2010. Likewise, building activity continues to decline, albeit recently at a slower pace. While singlefamily residential building permits declined sharply by $61.5 \%$ from 2006 to 2009, permits have only declined by $3.8 \%$, from 2,228 in 2009 to 2,143 in 2011 in the two counties combined. ${ }^{610}$

While housing sales and building activity continue to be sluggish, according to the National Association of Realtors, the median sales price of existing single-family homes in the Columbia MSA (a greater area consisting of six counties) actually increased $2.4 \%$ to $\$ 142,600$ in 2010 from $\$ 139,200$ in 2009. ${ }^{611}$ However, the uptick was short-lived as the median sales price decreased slightly in 2011, though, to $\$ 140,600$. While not consistent price appreciation, it appears housing prices are stabilizing somewhat in the area.

Mortgage delinquencies and foreclosures are a significant concern in the area. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) in Richland and Lexington counties increased from $5.6 \%$ in January 2010 to $9.9 \%$ in December 2011. Statewide in South Carolina, just 1.3\% of mortgages were seriously delinquent as of December 2011. ${ }^{612}$

The 2000 US census data indicates that there were 220,771 housing units in the assessment area, of which 138,033 (62.5\%) were owner-occupied. Of total housing units, 65,308 ( $29.6 \%$ ) were rental units. The highest concentration of rental units was in low-income census tracts where $68.8 \%$ of all units were renter-occupied. The area has seen a shift from home ownership to renting during the recession and continuing during the years 2010 and 2011. The homeownership rate in 2010 was $68.2 \%$ compared to $67.1 \%$ as of October 2011; meanwhile, the percentage of renters increased from $31.8 \%$ to $32.9 \%$ over the same time period. ${ }^{613}$ The median housing value in the assessment area was $\$ 94,020$, which was $13.1 \%$ higher than the median housing value for the state of South Carolina at $\$ 83,100$. The median age of housing stock in the assessment area was 24 years compared to 22 years for the state of South Carolina.

## Employment and Economic Data

Columbia is the state capital of South Carolina as well as the home of the University of South Carolina, the largest college in the state. The Columbia assessment area, consequently, has a large concentration of state and local government workers, as well as a large student population. 2010 REIS data indicates that state and local government is the primary employment sector in Columbia, comprising $15.2 \%$ of the area's total nonfarm employment. ${ }^{614}$ Other significant industry sectors in the area include retail trade, health care and social assistance, accommodation and food services, and other service industries. The following table shows the

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unemployment rates for 2010 and 2011 for the Columbia MSA, Lexington County, Richland County, and the State of South Carolina.

## Unemployment Rates

Assessment Area: SC Columbia

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Columbia MSA | 9.4 | 8.9 |
| Lexington County | 8.2 | 7.8 |
| Richland County | 9.7 | 9.2 |
| South Carolina | $\mathbf{1 1 . 2}$ | $\mathbf{1 0 . 3}$ |

Not Seasonally Adjusted
The Columbia MSA's pre-recession unemployment rate in 2007 was $4.9 \%$, which increased to $9.4 \%$ in 2010. While the assessment area experienced increased levels of unemployment during the recession, unemployment rates in the area were, and remain, lower than the statewide unemployment rate. In 2011, the unemployment rate for the area decreased for the first time since 2007 to $8.9 \%$, showing a slight improvement in the job market. Lexington County, with unemployment rates that peaked at $8.2 \%$, fared relatively well in comparison to Richland County and South Carolina as a whole.

Job losses occurred in nearly every industry sector, including the following: mining, logging, and construction; manufacturing; trade, transportation, and utilities; information; financial activities; and professional and business services. ${ }^{615}$ All of these sectors, with exception of professional and business services, remain at employment that is lower than pre-recession levels. While most sectors struggled during the recession, three industry sectors maintained employment levels, or even grew, during the recession: education and health services, leisure and hospitality, and government. As shown in the unemployment rate, employment levels grew once again between 2010 and 2011, encompassing nearly every sector.

## Community Contacts and Community Development Opportunities

According to a community contact from a local community development agency in the Columbia assessment area, the community is facing several challenges. Primary community needs for the area are affordable housing options for low- and moderate-income individuals, housing for homeless persons, revitalization of neighborhoods, and expanding economic opportunities by creating jobs that are accessible to low- and moderate-income persons. The community contact indicated that the economy remained sluggish and that there are few community development organizations operating in Columbia. According to the CDFI Fund, the Columbia area is home to five community development financial institutions (CDFIs) that provide alternative financing initiatives such as affordable housing, small businesses, and community facilities. ${ }^{616}$

The recession has been a drag on the Columbia economy and has directly impacted the low- and moderateincome community. The percentage of the population in the area receiving food stamps increased significantly during recession years. As of 2009, $12.9 \%$ of the population of Lexington County and $14.9 \%$ of the population

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## Columbia, South Carolina

in Richland County received food stamps. ${ }^{617}$ While both counties have a lower poverty rate than South Carolina as a whole, both counties have a large percentage of people living below the poverty. In 2010, the percentage of people living below the poverty level in Lexington County was $11.1 \%$, while Richland County's poverty rate was $14.5 \% .^{618}$ In comparison, the South Carolina statewide poverty rate as of 2010 was $16.4 \%$.

As the community contact mentioned, one of the top needs in the area is the revitalization of neighborhoods. To this end, the Columbia area received a significant allocation of the Neighborhood Stabilization Program (NSP) funds. The funds are available to help stabilize communities hard hit by the foreclosure crisis. Richland County received $\$ 2.2$ million in NSP funds, which have been used primarily for residential rehabilitation of foreclosed properties. ${ }^{619}$

The community contact also mentioned the large unbanked and underbanked population in the area, and specifically the need for financial literacy to help improve the financial prospects of low- and moderate-income individuals. According to the FDIC’s 2009 National Survey of Unbanked and Underbanked Households, 9.0\% of households in Richland County and $5.1 \%$ in Lexington County are unbanked, meaning they have no type of deposit account with a mainstream financial institution. In addition, $22.3 \%$ of households in Richland County and $18.6 \%$ in Lexington County are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower income and minority households. Richland particularly stands out with unbanked and underbanked populations that are higher than the national average, albeit still below statewide levels. ${ }^{620}$ The community contact indicated that a partnership between the City of Columbia and the South Carolina Bankers Association has begun the process of implementing a Bank On program for the city, which should help address these issues of improving the financial futures of the unbanked and underbanked population.

## Competition

The Columbia assessment area is a highly competitive market with a significant presence of national and multiregional banks. The competitiveness of the banking industry in the market, along with Regions Bank's small presence with only four branches in the area, presents a challenge to Regions Bank in meeting community needs. According to the June 30, 2011 FDIC Summary of Deposits Report, Regions Bank ranked $7^{\text {th }}$ in the assessment area with $3.1 \%$ of the deposit market share. The top financial institutions by deposit market share in the area were as follows: Bank of America ( $28.8 \%$ market share), Wells Fargo (18.6\%), Branch Banking and Trust (15.6\%), and First Citizens Bank and Trust (9.5\%).

Lending is also highly competitive in the area and is dominated by large national financial institutions. Leaders in small business lending in the market include American Express, Wells Fargo, Branch Banking and Trust, First Citizens, Citibank, and Capital One. Regions Bank ranked $17^{\text {th }}$ of 62 reporters with just $0.6 \%$ of the total small business loans in 2010. In 2011, Regions ranked $16^{\text {th }}$ of 56 reporters with $1.4 \%$ of the total loans in the assessment area.

For HMDA lending, Regions Bank ranked $26^{\text {th }}$ of 347 reporters with $0.7 \%$ of the HMDA lending market share in 2010. In 2011, the bank ranked $34^{\text {th }}$ of 318 reporters with just $0.4 \%$ of total HMDA loans. HMDA lending is

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## Columbia, South Carolina

also dominated by large national and multi-regional banks, including Bank of America, Wells Fargo, Branch Banking and Trust, and JPMorgan Chase, among others.

Demographic Characteristics
The following table provides demographic characteristics of the bank's assessment area based on the 2000 U.S. census data used to analyze the bank's CRA performance.

## Combined Demographics Report

Assessment Area(s): SC Columbia

| Income Categories | Tract <br> Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 9 | 7.4 |  | 2.8 | 1,594 | 41.0 | 26,481 | 19.3 |
| Moderate-income | 33 | 27.3 |  | 23.0 | 5,035 | 16.0 | 23,479 | 17.1 |
| Middle-income | 42 | 34.7 |  | 36.6 | 3,414 | 6.8 | 29,913 | 21.8 |
| Upper-income | 35 | 28.9 |  | 37.6 | 1,516 | 2.9 | 57,176 | 41.7 |
| Unknown-income | 2 | 1.7 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 121 | 100.0 |  | 100.0 | 11,559 | 8.4 | 137,049 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 8,036 | 1,647 |  | 20.5 | 5,526 | 68.8 | 863 | 10.7 |
| Moderate-income | 55,231 | 28,858 |  | 52.2 | 20,900 | 37.8 | 5,473 | 9.9 |
| Middle-income | 81,493 | 50,959 |  | 62.5 | 24,657 | 30.3 | 5,877 | 7.2 |
| Upper-income | 75,847 | 56,562 |  | 74.6 | 14,075 | 18.6 | 5,210 | 6.9 |
| Unknown-income | 164 |  | 7 | 4.3 | 150 | 91.5 | 7 | 4.3 |
| Total Assessment Area | 220,771 | 138,033 |  | 62.5 | 65,308 | 29.6 | 17,430 | 7.9 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,309 | 4.8 |  | 4.6 | 106 | 6.7 | 89 | 6.7 |
| Moderate-income | 5,448 | 20.0 |  | 19.5 | 385 | 24.2 | 343 | 25.8 |
| Middle-income | 8,969 | 33.0 |  | 33.2 | 522 | 32.9 | 393 | 29.6 |
| Upper-income | 10,592 | 39.0 |  | 40.0 | 477 | 30.0 | 416 | 31.3 |
| Unknown-income | 858 | 3.2 |  | 2.8 | 98 | 6.2 | 86 | 6.5 |
| Total Assessment Area | 27,176 | 100.0 |  | 100.0 | 1,588 | 100.0 | 1,327 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.3 |  | 5.8 |  | 4.9 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{aligned} & \text { Less Than or = } \\ & \text { \$1 Million } \end{aligned}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 5 | 1.5 |  | 1.5 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 83 | 24.1 |  | 24.2 | 3 | 25.0 | 0 | 0.0 |
| Middle-income | 155 | 45.1 |  | 44.4 | 7 | 58.3 | 1 | 100.0 |
| Upper-income | 99 | 28.8 |  | 29.3 | 2 | 16.7 | 0 | 0.0 |
| Unknown-income | 2 | 0.6 |  | 0.6 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 344 | 100.0 |  | 100.0 | 12 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 96.2 |  | 3.5 |  | . 3 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Columbia, South Carolina

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

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

During the review period, the bank reported 261 (62.1\%) HMDA loans compared to 159 (37.9\%) small business loans in the Columbia assessment area. Therefore, evaluation and rating of the assessment area focuses on the performance of HMDA lending more heavily than small business lending in determining the bank's lending test rating in the assessment area. In total, $0.2 \%$ of the bank's small business and HMDA lending by number of loans and $0.3 \%$ by dollar volume totaling $\$ 62.0$ million is located in the assessment area. The percentage of the bank's total lending at $0.2 \%$ is comparable to the percentage of deposits at $0.4 \%$ in this area. The bank also originated two community development loans in the Columbia assessment area. Regions Bank is not a major competitor in this market, ranking $34^{\text {th }}$ in HMDA originations and $16^{\text {th }}$ in small business originations in 2011.

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

## Geographic Distribution of Loans

For this analysis the geographic distribution of small business and HMDA lending, 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, the unemployment and poverty rates and the level of owner-occupied units in low- and moderate-income census tracts were issues considered when assessing the bank's performance with regard to HMDA lending. Considering all of these factors, Regions Bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Home Purchase Loans

During the review period, the bank did not originate any of its home purchase loans in low-income census tracts, where only $1.2 \%$ of owner-occupied units in the assessment area are located. It should also be noted that the aggregate had very low lending levels in both 2010 and 2011, which may suggest a lack of lending opportunity in low-income census tracts. Due to the low level of owner-occupied units, as well as limited aggregate activity, the bank's performance is adequate, with minimal weighting given to home purchase lending in low-income tracts.

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $11.4 \%$ of its home purchase loans in moderate-income census tracts, where $20.9 \%$ of the owneroccupied units in the assessment area are located. Regions Bank's performance was better than the aggregate in 2010 and below the aggregate in 2011.

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

## Columbia, South Carolina

## Home Refinance Loans

During the review period, the bank originated two home refinance loans in low-income census tracts, where only $1.2 \%$ of owner-occupied units in the assessment area are located. It should also be noted that the aggregate had very low lending levels in both 2010 and 2011, which may suggest a lack of lending opportunity in lowincome census tracts. Due to the low level of owner-occupied units, as well as limited aggregate activity, the bank’s performance is adequate, with minimal weighting given to home refinance lending in low-income tracts.

Regions Bank's home refinance lending in moderate-income census tracts is poor. During the review period, the bank originated $3.4 \%$ of its home refinance loans in moderate-income census tracts, where $20.9 \%$ of the owner-occupied units are located. Regions Bank's performance was below the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

During the review period, the bank did not originate any home improvement loans in low-income tracts, where only $1.2 \%$ of owner-occupied units in the assessment area are located. It should also be noted that the aggregate had very low lending levels in both 2010 and 2011, which may suggest a lack of lending opportunity in lowincome census tracts. Due to the low level of owner-occupied units, as well as limited aggregate activity, the bank's performance is adequate, with minimal weighting given to home improvement lending in low-income tracts.

Regions Bank’s home improvement lending in moderate-income census tracts is poor when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated only one home improvement loan in a moderate-income tract, where $20.9 \%$ of the owner-occupied units in the assessment area are located. Regions Bank’s performance was greater than aggregate in 2010 and less than aggregate in 2011.

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

## Small Business Loans

Regions Bank's small business lending in low-income census tracts is poor. During the review period, Regions Bank originated $2.5 \%$ of its small business loans in low-income tracts, where $4.6 \%$ of the small businesses in the assessment area are located. The bank performed below the aggregate in both 2010 and 2011.

Regions Bank's small business lending in moderate-income tracts is good. During the review period, the bank originated $20.1 \%$ of its small business loans in moderate-income census tracts, where $19.5 \%$ of the small businesses in the assessment area are located. The bank's performance was slightly greater than aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses.

## Columbia, South Carolina

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment, and poverty rates, were considered, as well as the performance of other banks.

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is adequate. The bank's performance was less than the demographic with $11.4 \%$ of its home purchase loans to low-income borrowers, while low-income families make up $19.3 \%$ of total families in the assessment area. The bank's performance was better than the aggregate in 2010 and less than the aggregate in 2011.

Home purchase lending to moderate-income borrowers is good. At 25.3\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $17.1 \%$. The bank's performance was comparable to the aggregate in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is adequate. The bank made $5.1 \%$ of its refinance loans to low-income borrowers, while low-income families make up $19.3 \%$ of total families in the assessment area. The bank's performance was slightly less than the aggregate in 2010 and greater than the aggregate in 2011.

The bank's home refinance lending to moderate-income borrowers is adequate when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $11.4 \%$ was less than the percentage of moderate-income families in the assessment area at $17.1 \%$. Regions Bank's performance was slightly less than aggregate in 2010 and comparable to aggregate in 2011.

The bank's home refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is very poor. Regions Bank did not originate any home improvement loans to low-income borrowers, while low-income families make up $19.3 \%$ of families in the assessment area. The bank's lending to low-income borrowers was significantly below the aggregate performance in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is adequate. Although Regions Bank originated only two loans to moderate-income borrowers, the bank’s percentage of home improvement loans to moderateincome borrowers at $28.6 \%$ exceeded the percentage of moderate-income families in the assessment area at $17.1 \%$. Additionally, the bank's performance was greater than the aggregate in both 2010 and 2011.

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

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than aggregate in 2011. The bank originated $34.0 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.3 \%$. However, of the 159 small business loans originated during the review period, 75 loans (47.2\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $64.3 \%$, which is still below the percentage of small businesses in the assessment area. However, $79.9 \%$ of the 159 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and comparable to the aggregate in 2011.

## Community Development Lending

Regions Bank makes an adequate level of community development loans in the Columbia assessment area. The bank originated two community development loans totaling $\$ 3.8$ million during the review period. One loan provides financing to a local school district where a majority of students are low- or moderate-income and one loan promotes economic development by providing credit to a revolving loan pool which finances small businesses that typically do not qualify for conventional commercial loans. Local community development credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization resulting from elevated foreclosure rates, financing for small businesses, and financial stability for residents. While the number and the dollar amount of community development loans in the assessment area are relatively small, the bank's community development loan portfolio exhibits adequate responsiveness to assessment area credit needs given its presence in the market.

## Investment Test

The bank's performance in the Columbia assessment area under the investment test is good. The bank had two investments totaling $\$ 9.2$ million, including one current period investment for $\$ 3.2$ million. Direct investments in the assessment area provided support for affordable housing through Low Income Housing Tax Credits (LIHTCs) and GNMA investment vehicles. The bank has invested in one LIHTC project in the assessment area that created 162 units of affordable housing. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and community revitalization through a regional New Markets Tax Credit fund. Local community credit needs include but are not limited to affordable housing for low- and moderate-income workers, neighborhood stabilization resulting from elevated foreclosure rates, financing for small businesses, and financial stability for low- and moderate-income residents. The dollar volume of Regions Bank's current and total investments exhibits responsiveness to some of the identified community needs given the bank's presence in the assessment area.

The bank made one contribution of $\$ 5,000$ to an organization that provides community services, specifically health care assistance, for low- and moderate-income individuals. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area.

## Columbia, South Carolina

## Service Test

The bank's service test performance in the Columbia assessment area is poor.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the four branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open any branches and closed one branch (located in an upper-income tract) in the Columbia assessment area. The bank does not have any branches located in low- or moderate-income geographies.

## Geographic Distribution of Branches

Assessment Area: SC Columbia

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | I Branc <br> \% | es <br> Open <br> \# | Closed \# | Drive thrus | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 9 | 7.4\% | 3.5\% | 4.8\% |
| Moderate | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 | 0 |  |  | 33 | 27.3\% | 24.5\% | 20.0\% |
| Middle | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 42 | 34.7\% | 37.2\% | 33.0\% |
| Upper | Total | 3 | 75.0\% | 0 | 1 | 3 | 3 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 35 | 28.9\% | 34.8\% | 39.0\% |
| Unknown | Total | 1 | 25.0\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 2 | 1.7\% | 0.1\% | 3.2\% |
| Total | Total | 4 | 100.0\% | 0 | 1 | 4 | 4 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 121 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a limited level of community development services in the assessment area. During the review period, Regions Bank employees provided 38 service hours for community development organizations by participating in eight community development services. According to information obtained from community contacts, there are opportunities for financial institutions to participate in community development services in

## Columbia, South Carolina

the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

## Metropolitan Areas (Limited Review)

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

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

- Anderson Assessment Area (Anderson County)

O As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $4.0 \%$ of its branches in South Carolina.
o As of June 30, 2011, the bank had $\$ 39.3$ million in deposits in this assessment area, representing a market share of $1.7 \%$ and $3.6 \%$ of Regions Bank's total deposits in South Carolina.

- Charleston Assessment Area (Charleston and Dorchester Counties)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing $20.0 \%$ of its branches in South Carolina.
o As of June 30, 2011, the bank had $\$ 153.9$ million in deposits in this assessment area, representing a market share of $1.8 \%$ and $14.1 \%$ of Regions Bank's total deposits in South Carolina.
- Greenville Assessment Area (Greenville County)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $16.0 \%$ of its branches in South Carolina.
o As of June 30, 2011, the bank had $\$ 185.7$ million in deposits in this assessment area, representing a market share of $1.7 \%$ and $17.1 \%$ of Regions Bank's total deposits in South Carolina.
- Myrtle Beach Assessment Area (Horry County)
o The bank closed its one branch in this assessment area during the review period, in April, 2010.
o As of December 31, 2011, Regions Bank operated no branches in the assessment area.
o As of June 30, 2011, the bank had no deposits in this assessment area.
- Spartanburg Assessment Area (Spartanburg County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $4.0 \%$ of its branches in South Carolina.
o As of June 30, 2011, the bank had $\$ 62.4$ million in deposits in this assessment area, representing a market share of $1.5 \%$ and $5.7 \%$ of Regions Bank's total deposits in South Carolina.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

## Metropolitan Areas (Limited Review)

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Anderson | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Charleston | Consistent | Not Consistent (Above) | Not Consistent (Above) |
| Greenville | Consistent | Not Consistent (Above) | Consistent |
| Myrtle Beach | Not Consistent <br> (Below) | Not Consistent (Below) | Not Consistent (Below) |
| Spartanburg | Consistent | Not Consistent (Above) | Not Consistent (Above) |

The Columbia and Hampton-Jasper-Beaufort assessment areas received full-scope reviews, and the bank's performance in both the Columbia and Hampton-Jasper-Beaufort assessment areas were given similar consideration in determining the overall rating for the state. Columbia is the bank's largest market in South Carolina in terms of deposits and number of branches. The full-scope areas selected together represent $53.9 \%$ of the deposits in the assessment areas in South Carolina as well as $48.0 \%$ of the branches. The full-scope assessment areas also represent $28.0 \%$ of the HMDA loans and $35.7 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits and a large portion of the branches and loans in the State of South Carolina.

For the Lending Test, performance was weaker than the bank's performance in the state in two of the limitedscope assessment areas (Anderson and Myrtle Beach) and consistent with the bank's performance in the remaining limited-assessment assessment areas (Charleston, Greenville and Spartanburg). The distribution of loans by borrower's income, lower levels of community development loans relative to the bank's operations in the assessment contributed to weaker performance in the Myrtle Beach assessment area.

For the Investment Test, the performance in three limited-scope assessment areas (Charleston and Spartanburg) was stronger than the bank's performance in the state due to higher levels of qualified investments relative to the bank's operations in the assessment areas. The performance in the Greenville assessment area was consistent with the bank's statewide performance. The performance in the Anderson limited-scope assessment area was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment area. Performance was weaker in the Myrtle Beach limited-scope assessment area due to a lack a presence in the area, which is attributed to the closing of the bank's one branch in the assessment area in April, 2010.

For the Service Test, the performance in three limited-scope assessment areas (Charleston, Greenville and Spartanburg) was stronger than the bank's performance in the state. The performance in the Anderson limitedscope assessment area was consistent with the bank's performance in the state. Performance was weaker in the Myrtle Beach limited-scope assessment area due to a lack a presence in the area, which is attributed to the closing of the bank's one branch in the assessment area in April, 2010.

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

NON-METROPOLITAN AREA<br>(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HAMPTON-JASPER-BEAUFORT, SOUTH CAROLINA ASSESSMENT AREA

The Hampton-Jasper-Beaufort assessment area includes all census tracts in Beaufort, Hampton and Jasper counties in southeastern South Carolina. There are 35 census tracts in the assessment area across the three counties. Beaufort County contains 27 tracts, two of which are moderate-income and 25 are middle- or upperincome. Hampton County has five census tracts of which one is a moderate-income tract and four are distressed or underserved non-metropolitan middle-income tracts. Jasper County is comprised of three distressed or underserved non-metropolitan middle-income tracts. The bank has eight branches located in the assessment area, none of which are located in low- or moderate-income tracts. These branches represent $32 \%$ of the bank's total branches in South Carolina.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 217 ( $0.3 \%$ ) were in the Hampton-Jasper-Beaufort assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 210 (0.2\%) were in the Hampton-Jasper-Beaufort assessment area.

## Population and Income Characteristics

The assessment area population is growing at an above average rate. According to census data, the population of the assessment area in 2000 was 163,001 , representing $4 \%$ of the statewide population. From 2000 to 2010, the assessment area population grew by $27.7 \%$ compared to the statewide population, which grew by $15.3 \%$. As of 2010, the assessment area population of 208,100 accounted for $4.5 \%$ of the statewide population.

Beaufort County is home to the popular tourist destination Hilton Head, South Carolina, as well as the United States Marine Corps training facility at Parris Island. It has the largest population of the three counties comprising the assessment area. The county's population grew by $34 \%$ from 2000 to 2010. Hampton County saw its population decline by $1.4 \%$ during this time period, while Jasper County's population grew by almost 20\%. Population growth in the assessment area was largest in the earlier parts of the decade. From 2005 to 2010, net migration was positive but has declined each year from a high of 2,252 individuals in 2006 to a low of 1,076 individuals in 2010. Net migration is defined as the number of in-migrants less the number of outmigrants and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns from the present year to the previous year. ${ }^{621}$

Food stamp usage has increased across the assessment and statewide. From 2000 to 2009, the percentage of assessment area residents receiving food stamps increased at a rate greater than the state of South Carolina. In 2000, $7.4 \%$ of assessment area residents received food stamps, which increased to $14.4 \%$ by 2009 . Jasper County experienced the greatest increase in food stamp recipients followed by Beaufort County and Hampton County. Conversely, Beaufort had the smallest percentage of its population on food stamps in 2010 at $9.9 \%$, compared to $26.3 \%$ in Jasper County, $27 \%$ in Hampton County, and $17 \%$ statewide. ${ }^{622}$

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following chart sets forth the estimated median family income for the years 2010 through 2011 for the non-metro areas in South Carolina. It

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## Hampton-Jasper-Beaufort, South Carolina

also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper).

## Borrower Income Levels <br> South Carolina State Non-Metro

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% |  | 119.99\% | 120\% | - | \& above |
| 2010 | \$49,100 | 0 | - | \$24,549 | \$24,550 | - | \$39,279 | \$39,280 |  | \$58,919 | \$58,920 | - | \& above |
| 2011 | \$47,700 | 0 | - | \$23,849 | \$23,850 | - | \$38,159 | \$38,160 |  | \$57,239 | \$57,240 |  | \& above |

## Housing Characteristics

The assessment area housing market has experienced a great deal of volatility as a result of the recent housing crisis, but median prices are lower than the statewide median value in many places. In 2009, the housing market dropped by as much as $30 \%$, but Beaufort County remains the most expensive market relative to the state. ${ }^{623}$ It contains some of the highest priced housing in the assessment area due to its extensive amount of land on the Atlantic Ocean, as well as being home to the popular upscale tourist community of Hilton Head Island. As of 2010, the median value of an owner-occupied home in Beaufort County was $\$ 290,900$, with the median value of a home on Hilton Head Island being $\$ 550,800$. Homes in Jasper and Hampton counties are much less expensive with 2010 median values of $\$ 118,700$ and $\$ 79,600$ respectively. The 2010 median value of an owner-occupied home statewide was $\$ 134,100 .{ }^{624}$

Census data show that there were 77,019 housing units in the assessment area in 2000 , of which $58.0 \%$ were owner-occupied, $19.9 \%$ were rental units and $22.1 \%$ were vacant. There were no low-income tracts in the assessment area. More than $70 \%$ of homes in moderate-income tracts were owner-occupied, indicating opportunity to lend in these geographies. The median age of housing stock across the assessment area was 16 years. ${ }^{625}$ Housing permits have declined, with only 428 single-family permits issued in 2011, compared to 4,234 in 2005, an $89.9 \%$ decrease. Multi-family development is not a significant source of housing inside the assessment area. ${ }^{626}$

Mortgage delinquencies have had an adverse impact on the local housing market. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $6.5 \%$ in January 2010 to $11.6 \%$ in December 2011. ${ }^{627}$ HMDA data for the assessment area show that demand for home purchase loans of owner-occupied, one- to four-family dwellings is stable. After decreasing by more than $50 \%$ between 2006 and 2008, the number of single-family home purchase loan originations has remained flat at approximately 1,300 annually for three years. Refinance activity has remained relatively strong in recent years as well, with 2011 loan refinances down only $21 \%$ from their peak of 3,276 in 2006.

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## Hampton-Jasper-Beaufort, South Carolina

## Employment and Economic Conditions

The Hampton-Jasper-Beaufort assessment area is an economically diverse region due to its coastal location in southeast South Carolina. Many of the coastal areas have concentrated wealth while inland areas are characterized by lower incomes and decreased economic activity. Beaufort County has the largest employment base with 92,190 jobs as of 2010. Retail trade, accommodation and food services, and the military are the largest employment sectors in the county, accounting for more than 31,000 jobs. Some of the county's top employers include the local school system, Wal-Mart Stores Inc., the Department of Defense, county government, and the US Marines. ${ }^{628}$ Hampton and Jasper counties combined account for 18,213 jobs, with $59 \%$ of these jobs in Jasper County and many residents of the two counties commuting to Beaufort County for work. The primary employment sectors across the two counties are local government, retail trade, and construction. ${ }^{629}$

There are multiple institutions of higher learning located inside the assessment area, most notably the University of South Carolina Beaufort (USCB). USCB is the fastest growing four-year institution in the University of South Carolina system, with campuses located in the town of Beaufort and at Hilton Head Gateway and serving over 1,700 students. ${ }^{630}$ In addition to traditional academic endeavors, the university offers degree programs designed to meet the needs of military personnel and their families. Other academic institutions located in the assessment area include Webster University, Park University, Technical College of the Lowcountry and EmbryRiddle Aeronautical University - Beaufort.

From an economic development perspective, Jasper County continues to focus efforts on the development of a deep water port on the Savannah River that would open up the area to additional commercial shipping traffic. According to the Jasper County Economic Development Department, this project will result in a $\$ 450$ million investment to construct the port terminal, double container shipping volume and yield 450 jobs at the port terminal, and provide 95,000 additional jobs in the surrounding area. The project, once completed, is forecast to generate $\$ 1$ million to $\$ 2$ million annually in fee income. ${ }^{631}$

Hampton County has seen the least amount of economic growth in the assessment area. The size of its population and civilian labor force remains about the same as it was 20 years ago. This lack of economic growth has resulted in a relatively low cost of living, low median household income and an elevated unemployment rate. Relative to the state and nation, Hampton County residents tend to be poorly educated and less skilled. ${ }^{632}$

Beaufort County's primary economic drivers are tourism and the military. Hilton Head Island in particular is a primary vacation destination for wealthy tourists. On average, more than 2 million tourists visit the island each year with an economic impact of more $\$ 1.5$ billion annually. ${ }^{633}$ Additionally, $60 \%$ of jobs in the local area are tourism related, providing more than 10,000 jobs for local residents. However, tourism has been on the decline for more than a decade, an issue currently being debated by public officials and the local business

[^205]
## Hampton-Jasper-Beaufort, South Carolina

community. ${ }^{634}$ The military also has a large presence in Beaufort County due to the US Marine Corps training facility at Parris Island. Approximately 16,000 Marine recruits graduate from boot camp here each year, resulting in more than 120,000 visitors annually to the area. The Marine Corps estimates the economic impact of Parris Island on the surrounding communities to be more than $\$ 345$ million annually. This includes, among other things, military and civilian salaries, contributions to local organizations, education and construction projects. ${ }^{635}$

Further highlighting the economic vitality of Beaufort County, the US credit rating agency Fitch affirmed the county's credit rating in 2012 as "AA," citing a stable outlook. Specifically, the agency noted that despite the county's concentration in tourism and military facilities, its economy remains strong, characterized by aboveaverage income and wealth levels. Employment levels show positive trends and the county's unemployment rate continues to decline. ${ }^{636}$

But despite recent declines, unemployment remains a challenge for the state of South Carolina and the assessment area. The table below shows that while the unemployment rates in Beaufort and Jasper counties were lower than the statewide rate in 2010 and 2011, Hampton County continues to battle excessively high unemployment. The 2011 nationwide average unemployment rate was $8.9 \%{ }^{637}$

## Unemployment Rates

Assessment Area: SC Hampton-Jasper-Beaufort

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Beaufort County | 9.1 | 8.7 |
| Hampton County | 14.2 | 13.9 |
| Jasper County | 10.1 | 9.8 |
| South Carolina | $\mathbf{1 1 . 2}$ | $\mathbf{1 0 . 3}$ |

Not Seasonally Adjusted

## Community Contacts and Community Development Opportunities

One community contact specializing in affordable housing advocacy and finance was interviewed to discuss local community development opportunities and challenges. That contact indicated that there is a critical shortage of affordable housing in the area. Many of the lower-income service personnel who work in the coastal communities live inland and must be bused in on a daily basis. Furthermore, only $10 \%$ of the people who qualify for Section 8 housing vouchers are able to obtain them due to a long waiting list. The contact added that the high cost of housing development, public opposition, and zoning requirements make the development of affordable housing on the coast challenging. Regarding bank involvement in community development activities, the contact stated that construction and development financing remains difficult to

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## Hampton-Jasper-Beaufort, South Carolina

obtain, but several banks are participating in local Neighborhood Stabilization Program (NSP) activities, and some are sponsoring financial education events for low- and moderate-income individuals.

As with many communities across the nation, access to traditional banking products and services for some assessment area residents is challenging. Bank On is a national initiative focused on connecting unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $9.2 \%$ of households in the Hilton Head Island-Beaufort metro area are unbanked relative to $10.2 \%$ statewide. Additionally, $18.3 \%$ of households in the assessment area are listed as underbanked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $24.2 \%$ of underbanked households statewide. ${ }^{638}$

The 2010 Beaufort County, South Carolina Comprehensive Plan includes a section outlining affordable housing challenges and recommendations. The plan notes that many of the area's developers are focusing on higher-end housing that caters to retirees, putting a strain on affordable housing and workforce housing stock. Affordable housing is needed for lower-income workers, seniors on fixed incomes, and the rural geographies inland. To help overcome barriers to affordable housing, Beaufort County established its Affordable Housing Program, which provides down payment assistance, project subsidies, housing development incentives, and technical development services. Other affordable housing resources available for leverage include but are not limited to Low Income Housing Tax Credits (LIHTCs), Habitat for Humanity, Beaufort Housing Authority, and the Lowcountry Housing Trust. Additionally, the plan notes the need for homebuyer education activities and a consistent source of funding to ensure ongoing availability of the information. ${ }^{639}$

The State of South Carolina received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. South Carolina received nearly $\$ 44.7$ million under the NSP1 allocation process. ${ }^{640}$

There are eleven community development financial institutions (CDFIs) in the state of South Carolina, one of which is located inside the assessment area. Community development opportunity also includes participation in the LIHTC program, through which the state provided more than $\$ 10$ million in tax credits in 2012 for the development of affordable housing for low-income families. ${ }^{641}$

## Competition

The Hampton-Jasper-Beaufort assessment area is a relatively small banking market. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 27 financial institutions operating 86 branch locations across the three counties. Regions Bank ranked $8^{\text {th }}$ with deposit market share of $5.3 \%$ ( $\$ 189.8$ million). Wells Fargo Bank had the largest deposit market share at $13.5 \%$, followed by Palmetto State Bank with $9.8 \%$ and South Carolina Bank and Trust with 9.1\%. Regions Bank had the most branches of any bank in the assessment area with eight.

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## Hampton-Jasper-Beaufort, South Carolina

Regions Bank is not a small business or HMDA lending leader in the assessment area. In 2010, the bank ranked $12^{\text {th }}$ out of 57 small business loan reporters by originating $2.7 \%$ of all small business loans. In 2011, the bank rose to number nine of 58 reporters and increased its lending performance to $3.7 \%$ of all loans. From 2010 to 2011, the bank's small business lending increased from 84 to 128 loans. For HMDA lending, Regions Bank ranked $17^{\text {th }}$ in 2010 and 2011 with $1.3 \%$ and $1.2 \%$ of all HMDA loans, respectively. Wells Fargo Bank, SunTrust Mortgage, and South Carolina Bank and Trust were consistently the top HMDA originators in the assessment area.

## Demographic Characteristics

The following table shows selected demographic information for the Hampton-Jasper-Beaufort assessment area.

## Hampton-Jasper-Beaufort, South Carolina

## Combined Demographics Report

Assessment Area: SC Hampton-Jasper-Beaufort


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## Hampton-Jasper-Beaufort, South Carolina

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Hampton-Jasper-Beaufort assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes few, if any, community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 210 (49.2\%) small business loans compared to 217 (50.8\%) HMDA loans in the Hampton-Jasper-Beaufort, South Carolina assessment area. Therefore, HMDA lending was given equal weight to small business lending in determining the bank's lending test rating in the assessment area. The percentage of the bank's total lending at $0.2 \%$ is comparable to the percentage of deposits at $0.2 \%$ in this area. The bank did not originate any community development loans in the Hampton-Jasper-Beaufort assessment area. Regions Bank is not a major competitor in this market, ranking $17^{\text {th }}$ in HMDA originations and $9^{\text {th }}$ in small business loan originations in 2011.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. There are no low-income tracts in the Hampton-Jasper-Beaufort assessment area. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank's geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Home Purchase Loans

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $2.9 \%$ of its home purchase loans in moderate-income census tracts, where $6.6 \%$ of the owneroccupied units in the assessment area are located. Regions Bank's performance was better than aggregate in 2010 but below the aggregate in 2011.

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

## Home Refinance Loans

Regions Bank’s home refinance lending in moderate-income census tracts is adequate. During the review period, the bank originated $2.3 \%$ of its home refinance loans in moderate-income census tracts, where $6.6 \%$ of the owner-occupied units are located. Regions Bank's performance was better than the aggregate in 2010 and 2011.

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

## Home Improvement Loans

Regions Bank's home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review

## Hampton-Jasper-Beaufort, South Carolina

period, Regions Bank originated 9.1\% home improvement loans in moderate-income tracts, where $6.6 \%$ of the owner-occupied units in the assessment area are located. Additionally, Regions Bank's performance was better than the aggregate in 2010 and less than the aggregate in 2011.

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

## Small Business Loans

Regions Bank’s small business lending in moderate-income tracts is good. During the review period, Regions Bank originated $4.3 \%$ of its small business loans in moderate-income census tracts, where $3.4 \%$ of the small businesses in the assessment area are located. The bank's performance was greater than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was greater than the percentage of small businesses in these tracts, while lending in upper-income tracts was less than the percentage of small businesses

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment, and poverty rates, were considered, as well as the performance of other banks.

## Home Purchase Loans

The bank's home purchase lending to low-income borrowers is very poor. The bank did not originate any of its home purchase loans to low-income borrowers. Low-income families make up $15.5 \%$ of total families in the assessment area. Regions Bank's performance was less than the aggregate in both 2010 and 2011.

Home purchase lending to moderate-income borrowers is excellent. At 14.7\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $14.5 \%$. Regions Bank's performance was better than aggregate in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made $4.1 \%$ of its refinance loans to low-income borrowers. Low-income families make up $15.5 \%$ of total families in the assessment area. It was noted that the aggregate performance was also less than the percentage of low-income families, indicating opportunity may be limited for home refinance lending. Nonetheless, the bank's performance exceeded the aggregate lenders in both 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is excellent when compared to the percentage of moderate-income families in the assessment area and to aggregate performance. The bank's percentage of home refinance lending to moderate-income borrowers at $10.5 \%$ was less than the percentage of

## Hampton-Jasper-Beaufort, South Carolina

moderate-income families in the assessment area at 14.5\%; however, Regions Bank's performance was significantly better than the aggregate in both 2010 and 2011.

The bank's home refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is good. Regions Bank's percentage of home improvement loans at $27.3 \%$ was greater than the percentage of low-income families in the assessment area at $15.5 \%$. The bank's performance was significantly better than the aggregate in 2010 but below the aggregate in 2011.

Home improvement lending to moderate-income borrowers is adequate. Regions Bank's percentage of home improvement loans at $9.1 \%$ was less than the percentage of moderate-income families in the assessment area at $14.5 \%$. The bank's performance was less than the aggregate in 2010 and greater than the aggregate in 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than the aggregate in 2011. The bank originated $30.5 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.9 \%$. However, of the 210 small business loans originated during the review period, 107 (51.0\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $62.1 \%$, which was still less than the percentage of small businesses in the Hampton-Jasper-Beaufort assessment area. However, $81.0 \%$ of the 210 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and comparable to the aggregate in 2011.

## Community Development Lending

Regions Bank makes few, if any, community development loans in the Hampton-Jasper-Beaufort assessment area. The bank did not originate any community development loans during the review period. Local community development credit needs include but are not limited to affordable housing for low- and moderateincome individuals, neighborhood stabilization resulting from elevated foreclosure rates, and economic development activities such as small business finance that result in job growth, none of which have been responded to by the bank through community development lending.

## Investment Test

The bank's performance in the Hampton-Jasper-Beaufort assessment area under the investment test is adequate. The bank had three investments totaling $\$ 1.9$ million and no current period investments. Direct investments in the assessment area provided support for affordable housing through LIHTCs and GNMA investment vehicles. The bank invested in one LIHTC project in 2008 that created 40 units of affordable housing. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader

## Hampton-Jasper-Beaufort, South Carolina

regional investments primarily funded small businesses and startup companies through SBICs and community revitalization through a regional New Markets Tax Credit fund. Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization resulting from elevated foreclosure rates, and economic development activities such as small business finance that result in job growth.

The bank made one contribution of $\$ 140$ to an organization that provides community services. In addition, the bank made several contributions to national organizations that may indirectly benefit the assessment area. The bank's investments and contributions are not considered highly responsive to identified community needs, given the bank's presence in the market.

## Service Test

The bank's service test performance in the Hampton-Jasper-Beaufort assessment area is poor.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the eight branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. Regions Bank did not open or close any branches in the Hampton-Jasper-Beaufort assessment area. The assessment area does not have any low-income tracts, but has three moderate-income tracts. The bank does not have any branches located in moderate-income tracts.

Geographic Distribution of Branches
Assessment Area: SC Hampton-Jasper-Beaufort

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | al Branc <br> \% | $\begin{gathered} \text { Open } \\ \# \end{gathered}$ | Closed \# | Drive <br> thrus <br> \# | Extend- ed Hours $\#$ | Week- <br> end <br> Hours <br> \# | Census Tracts |  | Households <br> \% | Total Businesses \% |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Moderate | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 3 | 8.6\% | 6.1\% | 3.3\% |
| Middle | Total | 4 | 50.0\% | 0 | 0 | 3 | 1 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 16 | 45.7\% | 51.2\% | 40.9\% |
| Upper | Total | 4 | 50.0\% | 0 | 0 | 4 | 0 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 16 | 45.7\% | 42.7\% | 55.7\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 0 | 0.0\% | 0.0\% | 0.0\% |
| Total | Total | 8 | 100.0\% | 0 | 0 | 7 | 1 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 0 | 0 |  |  | 35 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides a limited level of community development services in the assessment area. During the review period, Regions Bank employees provided 74 service hours for community development organizations by participating in 18 community development services. According to information obtained from community contacts, there are opportunities for financial institutions to participate in community development services in the assessment area. Identified needs in the community include affordable housing, neighborhood stabilization, foreclosure mitigation, and financing and support for small businesses.

## Non-Metropolitan Areas (Limited Review)

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

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SOUTH CAROLINA NONMETROPOLITAN ASSESSMENT AREA

## - McCormick-Barnwell Assessment Area (McCormick and Barnwell Counties)

o As of December 31, 2011, Regions Bank operated two branches in the assessment area, representing $8.0 \%$ of its branches in South Carolina.
o As of June 30, 2011, the bank had $\$ 60.3$ million in deposits in this assessment area, representing a market share of $17.8 \%$ and $5.5 \%$ of Regions Bank's total deposits in South Carolina.

## 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 tables below. Please refer to the tables in Appendix G for information regarding this area.

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| McCormick- <br> Barnwell | Not Consistent <br> (Below) | Not Consistent <br> (Below) | Not Consistent (Above) |

As stated earlier, the Columbia and Hampton-Jasper-Beaufort assessment areas received full-scope reviews, and the bank's performance in both the Columbia and Hampton-Jasper-Beaufort assessment areas were given similar consideration in determining the overall rating for the state. Columbia is the bank's largest market in South Carolina in terms of deposits and number of branches. The full-scope areas selected together represent $53.9 \%$ of the deposits in the assessment areas in South Carolina as well as $48.0 \%$ of the branches. The fullscope assessment areas also represent $28.0 \%$ of the HMDA loans and $35.7 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits and a large portion of the branches and loans in the State of South Carolina.

For the Lending Test, performance in the McCormick-Barnwell limited-scope assessment area was weaker than the bank's performance in the state. The distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment area contributed to weaker performance in this assessment area.

For the Investment Test, the performance in the McCormick-Barnwell assessment area was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment area.

For the Service Test, the performance in the McCormick-Barnwell limited-scope assessment area was stronger than the bank's performance in the state.

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

## Tennessee

## CRA RATING FOR TENNESSEE: Satisfactory ${ }^{642}$

## The Lending Test is rated: <br> The Investment Test is rated: <br> The Service Test is rated: <br> High Satisfactory <br> Outstanding <br> High Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides an excellent level of qualified community development investments and grants in the assessment areas and is often in a leadership position in response to the community development needs of the assessment areas.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank provides a relatively high level of community development services throughout the assessment areas.

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## SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in the State of Tennessee:

- Eastern Tennessee (non-MSA)
- Nashville

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

- Clarksville
- Cleveland
- Jackson
- Johnson City
- Knoxville
- Morristown
- Southern Tennessee (non-MSA)
- Western Tennessee (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 TENNESSEE

Regions Bank operates 186 branch offices in its assessment areas in Tennessee, representing $10.8 \%$ of the bank's total branches. As of June 30, 2011, the bank had $\$ 12.3$ billion in deposits in Tennessee, representing $12.5 \%$ of Regions Bank's total deposits in all the assessment areas. The bank ranked $1^{\text {st }}$ in total deposits in the state with a market share of $14.9 \%$. Of the 86,664 HMDA loans originated and purchased by Regions Bank, 10,183 (11.8\%) were in the Tennessee assessment areas. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 12,612 (11.4\%) were in the Tennessee assessment areas.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of Tennessee is High Satisfactory. Lending activity reflects good responsiveness to assessment area credit needs in the Nashville full-scope assessment area, while lending activity in Eastern Tennessee is considered adequate. The bank's performance with regard to the geographic distribution of loans reflects good penetration throughout the assessment areas. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different sizes. The bank makes an excellent level of community development loans.

Although Regions Bank is both a small business and HMDA lender, small business lending was given greater consideration in determining the lending test rating for Tennessee because the bank originated more small business loans by number than HMDA loans. Additionally, the Nashville assessment area received greater consideration when determining the rating because it holds a greater percentage of the bank's deposits, loans, and branches in the state of Tennessee than the other full-scope assessment area. Furthermore, Regions Bank originated only 189 small farm loans in Tennessee during the review period; therefore, no detailed discussion of these loans is included in this section of the report.

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

## Tennessee

## Lending Activity

Lending levels reflect good responsiveness to the credit needs of the Tennessee assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

# Statewide Summary of Lending Activity 

Assessment Areas Located in
Tennessee

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | $\mathbf{\%}$ |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 3,050 | $13.4 \%$ | $\$ 518,891$ | $20.5 \%$ |
| HMDA Refinance | 6,303 | $27.7 \%$ | $\$ 1,085,112$ | $42.9 \%$ |
| HMDA Home Improvement | 830 | $3.6 \%$ | $\$ 7,301$ | $0.3 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{1 0 , 1 8 3}$ | $\mathbf{4 4 . 7 \%}$ | $\mathbf{\$ 1 , 6 1 1 , 3 0 4}$ | $\mathbf{6 3 . 7} \%$ |
| Total Small Business | $\mathbf{1 2 , 4 2 3}$ | $\mathbf{5 4 . 5 \%}$ | $\mathbf{\$ 8 9 2 , 3 4 8}$ | $\mathbf{3 5 . 3 \%}$ |
| Total Farm | $\mathbf{1 8 9}$ | $\mathbf{0 . 8 \%}$ | $\mathbf{\$ 2 4 , 0 8 8}$ | $\mathbf{1 . 0 \%}$ |
| TOTAL LOANS | $\mathbf{2 2 , 7 9 5}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 2 , 5 2 7 , 7 4 0}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank’s HMDA and small business loans is good. The geographic distribution was good in the Nashville assessment area and poor in the Eastern Tennessee assessment area. Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered adequate in both full-scope assessment areas in the state. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Tennessee assessment areas. The bank made 80 community development loans totaling $\$ 274.2$ million during the review period, which represented $11.8 \%$ by number and $19.6 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the purpose of revitalization and stabilization of low- and moderate-income geographies and for affordable housing. The bank had an excellent level of community development lending in both the Nashville and Eastern Tennessee full-scope assessment areas. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating for the State of Tennessee is Outstanding when considering the bank’s statewide performance and its overall presence in the state. The bank made excellent use of qualified investments and contributions. The bank exhibited excellent responsiveness to credit and community development needs through its investment activities in the Nashville and East Tennessee assessment areas.

## Tennessee

The bank made 93 qualified investments of approximately $\$ 201.5$ million and contributions and in-kind donations of $\$ 1.1$ million within the Tennessee assessment areas. Of the 93 investments, 24 totaling $\$ 88.5$ million were current period investments. Most of the investments provided support for affordable housing through Low Income Housing Tax Credit (LIHTC) projects and LIHTC investment funds, as well as GNMA and FNMA investment instruments. Regions is a leader in financing affordable housing through LIHTCs in Tennessee. The bank has invested directly in 49 LIHTC projects for a total investment of $\$ 164.8$ million. In the current review period, the bank invested in 17 LIHTC projects, which provided more than 1,750 units of affordable, multi-family housing at a time when this is one of the biggest needs in the state. The total current period investment in LIHTC projects is over $\$ 71$ million. The bank also had investments that benefitted its footprint or a broader regional area that includes Tennessee. The broader regional investments primarily funded small businesses and startup companies through investments in SBICs and other small business loan funds.

In addition, the bank made several statewide contributions totaling $\$ 14,769$ that positively impacted all assessment areas in the state. These contributions provided support for affordable housing and community services. Specifically, the bank has been a long running supporter of a statewide initiative led by the Tennessee Housing Development Agency to increase access to homeownership counseling, with the goal of certifying homeownership counselors in all 95 counties in Tennessee. Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections.

## Service Test

The service test rating is High Satisfactory when considering the bank's statewide performance in Tennessee.

## Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. The bank closed five branches in low- or moderateincome tracts in the full-scope assessment areas since the previous CRA performance evaluation; nevertheless, the closing of branches has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

## Community Development Services

The bank provides a relatively high level of community development services that benefit residents and small businesses of the assessment areas. Out of the two full-scope assessment areas, community development services were good in the Nashville assessment area and adequate in the Eastern Tennessee assessment area.

METROPOLITAN AREA<br>(Full-scope Review)

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

The Nashville assessment area consists of Cannon, Davidson, Dickson, Robertson, Rutherford, Sumner, Williamson, and Wilson counties, which are part of the 13-county Nashville-Davidson-Murfreesboro-Franklin Metropolitan Statistical Area (MSA). Nashville is the largest city in the assessment area, followed by Murfreesboro (Rutherford County), Franklin (Williamson County), and Hendersonville (Sumner County). There are 246 census tracts in the assessment area across the eight counties, of which 16 are low-income and 53 are moderate-income. Regions Bank operates 66 branches in the Nashville assessment area, 3 in low-income tracts and 10 in moderate-income tracts. These branches represent $35 \%$ of the bank's total branches in Tennessee.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 4,883 (5.6\%) were in the Nashville assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 5,684 (5.3\%) were in the Nashville assessment area.

## Population and Income Characteristics

The Nashville assessment area grew rapidly between 2000 and 2010, with population increasing by $22 \%$ to almost 1.5 million in 2010. Statewide, population increased by $11.5 \%$ over this time period. NashvilleDavidson County (a consolidated city-county government) is the largest county within the assessment area, with approximately 626,000 residents in 2010. Rutherford is the second largest county, followed by Williamson and Sumner.

The assessment area represents $92 \%$ of the population in the Nashville-Davidson-Murfreesboro-Franklin MSA. Williamson and Rutherford counties have received national recognition as two of the fastest growing counties in the country, and each grew by more than $44 \%$ between 2000 and 2010. Population in Wilson, Sumner and Robertson counties grew by more than $20 \%$. In many metropolitan areas, population growth has occurred in the suburban areas while major cities have lost population. In the Nashville MSA, while the largest growth has occurred outside Nashville-Davidson County, the city also grew by almost 10\% between 2000 and 2010. Much of the growth has been driven by in-migration, including a large increase in the Hispanic population. ${ }^{643}$

There is substantial variation in the median family income throughout the assessment area. Williamson County is one of the wealthiest counties in the country, and the estimated median family income in 2010 was $\$ 100,407$. In Cannon County, the smallest county in the assessment area, median family income was $\$ 45,354$. Median family income in Davidson County was $\$ 56,084 .{ }^{644}$

For the purposes of this analysis, HUD's median family income for the Nashville-Davidson-MurfreesboroFranklin MSA for 2010 and 2011 is used. As shown, the median family income for the MSA increased between 2010 and 2011, from $\$ 65,200$ to $\$ 66,200$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

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## Nashville, Tennessee

## Borrower Income Levels <br> Nashville-Davidson-Murfreesboror-Franklin, TN MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$65,200 | 0 | - | \$32,599 | \$32,600 | - | \$52,159 | \$52,160 | - | \$78,239 | \$78,240 | - | \& above |
| 2011 | \$66,200 | 0 | - | \$33,099 | \$33,100 | - | \$52,959 | \$52,960 | - | \$79,439 | \$79,440 | - | \& above |

## Housing Characteristics

The housing market in the Nashville area softened during the economic downturn, but a modest recovery is already underway. Williamson County, in particular, fared well through the recession in terms of home prices, and the market has started to rebound quickly.

Home sales in the assessment almost doubled between 1996 and 2006, according to the Greater Nashville Association of Realtors. ${ }^{645}$ In 2006, there were more than 30,000 home sales in the area. Between 2006 and 2011, however, home sales dropped sharply. In all counties, sales were down by more than $40 \%$, with the greatest decline in fast-growing Rutherford County. Home sales increased in 2012 but remain well below the 2006 peak. ${ }^{646}$

Home prices also declined between 2006 and 2011, but because the market did not have great price appreciation before the recession, the decrease was less significant. The median home price is highest in Williamson County and has remained relatively stable, only dropping by $3 \%$ between 2006 and 2011. The median home price was $\$ 342,500$ in 2011 and continued to increase in 2012. The median home price in the other counties in the assessment area declined from $6 \%$ to $11 \%$ between 2006 and 2011. In Davidson County, the median home price was $\$ 158,000$, and elsewhere in the assessment area, home prices ranged from $\$ 121,000$ in Dickson County to $\$ 190,000$ in Wilson County. ${ }^{647}$

New home construction increased considerably between 2000 and 2005, particularly in suburban Sumner, Rutherford and Wilson counties. Construction peaked in 2005 when 13,680 single-family building permits were issued. Between 2005 and 2011 the number of single-family building permits fell by $70 \%{ }^{648}$ However, new single-family home construction increased by $41 \%$ in the Nashville MSA between 2011 and 2012, with $85 \%$ of the new development happening in Davidson, Rutherford, Williamson and Wilson counties.

The housing market has been adversely impacted by rising mortgage delinquencies and foreclosures. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due and in the foreclosure process, rose from $4.9 \%$ to $8.7 \%$ between January 2010 and December 2011. Mortgage

[^211]delinquency rates were highest in Robertson County, at $13.2 \%$, and over $10 \%$ in Rutherford and Sumner counties at the end of $2011 .{ }^{649}$

The homeownership rate differs throughout the assessment area, from a low of $55 \%$ in Davidson County to a high of $81 \%$ in Williamson County. Rutherford County was the only other county in 2010 with a homeownership rate less than $70 \%$. Housing affordability also varies. Williamson County is the least affordable county in the state, and only $9.8 \%$ of the homes were considered affordable for a family of four earning less than $80 \%$ of the area median income in 2009. This compares with over $45 \%$ of homes in Davidson County that are considered affordable to this target group. Dickson and Cannon counties are considered the most affordable in the assessment area. ${ }^{650}$

## Employment Conditions

Nashville is the state capital and serves as a vital hub for government, business and tourism in the state of Tennessee. Nashville-Davidson County is a center for the health care, music, publishing, banking, and transportation industries, including Bridgestone, Hospital Corporation of America (HCA), Lifeway, and Universal Music Group. Nashville is known as the center for country music, but it is also home to over 250 health care companies, including HCA, which is the largest private hospital management company in the country. The automotive industry has established a strong presence in middle Tennessee. In 2006, Nissan North America moved its North America Headquarters to Franklin (Williamson County). Nissan also has its largest manufacturing plant in North America located in Smyrna (Rutherford County). Nissan continues to invest in Smyrna, most recently by building a new plant to produce electric vehicles and lithium-ion batteries.

Williamson County is also an economic engine for the region, and it is consistently rated as one of the nation's fastest growing counties with upscale suburbs, and large retail and corporate office parks. The county is home to 40 corporate headquarters, including Nissan North America, Tractor Supply Company, Mars Petcare and Community Health Systems, Inc. ${ }^{651}$

Throughout the assessment area, the largest employment concentrations are in government, and health care and social services, followed by retail, accommodation and food services, manufacturing, and administrative and waste services. Davidson and Williamson counties have the most diverse economic base. The largest employers in the assessment area include the State of Tennessee, Vanderbilt University, St Thomas Health, and Gaylord Entertainment. ${ }^{652}$

The middle Tennessee economy weakened during the economic downturn in 2008 and 2009. Job loss was greatest in the manufacturing, construction, accommodation and food services, and other services sectors, though the impact of the recession varied across the counties in the assessment area. Job loss was greater in Davidson County, while employment levels in Williamson County remained relatively stable.

The entire middle Tennessee region was impacted by the closure of the General Motors Plant in late 2009 in Spring Hill, just south of the Williamson County line. At the peak, the plant employed 5,000 workers, and after it closed, the unemployment rate in Maury County reached $17 \%$. While this is outside the assessment area, the plant closure impacted the entire region and also led to job loss at automotive suppliers located in the

[^212]
## Nashville, Tennessee

surrounding counties. However, in late 2011, GM announced it was re-opening the plant in 2012 and will invest approximately $\$ 240$ million and eventually create up to 1,900 new jobs. ${ }^{633,654}$

Unemployment rates in the Nashville MSA increased from about 4\% in 2007 to a high of $9.3 \%$ in late 2009. The highest unemployment rates were in Robertson and Dickson counties. However, even at the peak of the recession, the Nashville MSA performed better than the state, where the unemployment rate peaked at $10.5 \%$ in 2009. ${ }^{655}$

Employment conditions in the region have been steadily improving. In the Nashville MSA, unemployment fell from $8.7 \%$ to $8.0 \%$ between 2010 and 2011. The unemployment rate in Davidson County fell from $8.9 \%$ to $8.2 \%$, while in Williamson County, unemployment fell from $6.9 \%$ to $6.2 \% .{ }^{656}$

## Unemployment Rates

Assessment Area: TN Nashville

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Nashville MSA | 8.7 | 8.0 |
| Cannon County | 9.5 | 8.9 |
| Davidson County | 8.9 | 8.2 |
| Dickson County | 9.8 | 9.6 |
| Robertson County | 8.7 | 8.3 |
| Rutherford County | 8.7 | 8.0 |
| Sumner County | 8.7 | 8.0 |
| Williamson County | 6.9 | 6.2 |
| Wilson County | 8.2 | 7.6 |
| Tennessee | $\mathbf{9 . 8}$ | $\mathbf{9 . 2}$ |

Not Seasonally Adjusted

Most sectors have been experiencing job growth, with the exception of the information and government sectors. The largest growth has occurred in professional and business services, and educational and health services. The loss of jobs in the government sector is primarily due to the impact of revenue constraints on local government.

The residential construction sector was hard hit by the recession, particularly in Williamson and Rutherford counties. However, jobs in commercial construction started increasing in 2010 due to a number of new construction projects in downtown Nashville and to support the clean up after a major flood hit the city in 2010.

[^213]
## Nashville, Tennessee

The flooding resulted in almost $\$ 2.0$ billion in damage to residential and commercial property. In addition, there are several major downtown development projects underway. First, construction started on the Music City Center, the city's new convention center, in 2010. At $\$ 585$ million, this project is the largest publicfinanced project in the city's history. In addition, construction is also underway on a new $\$ 280$ million Omni Hotel. These two projects alone have created many construction jobs and will support hundreds of new fulltime jobs when complete. ${ }^{657}$

There has also been strong growth in the health-services sector, with the expansion of several health care companies and new hospital facilities leading to an increase of 1,700 jobs. Employment in the logistics and distribution sector is also growing, and in late 2011, Amazon announced it was opening two new e-fulfillment centers in Wilson and Rutherford counties.

The economic recovery in Nashville is underway, fueled by job growth and investment in diverse sectors. In June 2012, Nashville was ranked $5^{\text {th }}$ in the Brookings Institute Metro Monitor index of economic recovery, which ranks the pace of recovery in the 100 largest metro economies based on job creation, unemployment rate, metro economic output, and housing prices. ${ }^{658}$ The Nashville MSA is gaining national recognition as an affordable, high quality place to live, and there is a growing entrepreneurial energy, which is fueling a public sense of optimism that the region is poised for continued growth.

## Competition

Nashville has a competitive banking market where national and regional banks have a significant presence, but there are also a number of local community banks. As of June 30, 2011, Regions had the largest share of deposits in the market, with $\$ 6.6$ billion, or $18.0 \%$ of total deposits. Bank of America had $17.4 \%$ of the market, followed by SunTrust (12.4\%), Pinnacle National Bank (9.1\%) and First Tennessee (5.9\%). There were 61 banks active in the market, operating 525 branches.

Regions ranked $6^{\text {th }}$ out of 528 HMDA reporters in 2010 with $3.8 \%$ of total loans. HMDA lending in the assessment area declined between 2010 and 2011, but Regions moved up to the $5^{\text {th }}$ ranking with $3.3 \%$ of loans. Wells Fargo Bank, Bank of America, JPMorgan Chase, and SunTrust are the dominant HMDA lenders in the market.

Regions was ranked $2^{\text {nd }}$ out of 107 small business loan reporters in 2010 with $11.0 \%$ of the loans. Small business lending in the market increased in 2011, and Regions was again ranked $2^{\text {nd }}$ with $14.3 \%$ of the loans. American Express Bank was the leading small business loan reporter in the market, though Pinnacle, US Bank, Chase, and Citibank also had a significant share of loans.

## Community Development

As mentioned earlier, the Nashville area experienced historic flooding in May 2010. Businesses in downtown Nashville and along the Cumberland River, and a number of residential areas throughout the city, were flooded. Several of the impacted neighborhoods were home to primarily low-income and working class residents. Because of the historic flood levels, most of the affected homeowners did not have flood insurance, and the financial assistance provided by the federal agencies was not sufficient to cover rebuilding costs. Thus, the city developed the We Are Home program in partnership with The Housing Fund, a local CDFI, to provide grants

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## Nashville, Tennessee

and low-interest loans to qualified flood victims. While many homeowners have been helped, there is a continuing need for revitalization in the flooded neighborhoods, where there are still many vacant and blighted properties.

Affordable housing generally is an issue throughout the assessment area. At the Greater Nashville Housing Summit hosted in July 2012, The Housing Fund reported that $34.1 \%$ of homeowners are paying significantly more than $30 \%$ of their income for housing and are therefore considered to be cost burdened. Renters also face significant challenges as rents in the region have risen in the past few years. The majority of the affordable housing initiatives are concentrated in Davidson County, due to the population density and higher demand. However, a shortage of affordable housing options is also an issue in the more suburban counties, and particularly Rutherford and Williamson. Developing affordable housing is challenging due to rising construction and land costs, particularly in Williamson County. Affordable rental housing is also difficult to finance without using the highly competitive Low Income Housing Tax Credit (LIHTC) program or identifying other sources of financing subsidies. A community contact that specializes in affordable housing indicated that overall, the Nashville market was recovering, but there is a need for more funding to support affordable housing and financial counseling programs. Foreclosures are a serious concern for low- and moderate-income homeowners in the region, and while the state provides some funding for foreclosure counseling, more resources are needed.

The Tennessee Housing Development Agency (THDA) is one of the largest funders of affordable housing statewide, particularly through the LIHTC program. Since 2008, approximately 1,670 units of affordable housing units financed by the LIHTC program have been put in service in the assessment area. The majority of the units are located in Davidson County, followed by Rutherford County.

The community development industry is most established in Davidson County, but many of the organizations serve a broader regional area. In addition to The Housing Fund, which provides affordable housing financing, Pathway Lending is a small business CDFI that provides assistance to small businesses statewide. There is also an active network of nonprofits that develop affordable housing, provide financial counseling, and offer other community services. In the suburban counties, there is a need to develop more nonprofit capacity and to bring in external partners to help address some of the community development needs.

Foreclosure activity increased in the Nashville MSA, particularly in southern Davidson County, where there the most rapid growth was occurring prior to the recession. Davidson County has received $\$ 34$ million in Neighborhood Stabilization Program (NSP) funds in the past three years to address the foreclosure crisis. The Metropolitan Development and Housing Agency (MDHA) partnered with several nonprofits to implement NSP, and funds have been allocated for the purchase and acquisition of foreclosed properties for rental and sale as affordable housing. Funds have also been used to develop new rental housing and to create a shared equity homeownership program that will allow low-income homeowners to purchase homes in targeted neighborhoods with significant financial assistance.

Increasing the financial stability of low- and moderate-income individuals is a focus for community development organizations in the region. In the Nashville MSA, $6.2 \%$ of households are unbanked, meaning they have no type of deposit account with a mainstream financial institution. In addition, $17 \%$ of households are considered underbanked, meaning they have a bank account but they also regularly use alternative financial services providers. In Nashville, the numbers are much higher, and over $11 \%$ of households are unbanked, and $22.5 \%$ are underbanked. The unbanked are disproportionately lower-income and minority households. ${ }^{659}$

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There are several initiatives underway to address the financial stability of low- and moderate-income individuals. First, there is an active network of volunteer income tax assistance (VITA) sites in Davidson, Rutherford and Williamson counties that provide free tax preparation. In Davidson County alone, VITA sites prepared over 10,000 tax returns in 2012. Second, Bank On Music City was launched in 2011, led by the United Way of Metropolitan Nashville. This initiative is part of the mayor's plan to reduce poverty and is focused on increasing access to mainstream financial services. Eight financial institutions, including Regions, are participating in this initiative by providing low-cost basic transaction accounts.

In addition to affordable housing and financial stability efforts, access to credit for small businesses is also an issue. The Federal Reserve Bank of Atlanta Community and Economic Development Department held a forum in 2010 with local small business lenders and technical assistance providers to learn more about the small business environment in the region. Meeting participants felt that banks had tightened underwriting criteria and small business owners that had been negatively impacted by the recession were not able to get loans. There was a need identified for smaller loans (under $\$ 100,000$ ) and also for technical assistance to help small business owners become good bank customers again. A community contact interviewed in 2012 felt that that there was a need for more lending to small and independent businesses, but overall, banks were doing a good job of meeting area credit needs.

Demographic Characteristics by Census Tract
The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

## Combined Demographics Report

Assessment Area: TN Nashville

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 16 | 6.5 |  | 3.6 | 4,580 | 39.8 | 58,585 | 18.4 |
| Moderate-income | 53 | 21.5 |  | 16.9 | 7,623 | 14.2 | 56,252 | 17.7 |
| Middle-income | 126 | 51.2 |  | 56.4 | 9,806 | 5.5 | 74,053 | 23.3 |
| Upper-income | 50 | 20.3 |  | 23.0 | 1,776 | 2.4 | 128,664 | 40.5 |
| Unknown-income | 1 | 0.4 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 246 | 100.0 |  | 100.0 | 23,785 | 7.5 | 317,554 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 20,939 | 5,425 |  | 25.9 | 13,536 | 64.6 | 1,978 | 9.4 |
| Moderate-income | 95,720 | 43,709 |  | 45.7 | 45,002 | 47.0 | 7,009 | 7.3 |
| Middle-income | 279,165 | 180,933 |  | 64.8 | 82,613 | 29.6 | 15,619 | 5.6 |
| Upper-income | 105,381 | 79,518 |  | 75.5 | 20,953 | 19.9 | 4,910 | 4.7 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 501,205 | 309,585 |  | 61.8 | 162,104 | 32.3 | 29,516 | 5.9 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2,299 | 3.3 |  | 3.1 | 221 | 5.3 | 152 | 4.3 |
| Moderate-income | 14,059 | 20.0 |  | 19.3 | 1,140 | 27.4 | 845 | 23.7 |
| Middle-income | 34,994 | 49.7 |  | 50.5 | 1,728 | 41.5 | 1,597 | 44.7 |
| Upper-income | 18,873 | 26.8 |  | 27.0 | 1,031 | 24.7 | 946 | 26.5 |
| Unknown-income | 189 | 0.3 |  | 0.2 | 47 | 1.1 | 30 | 0.8 |
| Total Assessment Area | 70,414 | 100.0 |  | 100.0 | 4,167 | 100.0 | 3,570 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.0 |  | 5.9 |  | 5.1 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \text { \$1 Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 4 | 0.4 |  | 0.4 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 138 | 12.1 |  | 11.9 | 3 | 33.3 | 0 | 0.0 |
| Middle-income | 816 | 71.5 |  | 71.6 | 5 | 55.6 | 1 | 100.0 |
| Upper-income | 184 | 16.1 |  | 16.2 | 1 | 11.1 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 1,142 | 100.0 |  | 100.0 | 9 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 99.1 |  | . 8 |  | . 1 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

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

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 5,684 (53.8\%) small business loans compared to 4,883 ( $46.2 \%$ ) HMDA loans in the Nashville assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. The percentage of the bank's total lending at $5.4 \%$ is comparable to the percentage of deposits at $6.7 \%$ in this area. Additionally, the bank originated 25 community development loans in the Nashville assessment area. Regions Bank is a major competitor in this market, ranking $5^{\text {th }}$ in HMDA originations and $2^{\text {nd }}$ in small business originations in 2011.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank's geographic distribution of loans reflects good penetration throughout the assessment area.

## Small Business Loans

Regions Bank's small business lending in low-income tracts is good. During the review period, Regions Bank originated $3.5 \%$ of its small business loans in low-income tracts, which was greater than the percentage of small businesses in low-income tracts at $3.1 \%$. The bank's performance was below the aggregate in 2010 but better than the aggregate in 2011.

Regions Bank's small business lending in moderate-income tracts is good. During the review period, Regions Bank originated $19.1 \%$ of its small business loans in moderate-income tracts, which contain $19.3 \%$ of the small businesses in the assessment area. The bank's performance was better than the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts, while lending in upper-income tracts was greater than the percentage of small businesses.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, Regions Bank originated $0.9 \%$ of its home purchase loans in low-income tracts, where only $1.8 \%$ of the owner-occupied units are located. Regions Bank's performance was slightly below the aggregate in 2010 and below the aggregate in 2011.

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $8.4 \%$ of its home purchase loans in moderate-income tracts, where $14.1 \%$ of the owner-occupied units are located. Regions Bank's performance was comparable to the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

Regions Bank's home refinance lending in low-income census tracts is adequate. During the review period, the bank originated $0.8 \%$ of its home refinance loans in low-income tracts, where only $1.8 \%$ of the owner-occupied units are located. Regions Bank's performance was comparable to the aggregate in 2010 and below the aggregate in 2011.

Regions Bank's home refinance lending in moderate-income tracts is adequate. During the review period, the bank originated $6.4 \%$ of its home refinance loans in moderate-income tracts, where $14.1 \%$ of the owneroccupied units are located. Regions Bank's performance was comparable to the aggregate in 2010 and 2011.

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

## Home Improvement Loans

Regions Bank's home improvement lending in low-income tracts is good when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated $1.6 \%$ home improvement loans in low-income tracts, where $1.8 \%$ of the owner-occupied units are located. The bank's performance was below the aggregate in 2010, but was comparable to the aggregate in 2011.

Regions Bank's home improvement lending in moderate-income tracts is good when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated 17.3\% home improvement loans in moderate-income tracts, where $14.1 \%$ of the owner-occupied units are located. Additionally, Regions Bank’s performance was better than the aggregate in both 2010 and 2011.

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

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment and poverty rates, were considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the demographic and aggregate data, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was below aggregate in 2011. The bank originated $33.0 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.0 \%$. However, of the 5,684 small business loans originated during the review period, 2,960 (52.1\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the bank's percentage of

## Nashville, Tennessee

loans originated to small businesses was $68.8 \%$, which was still less than the percentage of small businesses in the Nashville assessment area. However, $88.4 \%$ of the 5,684 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was comparable to the aggregate in 2010 and 2011.

## Home Purchase Loans

Home purchase lending to low-income borrowers is adequate. At 13.5\%, the bank's percentage of home purchase lending to low-income borrowers was less than the percentage of low-income families in the assessment area at $18.4 \%$. Although the bank's performance was less than the demographic, its performance was better than aggregate in 2010 and comparable to the aggregate in 2011.

Home purchase lending to moderate-income borrowers is good. At $22.8 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families in the assessment area at $17.7 \%$. Regions Bank's performance was comparable to the aggregate in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was comparable to the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is adequate. The bank originated $7.4 \%$ of its refinance loans to low-income borrowers. Low-income families make up $18.4 \%$ of total families in the assessment area. It was noted that the aggregate performance was also less than the percentage of low-income families, indicating opportunity may be limited for home refinance lending. Nonetheless, the bank's performance was comparable to the aggregate lenders in 2010 and exceeded the aggregate in 2011.

The bank's home refinance lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $16.4 \%$ was less than the percentage of moderate-income families in the assessment area at $17.7 \%$; however, Regions Bank's performance was comparable to the aggregate in 2010 and better than the aggregate in 2011.

The bank's home refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of home improvement loans at $14.8 \%$ was less than the percentage of low-income families in the assessment area at $18.4 \%$. Although the bank's performance was less than the demographic, lending performance was comparable to the aggregate in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans at $26.7 \%$ was greater than the percentage of moderate-income families in the assessment area at $17.7 \%$. The bank's performance was greater than the aggregate in both 2010 and 2011.

## Nashville, Tennessee

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Nashville assessment area. The bank originated 25 community development loans totaling $\$ 150.9$ million during the review period. The loans financed a wide variety of activities that responded to various community credit needs. Local credit needs include but are not limited to affordable housing for low- and moderate-income individuals, disaster recovery, neighborhood stabilization, and financial stability for residents. The bank's community development loan portfolio inside the assessment area exhibits excellent responsiveness to the credit needs of low- and moderateincome individuals and geographies, and small businesses. The dollar amount of the portfolio is excellent relative to the bank's presence in the market.

Examples of community development lending include the following:

- Multiple loans totaling approximately $\$ 18$ million to support the development of more than 400 LIHTC-supported affordable housing units;
- A $\$ 1.5$ million loan to a company located in a moderate-income census tract in Davidson County that was declared a disaster area due to flooding. Regions Bank provided funds for business repairs so that the company could resume operations prior to receiving insurance proceeds;
- Multiple loans that promote economic development by financing small businesses as part of the SBA's 504 Certified Development Company program; and
- A loan to a local nonprofit organization that is located in a moderate-income geography and serves as a food distribution facility for low- and moderate-income families and organizations serving low- and moderate-income communities.


## Investment Test

The bank's performance in the Nashville assessment area under the investment test is excellent. The bank had 30 investments totaling $\$ 76.4$ million, including eight current period investments totaling $\$ 28.6$ million. Direct investments in the assessment area provided support for affordable housing through FNMA and GNMA investment instruments, LIHTCs and investments in LIHTC funds. The bank has also provided community development program investments to several nonprofits. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs. Community development needs identified in the community include, but are not limited to, neighborhood stabilization due to elevated foreclosure and unemployment rates, affordable housing for low- and moderate-income individuals, financial stability for lowand moderate-income individuals, and small business financing and technical assistance.

The bank also made 82 contributions totaling $\$ 818,440$. Contributions were given primarily to organizations involved in provision of community services targeted to low- and moderate-income individuals and communities, affordable housing, and economic development. In addition, the assessment area may benefit from contributions to statewide and national organizations.

Regions Bank's investment portfolio and contributions exhibit excellent responsiveness to several of the identified community development needs. Examples include the following:

## Nashville, Tennessee

- The bank is a leader in financing affordable housing with LIHTCs. The bank has invested \$57.6 million in LIHTC projects since 2003, which has supported 13 projects and over 1,500 units of housing affordable to low- and moderate-income individuals in the Nashville metro area.
- The bank has provided more than $\$ 65,000$ in contributions to support affordable housing organizations and over $\$ 175,000$ to support education-related programs, including school programs and needs-based scholarships for low- and moderate-income students. The bank provided more than $\$ 200,000$ to other organizations providing community services to low- and moderate-income individuals and communities.
- The bank has invested $\$ 2.2$ million in a CDFI engaged in affordable housing in Nashville that provides down payment assistance to low- and moderate-income homebuyers and provides financing for the development of affordable housing.


## Service Test

The bank's service test performance in the Nashville assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the Nashville assessment area.

## Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of 66 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed 11 branches (three in moderate-income tracts, five in middle-income tracts, and three in upper-income tracts) in the Nashville assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderateincome geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank has extended and weekend hours for branches in low- and moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

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## Geographic Distribution of Branches

Assessment Area: TN Nashville

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | \# | al Branch <br> \% | es <br> Open <br> \# | Closed <br> \# | Drive thrus <br> \# | Extend- <br> ed <br> Hours <br> \# | Week <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
| Low | Total | 3 | 4.6\% | 0 | 0 | 3 | 2 | 2 |  |  |  |  |
|  | DTO LS | 0 0 |  | 0 | 0 0 | 0 |  |  | 16 | 6.5\% | 4.0\% | 3.3\% |
| Moderate | Total | 10 | 15.2\% | 0 | 3 | 9 | 7 | 4 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 | 0 |  |  | 53 | 21.5\% | 18.8\% | 20.0\% |
| Middle | Total | 39 | 59.1\% | 0 | 5 | 38 | 31 | 23 |  |  |  |  |
|  | DTO LS | 2 0 |  | 0 | 1 | 2 |  |  | 126 | 51.2\% | 55.9\% | 49.7\% |
| Upper | Total | 13 | 19.7\% | 0 | 3 | 13 | 12 | 8 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 0 | 0 |  |  | 50 | 20.3\% | 21.4\% | 26.8\% |
| Unknown | Total | 1 | 1.5\% | 0 | 0 | 1 | 1 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | 0 0 | 0 |  |  | 1 | 0.4\% | 0.0\% | 0.3\% |
| Total | Total | 66 | 100.0\% | 0 | 11 | 64 | 53 | 37 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 2 0 |  | 0 | 1 | 2 |  |  | 246 | 100.0\% | 100.0\% | 100.0\% |
| DTO - Drive Thru Only |  |  |  |  |  |  |  |  |  |  |  |  |

## Community Development Services

Regions Bank provides a relatively high level of community development services in the assessment area. During the review period, Regions Bank employees provided 2,221service hours in various capacities for community development organizations by participating in 269 community development services. Many of the community development services focused on education, affordable housing, youth involvement, tax assistance, activities that promote economic development for small businesses, and other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees provided volunteer income tax assistance to several low- and moderate-income individuals. In addition, Regions Bank employees served on the boards of directors and committees of various community organizations which provide services in low- and moderate-income geographies or to low- and moderateincome individuals.

## Metropolitan Areas (Limited Review)

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

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

- Clarksville Assessment Area (Montgomery and Stewart Counties)
o As of December 31, 2011, Regions Bank operated seven branches in the assessment area, representing 3.8\% of its branches in Tennessee.
o As of June 30, 2011, the bank had $\$ 314.4$ million in deposits in this assessment area, representing a market share of $14.1 \%$ and $2.6 \%$ of Regions Bank's total deposits in Tennessee.
- Cleveland Assessment Area (Bradley County)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $2.2 \%$ of its branches in Tennessee.
o As of June 30, 2011, the bank had $\$ 215.9$ million in deposits in this assessment area, representing a market share of $15.0 \%$ and $1.8 \%$ of Regions Bank's total deposits in Tennessee.
- Jackson Assessment Area (Chester and Madison Counties)
o As of December 31, 2011, Regions Bank operated nine branches in the assessment area, representing $4.8 \%$ of its branches in Tennessee.
o As of June 30, 2011, the bank had $\$ 406.3$ million in deposits in this assessment area, representing a market share of $22.8 \%$ and $3.3 \%$ of Regions Bank's total deposits in Tennessee.
- Johnson City Assessment Area (Carter and Washington Counties)
o As of December 31, 2011, Regions Bank operated five branches in the assessment area, representing $2.7 \%$ of its branches in Tennessee.
o As of June 30, 2011, the bank had $\$ 181.7$ million in deposits in this assessment area, representing a market share of $6.8 \%$ and $1.5 \%$ of Regions Bank's total deposits in Tennessee.
- Knoxville Assessment Area (Anderson, Blount, Knox and Loudon Counties)
o As of December 31, 2011, Regions Bank operated 28 branches in the assessment area, representing $15.1 \%$ of its branches in Tennessee.
o As of June 30, 2011, the bank had $\$ 2.0$ billion in deposits in this assessment area, representing a market share of $14.6 \%$ and $16.1 \%$ of Regions Bank's total deposits in Tennessee.
- Morristown Assessment Area (Hamblen and Jefferson Counties)
o As of December 31, 2011, Regions Bank operated four branches in the assessment area, representing $2.2 \%$ of its branches in Tennessee.
o As of June 30, 2011, the bank had $\$ 205.4$ million in deposits in this assessment area, representing a market share of $14.1 \%$ and $1.7 \%$ of Regions Bank's total deposits in Tennessee.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

## Metropolitan Areas (Limited Review)

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Clarksville | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Cleveland | Not Consistent <br> (Below) | Not Consistent (Below) | Consistent |
| Jackson | Consistent | Consistent | Consistent |
| Johnson City | Not Consistent <br> (Below) | Consistent | Consistent |
| Knoxville | Not Consistent <br> (Below) | Consistent | Not Consistent (Below) |
| Morristown | Consistent | Not Consistent (Below) | Consistent |

The Eastern Tennessee and Nashville assessment areas received full-scope reviews, and the bank's performance in the Nashville assessment area was given greater consideration in determining the overall rating for the state. Nashville is by far the bank's largest market in Tennessee in terms of deposits, loans, and branches. The fullscope areas selected together represent $61.6 \%$ of the deposits in the assessment areas in Tennessee as well as $47.3 \%$ of the branches. The full-scope assessment areas also represent $54.8 \%$ of the HMDA loans and $52.4 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits and loans and a large portion of the branches in the State of Tennessee.

For the Lending Test, performance was weaker than the bank's performance in the state in four of the limitedscope assessment areas (Clarksville, Cleveland, Johnson City and Knoxville) and consistent with the bank's performance in the remaining limited-scope assessment areas (Jackson and Morristown). Lower levels of community development loans relative to the bank's operations in the assessment areas contributed to weaker performance in the Clarksville and Cleveland assessment areas. Lower levels of community development loans relative to the bank's operations in the assessment area contributed to weaker performance in the Knoxville assessment area.

For the Investment Test, the performance in three limited-scope assessment areas (Clarksville, Cleveland and Morristown) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas. The performance in the remaining limited-scope assessment areas (Jackson, Johnson City and Knoxville) was consistent with the bank's performance in the state.

For the Service Test, the performance in one limited-scope assessment area (Knoxville) was weaker than the bank's performance in the state due to less accessibility of delivery systems and fewer community development services. The performance in the remaining limited-scope assessment areas was consistent with the bank's performance in the state.

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

## Eastern Tennessee

## NON-METROPOLITAN AREA <br> (Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EASTERN TENNESSEE ASSESSMENT AREA

The Eastern Tennessee assessment area consists of Campbell, Cumberland, McMinn, Meigs, Morgan, Monroe, Pickett, Putnam, Rhea, and Roane counties. The primary cities are Cookeville and Crossville. The assessment area has 70 census tracts, with no low-income tracts and 12 moderate-income tracts. In addition, most of the middle-income tracts have been designated as distressed or underserved. Regions Bank operates 22 branches in the assessment area, two of which are located in a moderate-income census tract. The 22 branches represent $12 \%$ of the bank's total branches in Tennessee.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 697 ( $0.8 \%$ ) were in the Eastern Tennessee assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 814 (0.8\%) were in the Eastern Tennessee assessment area.

## Population and Income Characteristics

Eastern Tennessee is a largely rural area with low population density. Portions of all counties in the assessment area, with the exception of Putnam, Cumberland and Roane, are classified as either distressed or underserved middle-income tracts. The moderate-income tracts are located in Morgan, McMinn and Campbell counties.

Putnam is the largest county in the assessment area with a population of about 72,300 in 2010. Cumberland, McMinn and Roane are all similar in size, with approximately 55,000 residents in 2010. The total population in 2010 in the assessment area was 390,682. Population grew by almost $11 \%$ between 2000 and 2010, slightly below the average population growth rate for the state of $11.5 \%$. Cumberland County had the largest population growth at almost $20 \%$, adding 9,000 residents. Campbell County had the least growth at just $2.2 \%$. Cookeville, located in Putnam County, is the largest city in the assessment area with 30,435 residents in 2010, and Crossville, in Cumberland County, is the second largest with 10,800 . Both cities experienced significant growth between 2000 and 2010, with the population in each city increasing by more than $20 \% .{ }^{660}$

According to US census estimates, median family income in 2010 ranged from $\$ 37,013$ in Campbell County to $\$ 51,924$ in Roane County. The median family income in all counties in the assessment area is lower than the median family income for the state, estimated at $\$ 53,250 .{ }^{661}$ For the purposes of this analysis, HUD's 2010 and 2011 median family income for Tennessee non-metro areas is used. As shown, the median family income decreased between 2010 and 2011, from \$46,400 to $\$ 45,400$. The following table provides a breakdown of the estimated annual income based on income classification (i.e., low, moderate, middle and upper).

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## Eastern Tennessee

## Borrower Income Levels <br> Tennessee State Non-Metro

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% |  | \& above |
| 2010 | \$46,400 | 0 | - | \$23,199 | \$23,200 | - | \$37,119 | \$37,120 | - | \$55,679 | \$55,680 | - | \& above |
| 2011 | \$45,400 | 0 | - | \$22,699 | \$22,700 | - | \$36,319 | \$36,320 | - | \$54,479 | \$54,480 | - | \& above |

Poverty is a persistent and growing issue in the assessment area. The estimated poverty rate between 2006 and 2010 exceeded 25\% in Meigs County, followed by Campbell (23\%), and Putnam (22.5\%). Roane County was the only county where the poverty rate was below $15 \%$. Most of the counties experienced a significant rise in the poverty rate, with the rate in several counties increasing by more the $40 \% .{ }^{662}$ Utilization of food stamps has also been increasing throughout the assessment area. Campbell County had the highest percentage of residents receiving food stamps in 2009 at $30.6 \%$, while food stamp usage was lowest in Roane County at $16.9 \%$. ${ }^{663}$

## Housing Characteristics

Crossville and several other communities in the Eastern Tennessee area are becoming popular retiree markets, which has softened the impact of the recent recession. Most counties did see some decline in housing prices between 2007 and 2009, but prices have rebounded and even increased since that time. The median home price in 2011 across the assessment area ranged from a low of $\$ 85,900$ in Morgan County to $\$ 136,500$ in Pickett County. The median home price in Putnam County was $\$ 126,375$ in $2011 .{ }^{664}$

While home prices have been relatively stable, home sales and new home construction have declined. Home sales in the assessment area have fallen by $64 \%$ since the peak in 2005, and in 2011 there were 2,141 new and existing home sales in the assessment area. The majority of the sales activity occurs in Cumberland and Putnam counties, though sales in these counties declined by $52 \%$ and $65 \%$, respectively, between 2005 and $2011 .{ }^{665}$ New home construction has also slowed and building permits for single-family homes decreased by $55 \%$ between 2005 and 2010. However, some counties were already seeing some increase in new construction by 2010. ${ }^{666}$

Foreclosure and mortgage delinquency rates have been rising in the assessment area. Seriously delinquent mortgages (defined as more than 90 days past due or in foreclosure) increased from 5.4\% in January 2010 to $10.1 \%$ in November 2011. The problem is most acute in the smaller counties. The delinquency rate in McMinn County reached $14.4 \%$ at the end of 2011 while Meigs, Morgan and Roane counties each had delinquency rates above $12 \%$. ${ }^{667}$

Similar to other rural communities, most of the households in the Eastern Tennessee area are homeowners, and the homeownership rate in most counties is well above $70 \%$. Putnam County is the only county with a

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## Eastern Tennessee

concentration of renters, primarily because Cookeville is home to Tennessee Tech, a 4-year university with over 11,000 students. Housing is considered relatively affordable in the assessment area. The percentage of homes that were affordable to a household earning $80 \%$ of the area median income ranged from $37.8 \%$ in Putnam County to $67.2 \%$ in Morgan County. Affordable rental housing, however, is a concern. The percentage of renters in 2009 considered cost burdened, meaning they spent more than $30 \%$ of their income on housing, ranged from $23.4 \%$ in Meigs County to $44.7 \%$ in Putnam County. Typically, renters are more likely to be cost burdened than homeowners. However, in Meigs County, more homeowners are cost burdened. ${ }^{668}$

## Employment and Economic Conditions

The Eastern Tennessee assessment area is primarily rural, with few large cities or employers. Cookeville is the only city in the assessment area with more than 30,000 residents. Some of the largest employers in the area include Tennessee Tech (Putnam), UT Battelle (Roane), the Cookeville Regional Medical Center (Putnam), La-Z-Boy Chair Company (Rhea), the Putnam County Board of Education (Putnam), Perdue Farms (Putnam), Denso Manufacturing (McMinn), and Bowater (McMinn). ${ }^{669}$ Throughout the assessment area, there are employment clusters in a number of different sectors including manufacturing, retail, professional, technical and scientific services, health care and social services, accommodation and food services, and local government. ${ }^{670}$ Putnam County is the largest employment center in the region.

Oak Ridge, which is located in both Roane and Anderson counties (outside the Eastern Tennessee assessment area), is also an economic asset for the region. Oak Ridge National Lab is the largest federally funded research and development center and soon to be home to the fastest computer in the world, creating many jobs in science and technology. Roane County is part of the "Innovation Valley," which is a regional economic development initiative centered around Oak Ridge to leverage the region's science, technology and business resources. ${ }^{671}$

The Eastern Tennessee region is an increasingly popular retiree market. The State of Tennessee created the "Retire Tennessee" program to promote the state to retirees; Cumberland, Putnam and Roane counties are all participating in the program. ${ }^{672}$ There are a number of new retiree communities, and the city of Crossville (Cumberland County) promotes itself as the "golf capital of Tennessee." The area is also looking to capitalize on the recreational and natural amenities, including the proximity to the Great Smoky Mountains and several state parks, to promote tourism to the area.

There are pockets of economic activity in the assessment area, but most of the counties saw significant job loss during the recession. The region has always struggled with high rates of unemployment; therefore, the recession further damaged a fragile economic environment. Unemployment peaked in 2009 in all counties in the assessment area, reaching as high as $17.5 \%$ in Monroe County. Four other counties saw unemployment rise to more than $13 \%$. The unemployment rate did drop between 2010 and 2011 in most counties, but with the exception of Putnam and Roane Counties, remains well above the state. ${ }^{673}$

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## Eastern Tennessee

## Unemployment Rates

Assessment Area: TN Eastern TN

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Campbell County | 12.1 | 11.5 |
| Cumberland County | 10.7 | 10.3 |
| McMinn County | 12.4 | 11.2 |
| Meigs County | 12.7 | 11.7 |
| Monroe County | 13.5 | 12.3 |
| Morgan County | 11.3 | 10.9 |
| Pickett County | 14.4 | 14.9 |
| Putnam County | 9.0 | 8.6 |
| Rhea County | 12.5 | 11.6 |
| Roane County | 8.0 | 8.0 |
| Tennessee | $\mathbf{9 . 8}$ | $\mathbf{9 . 2}$ |

Not Seasonally Adjusted

## Competition

The Eastern Tennessee market is served primarily by community banks. According to the June 30, 2011 FDIC Summary of Deposits Report, Regions Bank held the largest share of deposits, with $\$ 1.0$ billion, or $18.3 \%$ of the total deposits. Citizens National Bank of Athens (7.7\%), First National Bank of Tennessee (5.8\%), Cumberland County Bank (4.6\%), First Tennessee (4.6\%), and Bank of Putnam County (4.3\%) are the other larger deposit holders in the market. Overall there are 42 financial institutions operating 150 branches in the assessment area.

Regions ranked $2^{\text {nd }}$ out of 46 small business loan reporters in 2010 with $9.9 \%$ of the loans. Regions more than doubled its small business lending in 2011, primarily through purchasing loans, and was the top ranked lender in the market with almost $19 \%$ of all loans. American Express was the other leading small business lender in the market.

Regions ranked $7^{\text {th }}$ out of 329 HMDA reporters in 2010 with $3.3 \%$ of total loans. Overall HMDA lending in the assessment area declined between 2010 and 2011, and Regions’ HMDA lending followed the same trend. Regions captured a slightly greater share of the total HMDA loans in the assessment area in 2011 and was ranked $6^{\text {th }}$, with $3.4 \%$ of total loans. Wells Fargo Bank is the leading HMDA lender in the market.

## Community Development

Community development opportunities in Eastern Tennessee are limited. The Upper Cumberland and East Tennessee development districts are two regional agencies that provide support to local governments for community and economic development projects. These agencies also provide some small business financing through revolving loan funds, and the Upper Cumberland Development Agency has done some affordable housing development and provides homeownership counseling. In Cumberland County, the local housing

## Eastern Tennessee

authority is also the only affordable housing developer active in the county. According to a community contact in Cumberland County, the primary need in the area is affordable rental and single-family housing. The contact indicated that banks are relatively engaged in local housing efforts, providing staff for housing counseling programs and technical assistance, as appropriate.

There are several organizations located outside the assessment area that also serve some counties within the assessment area by providing access to housing counseling and some housing development services. The Federation of Appalachian Housing Enterprises (FAHE) is a regional CDFI that provides support to member nonprofits that serve the Appalachian region, and several of the FAHE members provide services to counties in the East Tennessee area. However, the majority of the funding for housing and community development activities comes from the Tennessee Housing Development Agency (THDA). Since 2005 there have been two Low Income Housing Tax Credit (LIHTC) projects developed in the assessment area, with a total of 87 units.

Foreclosure has not been a significant issue in the region, but several counties did receive funding to help stabilize neighborhoods impacted by foreclosures. Through the Neighborhood Stabilization Program allocation to THDA, counties in the Eastern Tennessee assessment area received about $\$ 1.5$ million. These funds have been used to purchase foreclosed properties in low- and moderate-income areas for resale to eligible homebuyers or for affordable rental housing.

Workforce development is a primary focus in the counties throughout the assessment area. There is a network of organizations that provide workforce training, but most of the institutions are located in the more populated areas. In the more rural areas, where the unemployment rate is highest, resources are limited. One of the primary economic development focus areas is expanding options for workforce training in rural counties through on-line learning and generally increasing the education level and skill set of the region's workforce. ${ }^{674}$

## Demographic Characteristics by Census Tract

The following table provides demographic characteristics of the bank's assessment area based on the 2000 US census data used to analyze the bank's CRA performance.

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## Eastern Tennessee

## Combined Demographics Report

Assessment Area: TN Eastern TN


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Eastern Tennessee

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Eastern Tennessee assessment area is adequate. The geographic distribution of loans reflects poor penetration throughout the assessment area. Also, the distribution of borrowers 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.

During the review period, the bank reported 697 (46.1\%) HMDA loans compared to 814 (53.9\%) small business loans in the Eastern Tennessee assessment area. Therefore, evaluation and rating of the assessment area focus on the performance of small business lending more heavily than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $0.8 \%$ of the bank's small business and HMDA lending by number of loans and $0.6 \%$ by dollar volume totaling $\$ 127.8$ million are located in this assessment area. The percentage of the bank's total lending at $0.8 \%$ is comparable to the percentage of deposits at $1.0 \%$ in this area. The bank also originated ten community development loans in the Eastern Tennessee assessment area. Regions Bank is a major competitor in this market, ranking $6^{\text {th }}$ in HMDA originations and $1^{\text {st }}$ in small business originations in 2011.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. There are no low-income tracts in the Eastern Tennessee assessment area. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank’s geographic distribution of loans reflects poor penetration throughout the assessment area.

## Small Business Loans

Regions Bank's small business lending in moderate-income tracts is poor. During the review period, the bank originated $8.2 \%$ of its small business loans in moderate-income tracts, where $14.0 \%$ of the small businesses are located. The bank's performance was less than aggregate in both 2010 and 2011.

The bank's small business lending to both middle-income and upper-income tracts was greater than the percentage of small businesses in both middle- and upper-income tracts, respectively, in the assessment area.

## Home Purchase Loans

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $6.5 \%$ of its home purchase loans in moderate-income tracts, where $10.1 \%$ of the owner-occupied units are located. Regions Bank's performance was better than the aggregate in 2010 and below the aggregate in 2011.

The bank's home purchase lending to both middle-income and upper-income tracts was greater than the percentage of owner-occupied units in both middle- and upper-income tracts, respectively, in the assessment area.

## Home Refinance Loans

Regions Bank's home refinance lending in moderate-income tracts is very poor. During the review period, the bank originated $2.6 \%$ of its home refinance loans in moderate-income tracts, where $10.1 \%$ of the owneroccupied units are located. Regions Bank's performance was significantly less than the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Regions Bank’s home improvement lending in moderate-income census tracts is very poor when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated two (2.0\%) of its home improvement loans in moderate-income tracts, where $10.1 \%$ of the owner-occupied units are located. Regions Bank's performance was significantly less than aggregate in 2010 and in 2011.

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

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment, and poverty rates, were considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than aggregate in 2011. The bank originated $26.8 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $91.0 \%$. However, of the 814 small business loans originated during the review period, 526 loans ( $64.6 \%$ ) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $75.7 \%$, which was still below the percentage of small businesses in the assessment area. However, $91.0 \%$ of the 814 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and comparable to the aggregate in 2011.

## Home Purchase Loans

Regions Bank’s home purchase lending to low-income borrowers is poor. The bank's performance was less than the demographic with $5.0 \%$ of its home purchase loans to low-income borrowers, while low-income families make up $20.3 \%$ of total families in the assessment area. The bank's performance was below the aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is adequate. At 20.9\%, the bank's percentage of home purchase lending to moderate-income borrowers was greater than the percentage of moderate-income families

## Eastern Tennessee

in the assessment area at $18.4 \%$. The bank's performance was slightly less than the aggregate in 2010 and slightly greater than the aggregate in 2011.

The bank's home purchase lending to both middle-income and upper-income borrowers was greater than the percentage of middle- and upper-income families, respectively, in the assessment area.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is good. The bank made $9.0 \%$ of its refinance loans to low-income borrowers, while low-income families make up $20.3 \%$ of total families in the assessment area. The bank's performance was significantly greater than the aggregate in 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is also good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $18.2 \%$ was comparable to the percentage of moderate-income families in the assessment area at $18.4 \%$. Regions Bank's performance was greater than aggregate in 2010 and 2011.

The bank's home refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is good. Regions Bank’s percentage of home improvement lending to low-income borrowers at $18.8 \%$ was slightly less than the percentage of low-income families in the assessment area at 20.3\%. Regions Bank's performance was greater than aggregate in 2010 and comparable to the aggregate in 2011.

The bank's home improvement lending to moderate-income borrowers is also good when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home improvement lending to moderate-income borrowers at $28.7 \%$ was greater than the percentage of moderate-income families in the assessment area at $18.4 \%$. Regions Bank's performance was significantly greater than aggregate in 2010 and comparable to the aggregate in 2011.

The bank's home improvement lending to middle-income borrowers was greater than the percentage of middleincome families in the assessment area, while lending to upper-income borrowers was less than the percentage of upper-income families.

## Community Development Lending

Regions Bank is a leader in making community development loans in the Eastern Tennessee assessment area. The bank originated 10 community development loans totaling $\$ 23.1$ million during the review period. The majority of the loans financed affordable housing for low- and moderate-income individuals, which is responsive to local community credit needs. Other credit needs include but are not limited to neighborhood stabilization, job growth and workforce development. The bank's community development loan portfolio inside the assessment area exhibits good responsiveness to the credit needs of low- and moderate-income individuals and geographies and small businesses. The dollar amount of community development loans is excellent relative to the bank's presence in the market.

Examples of community development lending include the following:

## Eastern Tennessee

- Six loans totaling $\$ 17.8$ million across three projects to develop more than 200 units of LIHTCsupported affordable housing restricted to tenants earning up to $60 \%$ of the area median income;
- Two loans to county government for the construction of a Federally Qualified Health Center (FQHC) that serves the medically underserved populations of Cumberland County; and
- One loan to a local government body for critical infrastructure that serves all residents in a distressed non-metropolitan middle-income geography.


## Investment Test

The bank's performance in the Eastern Tennessee assessment area under the investment test is excellent. The bank had eight investments totaling $\$ 21.8$ million, including four current period investments totaling $\$ 20.5$ million. Direct investments in the assessment area provided support for affordable housing through FNMA investment instruments and LIHTCs. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs.

The bank also made 19 contributions totaling $\$ 23,190$. Contributions were given primarily to organizations involved in provision of community services targeted to low- and moderate-income individuals and communities or in economic development. In addition, the assessment area may benefit from contributions to statewide and national organizations.

- Community development needs identified include, but are not limited to, affordable housing for lowand moderate-income individuals, economic development that creates job growth, workforce development, small business financing and financial stability for low- and moderate-income individuals. Regions Bank’s investment portfolio and contributions exhibit excellent responsiveness to several of the identified community development needs. For example, the bank invested nearly $\$ 20.5$ million in four LIHTC projects that provided 258 units of housing affordable to low- and moderateincome individuals in rural areas where quality, affordable housing is not widely available.


## Service Test

The bank's service test performance in the Eastern Tennessee assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Eastern Tennessee assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the 22 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open any branches and closed four branches (two in moderate-income tracts and two in middle-income tracts) in the Eastern Tennessee assessment area. The bank's record of closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderateincome geographies or to low- and moderate-income individuals. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Eastern Tennessee

## Geographic Distribution of Branches

Assessment Area: TN Eastern TN


## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 450 service hours for community development organizations by participating in 58 community development services. Many of the community development services focused on education, affordable housing, youth services, and various other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by teaching financial education classes to middle and high school students. The majority of the schools have a high number of students on free or reduced price lunch programs. In addition, Regions Bank employees served on the boards of directors or committees of various community organizations that provide services in low- and moderate-income geographies or to low- and moderate-income individuals.

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

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

- Southern Tennessee Assessment Area (Bedford, Coffee, DeKalb, Franklin, Lincoln, Lewis, Maury and Warren Counties)
o As of December 31, 2011, Regions Bank operated 17 branches in the assessment area, representing $9.1 \%$ of its branches in Tennessee.
o As of June 30, 2011, the bank had $\$ 695.1$ million in deposits in this assessment area, representing a market share of $14.0 \%$ and $5.7 \%$ of Regions Bank's total deposits in Tennessee.
- Western Tennessee Assessment Area (Dyer, Gibson, Lake, Obion, Benton, Carroll, Henry, Houston, Humphreys, Henderson, Weakley, Hardeman, Haywood, McNairy and Lauderdale Counties)
o As of December 31, 2011, Regions Bank operated 24 branches in the assessment area, representing $12.9 \%$ of its branches in Tennessee.
o As of June 30, 2011, the bank had $\$ 713.8$ million in deposits in this assessment area, representing a market share of $11.9 \%$ and $5.8 \%$ of Regions Bank's total deposits in Tennessee.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Southern <br> Tennessee | Not Consistent <br> (Below) | Consistent | Not Consistent (Below) |
| Western Tennessee | Consistent | Consistent | Not Consistent (Below) |

As stated earlier, the Eastern Tennessee and Nashville assessment areas received full-scope reviews, and the bank's performance in the Nashville assessment area was given greater consideration in determining the overall rating for the state. Nashville is by far the bank's largest market in Tennessee in terms of deposits, loans, and branches. The full-scope areas selected together represent $61.6 \%$ of the deposits in the assessment areas in Tennessee as well as $47.3 \%$ of the branches. The full-scope assessment areas also represent $54.8 \%$ of the HMDA loans and $52.4 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits and loans and a large portion of the branches in the State of Tennessee.

For the Lending Test, performance in the Southern Tennessee limited-scope assessment area was weaker than the bank's performance in the state. Weaker performance was primarily attributable to a lower level of community development loans relative to the bank's operations in the assessment area. The performance in the Western Tennessee limited-scope assessment area was consistent with the bank’s performance in the state.

## Non-Metropolitan Areas (Limited Review)

For the Investment Test, the performance in both limited-scope assessment areas was consistent with the bank's performance in the state.

For the Service Test, performance in both limited-scope assessment areas was weaker than the bank's performance in the state due to less accessibility of delivery systems and fewer community development services.

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

## CRA RATING FOR TEXAS: $\underline{\text { Satisfactory }}{ }^{675}$

## The Lending Test is rated: <br> Low Satisfactory <br> The Investment Test is rated: <br> Outstanding <br> The Service Test is rated: <br> Low Satisfactory

Major factors supporting the rating include the following:

- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of borrowers 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 within the assessment areas.
- The bank provides an excellent level of qualified community development investments and grants in the assessment areas and is often in a leadership position in response to the community development needs of the assessment areas.
- Retail services are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment areas.
- The bank provides an adequate level of community development services throughout the assessment areas.

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## SCOPE OF EXAMINATION

Full-scope reviews were conducted for two assessment areas in the State of Texas:

- Austin
- Houston

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

- Dallas
- Fort Worth
- Longview
- Tyler
- Cass (non-MSA)
- Nacogdoches-Angelina-Anderson (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 TEXAS

Regions Bank operates 82 branch offices in its assessment areas in Texas representing 4.8\% of the bank's total branches. As of June 30, 2011, the bank had $\$ 4.4$ billion in deposits in Texas representing 4.5\% of Regions Bank's total deposits in all the assessment areas. As of June 30, 2011, the bank ranked $14^{\text {th }}$ in total deposits in the state with a market share of $0.8 \%$. Of the 86,664 HMDA loans originated and purchased by Regions Bank, $2,331(2.7 \%)$ were in the Texas assessment areas. Of the 110,902 small business and small farm loans originated and purchased by Regions Bank, 3,011 (2.7\%) were in the Texas assessment areas.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

The lending test rating for the State of Texas is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs in both full-scope assessment areas in the state. The bank's performance with regard to the geographic distribution of loans reflects adequate penetration in the Houston assessment area and poor penetration in the Austin assessment area. Also, the distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes throughout the assessment areas. The bank makes a poor level of community development loans.

Although Regions Bank is both a small business and HMDA lender, small business lending was given greater consideration in determining the lending test rating for Texas because the bank originated more small business loans by number than HMDA loans. Additionally, the Houston assessment area received greater consideration when determining the rating because it holds a greater percentage of the bank's deposits, loans, and branches in the state of Texas than the other full-scope assessment area. Furthermore, Regions Bank originated only 51 small farm loans in Texas during the review period; therefore, no detailed discussion of these loans is included in this section of the report.

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

## Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the Texas assessment areas. The following table shows lending activity from January 1, 2010, through December 31, 2011.

## Texas

## Statewide Summary of Lending Activity

Assessment Areas Located in
Texas

| Loan Type | $\#$ | $\mathbf{\%}$ | $\mathbf{\$ ( 0 0 0 s )}$ | \% |
| :--- | :---: | :---: | :---: | :---: |
| HMDA Home Purchase | 1,018 | $19.1 \%$ | $\$ 236,132$ | $27.7 \%$ |
| HMDA Refinance | 1,123 | $21.0 \%$ | $\$ 265,922$ | $31.2 \%$ |
| HMDA Home Improvement | 190 | $3.6 \%$ | $\$ 2,275$ | $0.3 \%$ |
| HMDA Multi-Family | 0 | $0.0 \%$ | $\$ 0$ | $0.0 \%$ |
| Total HMDA | $\mathbf{2 , 3 3 1}$ | $\mathbf{4 3 . 6} \%$ | $\mathbf{\$ 5 0 4 , 3 2 9}$ | $\mathbf{5 9 . 2} \%$ |
| Total Small Business | $\mathbf{2 , 9 6 0}$ | $\mathbf{5 5 . 4} \%$ | $\mathbf{\$ 3 4 1 , 1 0 1}$ | $\mathbf{4 0 . 1} \%$ |
| Total Farm | $\mathbf{5 1}$ | $\mathbf{1 . 0 \%}$ | $\mathbf{\$ 6 , 0 0 0}$ | $\mathbf{0 . 7 \%}$ |
| TOTAL LOANS | $\mathbf{5 , 3 4 2}$ | $\mathbf{1 0 0 . 0} \%$ | $\mathbf{\$ 8 5 1 , 4 3 0}$ | $\mathbf{1 0 0 . 0 \%}$ |

Originations and Purchases
Affiliate loans include only loans originated or purchased within the bank's assessment area.

Lending activity is poor in the Austin assessment area and adequate in the Houston assessment areas.

## Geographic and Borrower Distribution

The geographic distribution of Regions Bank's HMDA and small business loans is adequate. The geographic distribution was adequate in the Houston assessment area and poor in the Austin assessment area. Overall, the distribution of loans by borrower's income and revenue size of business is adequate. The borrower distribution is considered adequate in both full-scope assessment areas in the state. A detailed discussion of the borrower and geographic distribution of lending for the full-scope assessment areas is included in the next section of this report.

## Community Development Lending

Regions Bank makes a low level of community development loans in the Texas assessment areas. The bank made nine community development loans totaling $\$ 6.9$ million during the review period, which represented $1.3 \%$ by number and $0.5 \%$ by dollar amount of the bank's community development lending. The majority of the loans were for the purpose of small business development. The bank’s performance regarding community development lending in both the Austin and Houston full-scope assessment areas is poor. More information on community development lending can be found in each full-scope assessment area section.

## Investment Test

The investment test rating is Outstanding when considering the bank's statewide performance in Texas. The bank made significant use of qualified investments and contributions and exhibited excellent responsiveness to credit and community development needs through its investment activities in the Austin and Houston assessment areas.

The bank made 32 qualified investments of approximately $\$ 126.5$ million and contributions of $\$ 19,650$ within the Texas assessment areas. Of the 32 investments, 18 totaling $\$ 100.2$ million were current period investments. Most of the investments provided support for affordable housing, through GNMA investment instruments, Low Income Housing Tax Credits (LIHTCs), and funds that finance LIHTC projects. The bank also invested in a

## Texas

Qualified School Construction Bond to support the construction of a new charter school in a low-income census tract that serves primarily students eligible for free and reduced-price lunch. The bank also had several statewide investments that may benefit the assessment areas. Specifically, the bank provided support for economic development and community realization through an investment in a statewide CDFI that provides small business financing and a New Markets Tax Credit fund. Finally, the bank had several investments that benefit its entire footprint, including Texas. The broader regional investments funded small businesses and startup companies through investments in SBICs.

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

## Service Test

The service test rating is Low Satisfactory when considering the bank's statewide performance in Texas.

## Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderateincome geographies or low- and moderate-income individuals. The record of opening and closing of offices has generally not adversely affected the accessibility of the bank's delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

## Community Development Services

The bank provides an adequate level of community development services that benefit residents and small businesses of the assessment areas. Community development services are adequate for both full-scope assessment areas.

METROPOLITAN AREA<br>(Full-scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE AUSTIN ASSESSMENT AREA

The Austin assessment area includes Travis and Williamson counties in Texas, which are located in the AustinRound Rock-San Marcos MSA. The assessment area contains a total of 227 census tracts, 20 of which are lowincome and 56 are moderate-income tracts. All low-income tracts and 51 of the moderate-income tracts are in Travis County. Regions Bank operates 14 branch offices in the assessment area, representing $17 \%$ of its branches in Texas. Two branches are located in low- or moderate-income census tracts with an additional five bordering at least one low- or moderate-income tract.
Of the 86,664 HMDA loans originated and purchased by Regions Bank, 294 ( $0.3 \%$ ) were in the Austin assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 382 ( $0.4 \%$ ) were in the Austin assessment area.

## Population and Income Characteristics

Population growth inside the assessment area has been robust in recent years. As of 2010, the total population for the assessment area was $1,446,945$, representing a $36 \%$ increase from 2000. During this time period, Williamson County saw its population grow by $69 \%$, making it the $12^{\text {th }}$ fastest growing county in the nation. ${ }^{676}$ Travis County, home to densely populated Austin, also experienced rapid population growth with its resident base increasing by $26 \%$. Comparatively, the population growth rate for the state of Texas from 2000 to 2010 was 20.6\%. Migration trends further highlight the area’s population changes. From 2005 to 2010, net migration was positive each year in both counties but is on the decline since peaking between 2006 and 2008. Net migration is defined as the number of in-migrants less the number of out-migrants and is determined by comparing the addresses of in-migrant and out-migrant federal tax returns from the present year to the previous year. ${ }^{677}$

The percentage of assessment area residents receiving food stamps increased from 2000 to 2009 but remains lower than the state. As of 2009, $11.6 \%$ of Travis County residents received food stamps, up from $3.2 \%$ in 2000. In Williamson County, food stamp usage increased to $7.1 \%$ in 2009 from $1.7 \%$ in 2000 while the state of Texas saw food stamp usage increase from $6.4 \%$ in 2000 to $13.7 \%$ in 2009. Poverty rates inside the assessment area have also trended upward. As of 2009, 15.2\% of Travis County residents and $6.2 \%$ of Williamson County residents lived below the poverty level. Comparatively, the statewide and national poverty rates were $16.8 \%$ and $13.5 \%$, respectively.

Free and reduced price lunch program participation can also be used to understand the income characteristics of a community. There are 17 school districts in the assessment area. In 2010, 35\% of school districts had more than $50 \%$ of students receiving free and reduced price lunch benefits, an increase from $17 \%$ in 2000 . Of the five schools districts with more than $50 \%$ of students receiving these benefits, two are in Travis County and three are in Williamson County. Jarrell Independent School District in Williamson County experienced the largest increase in eligible students, increasing from 20\% in 2000 to 58\% in 2010.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following table sets forth the

[^221]estimated median family income for the years 2010 through 2011 for the Austin-Round Rock-San Marcos MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle and upper) and shows that the estimated median family income increased by $\$ 1,100$, or $1.5 \%$, from 2010 to 2011.

## Borrower Income Levels <br> Austin-Round Rock-San Marcos, TX MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% | - | 119.99\% | 120\% | - | \& above |
| 2010 | \$73,800 | 0 | - | \$36,899 | \$36,900 | - | \$59,039 | \$59,040 | - | \$88,559 | \$88,560 | - | \& above |
| 2011 | \$74,900 | 0 | - | \$37,449 | \$37,450 | - | \$59,919 | \$59,920 | - | \$89,879 | \$89,880 | - | \& above |

## Housing Characteristics

Despite the impact of national economic issues and the recent housing crisis, the housing market in the assessment area has remained relatively healthy, although it is less affordable than the state of Texas housing market. Census data indicates that the median price of a single-family housing unit between 2005 and 2009 was $\$ 191,700$ in Travis County and $\$ 168,500$ in Williamson County, compared to $\$ 118,900$ for the state of Texas and $\$ 185,400$ for the United States.

The MSA's rental market, which is largely impacted by student enrollment at the University of Texas and Texas Southern University, is relatively balanced with an estimated vacancy rate of approximately 6\%. Single-family homes comprise $25 \%$ of the metropolitan area rental market. Occupancy and rents increased in the latter part of 2010 and early 2011, the first time growth occurred in these quarters in more than 5 years. Nevertheless, supply of affordable rental units remains a challenge as the University of Texas and Texas Southern University have a combined enrollment of more than 71,000 but provide housing for fewer than 20,000. ${ }^{678}$

The 2011-2013 Travis County Consolidated Plan \& Action Plan discusses housing needs for the densely populated area, stating that between 2000 and 2009, home values shifted towards higher priced homes. While $54 \%$ of housing units were valued between $\$ 50,000$ and $\$ 149,999$ in 2000 , only $29 \%$ of units fell within this range in 2009. Furthermore, the Plan cites independent reports documenting a significant lack of affordable rental units for households earning less than $\$ 20,000$ annually, with a gap of approximately 39,000 rental units. The problem is most severe for households earning less than $\$ 10,000$ a year, with a shortage of as many as 19,300 rental units. Approximately 48\% of renter households in Travis County are cost burdened and 86\% of low-income renter households report having a housing problem. ${ }^{679}$

The Travis County Plan also discusses barriers to the development of affordable housing, such as lack of funding for affordable housing, land costs, tight credit market, building codes, environmental regulations and other related affordability issues. One specific issue that disadvantages Travis County with regard to affordable housing is that it does not receive a HOME funding allocation from the federal government, which is a major funding source for many communities to develop affordable housing. This reduction in access to funding along

[^222]with a growing percentage of cost-burdened residents and a widening gap of affordable rental units needed in the county creates significant barriers to affordable housing. ${ }^{680}$

The Williamson County 2009-2012 Consolidated Action Plan also discusses the area's housing needs with challenges similar to Travis County. In particular, the report notes that there is a diverse and highly motivated nonprofit community in Williamson County that collectively possesses the organizational capacity to provide housing, services and facilities to lower-income households and persons; however, adequate funding to fully finance the programs and initiatives is lacking. There is also a pointed need for affordable housing for extremely low-income and very low-income households and persons, which has been exacerbated due to employment layoffs, cutback in hours, and rising fuel and food prices. The report adds that the needs of homeless persons and families in the county are not being adequately served. ${ }^{681}$

Census data show that there were 426,206 housing units in the assessment area in 2000, $53.9 \%$ of which were owner-occupied, $41.8 \%$ were rental units and $4.4 \%$ were vacant. While a majority of units were owneroccupied, a disproportionately higher percentage of housing units in low- and moderate-income tracts were rental units or vacant, indicating reduced mortgage lending opportunities in these areas. Housing stock was older in low- and moderate-income tracts compared to middle- and upper-income tracts, but not to the extent of many other urban areas across the nation. Additionally, housing permit activity declined from its peak years. For the MSA, single-family permits declined by $65 \%$ from 2006 to 2010 while multi-family residential permits experienced a decline of almost $72 \%$ from 2006 to 2009, but both categories saw an increase in activity from 2010 to 2011. ${ }^{682}$

Mortgage delinquencies and reduced loan demand resulting from the economic recession and housing crisis have also had an impact on the local housing market but to a lesser extent than many other urban areas around the country. The percentage of seriously delinquent mortgages, which includes loans more than 90 days past due, rose from $2.5 \%$ in January 2010 to 4.2\% in December 2011. ${ }^{683}$ HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings has weakened but remains active, declining from a high of 32,907 loans in 2006 to 16,833 in 2010, a reduction of nearly $49 \%$. Refinance activity, on the other hand, remains healthy, declining from a peak of 21,258 loans in 2004 to 8,803 in 2006 and then rebounding to nearly 24,000 in 2010, representing a $12.6 \%$ increase from 2004 to $2010 .{ }^{684}$

## Employment and Economic Conditions

The assessment area is located in the Austin-Round Rock-San Marcos, TX MSA, which is comprised of Travis, Williamson, Hays, Bastrop and Caldwell counties. This is one of the fastest growing MSAs in the country. As of 2010, total employment across the MSA was $1,073,304$. The largest private employment sectors included professional, scientific and technical services; health care and social assistance; and accommodation and food services. Combined, these sectors accounted for nearly 270,000 jobs, or $30 \%$ of private sector employment. ${ }^{685}$

Travis County offers a vibrant, urban environment for its residents. The state capital, Austin, is located in Travis County, resulting in more than 120,000 state and local government jobs being located in the county. Austin is also home to many of the region's technology-based companies and institutions of higher learning.

[^223]Williamson County is also home to large-scale employers such as Dell Inc., one of the world's largest computer systems companies. Other top employers in the assessment area include IBM Corporation, local hospitals and school systems, Apple Computer and Advance Micro Devices. ${ }^{686}$

Generally speaking, the Texas economy has maintained a much stronger position in recent years relative to most other states, due in large part to the booming oil industry. The Texas Workforce Commission’s December 2011 employment statement reported that Texas added more than 200,000 jobs in 2011 . The mining and logging sector, which was bolstered by oil and natural gas sector industries, added more than 40,000 jobs in 2011 and grew by $18.7 \%$. Other areas of note were professional and business services, which added 53,100 jobs, leisure and hospitality, which added 41,200 jobs, and the trade, transportation and utilities sector, which added nearly 46,000 workers. By the end of 2011, Texas had replaced all 427,600 jobs lost during the recession. This accelerated economic recovery put Texas well ahead of the national job market, which is unable to regain jobs at the rate of Texas. As of December 2011, only $30 \%$ of jobs shed nationally during the recession had been restored. ${ }^{687}$

The Austin assessment area economy has performed in a manner consistent with the statewide economy in recent years. In May 2012, Forbes magazine ranked Austin as the best place for jobs among the 65 largest metropolitan areas in the country due to, in part, strong growth in manufacturing, technology-related employment and business services. ${ }^{688}$ A 2012 study conducted by independent economic research firm Policom Corp. ranked Austin as the fifth strongest economy in the nation based on 23 different economic factors over a 20 -year period. Top-rated areas such as Austin had rapid, consistent growth in both size and quality for an extended period of time. ${ }^{689}$ In 2010, Austin ranked $3^{\text {rd }}$ on CNN Money’s list of the top 21 strongest performing, most "recession-proof" cities in America. ${ }^{690}$

In the greater Austin metro area, $40.6 \%$ of adults have at least a bachelor's degree, compared to $28.5 \%$ nationally, putting Austin in the top 10 among the largest metro areas. The region benefits from over 50 colleges and universities and 400,000 enrolled students within a 100 -mile radius. ${ }^{691}$ Austin is home to The University of Texas at Austin, one of the largest universities in the country and the flagship institution of The University of Texas System - the largest state system of higher education in Texas. Other institutions include Texas Southern University, Austin Community College, Concordia University, Huston-Tillotson University, St. Edward's University, Austin Graduate School of Theology, Austin Presbyterian Theological Seminary, and a branch of LeTourneau University. ${ }^{692}$

Both counties in the Austin assessment area have enterprise zones. The Texas Enterprise Zone Program is an economic development tool for local communities to partner with the State of Texas to promote job creation

[^224]and capital investment in economically distressed areas of the state. Designated projects are eligible to apply for state sales and use tax refunds on purchases of all taxable items purchased for use at the qualified business site related to the project or activity.

While unemployment remains a challenge for the local economy, it does so to a much lesser degree than most areas in the country. The following table illustrates the unemployment rates for the counties in the assessment area, the MSA and the state of Texas, all of which were lower than the national unemployment rate in 2010 and 2011.

## Unemployment Rates

Assessment Area: TX Austin

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Austin MSA | 7.1 | 6.8 |
| Travis County | 6.9 | 6.6 |
| Williamson County | 7.2 | 6.8 |
| Texas | $\mathbf{8 . 2}$ | $\mathbf{7 . 9}$ |

Not Seasonally Adjusted

## Community Contacts and Community Development Opportunities

One community contact was made with an individual specializing in affordable housing. The contact noted that the Austin area is in a good position economically with job growth being particularly good. Housing was discussed as a top community development priority, with affordability and cost burden being key concerns. The rental market in Austin is very tight and rents are high, but high property taxes and gentrification make homeownership an unattainable option for many low- and moderate-income families. Regarding financial institution involvement in local community development activities, the contact noted that while institutions are involved, there is not much innovation. Community land trusts were specifically noted as an area where innovative financing is needed but not happening. The contact added that banks are engaged in financial empowerment programs such as Bank On Central Texas.

Bank On is a national initiative designed to connect unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. The organization estimates that $10.7 \%$ of households in the city of Austin and $5.4 \%$ of households across the MSA are unbanked, compared to $11.7 \%$ statewide. An additional $23 \%$ of Austin households and $21.7 \%$ of MSA households are underbanked, meaning that they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops. This compares to $24 \%$ of underbanked households statewide. ${ }^{693}$ Bank On Central Texas is the local Bank On initiative led by United Way Capital Area that brings together financial institutions, government, private sector and community organizations to bring more people into the financial mainstream. ${ }^{694}$

The State of Texas received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure

[^225]
## Austin, Texas

crisis. The State of Texas received more than $\$ 100$ million for housing-related projects for which the City of Austin and area organizations were sub-grantees, receiving approximately $\$ 10$ million in funding for affordable housing acquisition, rehabilitation and redevelopment. ${ }^{695}$

There are 42 certified community development financial institutions (CDFIs) located in the state of Texas, comprised mostly of credit unions and loan funds. Four CDFIs are located in Austin, all of which are loan funds that typically provide alternative sources of capital to community development service providers when they are unable to access credit through traditional sources such as banks.

## Competition

The Austin, Texas assessment area is an active banking market. According to the June 30, 2011 FDIC Summary of Deposits Report, there were 57 financial institutions operating 403 branch locations across the two counties holding $\$ 23$ billion in total deposits. Regions Bank ranked $6{ }^{\text {th }}$ with deposit market share of 5.1\% (\$1.2 billion). Wells Fargo Bank had the largest deposit market share at 20.5\% followed by Bank of America with $17.6 \%$ and JPMorgan Chase Bank with 17.0\%.

Regions Bank is not a small business or HMDA lending leader in the assessment area. In 2010, the bank ranked $17^{\text {th }}$ out of 108 small business loan reporters by originating less than $1 \%$ of all loans. In 2011, the bank moved up one spot to number 16 of 118 reporters but still generated less than $1 \%$ of the loans. From 2010 to 2011, the bank's small business lending increased from 130 loans to 255 loans. For HMDA lending, Regions Bank ranked $69^{\text {th }}$ in 2010 and 2011 with less than $1 \%$ all HMDA originations in both years. Bank of America, JPMorgan Chase Bank and Wells Fargo Bank were the top HMDA lenders in the assessment area.

## Demographic Characteristics

The following table illustrates selected demographic information for the Austin assessment area.

[^226]
## Austin, Texas

## Combined Demographics Report

Assessment Area: TX Austin

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 20 | 8.8 |  | 5.7 | 3,513 | 24.2 | 48,208 | 19.0 |
| Moderate-income | 56 | 24.7 |  | 21.7 | 7,599 | 13.8 | 44,564 | 17.6 |
| Middle-income | 86 | 37.9 |  | 38.7 | 4,064 | 4.1 | 56,845 | 22.4 |
| Upper-income | 63 | 27.8 |  | 33.8 | 1,436 | 1.7 | 103,702 | 40.9 |
| Unknown-income | 2 | 0.9 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 227 | 100.0 |  | 100.0 | 16,612 | 6.6 | 253,319 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 34,714 |  |  | 19.8 | 26,408 | 76.1 | 1,432 | 4.1 |
| Moderate-income | 100,211 |  |  | 38.3 | 57,880 | 57.8 | 3,964 | 4.0 |
| Middle-income | 166,535 |  |  | 55.4 | 66,830 | 40.1 | 7,464 | 4.5 |
| Upper-income | 124,746 |  |  | 73.8 | 26,900 | 21.6 | 5,814 | 4.7 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 426,206 | 229,514 |  | 53.9 | 178,018 | 41.8 | 18,674 | 4.4 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3,065 | 4.0 |  | 3.8 | 198 | 5.3 | 203 | 5.8 |
| Moderate-income | 12,090 | 15.6 |  | 15.3 | 689 | 18.4 | 666 | 19.1 |
| Middle-income | 29,341 | 37.9 |  | 37.9 | 1,403 | 37.5 | 1,298 | 37.1 |
| Upper-income | 32,951 | 42.5 |  | 43.0 | 1,444 | 38.6 | 1,318 | 37.7 |
| Unknown-income | 57 | 0.1 |  | 0.1 | 3 | 0.1 | 9 | 0.3 |
| Total Assessment Area | 77,504 | 100.0 |  | 100.0 | 3,737 | 100.0 | 3,494 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 90.7 |  | 4.8 |  | 4.5 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 8 | 1.0 |  | 1.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 108 | 13.3 |  | 13.3 | 2 | 28.6 | 0 | 0.0 |
| Middle-income | 404 | 49.9 |  | 50.1 | 3 | 42.9 | 0 | 0.0 |
| Upper-income | 289 | 35.7 |  | 35.6 | 2 | 28.6 | 2 | 100.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 809 | 100.0 |  | 100.0 | 7 | 100.0 | 2 | 100.0 |
|  | Percentage of Total Farms: |  |  | 98.9 |  | . 9 |  | . 2 |

[^227]
## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank’s lending performance in the Austin assessment area is poor. The geographic distribution of loans reflects poor penetration throughout the assessment area. Also, the distribution of borrowers 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.

During the review period, the bank reported 294 (43.5\%) HMDA loans compared to 382 (56.5\%) small business loans in the Austin assessment area. Therefore, evaluation and rating of the assessment area focuses on the performance of small business lending more heavily than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $0.3 \%$ of the bank's total small business and HMDA lending by number of loans and $0.7 \%$ by dollar volume totaling $\$ 145.6$ million are located in this assessment area. The percentage of the bank's total lending at $0.3 \%$ is comparable to the percentage of deposits at $1.2 \%$ in this area. The bank also originated three community development loans in the Austin assessment area. Regions Bank is not major competitor in this market, ranking $69^{\text {th }}$ in HMDA loans and $16^{\text {th }}$ in small business loans in 2011.

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

## Geographic Distribution of Loans

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

## Small Business Loans

Regions Bank's small business lending in low-income tracts is very poor. During the review period, the bank originated only two ( $0.5 \%$ ) of its small business loans in low-income census tracts, which contain $3.8 \%$ of the small businesses in the assessment area. The bank's performance was significantly less than aggregate in both 2010 and 2011.

Regions Bank’s small business lending in moderate-income tracts is adequate. During the review period, the bank originated $11.8 \%$ of its small business loans in moderate-income census tracts, which contain $15.3 \%$ of the small businesses in the assessment area. The bank's performance was slightly less than aggregate in 2010 and comparable to aggregate in 2011.

The bank's small business lending in middle-income tracts was greater than the percentage of small businesses located in middle-income tracts while the lending to upper-income tracts was less than percentage of small businesses located in those tracts in the Austin assessment area.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, Regions Bank originated $2.3 \%$ of its home purchase loans in low-income census tracts, which contain $3.0 \%$ of the owner-occupied units in the assessment area. Although the aggregate did not originate home purchase loans at a level comparable to the percentage of owner-occupied units in low-income census tracts, Regions Bank’s performance was greater than the aggregate in both 2010 and 2011.

## Austin, Texas

Home purchase lending in moderate-income tracts is poor. During the review period, Regions Bank originated $6.9 \%$ of its home purchase loans in moderate-income census tracts, which contain $16.7 \%$ of the owner-occupied units in the assessment area. The bank's performance was less than the aggregate in both 2010 and 2011.

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

## Home Refinance Loans

Regions Bank's home refinance lending in low-income census tracts is adequate. During the review period, the bank originated $2.0 \%$ of its home refinance loans in low-income census tracts, which contain $3.0 \%$ of the owner-occupied units. Regions Bank's performance was greater than the aggregate in 2010 and less than the aggregate in 2011.

Regions Bank’s home refinance lending in moderate-income census tracts is very poor. During the review period, the bank originated $3.0 \%$ of its home refinance loans in moderate-income census tracts, which contain $16.7 \%$ of the owner-occupied units. Regions Bank's performance was significantly less than the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Regions Bank's home improvement lending in low-income census tracts is very poor when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank did not originate any of its home improvement loans in low-income tracts, which contain $3.0 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was significantly less than aggregate in both 2010 and 2011.

Regions Bank's home improvement lending in moderate-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts. During the review period, Regions Bank originated two (20.0\%) of its home improvement loans in moderate-income tracts, which contain $16.7 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was significantly less than aggregate in 2010 and significantly greater than the aggregate in 2011.

The bank's home improvement lending in both middle-income and upper-income tracts was comparable to the percentage of owner-occupied units in middle-income and upper-income tracts.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment and poverty rates, were considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the aggregate, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than aggregate in 2011. The bank originated $34.3 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $90.7 \%$. However, of the 382 small business loans originated during the review period, 156 loans (40.8\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $58.0 \%$, which was still below the percentage of small businesses in the assessment area. However, $72.8 \%$ of the 382 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank's performance was less than the aggregate in 2010 and comparable to the aggregate in 2011.

## Home Purchase Loans

Regions Bank's home purchase lending to low-income borrowers is very poor. The bank's performance was less than the demographic with $1.1 \%$ of its home purchase loans to low-income borrowers, while low-income families make up $19.0 \%$ of total families in the assessment area. The bank's performance was significantly less than the aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is poor. At $12.6 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area at 17.6\%. The bank's performance was less than the aggregate in both 2010 and 2011.

The bank's home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is poor. The bank made $2.0 \%$ of its refinance loans to low-income borrowers, while low-income families make up $19.0 \%$ of total families in the assessment area. The bank's performance was less than the aggregate in 2010 and 2011.

The bank's home refinance lending to moderate-income borrowers is also poor when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home refinance lending to moderate-income borrowers at $6.6 \%$ was less than the percentage of moderate-income families in the assessment area at 17.6\%. Regions Bank's performance was less than aggregate in 2010 and 2011.

The bank's home refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area while the lending to upper-income borrowers was greater than the percentage of upper-income families.

## Home Improvement Loans

Home improvement lending to low-income borrowers is adequate. Regions Bank's percentage of home improvement lending to low-income borrowers at $30.0 \%$ was greater than the percentage of low-income families in the assessment area at 19.0\%. Regions Bank’s performance was less than aggregate in 2010 and greater than the aggregate in 2011.

The bank's home improvement lending to moderate-income borrowers is poor when compared to the percentage of moderate-income families in the assessment area. The bank's percentage of home improvement
lending to moderate-income borrowers at $10.0 \%$ was less than the percentage of moderate-income families in the assessment area at $17.6 \%$. Regions Bank's performance was less than aggregate in 2010 and comparable to the aggregate in 2011.

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

## Community Development Lending

Regions Bank makes a low level of community development loans in the Austin, Texas assessment area. The bank originated three community development loans totaling $\$ 2.9$ million during the review period. All three loans promoted economic development by financing small businesses as part of the SBA’s 504 Certified Development Company program. Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization tied to elevated foreclosure rates and small business finance. The bank's community development portfolio inside the assessment area exhibits poor responsiveness to these credit needs of low- and moderate-income individuals and geographies and small businesses. Furthermore, the number and the dollar amount of community development loans are poor given the bank's presence in the market.

## Investment Test

The bank's performance in the Austin assessment area under the investment test is excellent. The bank had four investments totaling $\$ 15.3$ million, including two current period investments totaling $\$ 12.9$ million. Direct investments in the assessment area provided support for affordable housing through GNMA and investment instruments and investments in Low Income Housing Tax Credit funds. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and an investment in a statewide CDFI, as well as provided support for community revitalization through an investment in a New Markets Tax Credit fund.

The bank also made four contributions totaling $\$ 4,325$. Contributions were given primarily to organizations involved in providing community services targeted to low- and moderate-income individuals and communities. In addition, the assessment area may benefit from contributions to national organizations.

Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization tied to elevated foreclosure rates and small business finance. Regions Bank's investment portfolio and contributions exhibit responsiveness to some of the identified community development needs.

## Service Test

The bank's service test performance in the Austin assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Austin assessment area.

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the 14 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open or close any branches in the Austin assessment area. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-

## Austin, Texas

income geographies or to low- and moderate-income individuals. The bank has weekend hours for branches in low- and moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

## Geographic Distribution of Branches

Assessment Area: TX Austin

| Tract <br> Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | T | Branc <br> \% |  | Closed <br> \# | Drive thrus | Extend- <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> $\#$ | Census Tracts |  | Households <br> \% | Total Businesses $\%$ |
|  | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
| Low | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 20 | 8.8\% | 8.2\% | 4.0\% |
| Moderate | Total | 2 | 14.3\% | 0 | 0 | 2 | 2 | 2 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 56 | 24.7\% | 23.6\% | 15.6\% |
| Middle | Total | 8 | 57.1\% | 0 | 0 | 8 | 8 | 7 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 86 | 37.9\% | 39.0\% | 37.9\% |
| Upper | Total | 4 | 28.6\% | 0 | 0 | 2 | 4 | 1 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | 0 | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 63 | 27.8\% | 29.3\% | 42.5\% |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ |  | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0 \\ & 0 \end{aligned}$ | 0 |  |  | 2 | 0.9\% | 0.0\% | 0.1\% |
| Total | Total | 14 | 100.0\% | 0 | 0 | 12 | 14 | 10 |  |  |  |  |
|  | $\begin{aligned} & \text { DTO } \\ & \text { LS } \end{aligned}$ | 0 0 |  | 0 | 0 | 0 |  |  | 227 | 100.0\% | 100.0\% | 100.0\% |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 312 service hours in various capacities for community development organizations by participating in 44 community development services. Many of the community development services focused on education, affordable housing, youth services, tax assistance, and various other community services that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by teaching financial education classes to students. The majority of the schools where the classes were taught have a high number of students on free or reduced price lunch programs. Furthermore, many of the schools are located in low- and moderateincome geographies. In addition, Regions Bank employees served on the boards of directors and committees of various community organizations which provide services in low- and moderate-income geographies or to lowand moderate-income individuals.

## METROPOLITAN AREA

(Full-scope Review)

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

The 10 -county Houston-Sugar Land-Baytown MSA is the $5^{\text {th }}$ most populous MSA in the United States, and the city of Houston is the $4^{\text {th }}$ largest city in the country. The Houston MSA is also one of the largest from a geographic perspective, covering an area larger than the entire state of Massachusetts. Regions Bank's Houston assessment area consists of five of the 10 counties in the MSA: Harris, Brazoria, Fort Bend, Galveston, and Montgomery counties. The city of Houston is primarily located in Harris County and also serves as its county seat. There are 860 census tracts in the assessment area across the five counties, 70 of which are low-income and 269 are moderate-income. Regions Bank operates 27 branches in the Houston assessment area, two of which are located in moderate-income tracts. These branches represent $33 \%$ of the bank's total branches in Texas.

Of the 86,664 HMDA loans originated and purchased by Regions Bank, 664 ( $0.8 \%$ ) were in the Houston assessment area. Of the 107,574 small business loans originated and purchased by Regions Bank, 960 (0.9\%) were in the Houston assessment area.

## Population and Income Characteristics

Houston was the fastest growing U.S. city in the 20th century and has become a major center for business and commerce. ${ }^{696}$ As of the 2010 census, the Houston assessment area had a total population of $5,738,055$, which represents a $26.4 \%$ growth in population since $2000 .{ }^{697}$ The largest population base in the area is in Harris County with $4,092,459$ persons in 2010. The state of Texas has also been one of the fastest growing states in the country, growing from $20,851,820$ persons in 2000 to $25,145,561$ in 2010, a $20.6 \%$ growth over the decade.

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development's (HUD) estimated median family income for the relevant area. The following table sets forth the estimated median family income for 2010 and 2011 for the Houston MSA and also provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). The table indicates that the HUD estimated median family income for the Houston area in 2010 was $\$ 65,100$ and $\$ 66,000$ for 2011.

## Borrower Income Levels Houston-Sugarland-Baytown, TX MSA

| HUD Estimated Median Family Income |  | Low |  |  | Moderate |  |  | Middle |  |  | Upper |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 0 | - | 49.99\% | 50\% | - | 79.99\% | 80\% |  | 119.99\% | 120\% |  | \& above |
| 2010 | \$65,100 | 0 | - | \$32,549 | \$32,550 | - | \$52,079 | \$52,080 |  | \$78,119 | \$78,120 |  | \& above |
| 2011 | \$66,000 | 0 | - | \$32,999 | \$33,000 | - | \$52,799 | \$52,800 | - | \$79,199 | \$79,200 |  | \& above |

[^228]According to the 2000 U.S. census data, there were $1,145,168$ families in the assessment area. Of those families, $22.3 \%$ were low-income, $17.2 \%$ were moderate-income, $18.8 \%$ were middle-income, and $41.7 \%$ were upper-income. Of the total families, 124,462 (10.9\%) had incomes below the poverty level.

## Housing Characteristics

Across the state of Texas, housing prices have been relatively stable throughout the recession. Prior to the recession, housing prices did not experience the rapid price escalation and therefore did not fall drastically during the downturn. ${ }^{698}$ Housing prices throughout the Houston area have remained fairly steady, although some counties within the MSA are performing better than others. According to data from the Real Estate Center at Texas A\&M University, the median housing price in the Houston region has been steadily increasing, with median housing prices in 2010 of $\$ 152,700$ compared to $\$ 151,800$ in 2007. Home sales, however, have declined by about 30.0\% since 2006. In Brazoria County, home prices have declined from a peak price in 2009 of $\$ 127,300$ to $\$ 123,400$ in 2010 . Home sales in the county have fallen as well. In Galveston, the housing market was significantly impacted by Hurricane Ike in 2009. Housing prices fell from a peak of $\$ 181,500$ in 2008 to $\$ 128,800$ in 2009. Prices stabilized in 2010 and show signs of continued improvement. Home sales in Galveston have followed the same trend as elsewhere in the MSA, slowing significantly since $2005 .{ }^{699}$

New residential construction in the MSA has slowed considerably. Permits for new single-family homes fell by over $60.0 \%$ between 2006 and 2010, from 49,101 in 2006 to 18,932 in 2010. In 2011, new single-family home permits increased for the first time since 2006, with 19,485 that year. While showing some signs of improvement, the housing market remains soft due to the large available inventory. ${ }^{700}$

The Houston MSA has fared relatively well in terms of foreclosures compared to many metropolitan areas in the country, but still has had its struggles. The percentage of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) in the Houston assessment area increased from 3.9\% in January 2010 to $6.1 \%$ in December 2011. Statewide in Texas, just $0.8 \%$ of mortgages were seriously delinquent as of December 2011. ${ }^{701}$ Many of the foreclosures are located in new subdivisions, where homeowners took on too much debt or relied on creative mortgage products to purchase homes that they could not afford. ${ }^{702}$

The 2000 census indicates that there were $1,729,252$ total housing units in the assessment area. Of the total housing units, 960,979 ( $55.6 \%$ ) were owner-occupied and 635,484 ( $36.7 \%$ ) were renter-occupied. The median value of housing units in the assessment area in 2000 was $\$ 86,337$, which was $11.0 \%$ higher than the median housing value of the state of Texas at $\$ 77,800$. The median age of housing in the assessment area was 24 years, although there were several counties with significantly newer housing, including Fort Bend and Montgomery, where the average age of housing stock was just 14 years. The median gross rent was $\$ 591$, which was slightly higher than the average statewide rent of $\$ 574$.

Overall, the housing market in the Houston MSA has experienced the same downward trends evident in many other cities around the country. Home sales and new construction fell during the recession years, and

[^229]foreclosures have increased; however, recent home sales and new construction data indicate stabilization. Additionally, continued population and job growth bode well for the market's recovery.

## Employment and Economic Conditions

The Houston economy has traditionally been heavily dependent on the energy sector. Houston is the US energy headquarters and a world center for virtually every segment of the oil and gas industry including exploration, production, transmission, marketing, supply and technology. There are more 3,700 energy-related establishments located within the Houston MSA, and as of February 2011, 28.7\% of the nation’s jobs in oil and gas extraction and $11.2 \%$ of jobs in support activities for mining were based in the region. ${ }^{703}$

The Houston MSA ranks $3^{\text {rd }}$ in the country for Fortune 500 companies, with 23 Fortune 500 companies based in the region. Some of the largest corporations headquartered in the MSA include ConocoPhillips, Marathon Oil, Sysco, Enterprise Products Partners, Plains All American Pipeline, Halliburton, Baker Hughes, Waste Management, National Oilwell Varco, Apache, Anadarko Petroleum, and KBR. ${ }^{704}$

While energy remains central to Houston's economy, the economic base in the region has become more diverse in the past two decades. The diversification of the economy is evident in 2008 REIS data, which shows that the Houston MSA has a significant worker population in all of the following industries: mining; manufacturing; retail trade; health care and social assistance; accommodation and food services; federal, state and local government; administrative and waste services; construction; finance and insurance; transportation and warehousing; professional and technical services; information; and wholesale trade. ${ }^{705}$ Major employers in the Houston MSA include Wal-Mart Stores, Inc., Administaff, Inc., Memorial Hermann Healthcare System, The University of Texas MD Anderson Cancer Center, The Kroger Co., Exxon Mobil Corporation, Shell Oil Company, The Methodist Hospital System, Johnson Space Center and H-E-B. ${ }^{706}$ In addition, there are many other large employers in the region employing over 1,000 employees.

As with many areas of Texas, the Houston MSA did not experience as great an economic downturn as many other parts of the country. ${ }^{707}$ From the start of Houston's recession in September 2008 to the bottom in January 2010, Houston lost 135,400 jobs, or one in every 19 in the region. Despite these losses, Houston fared better than other large metro areas. In fact, in 2011, Houston actually surpassed pre-recession employment levels, and continued expansion is expected. ${ }^{708}$

The unemployment rate for the Houston MSA increased from pre-recession levels of $4.3 \%$ in 2007 to $8.5 \%$ in 2010. As shown on the table below, the unemployment rate for the MSA began improving in 2011, dropping to $8.1 \%$. At $8.1 \%$, the unemployment rate in Houston was well below the nationwide unemployment rate of $8.9 \%$ in 2011.

[^230]
## Unemployment Rates

Assessment Area: TX Houston

| Area | Years - Annualized |  |
| :--- | :---: | :---: |
|  | $\mathbf{2 0 1 0}$ | $\mathbf{2 0 1 1}$ |
| Houston MSA | 8.5 | 8.1 |
| Brazoria County | 8.9 | 8.6 |
| Fort Bend County | 7.8 | 7.3 |
| Galveston County | 9.2 | 9.1 |
| Harris County | 8.5 | 8.2 |
| Montgomery County | 7.5 | 7.2 |
| Texas | $\mathbf{8 . 2}$ | $\mathbf{7 . 9}$ |

Not Seasonally Adjusted
In 2011, the Houston area recovered fully from its job loss and began expanding. From October 2010 to October 2011, the Houston area added 79,500 jobs. One in seven of these additional jobs came from the energy industry, in particular the drilling boom, and each of these jobs supports an additional two to five jobs in the economy. ${ }^{709}$

Houston's recovery is more impressive in light of several events and policy changes that have impacted the economic environment in the region over the past few years. First, in 2008, Hurricane Ike devastated the coast in Galveston and Harris counties. The hurricane caused an estimated $\$ 14$ billion in property damage in the Greater Houston area, damaging 3,300 owner-occupied units and 1,425 rental units. ${ }^{710}$ Second, in 2010, a moratorium was placed on deep-water drilling in the Gulf of Mexico after the Deepwater Horizon oil spill. The moratorium idled rigs and workers based in Houston. Third, there have been many changes in the national space program, and some of the programs run through the Johnson Space Center have been moved to the private sector. Finally, Continental Airlines, a long-time Houston corporation, merged with United Airlines, and both headquarters have been consolidated in Chicago. ${ }^{711}$ All of these factors have impacted potential job growth in Houston over the past few years.

Economic development efforts in the Houston MSA are focused on several industry sectors, including advanced manufacturing, aerospace/aviation, biotechnology and life sciences, distribution and logistics, energy, corporate headquarters, information technology and nanotechnology. ${ }^{712}$

## Community Contacts and Community Development Opportunities

Community contacts from the region indicated overall that the Houston economy has remained fairly stable compared to much of the country. While there was some decline in the housing market in the area, there was no

[^231]collapse like what was experienced in many parts of the nation. Community development opportunities that were identified in the region include neighborhood revitalization, affordable housing for low- and moderateincome individuals, and provision of basic banking service for low-income individuals.

The Federal Reserve Bank of Dallas conducts a quarterly Community Outlook Survey that helps assess community and economic development in the $11^{\text {th }}$ District (covering Texas, Northern Louisiana and Southern New Mexico). Community organizations that provide housing, workforce development, and health and financial stability programs are invited to participate in the survey. While this survey covers a much larger area than the subject assessment area, the findings are illustrative of some of the challenges facing low- and moderate-income areas across the region. Organizations that participated in the fourth quarter 2011 survey identified a positive economic trend, but identified several areas of community development needs in the area. Primary areas of concern going forward are as follows: affordable housing for low- and moderate-income populations, financial literacy and education (including credit counseling), and permanent job creation. The availability of affordable housing is limited by a number of factors, including lack of capital for development, high development costs and competition for grants or subsidies. Another challenge is the creditworthiness of potential homebuyers. Finally, nonprofit agencies are facing sustainability challenges due to declining funding (both government and grants) and market conditions. ${ }^{713}$

Overall, the region has a strong community development environment, with numerous community development organizations, strong public agencies, and several community development financial institutions (CDFIs) that provide alternative financing for affordable housing, small businesses and community facilities. While the foreclosure problem in Houston was not as bad as elsewhere in the country, the region has received a significant allocation in Neighborhood Stabilization Program (NSP) funds. The funds are available to help stabilize communities hard hit by the foreclosure crisis. Harris County has received $\$ 19.25$ million in NSP funds, which have been used primarily for the acquisition and resale of foreclosed properties. ${ }^{714}$

## Competition

The Houston assessment area is a highly competitive market with a significant presence of national and multiregional banks. According to the June 30, 2011 FDIC Summary of Deposits Report, Regions Bank ranked 14th of 106 financial institutions operating in the assessment area with $0.9 \%$ of the deposit market share. At that time, Regions Bank operated 27 branch offices in the assessment area; in total, 1,488 branch offices were located in the area. The top financial institution by deposit market share in the area was JPMorgan Chase Bank with $34.9 \%$, followed by Wells Fargo, Bank of America, and Compass Bank.

Lending is also highly competitive in the area and is dominated by large national financial institutions. Leaders in small business lending in the market include American Express, Wells Fargo, Chase Bank, Citibank, and Capital One. Regions Bank ranked $24^{\text {th }}$ of 159 reporters with just $0.4 \%$ of the total loans in 2010. In 2011, Regions ranked $17^{\text {th }}$ of 170 reporters with $0.6 \%$ of the total small business loans in the assessment area.

Like the small business lending market, HMDA lending was similarly competitive with 754 total HMDA reporters operating in the Houston assessment area in 2010. Of these 754 reporters, Regions Bank ranked $67^{\text {th }}$ with $0.2 \%$ of the market share in 2010. In 2011, the bank ranked $82^{\text {nd }}$ of 761 reporters with $0.2 \%$ of total HMDA loans. HMDA lending was also dominated by large national and multi-regional banks, including Wells Fargo, Bank of America, JPMorgan Chase, and CitiMortgage, among others.

[^232]
## Demographic Characteristics

The Houston assessment area contains 860 census tracts; census data from 2000 indicates that there were 70 (8.1\%) low-income census tracts, 269 (31.3\%) moderate-income tracts, 257 (29.9\%) middle-income tracts, 256 (29.8\%) upper-income tracts and 8 ( $0.9 \%$ ) tracts with unknown income.

The following table provides demographic characteristics of the bank's assessment area based on the 2000 U.S. census data used to analyze the bank's CRA performance.

## Houston, Texas

## Combined Demographics Report

| Income Categories | Tract <br> Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 70 | 8.1 |  | 6.0 | 23,376 | 34.2 | 255,633 | 22.3 |
| Moderate-income | 269 | 31.3 |  | 28.2 | 59,591 | 18.4 | 197,152 | 17.2 |
| Middle-income | 257 | 29.9 |  | 30.6 | 29,186 | 8.3 | 215,281 | 18.8 |
| Upper-income | 256 | 29.8 |  | 35.2 | 12,309 | 3.1 | 477,102 | 41.7 |
| Unknown-income | 8 | 0.9 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 860 | 100.0 |  | 100.0 | 124,462 | 10.9 | 1,145,168 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 108,557 | 28,531 |  | 26.3 | 69,021 | 63.6 | 11,005 | 10.1 |
| Moderate-income | 498,139 | 217,452 |  | 43.7 | 238,183 | 47.8 | 42,504 | 8.5 |
| Middle-income | 543,554 | 305,917 |  | 56.3 | 196,442 | 36.1 | 41,195 | 7.6 |
| Upper-income | 578,983 | 409,069 |  | 70.7 | 131,830 | 22.8 | 38,084 | 6.6 |
| Unknown-income | 19 |  | 10 | 52.6 | 8 | 42.1 | 1 | 5.3 |
| Total Assessment Area | 1,729,252 | 960,979 |  | 55.6 | 635,484 | 36.7 | 132,789 | 7.7 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 12,809 | 4.5 |  | 4.4 | 853 | 5.7 | 715 | 5.2 |
| Moderate-income | 63,867 | 22.7 |  | 22.1 | 4,504 | 30.2 | 3,554 | 25.8 |
| Middle-income | 79,815 | 28.3 |  | 28.6 | 3,921 | 26.3 | 3,596 | 26.1 |
| Upper-income | 123,833 | 44.0 |  | 44.5 | 5,489 | 36.8 | 5,756 | 41.8 |
| Unknown-income | 1,294 | 0.5 |  | 0.4 | 166 | 1.1 | 154 | 1.1 |
| Total Assessment Area | 281,618 | 100.0 |  | 100.0 | 14,933 | 100.0 | 13,775 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.8 |  | 5.3 |  | 4.9 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | $\begin{aligned} & \text { Revenue Not } \\ & \text { Reported } \end{aligned}$ |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 25 | 1.2 |  | 1.2 | 0 | 0.0 | 1 | 4.3 |
| Moderate-income | 237 | 11.6 |  | 11.6 | 6 | 25.0 | 1 | 4.3 |
| Middle-income | 847 | 41.6 |  | 41.8 | 8 | 33.3 | 7 | 30.4 |
| Upper-income | 922 | 45.3 |  | 45.1 | 10 | 41.7 | 14 | 60.9 |
| Unknown-income | 5 | 0.2 |  | 0.3 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 2,036 | 100.0 |  | 100.0 | 24 | 100.0 | 23 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.7 |  | 1.2 |  | 1.1 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

## Lending Test

Regions Bank's lending performance in the Houston assessment area is adequate. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Also, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a low level of community development loans.

Regions Bank is both a small business and HMDA lender. During the review period, the bank reported 960 (59.1\%) small business loans compared to 664 (40.9\%) HMDA loans in the Houston, Texas assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's lending test rating in the assessment area. In total, $0.8 \%$ of the bank's total small business and HMDA lending by number of loans and $1.1 \%$ by dollar volume totaling $\$ 252.6$ million are located in this assessment area. The percentage of the bank's total lending at $0.8 \%$ is comparable to the percentage of deposits at $1.4 \%$ in this area. Additionally, the bank originated one community development loan in the Houston assessment area. Regions Bank is not a major competitor in this market, ranking $82^{\text {nd }}$ in HMDA loans and $17^{\text {th }}$ in small business loans in 2011.

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

## Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all these factors, Regions Bank’s geographic distribution of loans reflects adequate penetration throughout the assessment area.

## Small Business Loans

Regions Bank's small business lending in low-income tracts is adequate. During the review period, Regions Bank originated $2.4 \%$ of its small business loans in low-income census tracts, which is less than the percentage of small businesses in low-income tracts at $4.4 \%$. The bank's performance was slightly less than the aggregate in 2010 and less than the aggregate in 2011.

Regions Bank's small business lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $20.0 \%$ of its small business loans in moderate-income census tracts, which contain $22.1 \%$ of the small businesses in the assessment area. The bank's performance was comparable to the aggregate in both 2010 and 2011.

The bank's small business lending in middle-income tracts was less than the percentage of small businesses in these tracts while the lending in upper-income tracts was greater than the percentage of small businesses.

## Home Purchase Loans

Home purchase lending in low-income tracts is adequate. During the review period, Regions Bank originated one ( $0.4 \%$ ) of its home purchase loans in low-income census tracts, which contain only $3.0 \%$ of the owneroccupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at the level of the demographic; as such, minimal weight was given to this product. This may suggest that there are limited opportunities for home purchase lending in low-income tracts. Regions Bank's performance was less than the aggregate in both 2010 and 2011.

Home purchase lending in moderate-income tracts is adequate. During the review period, Regions Bank originated $10.0 \%$ of its home purchase loans in moderate-income census tracts, which contain $22.6 \%$ of the owner-occupied units in the assessment area. Regions Bank's performance was comparable to the aggregate in 2010 and slightly greater than the aggregate in 2011.

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

## Home Refinance Loans

Home refinance lending in low-income tracts is adequate. During the review period, Regions Bank originated two (0.6\%) of its home refinance loans in low-income census tracts, which contain only $3.0 \%$ of the owneroccupied units in the assessment area. Although the bank's level of lending was low, the aggregate also failed to lend at the level of the demographic; as such, minimal weight was given to this product.. This may suggest that there are limited opportunities for home refinance lending in low-income tracts. Regions Bank's performance was comparable to the aggregate in 2010 and less than the aggregate in 2011.

Regions Bank's home refinance lending in moderate-income census tracts is good. During the review period, the bank originated $10.9 \%$ of its home refinance loans in moderate-income census tracts, which contain $22.6 \%$ of the owner-occupied units. Regions Bank’s performance was significantly greater than the aggregate in 2010 and greater than the aggregate in 2011.

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

## Home Improvement Loans

Regions Bank's home improvement lending in low-income census tracts is adequate when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated $4.1 \%$ home improvement loans in low-income tracts, which contain $3.0 \%$ of the owner-occupied units in the assessment area. The bank's performance was greater than the aggregate in 2010, but was less than the aggregate in 2011.

Regions Bank's home improvement lending in moderate-income census tracts is excellent when compared to the percentage of owner-occupied units in these tracts and to the aggregate performance. During the review period, Regions Bank originated 26.0\% of its home improvement loans in moderate-income tracts, which contain $22.6 \%$ of the owner-occupied units in the assessment area. Additionally, Regions Bank's performance was significantly greater than the aggregate in both 2010 and 2011.

The bank's home improvement lending in middle-income tracts was greater than the percentage of owneroccupied units in these tracts while the lending in upper-income tracts was less than the percentage of owneroccupied units.

## Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Regions Bank's borrower distribution of loans reflects adequate penetration throughout the assessment area. 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, such as local economic conditions, unemployment and poverty rates, were considered, as well as the performance of other banks.

## Small Business Lending

Considering the bank's performance when compared to the demographic and aggregate data, the distribution of small business lending by business revenue size is adequate. The bank's lending to small businesses exceeded the aggregate in 2010 and was less than aggregate in 2011. The bank originated $32.2 \%$ of its loans to small businesses compared to the percentage of small businesses in the assessment area at $89.8 \%$. However, of the 960 small business loans originated during the review period, 393 (40.9\%) did not report revenue. An analysis of only the bank's small business loans reported with revenue indicates that the percentage of loans originated to small businesses was $54.5 \%$, which was still less than the percentage of small businesses in the Houston, Texas assessment area. However, $72.6 \%$ of the 960 originated small business loans were in amounts of $\$ 100,000$ or less, which typically represents loan amounts requested by very small businesses. With regard to small business lending in amounts of $\$ 100,000$ or less, Regions Bank’s performance was less than the aggregate in 2010 and 2011.

## Home Purchase Loans

Home purchase lending to low-income borrowers is poor. At $2.4 \%$, the bank's percentage of home purchase lending to low-income borrowers was less than the percentage of low-income families in the assessment area at 22.3\%. The bank's performance was also less than aggregate in 2010 and 2011.

Home purchase lending to moderate-income borrowers is adequate. At $17.1 \%$, the bank's percentage of home purchase lending to moderate-income borrowers was comparable to the percentage of moderate-income families in the assessment area at $17.2 \%$. Regions Bank's performance was comparable to the aggregate in 2010 and less than the aggregate in 2011.

The bank's home purchase lending to both middle-income and upper-income borrowers was greater than the percentage of middle-income and upper-income families, respectively, in the assessment area.

## Home Refinance Loans

The bank's home refinance lending to low-income borrowers is adequate. The bank originated $1.8 \%$ of its refinance loans to low-income borrowers. Low-income families make up $22.3 \%$ of total families in the assessment area. It was noted that the aggregate performance was also less than the percentage of low-income families, indicating opportunity may be limited for home refinance lending. Nonetheless, the bank's performance was comparable to the aggregate lenders in 2010 and was less than the aggregate in 2011.

The bank's home refinance lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area and to aggregate performance. The bank's percentage of home refinance lending to moderate-income borrowers at $11.8 \%$ was less than the percentage of moderate-income families in the assessment area at $17.2 \%$. Regions Bank's performance was significantly greater than the aggregate in both 2010 and 2011.

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

## Home Improvement Loans

Home improvement lending to low-income borrowers is excellent. Regions Bank's percentage of home improvement loans at $17.8 \%$ was less than the percentage of low-income families in the assessment area at $22.3 \%$. Although the bank's performance was less than the demographic, lending performance was significantly greater than the aggregate in both 2010 and 2011.

Home improvement lending to moderate-income borrowers is excellent. Regions Bank's percentage of home improvement loans at $20.5 \%$ was greater than the percentage of moderate-income families in the assessment area at $17.2 \%$. The bank's performance was greater than the aggregate in 2010 and comparable to the aggregate in 2011.

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

## Community Development Lending

Regions Bank makes a low level of community development loans in the Houston, Texas assessment area. The bank originated one community development loans for $\$ 1.1$ million during the review period. The loan promoted economic development by financing a small business as part of the SBA's 504 Certified Development Company program. Local community credit needs include but are not limited to affordable housing for lowand moderate-income individuals, neighborhood stabilization, financial stability for residents and small business finance. The bank's community development portfolio inside the assessment area exhibits poor responsiveness to these credit needs of low- and moderate-income individuals and small businesses. Furthermore, the number and the dollar amount of community development loans are poor given the bank's presence in the market.

## Investment Test

The bank's performance in the Houston assessment area under the investment test is excellent. The bank had 10 investments totaling $\$ 64.9$ million, including seven current period investments totaling $\$ 59.3$ million. Direct investments in the assessment area provided support for affordable housing through GNMA and FNMA investment instruments, Low Income Housing Tax Credits (LIHTCs) and investments in LIHTC funds. During the current review period, the bank invested almost $\$ 7.8$ million in an LIHTC project that provides 96 units of housing affordable to low- and moderate-income individuals. In addition, the bank had investments that benefitted a broader regional area that includes the assessment area. The broader regional investments primarily funded small businesses and startup companies through SBICs and an investment in a statewide CDFI, as well as provided support for community revitalization though an investment in a New Markets Tax Credit fund.

The bank also made three contributions totaling $\$ 11,000$. Contributions were given to organizations involved in providing community services targeted to low- and moderate-income individuals and communities, affordable housing and small business assistance. In addition, the assessment area may benefit from contributions to national organizations.

Local community credit needs include but are not limited to affordable housing for low- and moderate-income individuals, neighborhood stabilization and small business finance. Regions Bank's investment portfolio and contributions exhibit responsiveness to some of the identified community development needs.

## Service Test

The bank's service test performance in the Houston assessment area is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the Houston assessment area.

## Houston, Texas

## Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the 27 branch offices as of December 31, 2011, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank did not open or close any branches in the Houston assessment area. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderateincome geographies or to low- and moderate-income individuals. The bank has weekend hours for branches in low- and moderate-income geographies, and the level of branch services and hours offered by Regions Bank is basically the same throughout the assessment area.

Geographic Distribution of Branches
Assessment Area: TX Houston

| Tract Category | Branches |  |  |  |  |  |  |  | Demographics |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Total Branches | l Branc | Open | Closed | Drive thrus <br> \# | Extend <br> ed <br> Hours <br> \# | Week- <br> end <br> Hours <br> \# | Census <br> Tracts |  | Households <br> \% | Total Businesses \% |
|  |  | \# | \% | \# | \# |  |  |  | \# | \% |  |  |
| Low | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 70 | 8.1\% | 6.1\% | 4.5\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Moderate | Total | 2 | 7.4\% | 0 | 0 | 2 | 2 | 2 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 269 | 31.3\% | 28.5\% | 22.7\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Middle | Total | 8 | 29.6\% | 0 | 0 | 8 | 8 | 8 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 257 | 29.9\% | 31.5\% | 28.3\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Upper | Total | 17 | 63.0\% | 0 | 0 | 17 | 15 | 15 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 256 | 29.8\% | 33.9\% | 44.0\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Unknown | Total | 0 | 0.0\% | 0 | 0 | 0 | 0 | 0 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 8 | 0.9\% | 0.0\% | 0.5\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |
| Total | Total | 27 | 100.0\% | 0 | 0 | 27 | 25 | 25 |  |  |  |  |
|  | DTO | 0 |  | 0 | 0 | 0 |  |  | 860 | 100.0\% | 100.0\% | 100.0\% |
|  | LS | 0 |  | 0 | 0 |  |  |  |  |  |  |  |

DTO - Drive Thru Only
LS - Limited Service

## Community Development Services

Regions Bank provides an adequate level of community development services in the assessment area. During the review period, Regions Bank employees provided 504 service hours in various capacities for community development organizations by participating in 76 community development services. Many of the community development services focused on education, affordable housing, youth services, and service on boards of directors and committees for community organizations that aided low- and moderate-income geographies and low- and moderate-income individuals. In particular, Regions Bank employees volunteered several hours by teaching financial education classes to students. The majority of the schools where the classes were taught have
a high number of students on free or reduced price lunch programs. Furthermore, the majority of the schools are located in low- and moderate-income geographies.

## Metropolitan Areas (Limited Review)

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

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

- Dallas Assessment Area (Collin, Dallas, Rockwell and Denton Counties)
o As of December 31, 2011, Regions Bank operated 14 branches in the assessment area, representing $17.1 \%$ of its branches in Texas.
o As of June 30, 2011, the bank had $\$ 707.1$ million in deposits in this assessment area, representing a market share of $0.5 \%$ and $16.1 \%$ of Regions Bank's total deposits in Texas.
- Fort Worth Assessment Area (Tarrant County)
o As of December 31, 2011, Regions Bank operated six branches in the assessment area, representing $7.3 \%$ of its branches in Texas.
o As of June 30, 2011, the bank had $\$ 160.3$ million in deposits in this assessment area, representing a market share of $0.6 \%$ and $3.6 \%$ of Regions Bank's total deposits in Texas.
- Longview Assessment Area (Gregg County)
o As of December 31, 2012, Regions Bank operated five branches in the assessment area, representing $6.1 \%$ of its branches in Texas.
o As of June 30, 2012, the bank had $\$ 215.1$ million in deposits in this assessment area, representing a market share of $8.1 \%$ and $4.9 \%$ of Regions Bank's total deposits in Texas.
- Tyler Assessment Area (Smith County)
o As of December 31, 2011, Regions Bank operated seven branches in the assessment area, representing $8.5 \%$ of its branches in Texas.
o As of June 30, 2011, the bank had $\$ 292.2$ million in deposits in this assessment area, representing a market share of $6.7 \%$ and $6.6 \%$ of Regions Bank's total deposits in Texas.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Metropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment <br> Areas | Lending Test | Investment Test | Service Test |
| Dallas | Consistent | Consistent | Consistent |
| Fort Worth | Not Consistent <br> (Below) | Consistent | Consistent |
| Longview | Consistent | Not Consistent (Below) | Consistent |
| Tyler | Consistent | Not Consistent (Below) | Consistent |

The Austin and Houston assessment areas received full-scope reviews, and the bank's performance in the Houston assessment area was given greater consideration in determining the overall rating for the state. Houston is the bank's largest market in Texas in terms of deposits, loans, and branches. The full-scope areas

## Metropolitan Areas (Limited Review)

selected together represent $58.7 \%$ of the deposits in the assessment areas in Texas as well as $50.0 \%$ of the branches. The full-scope assessment areas also represent $41.1 \%$ of the HMDA loans and $45.3 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits and a large portion of branches and loans in the State of Texas.

For the Lending Test, performance in the limited-scope assessment areas was consistent with the bank's performance in the state except for the Fort Worth assessment area, where performance was weaker due to the distribution of loans by borrower's income and lower levels of community development loans relative to the bank's operations in the assessment area.

For the Investment Test, the performance in two limited-scope assessment areas (Longview and Tyler) was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment areas. The performance in the remaining limited-scope assessment areas (Dallas and Fort Worth) was consistent with the bank's performance in the state.

For the Service Test, the performance in all four limited-scope assessment areas was consistent with the bank's performance in the state.

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

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

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

- Cass Assessment Area (Cass County)
o As of December 31, 2011, Regions Bank operated one branch in the assessment area, representing $1.2 \%$ of its branches in Texas.
o As of June 30, 2011, the bank had $\$ 47.6$ million in deposits in this assessment area, representing a market share of $14.8 \%$ and $1.1 \%$ of Regions Bank's total deposits in Texas.
- Nacogdoches-Angelina-Anderson Assessment Area (Nacogdoches, Angelina and Anderson Counties)
o As of December 31, 2011, Regions Bank operated eight branches in the assessment area, representing $9.8 \%$ of its branches in Texas.
o As of June 30, 2011, the bank had $\$ 394.1$ million in deposits in this assessment area, representing a market share of $15.4 \%$ and $9.0 \%$ of Regions Bank's total deposits in Texas.


## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

| Nonmetropolitan Assessment Areas |  |  |  |
| :---: | :---: | :---: | :---: |
| Assessment Areas | Lending Test | Investment Test | Service Test |
| Cass | Consistent | Consistent | Not Consistent (Below) |
| Nacogdoches- <br> Angelina-Anderson | Consistent | Not Consistent <br> (Below) | Not Consistent (Above) |

As stated earlier, the Austin and Houston assessment areas received full-scope reviews, and the bank's performance in the Houston assessment area was given greater consideration in determining the overall rating for the state. Houston is the bank's largest market in Texas in terms of deposits, loans, and branches. The fullscope areas selected together represent $58.7 \%$ of the deposits in the assessment areas in Texas as well as $50.0 \%$ of the branches. The full-scope assessment areas also represent $41.1 \%$ of the HMDA loans and $45.3 \%$ of the small business loans in the state. Therefore, the two full-scope assessment areas represent more than half of the deposits and a large portion of branches and loans in the State of Texas.

For the Lending Test, performance in both limited-scope assessment areas was consistent with the bank's performance in the state.

For the Investment Test, the performance in the Nacogdoches-Angelina-Anderson assessment area was weaker than the bank's performance in the state due to lower levels of qualified investments relative to the bank's operations in the assessment area. The performance in the Cass limited-scope assessment area was consistent with the bank's performance in the state.

## Non-Metropolitan Areas (Limited Review)

For the Service Test, the performance in the Nacogdoches-Angelina-Anderson limited-scope assessment area was stronger than the bank's performance in the state. The performance in the Cass limited-scope assessment area was weaker than the bank's performance in the state due to fewer community development services.

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

## Appendices

## APPENDIX A: SCOPE OF THE EXAMINATION

| SCOPE OF EXAMINATION |  |  |  |
| :---: | :---: | :---: | :---: |
| TIME PERIOD REVIEWED <br> Lending: January 1, 2010 to December 31, 2011 <br> Investments, CD Loans, and Services: July 1, 2010 to June 30, 2012 |  |  |  |
| FINANCIAL INSTITUTION <br> Regions Bank, Birmingham, Alabama |  | PRODUCTS REVIEWED <br> HMDA Lending \& Small Business |  |
| AFFILIATE(S) <br> Regions Financial Corporation | AFFILIATE RELATIONSHIP <br> Bank Holding Company | PRODUCTS REVIEWED <br> None |  |
| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| ASSESSMENT AREA | $\begin{gathered} \text { TYPE } \\ \text { OF EXAMINATION } \end{gathered}$ | BRANCHES <br> VISITED | OTHER <br> INFORMATION |
| ALABAMA |  |  |  |
| Anniston, MSA \#11500 | Limited-Scope Review |  |  |
| Auburn, MSA \#12220 | Limited-Scope Review |  |  |
| Baldwin-Coffee-CovingtonEscambia | Limited-Scope Review |  |  |
| Birmingham, MSA\#13820, | Full-Scope Review |  |  |
| Decatur, MSA \#19460 | Limited-Scope Review |  |  |
| Dothan, MSA \#20020 | Limited-Scope Review |  |  |
| Fayette | Limited-Scope Review |  |  |
| Florence, MSA \#22520 | Limited-Scope Review |  |  |
| Gadsden, MSA \#23460 | Limited-Scope Review |  |  |
| Huntsville, MSA\#26620 | Full-Scope Review |  |  |
| Mobile, MSA\#33660 | Full-Scope Review |  |  |
| Montgomery, MSA \#33860 | Limited-Scope Review |  |  |

## Appendices

| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| :---: | :---: | :---: | :---: |
| ASSESSMENT AREA | $\begin{gathered} \text { TYPE } \\ \text { OF EXAMINATION } \end{gathered}$ | BRANCHES VISITED | OTHER <br> INFORMATION |
| Northern Alabama | Limited-Scope Review |  |  |
| Southern Alabama | Limited-Scope Review |  |  |
| Tallapoosa - Talladega | Limited-Scope Review |  |  |
| Tuscaloosa, MSA \#46220 | Limited-Scope Review |  |  |
| ARKANSAS |  |  |  |
| Fayetteville, MSA \#22220 | Limited-Scope Review |  |  |
| Fort Smith, MSA \#22900 | Limited-Scope Review |  |  |
| Hot Springs, MSA \#26300 | Full-Scope Review |  |  |
| Jonesboro, MSA \#27860 | Limited-Scope Review |  |  |
| Little Rock, MSA \#30780 | Full-Scope Review |  |  |
| Northeast Arkansas | Limited-Scope Review |  |  |
| Northwest Arkansas | Full-Scope Review |  |  |
| Southern Arkansas | Limited-Scope Review |  |  |
| Union | Limited-Scope Review |  |  |
| FLORIDA |  |  |  |
| Citrus | Limited-Scope Review |  |  |
| Daytona, MSA 19660 | Limited-Scope Review |  |  |
| Ft Lauderdale, MSA 22744 | Limited-Scope Review |  |  |
| Ft. Myer, MSA 15980 | Limited-Scope Review |  |  |
| Ft. Walton, MSA 18880 | Limited-Scope Review |  |  |

## Appendices

| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| :---: | :---: | :---: | :---: |
| ASSESSMENT AREA | TYPE OF EXAMINATION | BRANCHES <br> VISITED | OTHER INFORMATION |
| Gainesville, MSA 23540 | Limited-Scope Review |  |  |
| Jacksonville, MSA 27260 | Full-Scope Review |  |  |
| Lakeland, MSA 29460 | Limited-Scope Review |  |  |
| Miami, MSA 33124 | Limited-Scope Review |  |  |
| Naples, MSA 34940 | Limited-Scope Review |  |  |
| Northern Florida | Limited-Scope Review |  |  |
| Ocala, MSA 36100 | Limited-Scope Review |  |  |
| Okeechobee | Limited-Scope Review |  |  |
| Orlando, MSA 36740 | Full-Scope Review |  |  |
| Palm Bay, MSA 37340 | Limited-Scope Review |  |  |
| Panama City, MSA 37460 | Limited-Scope Review |  |  |
| Pensacola, MSA 37860 | Full-Scope Review |  |  |
| Punta Gorda, MSA 39460 | Limited-Scope Review |  |  |
| Sarasota, MSA 35840 | Limited-Scope Review |  |  |
| Tallahassee, MSA 45220 | Limited-Scope Review |  |  |
| Tampa, MSA 45300 | Full-Scope Review |  |  |
| West Palm Beach, MSA 48424 | Limited-Scope Review |  |  |
| GEORGIA |  |  |  |
| Albany, MSA 10500 | Limited-Scope Review |  |  |
| Athens, MSA 12020 | Limited-Scope Review |  |  |

## Appendices

| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| :---: | :---: | :---: | :---: |
| ASSESSMENT AREA | $\begin{gathered} \text { TYPE } \\ \text { OF EXAMINATION } \end{gathered}$ | BRANCHES <br> VISITED | OTHER <br> INFORMATION |
| Atlanta, MSA 12060 | Full-Scope Review |  |  |
| Dalton, MSA 19140 | Limited-Scope Review |  |  |
| Gainesville, MSA 23580 | Limited-Scope Review |  |  |
| Jefferson-Jenkins | Limited-Scope Review |  |  |
| Morgan-Elbert-Wilkes | Limited-Scope Review |  |  |
| Northeast Georgia | Full-Scope Review |  |  |
| Northwest Georgia | Limited-Scope Review |  |  |
| Rome, MSA 40660 | Limited-Scope Review |  |  |
| Savannah, MSA 42340 | Limited-Scope Review |  |  |
| Southwest Georgia | Limited-Scope Review |  |  |
| Valdosta, MSA 46660 | Limited-Scope Review |  |  |
| ILLINOIS |  |  |  |
| Bloomington, MSA 14060 | Limited-Scope Review |  |  |
| Central Illinois | Limited-Scope Review |  |  |
| Champaign, MSA 16580 | Limited-Scope Review |  |  |
| Decatur, MSA 19500 | Full-Scope Review |  |  |
| Livingston | Limited-Scope Review |  |  |
| Peoria, MSA 37900 | Full-Scope Review |  |  |
| Southeast Illinois | Limited-Scope Review |  |  |
| Southern Illinois | Limited-Scope Review |  |  |

## Appendices

| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| :---: | :---: | :---: | :---: |
| ASSESSMENT AREA | $\begin{gathered} \text { TYPE } \\ \text { OF EXAMINATION } \end{gathered}$ | BRANCHES <br> VISITED | OTHER <br> INFORMATION |
| Springfield, MSA 44100 | Limited-Scope Review |  |  |
| INDIANA |  |  |  |
| Bloomington, MSA 14020 | Limited-Scope Review |  |  |
| Clinton-Grant | Limited-Scope Review |  |  |
| Evansville, MSA 21780 | Limited-Scope Review |  |  |
| Gary, MSA 23844 | Limited-Scope Review |  |  |
| Indianapolis, MSA 26900 | Full-Scope Review |  |  |
| Knox-Lawrence | Limited-Scope Review |  |  |
| Kokomo, MSA 29020 | Limited-Scope Review |  |  |
| Lafayette, MSA 29140 | Limited-Scope Review |  |  |
| Louisville, MSA 31140 | Limited-Scope Review |  |  |
| Terre Haute, MSA 45460 | Limited-Scope Review |  |  |
| IOWA |  |  |  |
| Cedar Rapids, MSA 16300 | Limited-Scope Review |  |  |
| Des Moines, MSA 19780 | Full-Scope Review |  |  |
| Fayette - Tama | Limited-Scope Review |  |  |
| Iowa City, MSA 26980 | Limited-Scope Review |  |  |
| Waterloo, MSA 47940 | Full-Scope Review |  |  |
| KENTUCKY |  |  |  |
| Simpson | Limited-Scope Review |  |  |
| Southwest Kentucky | Full-Scope Review |  |  |

## Appendices

| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| :---: | :---: | :---: | :---: |
| ASSESSMENT AREA | TYPE <br> OF EXAMINATION | BRANCHES <br> VISITED | OTHER INFORMATION |
| LOUISIANA |  |  |  |
| Alexandria, MSA 10780 | Limited-Scope Review |  |  |
| Baton Rouge, MSA 12940 | Full-Scope Review |  |  |
| Houma, MSA 26380 | Limited-Scope Review |  |  |
| Lafayette, MSA 29180 | Limited-Scope Review |  |  |
| Monroe, MSA 33740 | Full-Scope Review |  |  |
| Morehouse | Limited-Scope Review |  |  |
| New Orleans, MSA 35380 | Limited-Scope Review |  |  |
| Northwest Lousiana | Limited-Scope Review |  |  |
| Shreveport, MSA 43340 | Full-Scope Review |  |  |
| Southern Louisiana | Full-Scope Review |  |  |
| St. James | Limited-Scope Review |  |  |
| Tangipahoa | Limited-Scope Review |  |  |
| MISSISSIPPI |  |  |  |
| Adams-Wilkinson | Limited-Scope Review |  |  |
| Central Mississippi | Full-Scope Review |  |  |
| Gulfport, MSA 25060 | Limited-Scope Review |  |  |
| Hattiesburg, MSA 25620 | Limited-Scope Review |  |  |
| Jackson, MSA 27140 | Full-Scope Review |  |  |
| Northern Mississippi | Limited-Scope Review |  |  |
| Northwest Mississippi | Limited-Scope Review |  |  |

## Appendices

| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| :---: | :---: | :---: | :---: |
| ASSESSMENT AREA | $\begin{gathered} \text { TYPE } \\ \text { OF EXAMINATION } \end{gathered}$ | BRANCHES <br> VISITED | $\begin{gathered} \text { OTHER } \\ \text { INFORMATION } \end{gathered}$ |
| Pascagoula, MSA 37700 | Limited-Scope Review |  |  |
| Southern Mississippi | Limited-Scope Review |  |  |
| Yazoo-Warren | Limited-Scope Review |  |  |
| MISSOURI | Limited-Scope Review |  |  |
| Cape Girardeau, MSA 16020 | Limited-Scope Review |  |  |
| Central Missouri | Limited-Scope Review |  |  |
| Columbia, MSA 17860 | Limited-Scope Review |  |  |
| Jefferson City, MSA 27620 | Limited-Scope Review |  |  |
| Lawrence | Limited-Scope Review |  |  |
| Southeast Missouri | Full-Scope Review |  |  |
| Springfield, MSA 44180 | Limited-Scope Review |  |  |
| St. Genevieve-Perry | Full-Scope Review |  |  |
| Taney | Limited-Scope Review |  |  |
| NORTH CAROLINA |  |  |  |
| Charlotte, MSA 16740 | Full-Scope Review |  |  |
| Greensboro, MSA 24660 | Limited-Scope Review |  |  |
| Macon | Limited-Scope Review |  |  |
| Raleigh, MSA 39580 | Limited-Scope Review |  |  |
| Wilmington, MSA 48900 | Limited-Scope Review |  |  |

## Appendices

| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| :---: | :---: | :---: | :---: |
| ASSESSMENT AREA | TYPE <br> OF EXAMINATION | BRANCHES <br> VISITED | OTHER INFORMATION |
| SOUTH CAROLINA |  |  |  |
| Anderson, MSA 11340 | Limited-Scope Review |  |  |
| Charleston, MSA 16700 | Limited-Scope Review |  |  |
| Columbia, MSA 17900 | Full-Scope Review |  |  |
| Greenville, MSA 24860 | Limited-Scope Review |  |  |
| Hampton-Jasper-Beaufort | Full-Scope Review |  |  |
| McCormick-Barnwell | Limited-Scope Review |  |  |
| Myrtle Beach, MSA 34820 | Limited-Scope Review |  |  |
| Spartanburg, MSA 43900 | Limited-Scope Review |  |  |
| TENNESSEE |  |  |  |
| Clarksville, MSA 17300 | Limited-Scope Review |  |  |
| Cleveland, MSA 17420 | Limited-Scope Review |  |  |
| Eastern Tennessee | Full-Scope Review |  |  |
| Jackson, MSA 27180 | Limited-Scope Review |  |  |
| Johnson City, MSA 27740 | Limited-Scope Review |  |  |
| Knoxville, MSA 28940 | Limited-Scope Review |  |  |
| Morristown, MSA 34100 | Limited-Scope Review |  |  |
| Nashville, MSA 34980 | Full-Scope Review |  |  |
| Southern Tennessee | Limited-Scope Review |  |  |
| Western Tennessee | Limited-Scope Review |  |  |

## Appendices

| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION |  |  |  |
| :--- | :--- | :--- | :--- |
| ASSESSMENT AREA | TYPE <br> OF EXAMINATION | BRANCHES <br> VISITED | OTHER <br> INFORMATION |
| TEXAS |  |  |  |
| Austin, MSA 12420 | Full-Scope Review |  |  |
| Cass | Limited-Scope Review |  |  |
| Dallas, MSA 19124 | Limited-Scope Review |  |  |
| Fort Worth, MSA 23104 | Limited-Scope Review |  |  |
| Houston, MSA 26420 | Full-Scope Review |  |  |
| Longview, MSA 30980 | Limited-Scope Review |  |  |
| Nacogdoches-Angelina- <br> Anderson | Limited-Scope Review |  |  |
| Tyler, MSA 46340 |  |  |  |
| MULTI-STATE <br> METROPOLITAN AREAS | Fimited-Scope Review |  |  |
| Augusta, MSA \#12260 | Full-Scope Review |  |  |
| Chattanooga, MSA \#16860 | Full-Scope Review |  |  |
| Columbus, MSA \#17980 | Full-Scope Review |  |  |
| Texarkana, MSA \#45500 | Full-Scope Review |  |  |
| Sempere Review |  |  |  |

## APPENDIX B - SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

| State or Multistate <br> Metropolitan Area <br> Name | Lending Test <br> Rating | Investment <br> Test Rating | Rervice Test <br> Rating | Overall State <br> or <br> Multistate <br> Metropolitan <br> Area Rating |
| :--- | :---: | :---: | :---: | :---: |
| Alabama | Low <br> Satisfactory | High <br> Satisfactory | High <br> Satisfactory | Satisfactory |
| Arkansas | High <br> Satisfactory | High <br> Satisfactory | Outstanding | Satisfactory |
| Florida | High <br> Satisfactory | Outstanding | Low <br> Satisfactory | Satisfactory |
| Georgia | High <br> Satisfactory | High <br> Satisfactory | High <br> Satisfactory | Satisfactory |
| Illinois | Low <br> Satisfactory | Needs to <br> Improve | Outstanding | Satisfactory |
| Indiana | Low <br> Satisfactory | Outstanding | Low <br> Satisfactory | Satisfactory |
| Iowa | Low <br> Satisfactory | High <br> Satisfactory | Low <br> Satisfactory | Satisfactory |
| Kentucky | Low <br> Satisfactory | Needs to <br> Improve | Low <br> Satisfactory | Needs to |
| Improve |  |  |  |  |$|$


| St. Louis | High <br> Satisfactory | High <br> Satisfactory | Low <br> Satisfactory | Satisfactory |
| :--- | :---: | :---: | :---: | :---: |
| Texarkana | High <br> Satisfactory | Outstanding | Outstanding | Outstanding |

## Appendices

## APPENDIX C - ABBREVIATIONS AND DEFINITIONS

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

## Performance Definitions Regarding Lending

Excellent - This rating is assigned to an institution with lending performance that substantially exceeds the characteristics of demographic data and aggregate performance.

Good - This rating is assigned to an institution with lending performance that exceeds the characteristics of demographic data and aggregate performance.

Adequate - This rating is assigned to an institution with lending performance that is comparable to the characteristics of demographic data and aggregate performance.

Poor - This rating is assigned to an institution with lending performance that is significantly below the characteristics of demographic data and aggregate performance.

## Appendices

## APPENDIX C - ABBREVIATIONS AND DEFINITIONS (Continued)

## Performance Definitions Regarding Lending (continued)

Consistent - This term is used to describe the performance of an institution in an assessment area reviewed not using full-scope procedures when the performance is comparable to the performance in the state overall.
*Not Consistent - This term is used to describe the performance of an institution in an assessment area reviewed not using full-scope procedures when the performance is not comparable to the performance in the state overall.
*A "not consistent" rating only illustrates the performance of an assessment area in comparison to the performance in the state as a whole. It does not necessarily indicate that the performance is less than satisfactory.

## Rounding Convention

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

## Appendices

## APPENDIX D - GLOSSARY

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-
I. Low-or moderate-income geographies;
II. Designated disaster areas; or
III. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
a. Rates of poverty, unemployment, and population loss; or
b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Effective January 19, 2010, the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation revised the definition of community development to include loans, investments, and services by financial institutions that-
I. Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
II. Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
III. Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

## Appendices

## APPENDIX D - GLOSSARY (Continued)

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

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

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

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

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

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

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

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

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

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

## Appendices

## APPENDIX D - GLOSSARY (Continued)

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.
Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

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

Multi-family: Refers to a residential structure that contains five or more units.
Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

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

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

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

## Appendices

## 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 Regions Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of September 10, 2012. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

## APPENDIX F: FULL SCOPE LENDING TABLES

## Geographic Distribution of HMDA Loans

Assessment Area: Multi Augusta

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparis on$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Owner O ccupied Units \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg | Ban |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 2 | 0.6\% | \$310 | 0.7\% | 4.1\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 0.5\% | 2 | 1.1\% | 0.9\% | \$310 | 1.2\% | 0.6\% |
|  | Moderate | 30 | 9.5\% | \$3,073 | 6.9\% | 15.0\% | 7 | 5.6\% | 7.7\% | \$1,125 | 6.1\% | 5.7\% | 23 | 12.2\% | 8.0\% | \$1,948 | 7.4\% | 5.7\% |
|  | Middle | 163 | 51.7\% | \$21,060 | 47.0\% | 55.0\% | 67 | 53.2\% | 54.3\% | \$8,827 | 47.5\% | 50.3\% | 96 | 50.8\% | 53.6\% | \$12,233 | 46.6\% | 50.0\% |
|  | Upper | 120 | 38.1\% | \$20,392 | 45.5\% | 25.9\% | 52 | 41.3\% | 37.1\% | \$8,620 | 46.4\% | 43.5\% | 68 | 36.0\% | 37.6\% | \$11,772 | 44.8\% | 43.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 315 | 100.0\% | \$44,835 | 100.0\% | 100.0\% | 126 | 100.0\% | 100.0\% | \$18,572 | 100.0\% | 100.0\% | 189 | 100.0\% | 100.0\% | \$26,263 | 100.0\% | 100.0\% |
|  | Low | 10 | 1.6\% | \$1,718 | 2.0\% | 4.1\% | 3 | 0.8\% | 0.9\% | \$466 | 0.9\% | 0.6\% | 7 | 2.8\% | 1.2\% | \$1,252 | 3.8\% | 0.8\% |
|  | Moderate | 47 | 7.4\% | \$5,649 | 6.5\% | 15.0\% | 29 | 7.5\% | 6.6\% | \$3,314 | 6.2\% | 4.6\% | 18 | 7.2\% | 6.9\% | \$2,335 | 7.0\% | 4.7\% |
|  | Middle | 321 | 50.3\% | \$39,829 | 46.1\% | 55.0\% | 188 | 48.5\% | 47.5\% | \$23,729 | 44.6\% | 43.4\% | 133 | 53.2\% | 47.0\% | \$16,100 | 48.5\% | 42.4\% |
|  | Upper | 260 | 40.8\% | \$39,216 | 45.4\% | 25.9\% | 168 | 43.3\% | 45.0\% | \$25,683 | 48.3\% | 51.5\% | 92 | 36.8\% | 44.9\% | \$13,533 | 40.7\% | 52.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 638 | 100.0\% | \$86,412 | 100.0\% | 100.0\% | 388 | 100.0\% | 100.0\% | \$53,192 | 100.0\% | 100.0\% | 250 | 100.0\% | 100.0\% | \$33,220 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 4.1\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 1.4\% |
|  | Moderate | 8 | 11.3\% | \$46 | 7.9\% | 15.0\% | 2 | 7.1\% | 11.3\% | \$19 | 8.3\% | 7.1\% | 6 | 14.0\% | 9.8\% | \$27 | 7.7\% | 5.1\% |
|  | Middle | 55 | 77.5\% | \$487 | 84.1\% | 55.0\% | 22 | 78.6\% | 54.5\% | \$197 | 85.7\% | 42.5\% | 33 | 76.7\% | 55.9\% | \$290 | 83.1\% | 41.2\% |
|  | Upper | 8 | 11.3\% | \$46 | 7.9\% | 25.9\% | 4 | 14.3\% | 32.2\% | \$14 | 6.1\% | 49.9\% | 4 | 9.3\% | 32.4\% | \$32 | 9.2\% | 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\% |
|  | Total | 71 | 100.0\% | \$579 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$230 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$349 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 14.1\% | 0 | 0.0\% | 8.7\% | \$0 | 0.0\% | 5.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.0\% | 0 | 0.0\% | 30.4\% | \$0 | 0.0\% | 12.9\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 19.1\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 46.9\% | 0 | 0.0\% | 34.8\% | \$0 | 0.0\% | 64.8\% | 0 | 0.0\% | 38.9\% | \$0 | 0.0\% | 76.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 20.1\% | 0 | 0.0\% | 26.1\% | \$0 | 0.0\% | 16.7\% | 0 | 0.0\% | 11.1\% | \$0 | 0.0\% | 4.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 12 | 1.2\% | \$2,028 | 1.5\% | 4.1\% | 3 | 0.6\% | 0.9\% | \$466 | 0.6\% | 0.6\% | 9 | 1.9\% | 1.1\% | \$1,562 | 2.6\% | 0.7\% |
|  | Moderate | 85 | 8.3\% | \$8,768 | 6.7\% | 15.0\% | 38 | 7.0\% | 7.3\% | \$4,458 | 6.2\% | 5.2\% | 47 | 9.8\% | 7.5\% | \$4,310 | 7.2\% | 5.5\% |
|  | Middle | 539 | 52.6\% | \$61,376 | 46.6\% | 55.0\% | 277 | 51.1\% | 50.7\% | \$32,753 | 45.5\% | 46.8\% | 262 | 54.4\% | 50.4\% | \$28,623 | 47.8\% | 46.9\% |
|  | Upper | 388 | 37.9\% | \$59,654 | 45.3\% | 25.9\% | 224 | 41.3\% | 41.1\% | \$34,317 | 47.7\% | 47.4\% | 164 | 34.0\% | 41.0\% | \$25,337 | 42.3\% | 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\% |
|  | Total | 1,024 | 100.0\% | \$131,826 | 100.0\% | 100.0\% | 542 | 100.0\% | 100.0\% | \$71,994 | 100.0\% | 100.0\% | 482 | 100.0\% | 100.0\% | \$59,832 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: Multi Augusta

| PRODUCT TYPE | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | unt | ank |  | Small Businesses \% | Count Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar | Agg |  | Coun <br> ank | Agg | Dollar |  |  |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 33 | 5.3\% | \$3,747 | 8.3\% | 6.8\% | 10 | 5.8\% | 6.5\% | \$1,481 | 7.4\% | 9.7\% | 23 | 5.1\% | 6.4\% | \$2,266 | 8.9\% | 8.5\% |
|  | Moderate | 56 | 9.0\% | \$2,585 | 5.7\% | 14.9\% | 15 | 8.7\% | 12.0\% | \$810 | 4.1\% | 12.8\% | 41 | 9.2\% | 11.5\% | \$1,775 | 7.0\% | 11.9\% |
|  | Middle | 350 | 56.5\% | \$26,119 | 57.7\% | 48.7\% | 102 | 59.3\% | 43.3\% | \$12,014 | 60.3\% | 39.3\% | 248 | 55.4\% | 42.5\% | \$14,105 | 55.7\% | 40.9\% |
|  | Upper | 174 | 28.1\% | \$12,711 | 28.1\% | 29.6\% | 45 | 26.2\% | 35.3\% | \$5,626 | 28.2\% | 37.1\% | 129 | 28.8\% | 37.7\% | \$7,085 | 28.0\% | 38.3\% |
|  | 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 | 7 | 1.1\% | \$91 | 0.2\% |  | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 1.1\% | 7 | 1.6\% | 2.0\% | \$91 | 0.4\% | 0.4\% |
|  | Total | 620 | 100.0\% | \$45,253 | 100.0\% | 100.0\% | 172 | 100.0\% | 100.0\% | \$19,931 | 100.0\% | 100.0\% | 448 | 100.0\% | 100.0\% | \$25,322 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 5.1\% | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 1.8\% | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 4.9\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 27.9\% | 0 | 0.0\% | 26.4\% | \$0 | 0.0\% | 31.6\% | 0 | 0.0\% | 27.3\% | \$0 | 0.0\% | 29.0\% |
|  | Middle | 14 | 82.4\% | \$1,209 | 69.6\% | 58.9\% | 2 | 66.7\% | 65.9\% | \$260 | 39.4\% | 61.8\% | 12 | 85.7\% | 57.9\% | \$949 | 88.2\% | 59.1\% |
|  | Upper | 2 | 11.8\% | \$127 | 7.3\% | 8.1\% | 0 | 0.0\% | 4.7\% | \$0 | 0.0\% | 1.2\% | 2 | 14.3\% | 9.9\% | \$127 | 11.8\% | 7.0\% |
|  | 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 | 1 | 5.9\% | \$400 | 23.0\% |  | 1 | 33.3\% | 0.8\% | \$400 | 60.6\% | 3.6\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 17 | 100.0\% | \$1,736 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$660 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$1,076 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: Multi Augusta

|  | Borrowe <br> $r$ Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 36 | 11.4\% | \$2,938 | 6.6\% | 22.3\% | 14 | 11.1\% | 6.7\% | \$1,253 | 6.7\% | 3.3\% | 22 | 11.6\% | 6.5\% | \$1,685 | 6.4\% | 3.3\% |
|  | Moderate | 87 | 27.6\% | \$9,925 | 22.1\% | 16.6\% | 25 | 19.8\% | 19.2\% | \$2,749 | 14.8\% | 13.8\% | 62 | 32.8\% | 17.7\% | \$7,176 | 27.3\% | 13.2\% |
|  | Middle | 87 | 27.6\% | \$11,506 | 25.7\% | 20.8\% | 34 | 27.0\% | 22.5\% | \$4,410 | 23.7\% | 20.9\% | 53 | 28.0\% | 21.9\% | \$7,096 | 27.0\% | 21.0\% |
|  | Upper | 104 | 33.0\% | \$20,399 | 45.5\% | 40.3\% | 53 | 42.1\% | 34.5\% | \$10,160 | 54.7\% | 44.4\% | 51 | 27.0\% | 33.5\% | \$10,239 | 39.0\% | 43.8\% |
|  | Unknown | 1 | 0.3\% | \$67 | 0.1\% | 0.0\% | 0 | 0.0\% | 17.2\% | \$0 | 0.0\% | 17.6\% | 1 | 0.5\% | 20.3\% | \$67 | 0.3\% | 18.7\% |
|  | Total | 315 | 100.0\% | \$44,835 | 100.0\% | 100.0\% | 126 | 100.0\% | 100.0\% | \$18,572 | 100.0\% | 100.0\% | 189 | 100.0\% | 100.0\% | \$26,263 | 100.0\% | 100.0\% |
|  | Low | 48 | 7.5\% | \$3,501 | 4.1\% | 22.3\% | 26 | 6.7\% | 4.4\% | \$1,740 | 3.3\% | 2.2\% | 22 | 8.8\% | 4.4\% | \$1,761 | 5.3\% | 2.1\% |
|  | Moderate | 103 | 16.1\% | \$9,113 | 10.5\% | 16.6\% | 64 | 16.5\% | 11.2\% | \$5,534 | 10.4\% | 7.0\% | 39 | 15.6\% | 9.9\% | \$3,579 | 10.8\% | 6.3\% |
|  | Middle | 156 | 24.5\% | \$18,772 | 21.7\% | 20.8\% | 88 | 22.7\% | 17.1\% | \$10,420 | 19.6\% | 13.8\% | 68 | 27.2\% | 15.6\% | \$8,352 | 25.1\% | 12.4\% |
|  | Upper | 317 | 49.7\% | \$52,869 | 61.2\% | 40.3\% | 203 | 52.3\% | 40.7\% | \$34,432 | 64.7\% | 49.0\% | 114 | 45.6\% | 39.6\% | \$18,437 | 55.5\% | 48.2\% |
|  | Unknown | 14 | 2.2\% | \$2,157 | 2.5\% | 0.0\% | 7 | 1.8\% | 26.6\% | \$1,066 | 2.0\% | 28.0\% | 7 | 2.8\% | 30.5\% | \$1,091 | 3.3\% | 31.0\% |
|  | Total | 638 | 100.0\% | \$86,412 | 100.0\% | 100.0\% | 388 | 100.0\% | 100.0\% | \$53,192 | 100.0\% | 100.0\% | 250 | 100.0\% | 100.0\% | \$33,220 | 100.0\% | 100.0\% |
|  | Lo | 10 | 14.1\% | \$45 | 7.8\% | 22.3\% | 5 | 17.9\% | 10.1\% | \$23 | 10.0\% | 3.7\% | 5 | 11.6\% | 9.2\% | \$22 | 6.3\% | 2.9\% |
|  | Moderate | 20 | 28.2\% | \$168 | 29.0\% | 16.6\% | 6 | 21.4\% | 17.3\% | \$85 | 37.0\% | 7.6\% | 14 | 32.6\% | 20.6\% | \$83 | 23.8\% | 11.1\% |
|  | Middle | 18 | 25.4\% | \$132 | 22.8\% | 20.8\% | 8 | 28.6\% | 21.1\% | \$47 | 20.4\% | 14.2\% | 10 | 23.3\% | 22.9\% | \$85 | 24.4\% | 20.3\% |
|  | Upper | 23 | 32.4\% | \$234 | 40.4\% | 40.3\% | 9 | 32.1\% | 46.7\% | \$75 | 32.6\% | 68.8\% | 14 | 32.6\% | 42.2\% | \$159 | 45.6\% | 57.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 5.8\% | 0 | 0.0\% | 5.1\% | \$0 | 0.0\% | 8.6\% |
|  | Total | 71 | 100.0\% | \$579 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$230 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$349 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 22.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 16.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 20.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 94 | 9.2\% | \$6,484 | 4.9\% | 22.3\% | 45 | 8.3\% | 5.6\% | \$3,016 | 4.2\% | 2.7\% | 49 | 10.2\% | 5.5\% | \$3,468 | 5.8\% | 2.6\% |
|  | Moderate | 210 | 20.5\% | \$19,206 | 14.6\% | 16.6\% | 95 | 17.5\% | 14.9\% | \$8,368 | 11.6\% | 10.0\% | 115 | 23.9\% | 13.9\% | \$10,838 | 18.1\% | 9.5\% |
|  | Middle | 261 | 25.5\% | \$30,410 | 23.1\% | 20.8\% | 130 | 24.0\% | 19.6\% | \$14,877 | 20.7\% | 16.9\% | 131 | 27.2\% | 18.8\% | \$15,533 | 26.0\% | 16.3\% |
|  | Upper | 444 | 43.4\% | \$73,502 | 55.8\% | 40.3\% | 265 | 48.9\% | 38.0\% | \$44,667 | 62.0\% | 46.5\% | 179 | 37.1\% | 36.7\% | \$28,835 | 48.2\% | 44.9\% |
|  | Unknown | 15 | 1.5\% | \$2,224 | 1.7\% | 0.0\% | 7 | 1.3\% | 21.9\% | \$1,066 | 1.5\% | 23.9\% | 8 | 1.7\% | 25.0\% | \$1,158 | 1.9\% | 26.7\% |
|  | Total | 1,024 | 100.0\% | \$131,826 | 100.0\% | 100.0\% | 542 | 100.0\% | 100.0\% | \$71,994 | 100.0\% | 100.0\% | 482 | 100.0\% | 100.0\% | \$59,832 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison   <br> 2010   |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount <br> \% | $\begin{aligned} & \text { ank } \\ & \quad \text { Doll } \\ & \$(\mathbf{0 0 0}) \end{aligned}$ | \$ \% | Total Businesses \% |  | Count ank \% | Agg <br> \% |  | Dollar nk \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  | \$1 Million or Less Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{aligned} & 195 \\ & 100 \\ & 295 \\ & 325 \end{aligned}$ | $\begin{gathered} \hline 31.5 \% \\ 16.1 \% \\ 47.6 \% \\ 52.4 \% \end{gathered}$ | $\begin{gathered} \hline \$ 18,011 \\ \$ 17,820 \\ \$ 35,831 \\ \$ 9,422 \end{gathered}$ | $\begin{gathered} \hline 39.8 \% \\ 39.4 \% \\ 79.2 \% \\ 20.8 \% \end{gathered}$ | $\begin{gathered} \hline 91.0 \% \\ 4.7 \% \\ 95.7 \% \\ 4.3 \% \end{gathered}$ | $\begin{gathered} 89 \\ 50 \\ 139 \\ 33 \end{gathered}$ | $\begin{aligned} & \hline 51.7 \% \\ & 29.1 \% \\ & 80.8 \% \\ & 19.2 \% \end{aligned}$ | 39.1\% | \$9,115 | 45.7\% | 49.1\% | 106 50 156 292 | $\begin{aligned} & 23.7 \% \\ & 11.2 \% \\ & 34.9 \% \\ & 65.2 \% \end{aligned}$ | 48.3\% | \$8,896 | 35.1\% | 50.9\% |
| $\stackrel{\sim}{0}$ |  | Total | 620 | 100.0\% | \$45,253 | 100.0\% | 100.0\% | 172 | 100.0\% |  |  |  |  | 448 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \underset{\sim}{n} \end{aligned}$ | $\begin{aligned} & \stackrel{N}{N} \\ & \dot{\omega} \\ & \stackrel{\pi}{\sigma} \end{aligned}$ | $\begin{array}{l\|} \hline \$ 100,000 \text { or Less } \\ \$ 100,001 \text { - } \$ 250,000 \\ \$ 250,001 \text { - } \$ 1 \text { Million } \end{array}$ | $\begin{gathered} \hline 508 \\ 63 \\ 49 \end{gathered}$ | $\begin{gathered} \hline 81.9 \% \\ 10.2 \% \\ 7.9 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 12,550 \\ & \$ 11,308 \\ & \$ 21,395 \end{aligned}$ | $\begin{aligned} & \hline 27.7 \% \\ & 25.0 \% \\ & 47.3 \% \end{aligned}$ |  | $\begin{gathered} 118 \\ 29 \\ 25 \end{gathered}$ | $\begin{gathered} \hline 68.6 \% \\ 16.9 \% \\ 14.5 \% \end{gathered}$ | $\begin{gathered} \hline 87.9 \% \\ 6.6 \% \\ 5.5 \% \end{gathered}$ | $\begin{gathered} \hline \$ 4,144 \\ \$ 5,097 \\ \$ 10,690 \end{gathered}$ | $\begin{aligned} & \hline 20.8 \% \\ & 25.6 \% \\ & 53.6 \% \end{aligned}$ | $\begin{aligned} & \hline 25.9 \% \\ & 21.8 \% \\ & 52.3 \% \end{aligned}$ | $\begin{gathered} \hline 390 \\ 34 \\ 24 \end{gathered}$ | $\begin{gathered} \hline 87.1 \% \\ 7.6 \% \\ 5.4 \% \end{gathered}$ | $\begin{gathered} \hline 89.1 \% \\ 6.1 \% \\ 4.7 \% \end{gathered}$ | $\begin{gathered} \hline \$ 8,406 \\ \$ 6,211 \\ \$ 10,705 \end{gathered}$ | $\begin{aligned} & \hline 33.2 \% \\ & 24.5 \% \\ & 42.3 \% \end{aligned}$ | $\begin{aligned} & \hline 29.4 \% \\ & 22.4 \% \\ & 48.2 \% \end{aligned}$ |
|  |  | Total | 620 | 100.0\% | \$45,253 | 100.0\% |  | 172 | 100.0\% | 100.0\% | \$19,931 | 100.0\% | 100.0\% | 448 | 100.0\% | 100.0\% | \$25,322 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | 13 2 2 | $\begin{aligned} & 76.5 \% \\ & 11.8 \% \\ & 11.8 \% \end{aligned}$ | $\begin{gathered} \$ 1,309 \\ \$ 404 \\ \$ 23 \end{gathered}$ | $\begin{gathered} 75.4 \% \\ 23.3 \% \\ 1.3 \% \end{gathered}$ | Total Farms <br> $98.3 \%$ <br> $1.5 \%$ <br> $0.2 \%$ | $\begin{aligned} & 2 \\ & 1 \\ & 0 \\ & \hline \end{aligned}$ | $\begin{gathered} 66.7 \% \\ 33.3 \% \\ 0.0 \% \end{gathered}$ | 76.7\% | \$456 | 69.1\% | 75.5\% | $\begin{gathered} 11 \\ 1 \\ 2 \end{gathered}$ | $\begin{gathered} 78.6 \% \\ 7.1 \% \\ 14.3 \% \end{gathered}$ | 68.6\% | \$853 | 79.3\% | 61.8\% |
|  |  | Total | 17 | 100.0\% | \$1,736 | 100.0\% | 100.0\% | 3 | 100.0\% |  |  |  |  | 14 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{\sim}{N} \\ & \stackrel{\sim}{0} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | 11 5 1 | $\begin{gathered} \hline 64.7 \% \\ 29.4 \% \\ 5.9 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 425 \\ & \$ 911 \\ & \$ 400 \end{aligned}$ | $\begin{aligned} & \hline 24.5 \% \\ & 52.5 \% \\ & 23.0 \% \end{aligned}$ |  | $1$ | $\begin{aligned} & \hline 33.3 \% \\ & 33.3 \% \\ & 33.3 \% \end{aligned}$ | $\begin{aligned} & \hline 73.6 \% \\ & 16.3 \% \\ & 10.1 \% \end{aligned}$ | $\begin{gathered} \hline \$ 56 \\ \$ 204 \\ \$ 400 \end{gathered}$ | $\begin{gathered} \hline 8.5 \% \\ 30.9 \% \\ 60.6 \% \end{gathered}$ | $\begin{aligned} & \hline 23.9 \% \\ & 34.2 \% \\ & 41.9 \% \end{aligned}$ | $\begin{gathered} \hline 10 \\ 4 \\ 0 \end{gathered}$ | $\begin{gathered} \hline 71.4 \% \\ 28.6 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 73.6 \% \\ & 14.0 \% \\ & 12.4 \% \end{aligned}$ | $\begin{gathered} \hline \$ 369 \\ \$ 707 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 34.3 \% \\ 65.7 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 23.9 \% \\ & 26.1 \% \\ & 50.0 \% \end{aligned}$ |
|  |  | Total | 17 | 100.0\% | \$1,736 | 100.0\% |  | 3 | 100.0\% | 100.0\% | \$660 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$1,076 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

## Assessment Area: Multi Chattanooga



Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: Multi Chattanooga

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Agg$\%$ |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 68 | 3.3\% | \$5,542 | 4.0\% | 3.9\% | 27 | 3.5\% | 5.0\% | \$2,723 | 3.9\% | 11.1\% | 41 | 3.2\% | 4.7\% | \$2,819 | 4.2\% | 8.9\% |
|  | Moderate | 243 | 11.9\% | \$19,240 | 14.0\% | 12.6\% | 99 | 13.0\% | 11.9\% | \$10,631 | 15.3\% | 14.5\% | 144 | 11.2\% | 11.7\% | \$8,609 | 12.8\% | 16.3\% |
|  | Middle | 1,121 | 54.7\% | \$75,516 | 55.1\% | 57.3\% | 418 | 54.8\% | 53.3\% | \$38,321 | 55.1\% | 53.3\% | 703 | 54.6\% | 53.7\% | \$37,195 | 55.1\% | 55.1\% |
|  | Upper | 618 | 30.1\% | \$36,703 | 26.8\% | 26.3\% | 219 | 28.7\% | 26.2\% | \$17,877 | 25.7\% | 20.2\% | 399 | 31.0\% | 27.1\% | \$18,826 | 27.9\% | 19.2\% |
|  | 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\% | 3.6\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 0.6\% |
|  | Total | 2,050 | 100.0\% | \$137,001 | 100.0\% | 100.0\% | 763 | 100.0\% | 100.0\% | \$69,552 | 100.0\% | 100.0\% | 1,287 | 100.0\% | 100.0\% | \$67,449 | 100.0\% | 100.0\% |
|  | 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\% | 5.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 4.9\% |
|  | Middle | 6 | 100.0\% | \$572 | 100.0\% | 69.1\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 61.4\% | 6 | 100.0\% | 65.0\% | \$572 | 100.0\% | 41.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 25.5\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 38.6\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 53.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 6 | 100.0\% | \$572 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$572 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: Multi Chattanooga

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  |  | Bank |  | Agg | Bank |  | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% |  |
|  | Low | 86 | 11.3\% | \$7,094 | 6.2\% | 18.8\% | 39 | 10.8\% | 10.0\% | \$3,188 | 5.7\% | 5.5\% | 47 | 11.9\% | 8.8\% | \$3,906 | 6.6\% | 4.6\% |
|  | Moderate | 192 | 25.3\% | \$20,144 | 17.5\% | 17.5\% | 94 | 26.0\% | 25.8\% | \$9,815 | 17.7\% | 19.1\% | 98 | 24.7\% | 22.8\% | \$10,329 | 17.4\% | 16.2\% |
|  | Middle | 165 | 21.8\% | \$22,781 | 19.8\% | 22.5\% | 79 | 21.8\% | 21.6\% | \$10,994 | 19.8\% | 20.5\% | 86 | 21.7\% | 20.5\% | \$11,787 | 19.9\% | 18.7\% |
|  | Upper | 314 | 41.4\% | \$64,680 | 56.3\% | 41.2\% | 150 | 41.4\% | 32.4\% | \$31,579 | 56.8\% | 44.6\% | 164 | 41.4\% | 34.5\% | \$33,101 | 55.9\% | 47.3\% |
|  | Unknown | 1 | 0.1\% | \$90 | 0.1\% | 0.0\% | 0 | 0.0\% | 10.2\% | \$0 | 0.0\% | 10.3\% | 1 | 0.3\% | 13.4\% | \$90 | 0.2\% | 13.2\% |
|  | Total | 758 | 100.0\% | \$114,789 | 100.0\% | 100.0\% | 362 | 100.0\% | 100.0\% | \$55,576 | 100.0\% | 100.0\% | 396 | 100.0\% | 100.0\% | \$59,213 | 100.0\% | 100.0\% |
|  | Low | 47 | 5.0\% | \$3,425 | 2.1\% | 18.8\% | 25 | 4.6\% | 4.9\% | \$1,597 | 1.7\% | 2.5\% | 22 | 5.4\% | 5.7\% | \$1,828 | 2.8\% | 2.9\% |
|  | Moderate | 143 | 15.2\% | \$13,895 | 8.6\% | 17.5\% | 77 | 14.3\% | 15.1\% | \$7,943 | 8.4\% | 10.2\% | 66 | 16.3\% | 13.9\% | \$5,952 | 9.0\% | 9.4\% |
|  | Middle | 211 | 22.4\% | \$27,457 | 17.0\% | 22.5\% | 115 | 21.4\% | 19.2\% | \$15,483 | 16.3\% | 15.8\% | 96 | 23.8\% | 18.4\% | \$11,974 | 18.0\% | 15.1\% |
|  | Upper | 530 | 56.3\% | \$115,200 | 71.4\% | 41.2\% | 317 | 58.9\% | 39.3\% | \$69,565 | 73.2\% | 48.5\% | 213 | 52.7\% | 39.3\% | \$45,635 | 68.7\% | 50.5\% |
|  | Unknown | 11 | 1.2\% | \$1,435 | 0.9\% | 0.0\% | 4 | 0.7\% | 21.6\% | \$439 | 0.5\% | 23.0\% | 7 | 1.7\% | 22.7\% | \$996 | 1.5\% | 22.1\% |
|  | Total | 942 | 100.0\% | \$161,412 | 100.0\% | 100.0\% | 538 | 100.0\% | 100.0\% | \$95,027 | 100.0\% | 100.0\% | 404 | 100.0\% | 100.0\% | \$66,385 | 100.0\% | 100.0\% |
|  | Low | 20 | 15.7\% | \$87 | 7.4\% | 18.8\% | 5 | 10.0\% | 15.8\% | \$18 | 3.8\% | 4.1\% | 15 | 19.5\% | 17.9\% | \$69 | 9.7\% | 4.1\% |
|  | Moderate | 30 | 23.6\% | \$171 | 14.5\% | 17.5\% | 11 | 22.0\% | 19.3\% | \$58 | 12.3\% | 11.6\% | 19 | 24.7\% | 18.8\% | \$113 | 15.9\% | 10.7\% |
|  | Middle | 30 | 23.6\% | \$387 | 32.8\% | 22.5\% | 11 | 22.0\% | 23.4\% | \$180 | 38.1\% | 19.3\% | 19 | 24.7\% | 24.7\% | \$207 | 29.2\% | 21.6\% |
|  | Upper | 43 | 33.9\% | \$515 | 43.6\% | 41.2\% | 22 | 44.0\% | 30.1\% | \$213 | 45.1\% | 42.9\% | 21 | 27.3\% | 31.1\% | \$302 | 42.6\% | 52.1\% |
|  | Unknown | 4 | 3.1\% | \$21 | 1.8\% | 0.0\% | 1 | 2.0\% | 11.5\% | \$3 | 0.6\% | 22.1\% | 3 | 3.9\% | 7.5\% | \$18 | 2.5\% | 11.4\% |
|  | Total | 127 | 100.0\% | \$1,181 | 100.0\% | 100.0\% | 50 | 100.0\% | 100.0\% | \$472 | 100.0\% | 100.0\% | 77 | 100.0\% | 100.0\% | \$709 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | M oderate | 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\% | 22.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 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\% |
|  | Low | 153 | 8.4\% | \$10,606 | 3.8\% | 18.8\% | 69 | 7.3\% | 7.2\% | \$4,803 | 3.2\% | 3.5\% | 84 | 9.6\% | 7.3\% | \$5,803 | 4.6\% | 3.3\% |
|  | Moderate | 365 | 20.0\% | \$34,210 | 12.3\% | 17.5\% | 182 | 19.2\% | 19.4\% | \$17,816 | 11.8\% | 13.1\% | 183 | 20.9\% | 17.7\% | \$16,394 | 13.0\% | 11.3\% |
|  | Middle | 406 | 22.2\% | \$50,625 | 18.3\% | 22.5\% | 205 | 21.6\% | 20.2\% | \$26,657 | 17.6\% | 16.9\% | 201 | 22.9\% | 19.4\% | \$23,968 | 19.0\% | 15.2\% |
|  | Upper | 887 | 48.5\% | \$180,395 | 65.0\% | 41.2\% | 489 | 51.5\% | 36.2\% | \$101,357 | 67.1\% | 44.8\% | 398 | 45.4\% | 37.0\% | \$79,038 | 62.6\% | 44.8\% |
|  | Unknown | 16 | 0.9\% | \$1,546 | 0.6\% | 0.0\% | 5 | 0.5\% | 16.9\% | \$442 | 0.3\% | 21.7\% | 11 | 1.3\% | 18.6\% | \$1,104 | 0.9\% | 25.4\% |
|  | Total | 1,827 | 100.0\% | \$277,382 | 100.0\% | 100.0\% | 950 | 100.0\% | 100.0\% | \$151,075 | 100.0\% | 100.0\% | 877 | 100.0\% | 100.0\% | \$126,307 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | 2010 Aggregate |  |  |  |  |  | omparison 2011 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Count $\quad$Bank <br> Dollar |  |  |  | Total Businesses <br> \% | \# | Count ank \% | Agg <br> \% | $\begin{array}{r} \text { Ba } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar nk \$ \% | Agg <br> \$ \% |  | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{gathered} \text { Ban } \\ \$ \mathbf{0 0 0} \end{gathered}$ | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  |  | $\begin{gathered} \hline 677 \\ 241 \\ 918 \\ 1,132 \end{gathered}$ | $\begin{gathered} \hline 33.0 \% \\ 11.8 \% \\ 44.8 \% \\ 55.2 \% \end{gathered}$ | $\$ 57,848$ $\$ 47,034$ $\$ 104,882$ $\$ 32,119$ | $\begin{gathered} \hline 42.2 \% \\ 34.3 \% \\ 76.5 \% \\ 23.4 \% \end{gathered}$ | $\begin{gathered} \hline 89.1 \% \\ 6.2 \% \\ 95.3 \% \\ 4.7 \% \end{gathered}$ | 423 141 564 199 | $\begin{gathered} \hline 55.4 \% \\ 18.5 \% \\ 73.9 \% \\ 26.1 \% \end{gathered}$ | 32.9\% | \$35,832 | 51.5\% | 36.1\% | 254 100 354 933 | $19.7 \%$ $7.8 \%$ $27.5 \%$ $72.5 \%$ | 35.6\% | \$22,016 | 32.6\% | 32.7\% |
|  |  |  | 2,050 | 100.0\% | \$137,001 | 100.0\% | 100.0\% | 763 | 100.0\% |  |  |  |  | 1,287 | 100.0\% |  |  |  |  |
|  |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} \hline 1,820 \\ 128 \\ 102 \end{gathered}$ | $\begin{array}{c\|} \hline 88.8 \% \\ 6.2 \% \\ 5.0 \% \end{array}$ | $\begin{aligned} & \hline \$ 61,349 \\ & \$ 22,336 \\ & \$ 53,316 \end{aligned}$ | $\begin{aligned} & \hline 44.8 \% \\ & 16.3 \% \\ & 38.9 \% \end{aligned}$ |  | $\begin{gathered} \hline 640 \\ 66 \\ 57 \end{gathered}$ | $\begin{gathered} \hline 83.9 \% \\ 8.7 \% \\ 7.5 \% \end{gathered}$ | $\begin{gathered} \hline 86.4 \% \\ 6.3 \% \\ 7.3 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 28,330 \\ & \$ 11,587 \\ & \$ 29,635 \end{aligned}$ | $\begin{gathered} \hline 40.7 \% \\ 16.7 \% \\ 42.6 \% \end{gathered}$ | $\begin{aligned} & \hline 24.8 \% \\ & 17.1 \% \\ & 58.1 \% \end{aligned}$ | $\begin{array}{\|c\|} \hline 1,180 \\ 62 \\ 45 \end{array}$ | $\begin{gathered} \hline 91.7 \% \\ 4.8 \% \\ 3.5 \% \end{gathered}$ | $\begin{gathered} \hline 89.1 \% \\ 5.0 \% \\ 5.8 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 33,019 \\ & \$ 10,749 \\ & \$ 23,681 \end{aligned}$ | $\begin{aligned} & \hline 49.0 \% \\ & 15.9 \% \\ & 35.1 \% \end{aligned}$ | $\begin{gathered} \hline 26.6 \% \\ 16.7 \% \\ 56.7 \% \end{gathered}$ |
|  |  | Total | 2,050 | 100.0\% | \$137,001 | 100.0\% |  | 763 | 100.0\% | 100.0\% | \$69,552 | 100.0\% | 100.0\% | 1,287 | 100.0\% | 100.0\% | \$67,449 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{aligned} & 0 \\ & 3 \\ & 3 \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 50.0 \% \\ & 50.0 \% \end{aligned}$ | $\begin{gathered} \$ 0 \\ \$ 545 \\ \$ 27 \end{gathered}$ | $\begin{gathered} 0.0 \% \\ 95.3 \% \\ 4.7 \% \end{gathered}$ | Total Farms <br> $99.0 \%$ <br> $0.5 \%$ <br> $0.5 \%$ | 0 0 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | 57.1\% | \$0 | 0.0\% | 66.1\% | $\begin{aligned} & 0 \\ & 3 \\ & 3 \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 50.0 \% \\ 50.0 \% \end{gathered}$ | 45.0\% | \$0 | 0.0\% | 44.2\% |
|  |  | Total | 6 | 100.0\% | \$572 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  |  | 100.0\% |  |  |  |  |
|  |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{aligned} & \hline 3 \\ & 2 \\ & 1 \end{aligned}$ | $\begin{aligned} & \hline 50.0 \% \\ & 33.3 \% \\ & 16.7 \% \end{aligned}$ | $\begin{gathered} \hline \$ 27 \\ \$ 239 \\ \$ 306 \end{gathered}$ | $\begin{gathered} \hline 4.7 \% \\ 41.8 \% \\ 53.5 \% \end{gathered}$ |  | 0 0 0 | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{array}{\|c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ | $\begin{aligned} & \hline \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{array}{\|c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ | $\begin{aligned} & 3 \\ & 2 \\ & 1 \end{aligned}$ | $\begin{gathered} \hline 50.0 \% \\ 33.3 \% \\ 16.7 \% \end{gathered}$ | $\begin{aligned} & \hline 70.0 \% \\ & 15.0 \% \\ & 15.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 27 \\ \$ 239 \\ \$ 306 \end{gathered}$ | $\begin{gathered} \hline 4.7 \% \\ 41.8 \% \\ 53.5 \% \end{gathered}$ | $\begin{aligned} & \hline 16.7 \% \\ & 19.3 \% \\ & 63.9 \% \end{aligned}$ |
|  |  | Total | 6 | 100.0\% | \$572 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$572 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: Multi Columbus


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: Multi Columbus

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Small Businesses |  | Count <br> ank | Agg |  | Dollar | Agg | Count |  | Agg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 24 | 12.9\% | \$2,038 | 8.1\% | 9.6\% | 6 | 10.3\% | 10.0\% | \$1,077 | 8.6\% | 11.3\% | 18 | 14.1\% | 9.0\% | \$961 | 7.5\% | 10.5\% |
|  | Moderate | 35 | 18.8\% | \$4,336 | 17.2\% | 20.0\% | 9 | 15.5\% | 16.7\% | \$1,035 | 8.3\% | 16.1\% | 26 | 20.3\% | 17.6\% | \$3,301 | 25.8\% | 18.0\% |
|  | Middle | 56 | 30.1\% | \$7,735 | 30.6\% | 33.2\% | 17 | 29.3\% | 28.2\% | \$4,509 | 36.1\% | 28.6\% | 39 | 30.5\% | 29.4\% | \$3,226 | 25.3\% | 27.0\% |
|  | Upper | 65 | 34.9\% | \$10,966 | 43.4\% | 33.7\% | 24 | 41.4\% | 39.3\% | \$5,821 | 46.5\% | 36.9\% | 41 | 32.0\% | 39.6\% | \$5,145 | 40.3\% | 40.1\% |
|  | Unknown | 6 | 3.2\% | \$205 | 0.8\% | 3.5\% | 2 | 3.4\% | 3.5\% | \$65 | 0.5\% | 6.8\% | 4 | 3.1\% | 3.5\% | \$140 | 1.1\% | 4.3\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 186 | 100.0\% | \$25,280 | 100.0\% | 100.0\% | 58 | 100.0\% | 100.0\% | \$12,507 | 100.0\% | 100.0\% | 128 | 100.0\% | 100.0\% | \$12,773 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{r}}^{\underset{4}{4}} \\ & \frac{1}{4} \\ & \sum_{i}^{\top} \end{aligned}$ | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 50.0\% | \$14 | 3.5\% | 35.8\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 52.9\% | 1 | 50.0\% | 29.4\% | \$14 | 3.5\% | 28.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 31.3\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 44.7\% | 0 | 0.0\% | 41.2\% | \$0 | 0.0\% | 49.6\% |
|  | Upper | 1 | 50.0\% | \$386 | 96.5\% | 31.3\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 2.0\% | 1 | 50.0\% | 29.4\% | \$386 | 96.5\% | 22.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2 | 100.0\% | \$400 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$400 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: Multi Columbus


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: Multi Columbus

| $\begin{aligned} & \stackrel{0}{2} \\ & \underset{\lambda}{4} \\ & \frac{0}{0} \\ & \frac{0}{2} \end{aligned}$ |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount <br> \% | $\begin{aligned} & \text { ank } \\ & \\ & \\ & \\ & \text { Doll } \\ & \text { \$(000s) } \end{aligned}$ | ar \$ \% | Total Businesses \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bar } \\ \$ 000 \mathrm{~s} \end{array}$ | Dollar nk | Agg <br> \$ \% |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Ba } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar <br> k \$ \% | Agg \$ \% |
|  | $\begin{aligned} & \stackrel{\otimes}{\stackrel{\rightharpoonup}{0}} \\ & \stackrel{\rightharpoonup}{0} \\ & \underset{\sim}{む} \end{aligned}$ | \$1 Million or Less Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{aligned} & \hline 65 \\ & 33 \\ & 98 \\ & 88 \end{aligned}$ | $\begin{gathered} \hline 34.9 \% \\ 17.7 \% \\ 52.6 \% \\ 47.3 \% \end{gathered}$ | $\begin{gathered} \hline \$ 10,764 \\ \$ 10,582 \\ \$ 21,346 \\ \$ 3,934 \end{gathered}$ | $\begin{aligned} & \hline 42.6 \% \\ & 41.9 \% \\ & 84.5 \% \\ & 15.6 \% \end{aligned}$ | $\begin{gathered} \hline 89.6 \% \\ 5.5 \% \\ 95.1 \% \\ 4.9 \% \end{gathered}$ | 32 16 48 10 | $\begin{aligned} & 55.2 \% \\ & 27.6 \% \\ & 82.8 \% \\ & 17.2 \% \end{aligned}$ | 43.3\% | \$4,740 | 37.9\% | 41.9\% | 33 17 50 78 | $\begin{gathered} \hline 25.8 \% \\ 13.3 \% \\ 39.1 \% \\ 60.9 \% \end{gathered}$ | 45.7\% | \$6,024 | 47.2\% | 48.1\% |
| - |  | Total | 186 | 100.0\% | \$25,280 | 100.0\% | 100.0\% | 58 | 100.0\% |  |  |  |  | 128 | 100.0\% |  |  |  |  |
| $\begin{array}{\|l\|l\|} \overline{\bar{\sigma}} \\ \underset{\sim}{n} \end{array}$ |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} 134 \\ 20 \\ 32 \end{gathered}$ | $\begin{aligned} & \hline 72.0 \% \\ & 10.8 \% \\ & 17.2 \% \end{aligned}$ | $\begin{gathered} \hline \$ 4,020 \\ \$ 3,862 \\ \$ 17,398 \end{gathered}$ | $\begin{aligned} & \hline 15.9 \% \\ & 15.3 \% \\ & 68.8 \% \end{aligned}$ |  | 34 7 17 | $\begin{aligned} & \hline 58.6 \% \\ & 12.1 \% \\ & 29.3 \% \end{aligned}$ | $\begin{gathered} \hline 80.5 \% \\ 8.9 \% \\ 10.7 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 1,515 \\ & \$ 1,449 \\ & \$ 9,543 \end{aligned}$ | $\begin{aligned} & \hline 12.1 \% \\ & 11.6 \% \\ & 76.3 \% \end{aligned}$ | $\begin{aligned} & \hline 18.6 \% \\ & 17.7 \% \\ & 63.7 \% \end{aligned}$ | $\begin{gathered} \hline 100 \\ 13 \\ 15 \end{gathered}$ | $\begin{aligned} & \hline 78.1 \% \\ & 10.2 \% \\ & 11.7 \% \end{aligned}$ | $\begin{gathered} \hline 83.3 \% \\ 8.3 \% \\ 8.3 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 2,505 \\ & \$ 2,413 \\ & \$ 7,855 \end{aligned}$ | $\begin{aligned} & \hline 19.6 \% \\ & 18.9 \% \\ & 61.5 \% \end{aligned}$ | $\begin{aligned} & \hline 21.2 \% \\ & 19.8 \% \\ & 59.0 \% \end{aligned}$ |
|  |  | Total | 186 | 100.0\% | \$25,280 | 100.0\% |  | 58 | 100.0\% | 100.0\% | \$12,507 | 100.0\% | 100.0\% | 128 | 100.0\% | 100.0\% | \$12,773 | 100.0\% | 100.0\% |
| $\begin{array}{\|l\|l} \underline{\xi} \\ \widetilde{N} \\ \bar{\sim} \\ \overline{\widetilde{\omega}} \\ \tilde{\omega} \end{array}$ |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | 0 | $\begin{gathered} 50.0 \% \\ 50.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \$ 14 \\ \$ 386 \\ \$ 0 \end{gathered}$ | $\begin{gathered} 3.5 \% \\ 96.5 \% \\ 0.0 \% \end{gathered}$ | Total Farms <br> $95.7 \%$ <br> $2.9 \%$ <br> $1.4 \%$ | 0 0 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | 70.0\% | \$0 | 0.0\% | 92.8\% | 1 1 0 | $\begin{gathered} 50.0 \% \\ 50.0 \% \\ 0.0 \% \end{gathered}$ | 64.7\% | \$14 | 3.5\% | 60.6\% |
|  |  | Total | 2 | 100.0\% | \$400 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 2 | 100.0\% |  |  |  |  |
|  |  | $\$ 100,000$ or Less $\$ 100,001-\$ 250,000$ $\$ 250,001-\$ 500,000$ | $\begin{aligned} & 0 \\ & 1 \end{aligned}$ | $\begin{gathered} \hline 50.0 \% \\ 0.0 \% \\ 50.0 \% \end{gathered}$ | $\begin{gathered} \hline \$ 14 \\ \$ 0 \\ \$ 386 \end{gathered}$ | $\begin{gathered} \hline 3.5 \% \\ 0.0 \% \\ 96.5 \% \end{gathered}$ |  | 0 | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{aligned} & \hline 70.0 \% \\ & 10.0 \% \\ & 20.0 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{aligned} & \hline 16.7 \% \\ & 17.3 \% \\ & 66.1 \% \end{aligned}$ | $1$ | $\begin{gathered} \hline 50.0 \% \\ 0.0 \% \\ 50.0 \% \end{gathered}$ | $\begin{aligned} & \hline 58.8 \% \\ & 17.6 \% \\ & 23.5 \% \end{aligned}$ | $\begin{gathered} \hline \$ 14 \\ \$ 0 \\ \$ 386 \end{gathered}$ | $\begin{gathered} \hline 3.5 \% \\ 0.0 \% \\ 96.5 \% \end{gathered}$ | $\begin{gathered} \hline 8.6 \% \\ 23.8 \% \\ 67.6 \% \end{gathered}$ |
|  |  |  | 2 | 100.0\% | \$400 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$400 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: Multi Kingsport


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: Multi Kingsport

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Agg$\%$ |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | 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 | 149 | 20.2\% | \$8,666 | 22.1\% | 18.4\% | 62 | 21.9\% | 18.4\% | \$4,374 | 22.0\% | 23.2\% | 87 | 19.2\% | 16.2\% | \$4,292 | 22.2\% | 18.5\% |
|  | Middle | 371 | 50.3\% | \$20,588 | 52.5\% | 62.1\% | 138 | 48.8\% | 56.5\% | \$10,408 | 52.4\% | 57.1\% | 233 | 51.3\% | 58.5\% | \$10,180 | 52.7\% | 59.0\% |
|  | Upper | 216 | 29.3\% | \$9,910 | 25.3\% | 19.5\% | 82 | 29.0\% | 21.9\% | \$5,055 | 25.4\% | 18.9\% | 134 | 29.5\% | 23.4\% | \$4,855 | 25.1\% | 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\% |
|  | Tr Unknown | 1 | 0.1\% | \$35 | 0.1\% |  | 1 | 0.4\% | 3.1\% | \$35 | 0.2\% | 0.8\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 1.0\% |
|  | Total | 737 | 100.0\% | \$39,199 | 100.0\% | 100.0\% | 283 | 100.0\% | 100.0\% | \$19,872 | 100.0\% | 100.0\% | 454 | 100.0\% | 100.0\% | \$19,327 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{\underset{\sim}{4} \\ \underset{~}{4} \\ \underset{\sim}{4} \\ \sum \\ \hline}} \end{aligned}$ | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 7.8\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 5.7\% | \$0 | 0.0\% | 11.5\% |
|  | Middle | 1 | 100.0\% | \$10 | 100.0\% | 82.4\% | 0 | 0.0\% | 94.9\% | \$0 | 0.0\% | 98.8\% | 1 | 100.0\% | 80.0\% | \$10 | 100.0\% | 75.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 9.8\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 13.1\% |
|  | 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\% |
|  | Total | 1 | 100.0\% | \$10 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: Multi Kingsport


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## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount | $\begin{aligned} & \text { ank } \\ & \quad \text { Doll } \\ & \$(\mathbf{0 0 0 0}) \end{aligned}$ | \$ \% | Total Businesses <br> \% |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar <br> k \$ \% | Agg <br> \$ \% |  | Count <br> nk <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bar } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar <br> k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  | $\stackrel{\otimes}{\stackrel{D}{D}}$ | \$1 Million or Less <br> Over $\$ 1$ Million <br> Total Rev. available <br> Rev. Not Known | $\begin{gathered} \hline 238 \\ 76 \\ 314 \\ 423 \end{gathered}$ | $\begin{gathered} \hline 32.3 \% \\ 10.3 \% \\ 42.6 \% \\ 57.4 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 13,423 \\ & \$ 13,290 \\ & \$ 26,713 \\ & \$ 12,486 \end{aligned}$ | $\begin{aligned} & \hline 34.2 \% \\ & 33.9 \% \\ & 68.1 \% \\ & 31.9 \% \end{aligned}$ | $\begin{gathered} \hline 89.8 \% \\ 5.4 \% \\ 95.2 \% \\ 4.8 \% \end{gathered}$ | $\begin{gathered} \hline 163 \\ 39 \\ 202 \\ 81 \end{gathered}$ | $\begin{gathered} 57.6 \% \\ \text { 13.8\% } \\ 71.4 \% \\ 28.6 \% \end{gathered}$ | 38.6\% | \$9,137 | 46.0\% | 41.6\% | 75 37 112 342 | $\begin{gathered} 16.5 \% \\ 8.1 \% \\ 24.6 \% \\ 75.3 \% \end{gathered}$ | 39.9\% | \$4,286 | 22.2\% | 39.2\% |
|  |  | Total | 737 | 100.0\% | \$39,199 | 100.0\% | 100.0\% | 283 | 100.0\% |  |  |  |  | 454 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \underset{\mathcal{E}}{0} \end{aligned}$ | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { त्ర } \end{aligned}$ | $\begin{array}{l\|} \hline \$ 100,000 \text { or Less } \\ \$ 100,001-\$ 250,000 \\ \$ 250,001-\$ 1 \text { Million } \end{array}$ | $\begin{gathered} \hline 693 \\ 26 \\ 18 \end{gathered}$ | $\begin{array}{c\|} \hline 94.0 \% \\ 3.5 \% \\ 2.4 \% \end{array}$ | $\begin{gathered} \hline \$ 24,670 \\ \$ 4,381 \\ \$ 10,148 \end{gathered}$ | $\begin{aligned} & \hline 62.9 \% \\ & 11.2 \% \\ & 25.9 \% \end{aligned}$ |  | $\begin{gathered} \hline 259 \\ 15 \\ 9 \end{gathered}$ | $\begin{gathered} \hline 91.5 \% \\ 5.3 \% \\ 3.2 \% \end{gathered}$ | $\begin{gathered} \hline 86.6 \% \\ 7.3 \% \\ 6.1 \% \end{gathered}$ | $\begin{gathered} \hline \$ 11,829 \\ \$ 2,666 \\ \$ 5,377 \end{gathered}$ | $\begin{aligned} & \hline 59.5 \% \\ & 13.4 \% \\ & 27.1 \% \end{aligned}$ | $\begin{aligned} & \hline 27.8 \% \\ & 21.2 \% \\ & 51.0 \% \end{aligned}$ | $\begin{gathered} \hline 434 \\ 11 \\ 9 \end{gathered}$ | $\begin{gathered} \hline 95.6 \% \\ 2.4 \% \\ 2.0 \% \end{gathered}$ | $\begin{gathered} \hline 89.4 \% \\ 5.8 \% \\ 4.8 \% \end{gathered}$ | $\begin{gathered} \hline \$ 12,841 \\ \$ 1,715 \\ \$ 4,771 \end{gathered}$ | $\begin{gathered} \hline 66.4 \% \\ 8.9 \% \\ 24.7 \% \end{gathered}$ | $\begin{aligned} & \hline 32.5 \% \\ & 20.9 \% \\ & 46.6 \% \end{aligned}$ |
|  |  | Total | 737 | 100.0\% | \$39,199 | 100.0\% |  | 283 | 100.0\% | 100.0\% | \$19,872 | 100.0\% | 100.0\% | 454 | 100.0\% | 100.0\% | \$19,327 | 100.0\% | 100.0\% |
|  | $\stackrel{0}{\stackrel{0}{0}}$ | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{aligned} & 0 \\ & 0 \\ & 1 \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | $\begin{gathered} \$ 0 \\ \$ 0 \\ \$ 10 \end{gathered}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | Total Farms <br> $99.5 \%$ <br> $0.0 \%$ <br> $0.5 \%$ | $\begin{aligned} & 0 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | 89.7\% | \$0 | 0.0\% | 85.4\% | $\begin{aligned} & 0 \\ & 0 \\ & 1 \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | 85.7\% | \$0 | 0.0\% | 81.4\% |
|  |  | Total | 1 | 100.0\% | \$10 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \mathbb{N} \\ & \dot{N} \\ & \text { त్ } \end{aligned}$ | $\$ 100,000$ or Less $\$ 100,001-\$ 250,000$ $\$ 250,001-\$ 500,000$ | $\begin{aligned} & 1 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline \$ 10 \\ \$ 0 \\ \$ 0 \end{gathered}$ | $\begin{array}{c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ |  | $\begin{aligned} & \hline 0 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{array}{c\|} \hline 97.4 \% \\ 2.6 \% \\ 0.0 \% \end{array}$ | $\begin{aligned} & \hline \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{gathered} \hline 74.1 \% \\ 25.9 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & 1 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 91.4 \% \\ 8.6 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 10 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 60.4 \% \\ 39.6 \% \\ 0.0 \% \end{gathered}$ |
|  |  |  | 1 | 100.0\% | \$10 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: Multi Memphis

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner Occupied Units \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  | Agg | Bank |  |  | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 9 | 1.0\% | \$567 | 0.4\% | 5.6\% | 4 | 0.9\% | 0.8\% | \$300 | 0.4\% | 0.4\% | 5 | 1.1\% | 0.7\% | \$267 | 0.4\% | 0.3\% |
|  | Moderate | 72 | 7.8\% | \$5,704 | 4.1\% | 19.8\% | 37 | 8.0\% | 6.7\% | \$3,248 | 4.5\% | 4.1\% | 35 | 7.6\% | 6.1\% | \$2,456 | 3.7\% | 3.2\% |
|  | Middle | 245 | 26.5\% | \$26,411 | 19.1\% | 35.3\% | 126 | 27.1\% | 28.3\% | \$12,731 | 17.7\% | 21.5\% | 119 | 25.8\% | 28.3\% | \$13,680 | 20.6\% | 21.5\% |
|  | Upper | 600 | 64.8\% | \$105,548 | 76.4\% | 39.3\% | 298 | 64.1\% | 64.2\% | \$55,562 | 77.3\% | 74.1\% | 302 | 65.5\% | 65.0\% | \$49,986 | 75.3\% | 75.0\% |
|  | 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 | 926 | 100.0\% | \$138,230 | 100.0\% | 100.0\% | 465 | 100.0\% | 100.0\% | \$71,841 | 100.0\% | 100.0\% | 461 | 100.0\% | 100.0\% | \$66,389 | 100.0\% | 100.0\% |
|  | Low | 15 | 0.9\% | \$778 | 0.3\% | 5.6\% | 8 | 0.9\% | 0.4\% | \$501 | 0.4\% | 0.2\% | 7 | 0.9\% | 0.5\% | \$277 | 0.3\% | 0.2\% |
|  | Moderate | 107 | 6.6\% | \$8,216 | 3.4\% | 19.8\% | 47 | 5.4\% | 4.2\% | \$4,595 | 3.2\% | 2.4\% | 60 | 7.9\% | 5.1\% | \$3,621 | 3.5\% | 2.9\% |
|  | Middle | 407 | 25.0\% | \$45,607 | 18.6\% | 35.3\% | 207 | 23.7\% | 26.5\% | \$24,153 | 17.0\% | 21.4\% | 200 | 26.5\% | 27.7\% | \$21,454 | 21.0\% | 22.4\% |
|  | Upper | 1,101 | 67.5\% | \$190,055 | 77.7\% | 39.3\% | 612 | 70.0\% | 69.0\% | \$113,193 | 79.5\% | 76.1\% | 489 | 64.7\% | 66.6\% | \$76,862 | 75.2\% | 74.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,630 | 100.0\% | \$244,656 | 100.0\% | 100.0\% | 874 | 100.0\% | 100.0\% | \$142,442 | 100.0\% | 100.0\% | 756 | 100.0\% | 100.0\% | \$102,214 | 100.0\% | 100.0\% |
|  | Lo | 30 | 10.5\% | \$224 | 8.6\% | 5.6\% | 13 | 11.8\% | 3.0\% | \$86 | 8.7\% | 0.6\% | 17 | 9.7\% | 6.1\% | \$138 | 8.5\% | 1.9\% |
|  | Moderate | 55 | 19.3\% | \$405 | 15.5\% | 19.8\% | 24 | 21.8\% | 12.1\% | \$186 | 18.8\% | 5.3\% | 31 | 17.7\% | 10.8\% | \$219 | 13.5\% | 4.4\% |
|  | Middle | 90 | 31.6\% | \$746 | 28.5\% | 35.3\% | 36 | 32.7\% | 47.9\% | \$320 | 32.3\% | 34.8\% | 54 | 30.9\% | 45.6\% | \$426 | 26.2\% | 34.7\% |
|  | Upper | 110 | 38.6\% | \$1,239 | 47.4\% | 39.3\% | 37 | 33.6\% | 37.1\% | \$399 | 40.3\% | 59.4\% | 73 | 41.7\% | 37.5\% | \$840 | 51.8\% | 59.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 285 | 100.0\% | \$2,614 | 100.0\% | 100.0\% | 110 | 100.0\% | 100.0\% | \$991 | 100.0\% | 100.0\% | 175 | 100.0\% | 100.0\% | \$1,623 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\stackrel{\searrow}{\stackrel{~}{\perp}}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 14.3\% | 0 | 0.0\% | 6.3\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 6.4\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 30.7\% | 0 | 0.0\% | 28.1\% | \$0 | 0.0\% | 4.3\% | 0 | 0.0\% | 36.2\% | \$0 | 0.0\% | 5.5\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 30.9\% | 0 | 0.0\% | 40.6\% | \$0 | 0.0\% | 58.6\% | 0 | 0.0\% | 21.3\% | \$0 | 0.0\% | 20.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 24.1\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 36.8\% | 0 | 0.0\% | 36.2\% | \$0 | 0.0\% | 73.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Lo | 54 | 1.9\% | \$1,569 | 0.4\% | 5.6\% | 25 | 1.7\% | 0.6\% | \$887 | 0.4\% | 0.3\% | 29 | 2.1\% | 0.8\% | \$682 | 0.4\% | 0.2\% |
|  | Moderate | 234 | 8.2\% | \$14,325 | 3.7\% | 19.8\% | 108 | 7.5\% | 5.5\% | \$8,029 | 3.7\% | 3.1\% | 126 | 9.1\% | 5.8\% | \$6,296 | 3.7\% | 3.2\% |
|  | Middle | 742 | 26.1\% | \$72,764 | 18.9\% | 35.3\% | 369 | 25.5\% | 27.8\% | \$37,204 | 17.3\% | 22.6\% | 373 | 26.8\% | 28.5\% | \$35,560 | 20.9\% | 22.0\% |
|  | Upper | 1,811 | 63.7\% | \$296,842 | 77.0\% | 39.3\% | 947 | 65.4\% | 66.1\% | \$169,154 | 78.6\% | 74.0\% | 864 | 62.1\% | 64.9\% | \$127,688 | 75.0\% | 74.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2,841 | 100.0\% | \$385,500 | 100.0\% | 100.0\% | 1,449 | 100.0\% | 100.0\% | \$215,274 | 100.0\% | 100.0\% | 1,392 | 100.0\% | 100.0\% | \$170,226 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: Multi Memphis

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Agg$\%$ |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 230 | 7.9\% | \$29,427 | 10.4\% | 7.0\% | 90 | 9.0\% | 5.9\% | \$14,646 | 11.1\% | 8.4\% | 140 | 7.3\% | 6.4\% | \$14,781 | 9.7\% | 9.5\% |
|  | Moderate | 566 | 19.4\% | \$57,065 | 20.1\% | 17.3\% | 199 | 19.8\% | 13.8\% | \$25,434 | 19.3\% | 16.5\% | 367 | 19.2\% | 13.8\% | \$31,631 | 20.8\% | 15.4\% |
|  | Middle | 703 | 24.1\% | \$56,346 | 19.9\% | 31.5\% | 249 | 24.8\% | 27.6\% | \$27,106 | 20.6\% | 21.8\% | 454 | 23.7\% | 26.1\% | \$29,240 | 19.3\% | 23.0\% |
|  | Upper | 1,403 | 48.0\% | \$137,128 | 48.3\% | 44.0\% | 462 | 46.0\% | 50.2\% | \$63,396 | 48.1\% | 51.3\% | 941 | 49.1\% | 52.0\% | \$73,732 | 48.5\% | 50.5\% |
|  | Unknown | 17 | 0.6\% | \$3,717 | 1.3\% | 0.2\% | 5 | 0.5\% | 0.6\% | \$1,245 | 0.9\% | 1.4\% | 12 | 0.6\% | 0.5\% | \$2,472 | 1.6\% | 1.5\% |
|  | Tr Unknown | 1 | 0.0\% | \$15 | 0.0\% |  | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 0.6\% | 1 | 0.1\% | 1.2\% | \$15 | 0.0\% | 0.1\% |
|  | Total | 2,920 | 100.0\% | \$283,698 | 100.0\% | 100.0\% | 1,005 | 100.0\% | 100.0\% | \$131,827 | 100.0\% | 100.0\% | 1,915 | 100.0\% | 100.0\% | \$151,871 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.8\% | 0 | 0.0\% | 1.8\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 1.9\% |
|  | Moderate | 13 | 33.3\% | \$1,923 | 34.1\% | 10.7\% | 6 | 40.0\% | 13.1\% | \$890 | 39.8\% | 20.7\% | 7 | 29.2\% | 14.8\% | \$1,033 | 30.4\% | 19.9\% |
|  | Middle | 19 | 48.7\% | \$2,583 | 45.8\% | 63.3\% | 7 | 46.7\% | 58.3\% | \$824 | 36.8\% | 48.3\% | 12 | 50.0\% | 57.7\% | \$1,759 | 51.7\% | 50.9\% |
|  | Upper | 7 | 17.9\% | \$1,133 | 20.1\% | 23.8\% | 2 | 13.3\% | 22.0\% | \$524 | 23.4\% | 26.5\% | 5 | 20.8\% | 23.5\% | \$609 | 17.9\% | 27.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.6\% | \$0 | 0.0\% | 4.2\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 39 | 100.0\% | \$5,639 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$2,238 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$3,401 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: Multi Memphis

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  | Agg | Bank |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% |  |
|  | Low | 117 | 12.6\% | \$8,611 | 6.2\% | 22.3\% | 61 | 13.1\% | 9.7\% | \$4,582 | 6.4\% | 5.1\% | 56 | 12.1\% | 7.7\% | \$4,029 | 6.1\% | 4.1\% |
|  | Moderate | 250 | 27.0\% | \$26,438 | 19.1\% | 16.4\% | 126 | 27.1\% | 22.3\% | \$13,035 | 18.1\% | 16.9\% | 124 | 26.9\% | 19.6\% | \$13,403 | 20.2\% | 14.7\% |
|  | Middle | 205 | 22.1\% | \$27,937 | 20.2\% | 19.7\% | 96 | 20.6\% | 22.0\% | \$13,616 | 19.0\% | 21.6\% | 109 | 23.6\% | 20.6\% | \$14,321 | 21.6\% | 20.0\% |
|  | Upper | 345 | 37.3\% | \$74,467 | 53.9\% | 41.6\% | 182 | 39.1\% | 31.8\% | \$40,608 | 56.5\% | 43.7\% | 163 | 35.4\% | 33.9\% | \$33,859 | 51.0\% | 45.3\% |
|  | Unknown | 9 | 1.0\% | \$777 | 0.6\% | 0.0\% | 0 | 0.0\% | 14.2\% | \$0 | 0.0\% | 12.7\% | 9 | 2.0\% | 18.2\% | \$777 | 1.2\% | 15.8\% |
|  | Total | 926 | 100.0\% | \$138,230 | 100.0\% | 100.0\% | 465 | 100.0\% | 100.0\% | \$71,841 | 100.0\% | 100.0\% | 461 | 100.0\% | 100.0\% | \$66,389 | 100.0\% | 100.0\% |
|  | Low | 121 | 7.4\% | \$7,446 | 3.0\% | 22.3\% | 52 | 5.9\% | 3.1\% | \$3,864 | 2.7\% | 1.4\% | 69 | 9.1\% | 3.5\% | \$3,582 | 3.5\% | 1.6\% |
|  | Moderate | 225 | 13.8\% | \$19,853 | 8.1\% | 16.4\% | 107 | 12.2\% | 9.6\% | \$10,540 | 7.4\% | 6.0\% | 118 | 15.6\% | 9.4\% | \$9,313 | 9.1\% | 5.8\% |
|  | Middle | 318 | 19.5\% | \$36,014 | 14.7\% | 19.7\% | 186 | 21.3\% | 16.9\% | \$21,934 | 15.4\% | 13.2\% | 132 | 17.5\% | 16.0\% | \$14,080 | 13.8\% | 12.3\% |
|  | Upper | 926 | 56.8\% | \$175,487 | 71.7\% | 41.6\% | 514 | 58.8\% | 48.8\% | \$103,648 | 72.8\% | 58.1\% | 412 | 54.5\% | 47.5\% | \$71,839 | 70.3\% | 57.3\% |
|  | Unknown | 40 | 2.5\% | \$5,856 | 2.4\% | 0.0\% | 15 | 1.7\% | 21.6\% | \$2,456 | 1.7\% | 21.2\% | 25 | 3.3\% | 23.7\% | \$3,400 | 3.3\% | 23.0\% |
|  | Total | 1,630 | 100.0\% | \$244,656 | 100.0\% | 100.0\% | 874 | 100.0\% | 100.0\% | \$142,442 | 100.0\% | 100.0\% | 756 | 100.0\% | 100.0\% | \$102,214 | 100.0\% | 100.0\% |
|  | Low | 47 | 16.5\% | \$264 | 10.1\% | 22.3\% | 19 | 17.3\% | 15.1\% | \$101 | 10.2\% | 3.4\% | 28 | 16.0\% | 15.4\% | \$163 | 10.0\% | 5.8\% |
|  | Moderate | 73 | 25.6\% | \$509 | 19.5\% | 16.4\% | 30 | 27.3\% | 21.8\% | \$224 | 22.6\% | 10.0\% | 43 | 24.6\% | 20.1\% | \$285 | 17.6\% | 11.0\% |
|  | Middle | 67 | 23.5\% | \$545 | 20.8\% | 19.7\% | 19 | 17.3\% | 20.3\% | \$103 | 10.4\% | 20.2\% | 48 | 27.4\% | 22.2\% | \$442 | 27.2\% | 16.9\% |
|  | Upper | 94 | 33.0\% | \$1,263 | 48.3\% | 41.6\% | 40 | 36.4\% | 35.8\% | \$539 | 54.4\% | 53.3\% | 54 | 30.9\% | 34.9\% | \$724 | 44.6\% | 53.6\% |
|  | Unknown | 4 | 1.4\% | \$33 | 1.3\% | 0.0\% | 2 | 1.8\% | 7.1\% | \$24 | 2.4\% | 13.1\% | 2 | 1.1\% | 7.4\% | \$9 | 0.6\% | 12.7\% |
|  | Total | 285 | 100.0\% | \$2,614 | 100.0\% | 100.0\% | 110 | 100.0\% | 100.0\% | \$991 | 100.0\% | 100.0\% | 175 | 100.0\% | 100.0\% | \$1,623 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{\stackrel{~}{¿}}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 22.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | M oderate | 0 | 0.0\% | \$0 | 0.0\% | 16.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 19.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 41.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 285 | 10.0\% | \$16,321 | 4.2\% | 22.3\% | 132 | 9.1\% | 6.2\% | \$8,547 | 4.0\% | 2.9\% | 153 | 11.0\% | 5.8\% | \$7,774 | 4.6\% | 2.6\% |
|  | M oderate | 548 | 19.3\% | \$46,800 | 12.1\% | 16.4\% | 263 | 18.2\% | 15.4\% | \$23,799 | 11.1\% | 10.2\% | 285 | 20.5\% | 14.5\% | \$23,001 | 13.5\% | 9.4\% |
|  | Middle | 590 | 20.8\% | \$64,496 | 16.7\% | 19.7\% | 301 | 20.8\% | 19.2\% | \$35,653 | 16.6\% | 16.2\% | 289 | 20.8\% | 18.3\% | \$28,843 | 16.9\% | 15.1\% |
|  | Upper | 1,365 | 48.0\% | \$251,217 | 65.2\% | 41.6\% | 736 | 50.8\% | 41.1\% | \$144,795 | 67.3\% | 50.7\% | 629 | 45.2\% | 40.7\% | \$106,422 | 62.5\% | 49.1\% |
|  | Unknown | 53 | 1.9\% | \$6,666 | 1.7\% | 0.0\% | 17 | 1.2\% | 18.1\% | \$2,480 | 1.2\% | 20.0\% | 36 | 2.6\% | 20.7\% | \$4,186 | 2.5\% | 23.8\% |
|  | Total | 2,841 | 100.0\% | \$385,500 | 100.0\% | 100.0\% | 1,449 | 100.0\% | 100.0\% | \$215,274 | 100.0\% | 100.0\% | 1,392 | 100.0\% | 100.0\% | \$170,226 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: Multi St. Louis


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: Multi St. Louis

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Agg$\%$ |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 128 | 4.4\% | \$16,179 | 6.3\% | 4.6\% | 37 | 4.6\% | 3.2\% | \$5,803 | 5.1\% | 4.2\% | 91 | 4.3\% | 3.5\% | \$10,376 | 7.2\% | 4.2\% |
|  | Moderate | 568 | 19.6\% | \$51,182 | 19.9\% | 17.2\% | 169 | 21.2\% | 13.1\% | \$23,211 | 20.5\% | 14.9\% | 399 | 18.9\% | 13.9\% | \$27,971 | 19.5\% | 14.1\% |
|  | Middle | 1,349 | 46.4\% | \$112,264 | 43.7\% | 41.2\% | 376 | 47.1\% | 39.2\% | \$50,397 | 44.5\% | 39.6\% | 973 | 46.2\% | 40.0\% | \$61,867 | 43.1\% | 40.9\% |
|  | Upper | 850 | 29.3\% | \$76,632 | 29.8\% | 36.8\% | 215 | 26.9\% | 42.7\% | \$33,621 | 29.7\% | 40.3\% | 635 | 30.1\% | 41.1\% | \$43,011 | 29.9\% | 39.6\% |
|  | Unknown | 9 | 0.3\% | \$482 | 0.2\% | 0.3\% | 1 | 0.1\% | 0.5\% | \$100 | 0.1\% | 0.8\% | 8 | 0.4\% | 0.5\% | \$382 | 0.3\% | 1.1\% |
|  | Tr Unknown | 1 | 0.0\% | \$10 | 0.0\% |  | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.3\% | 1 | 0.0\% | 1.0\% | \$10 | 0.0\% | 0.2\% |
|  | Total | 2,905 | 100.0\% | \$256,749 | 100.0\% | 100.0\% | 798 | 100.0\% | 100.0\% | \$113,132 | 100.0\% | 100.0\% | 2,107 | 100.0\% | 100.0\% | \$143,617 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.5\% |
|  | Moderate | 5 | 12.2\% | \$803 | 13.0\% | 3.8\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 2.9\% | 5 | 16.7\% | 3.5\% | \$803 | 20.1\% | 3.2\% |
|  | Middle | 27 | 65.9\% | \$3,284 | 53.1\% | 77.0\% | 8 | 72.7\% | 81.7\% | \$1,497 | 68.4\% | 81.1\% | 19 | 63.3\% | 87.1\% | \$1,787 | 44.8\% | 84.0\% |
|  | Upper | 9 | 22.0\% | \$2,093 | 33.9\% | 18.7\% | 3 | 27.3\% | 13.0\% | \$692 | 31.6\% | 15.3\% | 6 | 20.0\% | 8.9\% | \$1,401 | 35.1\% | 11.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.5\% |
|  | Total | 41 | 100.0\% | \$6,180 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$2,189 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$3,991 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: Multi St. Louis


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  |  |  |  | 010 |  | regate | ompar |  |  | 011 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Count $\quad$Bank |  |  |  | Total Businesses \% | \# | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { I } \\ \text { Banl } \\ \$ 000 \mathrm{~s} \end{array}$ | Dollar n \$ \% | Agg <br> \$ \% |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Ban } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar <br> k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  | $\begin{aligned} & \stackrel{0}{\sim} \\ & \underset{\sim}{D} \\ & \underset{\sim}{D} \\ & \underset{\sim}{0} \end{aligned}$ | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{gathered} \hline 908 \\ 550 \\ 1,458 \\ 1,447 \end{gathered}$ | $\begin{gathered} \hline 31.3 \% \\ 18.9 \% \\ 50.2 \% \\ 49.8 \% \end{gathered}$ | $\begin{gathered} \hline \$ 80,062 \\ \$ 131,914 \\ \$ 211,976 \\ \$ 44,773 \end{gathered}$ | $\begin{aligned} & \hline 31.2 \% \\ & 51.4 \% \\ & 82.6 \% \\ & 17.4 \% \end{aligned}$ | $\begin{gathered} \hline 86.9 \% \\ 7.4 \% \\ 94.3 \% \\ 5.7 \% \end{gathered}$ | 424 260 684 114 | $\begin{gathered} \hline 53.1 \% \\ 32.6 \% \\ 85.7 \% \\ 14.3 \% \end{gathered}$ | 37.7\% | \$39,475 | 34.9\% | 33.8\% | $\begin{gathered} \hline 484 \\ 290 \\ 774 \\ 1,333 \end{gathered}$ | $\begin{gathered} \hline 23.0 \% \\ 13.8 \% \\ 36.8 \% \\ 63.3 \% \end{gathered}$ | 43.4\% | \$40,587 | 28.3\% | 34.4\% |
|  |  | Total | 2,905 | 100.0\% | \$256,749 | 100.0\% | 100.0\% | 798 | 100.0\% |  |  |  |  | 2,107 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { ָ } \\ & \text { © } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} \hline 2,339 \\ 294 \\ 272 \end{gathered}$ | $\begin{array}{c\|} \hline 80.5 \% \\ 10.1 \% \\ 9.4 \% \end{array}$ | $\begin{aligned} & \hline \$ 65,510 \\ & \$ 52,482 \\ & \$ 138,757 \end{aligned}$ | $\begin{aligned} & \hline 25.5 \% \\ & 20.4 \% \\ & 54.0 \% \end{aligned}$ |  | 524 <br> 137 $137$ | $\begin{aligned} & \hline 65.7 \% \\ & 17.2 \% \\ & 17.2 \% \end{aligned}$ | $\begin{gathered} \hline 87.2 \% \\ 5.8 \% \\ 7.0 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 20,947 \\ & \$ 24,063 \\ & \$ 68,122 \end{aligned}$ | $\begin{aligned} & \hline 18.5 \% \\ & 21.3 \% \\ & 60.2 \% \end{aligned}$ | $\begin{aligned} & \hline 20.0 \% \\ & 17.2 \% \\ & 62.8 \% \end{aligned}$ | $\begin{gathered} \hline 1,815 \\ 157 \\ 135 \end{gathered}$ | $\begin{gathered} \hline 86.1 \% \\ 7.5 \% \\ 6.4 \% \end{gathered}$ | $\begin{gathered} \hline 88.6 \% \\ 5.1 \% \\ 6.3 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 44,563 \\ & \$ 28,419 \\ & \$ 70,635 \end{aligned}$ | $\begin{aligned} & \hline 31.0 \% \\ & 19.8 \% \\ & 49.2 \% \end{aligned}$ | $\begin{aligned} & \hline 22.4 \% \\ & 16.8 \% \\ & 60.9 \% \end{aligned}$ |
|  |  | Total | 2,905 | 100.0\% | \$256,749 | 100.0\% |  | 798 | 100.0\% | 100.0\% | \$113,132 | 100.0\% | 100.0\% | 2,107 | 100.0\% | 100.0\% | \$143,617 | 100.0\% | 100.0\% |
|  | $\begin{aligned} & \underset{\sim}{\mathcal{D}} \\ & \stackrel{\rightharpoonup}{\omega} \\ & \underset{\sim}{\mathcal{D}} \\ & \hline \end{aligned}$ | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{gathered} 32 \\ 2 \\ 7 \end{gathered}$ | $\begin{gathered} 78.0 \% \\ 4.9 \% \\ 17.1 \% \end{gathered}$ | $\begin{gathered} \$ 5,439 \\ \$ 650 \\ \$ 91 \end{gathered}$ | $\begin{gathered} 88.0 \% \\ 10.5 \% \\ 1.5 \% \end{gathered}$ | Total Farms <br> $98.6 \%$ <br> $0.9 \%$ <br> $0.6 \%$ <br> $10.0 \%$ | 11 0 0 | $\begin{gathered} 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | 79.8\% | \$2,189 | 100.0\% | 79.3\% | $\begin{gathered} 21 \\ 2 \\ 7 \end{gathered}$ | $\begin{gathered} 70.0 \% \\ 6.7 \% \\ 23.3 \% \end{gathered}$ | 77.5\% | \$3,250 | 81.4\% | 73.6\% |
|  |  | Total | 41 | 100.0\% | \$6,180 | 100.0\% | 100.0\% | 11 | 100.0\% |  |  |  |  |  | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \stackrel{N}{0} \\ & \stackrel{\Gamma}{\widetilde{0}} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{gathered} \hline 20 \\ 12 \\ 9 \end{gathered}$ | $\begin{aligned} & \hline 48.8 \% \\ & 29.3 \% \\ & 22.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 859 \\ \$ 1,798 \\ \$ 3,523 \end{gathered}$ | $\begin{aligned} & \hline 13.9 \% \\ & 29.1 \% \\ & 57.0 \% \end{aligned}$ |  | 3 5 3 | $\begin{aligned} & \hline 27.3 \% \\ & 45.5 \% \\ & 27.3 \% \end{aligned}$ | $\begin{gathered} \hline 76.6 \% \\ 17.4 \% \\ 6.0 \% \end{gathered}$ | $\begin{gathered} \hline \$ 192 \\ \$ 769 \\ \$ 1,228 \end{gathered}$ | $\begin{gathered} \hline 8.8 \% \\ 35.1 \% \\ 56.1 \% \end{gathered}$ | $\begin{aligned} & \hline 33.7 \% \\ & 35.8 \% \\ & 30.5 \% \end{aligned}$ | $\begin{gathered} 17 \\ 7 \\ 6 \end{gathered}$ | $\begin{aligned} & \hline 56.7 \% \\ & 23.3 \% \\ & 20.0 \% \end{aligned}$ | $\begin{gathered} \hline 73.3 \% \\ 18.7 \% \\ 8.1 \% \end{gathered}$ | $\begin{gathered} \hline \$ 667 \\ \$ 1,029 \\ \$ 2,295 \end{gathered}$ | $\begin{aligned} & \hline 16.7 \% \\ & 25.8 \% \\ & 57.5 \% \end{aligned}$ | $\begin{aligned} & \hline 31.6 \% \\ & 35.7 \% \\ & 32.7 \% \end{aligned}$ |
|  |  |  | 41 | 100.0\% | \$6,180 | 100.0\% |  | 11 | 100.0\% | 100.0\% | \$2,189 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$3,991 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: Multi Texarkana

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 3.5\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 2 | 6.7\% | \$165 | 4.7\% | 8.8\% | 1 | 5.0\% | 4.8\% | \$67 | 2.8\% | 2.9\% | 1 | 10.0\% | 4.5\% | \$98 | 8.6\% | 3.2\% |
|  | Middle | 20 | 66.7\% | \$2,126 | 60.0\% | 72.4\% | 13 | 65.0\% | 70.6\% | \$1,299 | 54.1\% | 63.9\% | 7 | 70.0\% | 69.7\% | \$827 | 72.4\% | 65.2\% |
|  | Upper | 8 | 26.7\% | \$1,251 | 35.3\% | 15.3\% | 6 | 30.0\% | 23.8\% | \$1,033 | 43.1\% | 32.8\% | 2 | 20.0\% | 25.3\% | \$218 | 19.1\% | 31.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 30 | 100.0\% | \$3,542 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$2,399 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,143 | 100.0\% | 100.0\% |
| $\begin{aligned} & 山 己 \\ & \underset{\sim}{u} \\ & \underset{\sim}{2} \\ & \underset{\sim}{\underset{\sim}{u}} \end{aligned}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 3.5\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 3 | 4.7\% | \$87 | 1.2\% | 8.8\% | 1 | 2.7\% | 3.9\% | \$29 | 0.7\% | 3.0\% | 2 | 7.4\% | 4.2\% | \$58 | 2.2\% | 2.3\% |
|  | Middle | 51 | 79.7\% | \$4,951 | 70.8\% | 72.4\% | 29 | 78.4\% | 68.7\% | \$3,138 | 71.7\% | 64.5\% | 22 | 81.5\% | 67.3\% | \$1,813 | 69.3\% | 62.7\% |
|  | Upper | 10 | 15.6\% | \$1,953 | 27.9\% | 15.3\% | 7 | 18.9\% | 26.8\% | \$1,208 | 27.6\% | 32.2\% | 3 | 11.1\% | 28.1\% | \$745 | 28.5\% | 34.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 64 | 100.0\% | \$6,991 | 100.0\% | 100.0\% | 37 | 100.0\% | 100.0\% | \$4,375 | 100.0\% | 100.0\% | 27 | 100.0\% | 100.0\% | \$2,616 | 100.0\% | 100.0\% |
|  | ow | 1 | 4.2\% | \$3 | 2.2\% | 3.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 1 | 9.1\% | 0.5\% | \$3 | 4.4\% | 0.0\% |
|  | Moderate | 3 | 12.5\% | \$14 | 10.1\% | 8.8\% | 2 | 15.4\% | 5.9\% | \$6 | 8.6\% | 2.6\% | 1 | 9.1\% | 7.0\% | \$8 | 11.8\% | 6.1\% |
|  | Middle | 18 | 75.0\% | \$112 | 81.2\% | 72.4\% | 10 | 76.9\% | 71.8\% | \$58 | 82.9\% | 69.3\% | 8 | 72.7\% | 69.7\% | \$54 | 79.4\% | 66.6\% |
|  | Upper | 2 | 8.3\% | \$9 | 6.5\% | 15.3\% | 1 | 7.7\% | 22.4\% | \$6 | 8.6\% | 28.1\% | 1 | 9.1\% | 22.7\% | \$3 | 4.4\% | 27.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 24 | 100.0\% | \$138 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$70 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$68 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 9.2\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 9.8\% | 0 | 0.0\% | 6.3\% | \$0 | 0.0\% | 3.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 21.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 3.7\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 48.6\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 83.7\% | 0 | 0.0\% | 43.8\% | \$0 | 0.0\% | 15.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 21.2\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 6.5\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 77.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 1 | 0.8\% | \$3 | 0.0\% | 3.5\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 1.0\% | 1 | 2.1\% | 0.4\% | \$3 | 0.1\% | 0.4\% |
|  | Moderate | 8 | 6.8\% | \$266 | 2.5\% | 8.8\% | 4 | 5.7\% | 4.4\% | \$102 | 1.5\% | 2.7\% | 4 | 8.3\% | 4.6\% | \$164 | 4.3\% | 2.9\% |
|  | Middle | 89 | 75.4\% | \$7,189 | 67.4\% | 72.4\% | 52 | 74.3\% | 69.7\% | \$4,495 | 65.7\% | 65.7\% | 37 | 77.1\% | 68.6\% | \$2,694 | 70.4\% | 60.0\% |
|  | Upper | 20 | 16.9\% | \$3,213 | 30.1\% | 15.3\% | 14 | 20.0\% | 25.1\% | \$2,247 | 32.8\% | 30.6\% | 6 | 12.5\% | 26.4\% | \$966 | 25.2\% | 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\% |
|  | Total | 118 | 100.0\% | \$10,671 | 100.0\% | 100.0\% | 70 | 100.0\% | 100.0\% | \$6,844 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$3,827 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: Multi Texarkana

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Bank  Agg <br> $\#$ $\%$ $\%$ |  |  | Dollar <br> Bank |  | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | Count <br> Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  |  |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% |
|  | Low | 31 | 9.3\% | \$1,534 | 6.9\% | 7.4\% | 12 | 10.2\% | 6.4\% |  |  | \$888 | 8.4\% | 4.6\% |  | 19 | 8.9\% | 6.3\% | \$646 | 5.5\% | 5.0\% |
|  | Moderate | 49 | 14.8\% | \$2,804 | 12.6\% | 11.7\% | 14 | 11.9\% | 10.2\% | \$1,453 | 13.7\% | 12.1\% | 35 | 16.4\% | 10.9\% | \$1,351 | 11.6\% | 13.6\% |
|  | Middle | 144 | 43.4\% | \$11,531 | 51.7\% | 63.6\% | 49 | 41.5\% | 54.0\% | \$5,281 | 49.7\% | 49.1\% | 95 | 44.4\% | 53.3\% | \$6,250 | 53.6\% | 51.6\% |
|  | Upper | 108 | 32.5\% | \$6,422 | 28.8\% | 17.3\% | 43 | 36.4\% | 25.2\% | \$3,008 | 28.3\% | 30.3\% | 65 | 30.4\% | 23.4\% | \$3,414 | 29.3\% | 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\% | 4.3\% | \$0 | 0.0\% | 3.9\% | 0 | 0.0\% | 6.1\% | \$0 | 0.0\% | 1.5\% |
|  | Total | 332 | 100.0\% | \$22,291 | 100.0\% | 100.0\% | 118 | 100.0\% | 100.0\% | \$10,630 | 100.0\% | 100.0\% | 214 | 100.0\% | 100.0\% | \$11,661 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 10.5\% | \$80 | 4.4\% | 3.3\% | 1 | 20.0\% | 8.2\% | \$40 | 11.0\% | 6.9\% | 1 | 7.1\% | 5.7\% | \$40 | 2.7\% | 4.0\% |
|  | Middle | 11 | 57.9\% | \$824 | 45.2\% | 83.4\% | 3 | 60.0\% | 76.5\% | \$125 | 34.2\% | 72.9\% | 8 | 57.1\% | 70.5\% | \$699 | 47.9\% | 60.1\% |
|  | Upper | 6 | 31.6\% | \$921 | 50.5\% | 12.6\% | 1 | 20.0\% | 9.4\% | \$200 | 54.8\% | 18.6\% | 5 | 35.7\% | 17.0\% | \$721 | 49.4\% | 34.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.7\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 6.8\% | \$0 | 0.0\% | 1.5\% |
|  | Total | 19 | 100.0\% | \$1,825 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$365 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$1,460 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: Multi Texarkana


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: AL Birmingham

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | O wner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  | Agg | Bank |  |  | Bank |  | Agg\$ \% |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | Low | 10 | 0.9\% | \$1,339 | 0.6\% | 2.3\% | 4 | 0.7\% | 0.6\% | \$505 | 0.4\% | 0.4\% | 6 | 1.1\% | 0.6\% | \$834 | 0.8\% | 0.5\% |
|  | Moderate | 49 | 4.3\% | \$5,141 | 2.2\% | 21.8\% | 22 | 3.6\% | 7.4\% | \$2,142 | 1.7\% | 4.2\% | 27 | 5.1\% | 7.4\% | \$2,999 | 2.8\% | 4.0\% |
|  | Middle | 430 | 37.6\% | \$64,244 | 28.0\% | 42.7\% | 233 | 38.2\% | 45.1\% | \$36,089 | 29.3\% | 37.6\% | 197 | 36.9\% | 44.2\% | \$28,155 | 26.5\% | 35.6\% |
|  | Upper | 655 | 57.3\% | \$158,644 | 69.2\% | 33.2\% | 351 | 57.5\% | 46.8\% | \$84,273 | 68.5\% | 57.8\% | 304 | 56.9\% | 47.8\% | \$74,371 | 69.9\% | 59.9\% |
|  | 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 | 1,144 | 100.0\% | \$229,368 | 100.0\% | 100.0\% | 610 | 100.0\% | 100.0\% | \$123,009 | 100.0\% | 100.0\% | 534 | 100.0\% | 100.0\% | \$106,359 | 100.0\% | 100.0\% |
|  | Low | 13 | 0.6\% | \$1,773 | 0.4\% | 2.3\% | 7 | 0.5\% | 0.5\% | \$1,135 | 0.4\% | 0.3\% | 6 | 0.7\% | 0.5\% | \$638 | 0.4\% | 0.3\% |
|  | Moderate | 130 | 5.6\% | \$14,243 | 3.0\% | 21.8\% | 78 | 5.2\% | 6.5\% | \$8,948 | 2.9\% | 3.8\% | 52 | 6.2\% | 6.6\% | \$5,295 | 3.3\% | 3.8\% |
|  | Middle | 731 | 31.4\% | \$110,590 | 23.6\% | 42.7\% | 466 | 31.4\% | 38.2\% | \$73,366 | 23.9\% | 31.7\% | 265 | 31.5\% | 38.8\% | \$37,224 | 23.0\% | 31.4\% |
|  | Upper | 1,453 | 62.4\% | \$342,369 | 73.0\% | 33.2\% | 935 | 62.9\% | 54.9\% | \$223,958 | 72.9\% | 64.3\% | 518 | 61.6\% | 54.1\% | \$118,411 | 73.3\% | 64.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2,327 | 100.0\% | \$468,975 | 100.0\% | 100.0\% | 1,486 | 100.0\% | 100.0\% | \$307,407 | 100.0\% | 100.0\% | 841 | 100.0\% | 100.0\% | \$161,568 | 100.0\% | 100.0\% |
|  | Lo | 9 | 1.8\% | \$55 | 1.3\% | 2.3\% | 4 | 2.0\% | 1.8\% | \$23 | 1.4\% | 0.9\% | 5 | 1.7\% | 1.0\% | \$32 | 1.3\% | 0.2\% |
|  | Moderate | 83 | 16.8\% | \$557 | 13.2\% | 21.8\% | 32 | 15.9\% | 19.6\% | \$196 | 11.5\% | 10.9\% | 51 | 17.4\% | 15.9\% | \$361 | 14.3\% | 7.0\% |
|  | Middle | 233 | 47.2\% | \$1,866 | 44.1\% | 42.7\% | 97 | 48.3\% | 52.3\% | \$708 | 41.6\% | 40.0\% | 136 | 46.4\% | 47.3\% | \$1,158 | 45.8\% | 32.4\% |
|  | Upper | 169 | 34.2\% | \$1,752 | 41.4\% | 33.2\% | 68 | 33.8\% | 26.4\% | \$773 | 45.5\% | 48.2\% | 101 | 34.5\% | 35.7\% | \$979 | 38.7\% | 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 | 494 | 100.0\% | \$4,230 | 100.0\% | 100.0\% | 201 | 100.0\% | 100.0\% | \$1,700 | 100.0\% | 100.0\% | 293 | 100.0\% | 100.0\% | \$2,530 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Total | 0 | 0.0\% | \$0 | 0.0\% | 14.6\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.5\% | \$0 | 0.0\% | 3.8\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 22.9\% | 0 | 0.0\% | 28.3\% | \$0 | 0.0\% | 22.3\% | 0 | 0.0\% | 29.0\% | \$0 | 0.0\% | 11.5\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 31.3\% | 0 | 0.0\% | 43.5\% | \$0 | 0.0\% | 36.5\% | 0 | 0.0\% | 37.7\% | \$0 | 0.0\% | 50.6\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 31.1\% | 0 | 0.0\% | 26.1\% | \$0 | 0.0\% | 41.2\% | 0 | 0.0\% | 18.8\% | \$0 | 0.0\% | 34.1\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$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\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Total | 32 | 0.8\% | \$3,167 | 0.5\% | 2.3\% | 15 | 0.7\% | 0.6\% | \$1,663 | 0.4\% | 0.3\% | 17 | 1.0\% | 0.6\% | 1,504 | 0.6\% | 0.5\% |
|  |  | 262 | 6.6\% | \$19,941 | 2.8\% | 21.8\% | 132 | 5.7\% | 7.3\% | \$11,286 | 2.6\% | 4.6\% | 130 | 7.8\% | 7.3\% | \$8,655 | 3.2\% | 4.1\% |
|  |  | 1,394 | 35.2\% | \$176,700 | 25.2\% | 42.7\% | 796 | 34.7\% | 41.1\% | \$110,163 | 25.5\% | 33.9\% | 598 | 35.9\% | 41.4\% | \$66,537 | 24.6\% | 33.6\% |
|  |  | 2,277 | 57.4\% | \$502,765 | 71.6\% | 33.2\% | 1,354 | 58.9\% | 51.0\% | \$309,004 | 71.5\% | 61.1\% | 923 | 55.3\% | 50.7\% | \$193,761 | 71.6\% | 61.8\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 3,965 | 100.0\% | \$702,573 | 100.0\% | 100.0\% | 2,297 | 100.0\% | 100.0\% | \$432,116 | 100.0\% | 100.0\% | 1,668 | 100.0\% | 100.0\% | \$270,457 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: AL Birmingham


## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: AL Birmingham


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | \# ${ }^{\text {Cou}}$ | \% | $\begin{aligned} & \text { Doll: } \\ & \$(000 \mathrm{~s}) \end{aligned}$ | \$ \% | Total Businesses \% |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar <br> k <br> \$ \% | Agg <br> \$ \% |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar <br> k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  | $\stackrel{\otimes}{\stackrel{0}{ \pm}}$ | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{aligned} & \hline 2,160 \\ & 1,223 \\ & 3,383 \\ & 3,968 \end{aligned}$ | $\begin{aligned} & \hline 29.4 \% \\ & 16.6 \% \\ & 46.0 \% \\ & 54.0 \% \end{aligned}$ | $\begin{aligned} & \$ 175,934 \\ & \$ 307,733 \\ & \$ 483,667 \\ & \$ 132,230 \end{aligned}$ | $\begin{aligned} & \hline 28.6 \% \\ & 50.0 \% \\ & 78.6 \% \\ & 21.5 \% \end{aligned}$ | $\begin{gathered} \hline 88.9 \% \\ 6.2 \% \\ 95.1 \% \\ 4.8 \% \end{gathered}$ | $\begin{array}{\|c\|} \hline 1,340 \\ 688 \\ 2,028 \\ 645 \end{array}$ | $\begin{aligned} & \hline 50.1 \% \\ & 25.7 \% \\ & 75.8 \% \\ & 24.1 \% \end{aligned}$ | 34.2\% | \$103,534 | 32.1\% | 37.3\% | $\begin{array}{\|c} \hline 820 \\ 535 \\ 1,355 \\ 3,323 \end{array}$ | $\begin{gathered} 17.5 \% \\ 11.4 \% \\ 28.9 \% \\ 71.0 \% \end{gathered}$ | 38.5\% | \$72,400 | 24.7\% | 35.8\% |
|  |  | Total | 7,351 | 100.0\% | \$615,897 | 100.0\% | 100.0\% | 2,673 | 100.0\% |  |  |  |  | 4,678 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \underset{\zeta}{\omega} \end{aligned}$ | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{N}{N} \\ & \underset{\sim}{0} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} \hline 6,366 \\ 425 \\ 560 \end{gathered}$ | $\begin{gathered} \hline 86.6 \% \\ 5.8 \% \\ 7.6 \% \end{gathered}$ | $\begin{gathered} \hline \$ 223,110 \\ \$ 77,129 \\ \$ 315,658 \end{gathered}$ | $\begin{aligned} & \hline 36.2 \% \\ & 12.5 \% \\ & 51.3 \% \end{aligned}$ |  | $\begin{array}{\|c\|} \hline 2,125 \\ 227 \\ 321 \end{array}$ | $\begin{gathered} \hline 79.5 \% \\ 8.5 \% \\ 12.0 \% \end{gathered}$ | $\begin{gathered} \hline 88.5 \% \\ 5.6 \% \\ 6.0 \% \end{gathered}$ | $\begin{gathered} \hline \$ 101,158 \\ \$ 40,528 \\ \$ 181,175 \end{gathered}$ | $\begin{aligned} & \hline 31.3 \% \\ & 12.6 \% \\ & 56.1 \% \end{aligned}$ | $\begin{aligned} & \hline 29.4 \% \\ & 16.5 \% \\ & 54.0 \% \end{aligned}$ | $\begin{array}{\|c\|} \hline 4,241 \\ 198 \\ 239 \end{array}$ | $\begin{gathered} \hline 90.7 \% \\ 4.2 \% \\ 5.1 \% \end{gathered}$ | $\begin{gathered} \hline 90.3 \% \\ 4.6 \% \\ 5.1 \% \end{gathered}$ | $\begin{array}{\|c} \hline \$ 121,952 \\ \$ 36,601 \\ \$ 134,483 \end{array}$ | $\begin{aligned} & \hline 41.6 \% \\ & 12.5 \% \\ & 45.9 \% \end{aligned}$ | $\begin{aligned} & \hline 30.7 \% \\ & 15.9 \% \\ & 53.4 \% \end{aligned}$ |
|  |  | Total | 7,351 | 100.0\% | \$615,897 | 100.0\% |  | 2,673 | 100.0\% | 100.0\% | \$322,861 | 100.0\% | 100.0\% | 4,678 | 100.0\% | 100.0\% | \$293,036 | 100.0\% | 100.0\% |
|  | $\begin{aligned} & \stackrel{0}{\vec{\rightharpoonup}} \\ & \underset{\sim}{\otimes} \\ & \underset{\sim}{0} \end{aligned}$ | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{gathered} 16 \\ 4 \\ 11 \end{gathered}$ | $\begin{gathered} 51.6 \% \\ 12.9 \% \\ 35.5 \% \end{gathered}$ | $\begin{gathered} \$ 2,288 \\ \$ 659 \\ \$ 116 \end{gathered}$ | $\begin{gathered} 74.7 \% \\ 21.5 \% \\ 3.8 \% \end{gathered}$ | Total Farms <br> $95.0 \%$ <br> $3.8 \%$ <br> $1.1 \%$ | $\begin{gathered} 10 \\ 2 \\ 0 \end{gathered}$ | $\begin{gathered} 83.3 \% \\ 16.7 \% \\ 0.0 \% \end{gathered}$ | 71.0\% | \$1,750 | 82.9\% | 77.8\% | 6 2 11 | $\begin{gathered} 31.6 \% \\ 10.5 \% \\ 57.9 \% \end{gathered}$ | 63.0\% | \$538 | 56.5\% | 64.8\% |
|  |  | Total | 31 | 100.0\% | \$3,063 | 100.0\% | 100.0\% | 12 | 100.0\% |  |  |  |  | 19 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{1}{N} \\ & \text { ్ָర } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{gathered} \hline 18 \\ 11 \\ 2 \end{gathered}$ | $\begin{gathered} \hline 58.1 \% \\ 35.5 \% \\ 6.5 \% \end{gathered}$ | $\begin{gathered} \hline \$ 419 \\ \$ 2,004 \\ \$ 640 \end{gathered}$ | $\begin{aligned} & \hline 13.7 \% \\ & 65.4 \% \\ & 20.9 \% \end{aligned}$ |  | $\begin{aligned} & 2 \\ & 9 \\ & 1 \end{aligned}$ | $\begin{gathered} \hline 16.7 \% \\ 75.0 \% \\ 8.3 \% \end{gathered}$ | $\begin{gathered} \hline 74.2 \% \\ 16.1 \% \\ 9.7 \% \end{gathered}$ | $\begin{gathered} \hline \$ 123 \\ \$ 1,634 \\ \$ 353 \end{gathered}$ | $\begin{gathered} \hline 5.8 \% \\ 77.4 \% \\ 16.7 \% \end{gathered}$ | $\begin{aligned} & \hline 17.0 \% \\ & 37.8 \% \\ & 45.2 \% \end{aligned}$ | $\begin{gathered} 16 \\ 2 \\ 1 \end{gathered}$ | $\begin{gathered} \hline 84.2 \% \\ 10.5 \% \\ 5.3 \% \end{gathered}$ | $\begin{gathered} \hline 84.9 \% \\ 11.0 \% \\ 4.1 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 296 \\ & \$ 370 \\ & \$ 287 \end{aligned}$ | $\begin{aligned} & \hline 31.1 \% \\ & 38.8 \% \\ & 30.1 \% \end{aligned}$ | $\begin{aligned} & \hline 33.9 \% \\ & 36.6 \% \\ & 29.5 \% \end{aligned}$ |
|  |  |  | 31 | 100.0\% | \$3,063 | 100.0\% |  | 12 | 100.0\% | 100.0\% | \$2,110 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$953 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

## Assessment Area: AL Huntsville



Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: AL Hunts sille


## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: AL Huntsville


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison   <br> 2010   |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount $\%$ | $\begin{aligned} & \text { Dank } \\ & \quad \text { Doll } \\ & \text { \$(000s) } \end{aligned}$ | ar \$ \% | Total Businesses <br> \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ban } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar nk \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bar } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar <br> nk <br> \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
| $\begin{aligned} & \stackrel{\sim}{凶} \\ & \stackrel{\oplus}{=} \end{aligned}$ | $\begin{aligned} & \stackrel{\otimes}{\stackrel{\rightharpoonup}{0}} \\ & \stackrel{\rightharpoonup}{\omega} \\ & \underset{\sim}{\otimes} \end{aligned}$ | \$1 Million or Less Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{gathered} \hline 509 \\ 224 \\ 733 \\ 1,099 \end{gathered}$ | $\begin{aligned} & \hline 27.8 \% \\ & 12.2 \% \\ & 40.0 \% \\ & 60.0 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 38,513 \\ & \$ 55,521 \\ & \$ 94,034 \\ & \$ 39,290 \end{aligned}$ | $\begin{aligned} & \hline 28.9 \% \\ & 41.6 \% \\ & 70.5 \% \\ & 29.5 \% \end{aligned}$ | $\begin{gathered} \hline 90.4 \% \\ 5.5 \% \\ 95.9 \% \\ 4.2 \% \end{gathered}$ | $\begin{aligned} & \hline 320 \\ & 129 \\ & 449 \\ & 147 \end{aligned}$ | $\begin{gathered} \hline 53.7 \% \\ 21.6 \% \\ 75.3 \% \\ 24.7 \% \end{gathered}$ | 37.1\% | \$25,267 | 36.7\% | 44.7\% | $\begin{gathered} 189 \\ 95 \\ 284 \\ 952 \end{gathered}$ | $\begin{gathered} 15.3 \% \\ 7.7 \% \\ 23.0 \% \\ 77.0 \% \end{gathered}$ | 42.6\% | \$13,246 | 20.5\% | 40.0\% |
| $\stackrel{\square}{\square}$ |  | Total | 1,832 | 100.0\% | \$133,324 | 100.0\% | 100.0\% | 596 | 100.0\% |  |  |  |  | 1,236 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { ᄃ } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} \hline 1,568 \\ 135 \\ 129 \end{gathered}$ | $\begin{gathered} \hline 85.6 \% \\ 7.4 \% \\ 7.0 \% \end{gathered}$ | $\begin{aligned} & \$ 45,909 \\ & \$ 23,480 \\ & \$ 63,935 \end{aligned}$ | $\begin{aligned} & \hline 34.4 \% \\ & 17.6 \% \\ & 48.0 \% \end{aligned}$ |  | $\begin{gathered} \hline 458 \\ 61 \\ 77 \end{gathered}$ | $\begin{aligned} & \hline 76.8 \% \\ & 10.2 \% \\ & 12.9 \% \end{aligned}$ | $\begin{gathered} \hline 85.8 \% \\ 7.0 \% \\ 7.2 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 19,395 \\ & \$ 10,821 \\ & \$ 38,648 \end{aligned}$ | $\begin{aligned} & \hline 28.2 \% \\ & 15.7 \% \\ & 56.1 \% \end{aligned}$ | $\begin{aligned} & \hline 24.6 \% \\ & 19.1 \% \\ & 56.3 \% \end{aligned}$ | $\begin{array}{\|c\|} \hline 1,110 \\ 74 \\ 52 \end{array}$ | $\begin{gathered} \hline 89.8 \% \\ 6.0 \% \\ 4.2 \% \end{gathered}$ | $\begin{array}{c\|} \hline 87.1 \% \\ 6.0 \% \\ 6.9 \% \end{array}$ | $\begin{aligned} & \hline \$ 26,514 \\ & \$ 12,659 \\ & \$ 25,287 \end{aligned}$ | $\begin{gathered} \hline 41.1 \% \\ 19.6 \% \\ 39.2 \% \end{gathered}$ | $\begin{aligned} & \hline 23.5 \% \\ & 18.0 \% \\ & 58.4 \% \end{aligned}$ |
|  |  | Total | 1,832 | 100.0\% | \$133,324 | 100.0\% |  | 596 | 100.0\% | 100.0\% | \$68,864 | 100.0\% | 100.0\% | 1,236 | 100.0\% | 100.0\% | \$64,460 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{gathered} 23 \\ 4 \\ 8 \end{gathered}$ | $\begin{gathered} 65.7 \% \\ 11.4 \% \\ 22.9 \% \end{gathered}$ | $\begin{gathered} \$ 3,478 \\ \$ 817 \\ \$ 110 \end{gathered}$ | $\begin{gathered} 79.0 \% \\ 18.5 \% \\ 2.5 \% \end{gathered}$ | Total Farms <br> $97.7 \%$ <br> $1.8 \%$ <br> $0.5 \%$ | $\begin{gathered} 12 \\ 2 \\ 0 \end{gathered}$ | $\begin{gathered} 85.7 \% \\ 14.3 \% \\ 0.0 \% \end{gathered}$ | 86.2\% | \$1,590 | 70.5\% | 72.5\% | $\begin{gathered} 11 \\ 2 \\ 8 \end{gathered}$ | $\begin{gathered} 52.4 \% \\ 9.5 \% \\ 38.1 \% \end{gathered}$ | 80.8\% | \$1,888 | 87.8\% | 79.2\% |
|  |  |  | 35 | 100.0\% | \$4,405 | 100.0\% | 100.0\% | 14 | 100.0\% |  |  |  |  |  | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{\sim}{\sigma} \\ & \stackrel{\sim}{0} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{gathered} \hline 23 \\ 5 \\ 7 \end{gathered}$ | $\begin{aligned} & \hline 65.7 \% \\ & 14.3 \% \\ & 20.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 1,032 \\ \$ 912 \\ \$ 2,461 \end{gathered}$ | $\begin{aligned} & \hline 23.4 \% \\ & 20.7 \% \\ & 55.9 \% \end{aligned}$ |  | 7 3 4 | $\begin{aligned} & \hline 50.0 \% \\ & 21.4 \% \\ & 28.6 \% \end{aligned}$ | $\begin{gathered} \hline 79.8 \% \\ 13.8 \% \\ 6.4 \% \end{gathered}$ | $\begin{gathered} \$ 422 \\ \$ 561 \\ \$ 1,271 \end{gathered}$ | $\begin{aligned} & \hline 18.7 \% \\ & 24.9 \% \\ & 56.4 \% \end{aligned}$ | $\begin{aligned} & \hline 34.4 \% \\ & 32.9 \% \\ & 32.7 \% \end{aligned}$ | $\begin{gathered} 16 \\ 2 \\ 3 \end{gathered}$ | $\begin{gathered} \hline 76.2 \% \\ 9.5 \% \\ 14.3 \% \end{gathered}$ | $\begin{aligned} & \hline 69.7 \% \\ & 18.2 \% \\ & 12.1 \% \end{aligned}$ | $\begin{gathered} \hline \$ 610 \\ \$ 351 \\ \$ 1,190 \end{gathered}$ | $\begin{aligned} & \hline 28.4 \% \\ & 16.3 \% \\ & 55.3 \% \end{aligned}$ | $\begin{aligned} & \hline 21.6 \% \\ & 32.8 \% \\ & 45.6 \% \end{aligned}$ |
|  |  | Total | 35 | 100.0\% | \$4,405 | 100.0\% |  | 14 | 100.0\% | 100.0\% | \$2,254 | 100.0\% | 100.0\% | 21 | 100.0\% | 100.0\% | \$2,151 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: AL Mobile


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: AL Mobile

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 153 | 7.4\% | \$18,840 | 10.1\% | 5.7\% | 54 | 9.3\% | 7.1\% | \$8,853 | 9.8\% | 9.2\% | 99 | 6.7\% | 6.9\% | \$9,987 | 10.5\% | 8.5\% |
|  | Moderate | 202 | 9.8\% | \$16,325 | 8.8\% | 9.9\% | 53 | 9.1\% | 8.8\% | \$8,379 | 9.2\% | 8.2\% | 149 | 10.1\% | 8.7\% | \$7,946 | 8.3\% | 8.4\% |
|  | Middle | 950 | 46.1\% | \$94,706 | 50.9\% | 50.4\% | 275 | 47.3\% | 44.6\% | \$44,549 | 49.1\% | 45.8\% | 675 | 45.7\% | 46.1\% | \$50,157 | 52.5\% | 48.8\% |
|  | Upper | 754 | 36.6\% | \$56,305 | 30.2\% | 34.0\% | 199 | 34.3\% | 37.0\% | \$28,858 | 31.8\% | 35.9\% | 555 | 37.6\% | 36.3\% | \$27,447 | 28.7\% | 33.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 2,059 | 100.0\% | \$186,176 | 100.0\% | 100.0\% | 581 | 100.0\% | 100.0\% | \$90,639 | 100.0\% | 100.0\% | 1,478 | 100.0\% | 100.0\% | \$95,537 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 3.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 3.5\% | 0 | 0.0\% | 7.3\% | \$0 | 0.0\% | 4.7\% | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 0.5\% |
|  | Middle | 12 | 34.3\% | \$2,629 | 39.6\% | 69.4\% | 5 | 31.3\% | 58.5\% | \$1,217 | 34.5\% | 51.6\% | 7 | 36.8\% | 44.4\% | \$1,412 | 45.3\% | 56.4\% |
|  | Upper | 23 | 65.7\% | \$4,017 | 60.4\% | 25.4\% | 11 | 68.8\% | 31.7\% | \$2,315 | 65.5\% | 43.6\% | 12 | 63.2\% | 47.2\% | \$1,702 | 54.7\% | 40.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 35 | 100.0\% | \$6,646 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$3,532 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$3,114 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: AL Mobile

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Bank |  | Dollar | Families by Family Income \% | Bank |  |  | Bank |  |  |  | Count ank |  | Bank |  | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% |  |
|  | Low | 36 | 6.3\% | \$2,558 | 3.2\% | 23.7\% | 21 | 7.2\% | 6.8\% | \$1,504 | 3.6\% | 3.7\% | 15 | 5.4\% | 6.2\% | \$1,054 | 2.8\% | 3.4\% |
|  | M oderate | 145 | 25.6\% | \$14,449 | 18.0\% | 15.7\% | 75 | 25.8\% | 23.5\% | \$8,247 | 19.6\% | 17.7\% | 70 | 25.4\% | 21.0\% | \$6,202 | 16.3\% | 15.7\% |
|  | Middle | 154 | 27.2\% | \$18,678 | 23.3\% | 19.9\% | 83 | 28.5\% | 27.0\% | \$10,496 | 25.0\% | 25.3\% | 71 | 25.7\% | 25.9\% | \$8,182 | 21.5\% | 24.7\% |
|  | Upper | 232 | 40.9\% | \$44,394 | 55.4\% | 40.6\% | 112 | 38.5\% | 34.2\% | \$21,780 | 51.8\% | 45.1\% | 120 | 43.5\% | 31.3\% | \$22,614 | 59.4\% | 41.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 8.4\% | \$0 | 0.0\% | 8.2\% | 0 | 0.0\% | 15.7\% | \$0 | 0.0\% | 14.5\% |
|  | Total | 567 | 100.0\% | \$80,079 | 100.0\% | 100.0\% | 291 | 100.0\% | 100.0\% | \$42,027 | 100.0\% | 100.0\% | 276 | 100.0\% | 100.0\% | \$38,052 | 100.0\% | 100.0\% |
|  | Low | 49 | 4.8\% | \$3,745 | 2.4\% | 23.7\% | 27 | 4.2\% | 3.9\% | \$1,766 | 1.9\% | 2.1\% | 22 | 5.8\% | 3.4\% | \$1,979 | 3.4\% | 1.7\% |
|  | Moderate | 166 | 16.3\% | \$14,771 | 9.6\% | 15.7\% | 103 | 16.1\% | 11.8\% | \$9,434 | 9.9\% | 8.0\% | 63 | 16.6\% | 10.8\% | \$5,337 | 9.2\% | 7.2\% |
|  | Middle | 235 | 23.1\% | \$25,909 | 16.9\% | 19.9\% | 149 | 23.3\% | 21.5\% | \$16,445 | 17.2\% | 17.1\% | 86 | 22.7\% | 18.9\% | \$9,464 | 16.4\% | 15.8\% |
|  | Upper | 551 | 54.1\% | \$105,792 | 69.1\% | 40.6\% | 353 | 55.2\% | 46.6\% | \$66,672 | 69.9\% | 57.1\% | 198 | 52.2\% | 43.8\% | \$39,120 | 67.7\% | 54.0\% |
|  | Unknown | 17 | 1.7\% | \$2,953 | 1.9\% | 0.0\% | 7 | 1.1\% | 16.2\% | \$1,075 | 1.1\% | 15.7\% | 10 | 2.6\% | 23.1\% | \$1,878 | 3.3\% | 21.3\% |
|  | Total | 1,018 | 100.0\% | \$153,170 | 100.0\% | 100.0\% | 639 | 100.0\% | 100.0\% | \$95,392 | 100.0\% | 100.0\% | 379 | 100.0\% | 100.0\% | \$57,778 | 100.0\% | 100.0\% |
|  | Lo | 15 | 8.5\% | \$71 | 5.2\% | 23.7\% | 8 | 9.4\% | 7.6\% | \$31 | 5.6\% | 3.4\% | 7 | 7.6\% | 10.2\% | \$40 | 4.9\% | 5.9\% |
|  | M oderate | 38 | 21.5\% | \$191 | 13.9\% | 15.7\% | 19 | 22.4\% | 22.6\% | \$91 | 16.4\% | 16.5\% | 19 | 20.7\% | 17.5\% | \$100 | 12.2\% | 7.3\% |
|  | Middle | 66 | 37.3\% | \$477 | 34.7\% | 19.9\% | 32 | 37.6\% | 26.5\% | \$178 | 32.1\% | 19.5\% | 34 | 37.0\% | 28.1\% | \$299 | 36.5\% | 21.8\% |
|  | Upper | 55 | 31.1\% | \$622 | 45.3\% | 40.6\% | 24 | 28.2\% | 38.4\% | \$247 | 44.6\% | 53.5\% | 31 | 33.7\% | 35.9\% | \$375 | 45.8\% | 50.3\% |
|  | Unknown | 3 | 1.7\% | \$12 | 0.9\% | 0.0\% | 2 | 2.4\% | 4.9\% | \$7 | 1.3\% | 7.0\% | 1 | 1.1\% | 8.4\% | \$5 | 0.6\% | 14.7\% |
|  | Total | 177 | 100.0\% | \$1,373 | 100.0\% | 100.0\% | 85 | 100.0\% | 100.0\% | \$554 | 100.0\% | 100.0\% | 92 | 100.0\% | 100.0\% | \$819 | 100.0\% | 100.0\% |
|  | 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\% |
|  | M oderate | 0 | 0.0\% | \$0 | 0.0\% | 15.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 19.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 100 | 5.7\% | \$6,374 | 2.7\% | 23.7\% | 56 | 5.5\% | 5.2\% | \$3,301 | 2.4\% | 2.7\% | 44 | 5.9\% | 5.0\% | \$3,073 | 3.2\% | 2.4\% |
|  | Moderate | 349 | 19.8\% | \$29,411 | 12.5\% | 15.7\% | 197 | 19.4\% | 16.9\% | \$17,772 | 12.9\% | 11.7\% | 152 | 20.3\% | 15.8\% | \$11,639 | 12.0\% | 10.4\% |
|  | Middle | 455 | 25.8\% | \$45,064 | 19.2\% | 19.9\% | 264 | 26.0\% | 23.9\% | \$27,119 | 19.7\% | 20.0\% | 191 | 25.6\% | 22.5\% | \$17,945 | 18.6\% | 18.7\% |
|  | Upper | 838 | 47.6\% | \$150,808 | 64.3\% | 40.6\% | 489 | 48.2\% | 41.2\% | \$88,699 | 64.3\% | 51.2\% | 349 | 46.7\% | 37.6\% | \$62,109 | 64.3\% | 45.5\% |
|  | Unknown | 20 | 1.1\% | \$2,965 | 1.3\% | 0.0\% | 9 | 0.9\% | 12.7\% | \$1,082 | 0.8\% | 14.3\% | 11 | 1.5\% | 19.1\% | \$1,883 | 1.9\% | 23.1\% |
|  | Total | 1,762 | 100.0\% | \$234,622 | 100.0\% | 100.0\% | 1,015 | 100.0\% | 100.0\% | \$137,973 | 100.0\% | 100.0\% | 747 | 100.0\% | 100.0\% | \$96,649 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Bank  <br> Count Dollar |  |  |  | Total Businesses \% |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ban } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Ba } \\ \$ \text { 000s } \end{array}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
| $\begin{aligned} & \mathscr{\sim} \\ & \stackrel{\unrhd}{=} \end{aligned}$ | $\begin{aligned} & \mathbb{D} \\ & \stackrel{\rightharpoonup}{0} \\ & \underset{\sim}{む} \\ & \underset{\sim}{2} \end{aligned}$ | \$1 Million or Less Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{gathered} \hline 498 \\ 360 \\ 858 \\ 1,201 \end{gathered}$ | $\begin{aligned} & \hline 24.2 \% \\ & 17.5 \% \\ & 41.7 \% \\ & 58.3 \% \end{aligned}$ | $\begin{gathered} \hline \$ 66,317 \\ \$ 84,022 \\ \$ 150,339 \\ \$ 35,837 \end{gathered}$ | $\begin{aligned} & \hline 35.6 \% \\ & 45.1 \% \\ & 80.7 \% \\ & 19.2 \% \end{aligned}$ | $\begin{gathered} \hline 88.6 \% \\ 6.5 \% \\ 95.1 \% \\ 4.8 \% \end{gathered}$ | 290 188 478 103 | $\begin{gathered} 49.9 \% \\ 32.4 \% \\ 82.3 \% \\ 17.7 \% \end{gathered}$ | 39.4\% | \$39,334 | 43.4\% | 50.3\% | 208 <br> 172 <br> 380 <br> 1,098 | $\begin{gathered} 14.1 \% \\ 11.6 \% \\ 25.7 \% \\ 74.3 \% \end{gathered}$ | 37.6\% | \$26,983 | 28.2\% | 40.5\% |
| $\stackrel{3}{0}$ |  | Total | 2,059 | 100.0\% | \$186,176 | 100.0\% | 100.0\% | 581 | 100.0\% |  |  |  |  | 1,478 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \underset{\mathcal{N}}{2} \end{aligned}$ | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{1}{\tilde{\sigma}} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} \hline 1,644 \\ 231 \\ 184 \end{gathered}$ | $\begin{gathered} \hline 79.8 \% \\ 11.2 \% \\ 8.9 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 46,699 \\ & \$ 41,834 \\ & \$ 97,643 \end{aligned}$ | $\begin{aligned} & \hline 25.1 \% \\ & 22.5 \% \\ & 52.4 \% \end{aligned}$ |  | $\begin{aligned} & \hline 359 \\ & 122 \\ & 100 \end{aligned}$ | $\begin{aligned} & \hline 61.8 \% \\ & 21.0 \% \\ & 17.2 \% \end{aligned}$ | $\begin{gathered} \hline 82.5 \% \\ 9.3 \% \\ 8.2 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 17,134 \\ & \$ 22,059 \\ & \$ 51,446 \end{aligned}$ | $\begin{aligned} & \hline 18.9 \% \\ & 24.3 \% \\ & 56.8 \% \end{aligned}$ | $\begin{aligned} & \hline 21.7 \% \\ & 22.0 \% \\ & 56.3 \% \end{aligned}$ | $\begin{array}{\|c\|} \hline 1,285 \\ 109 \\ 84 \end{array}$ | $\begin{gathered} \hline 86.9 \% \\ 7.4 \% \\ 5.7 \% \end{gathered}$ | $\begin{gathered} \hline 87.2 \% \\ 7.3 \% \\ 5.5 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 29,565 \\ & \$ 19,775 \\ & \$ 46,197 \end{aligned}$ | $\begin{aligned} & \hline 30.9 \% \\ & 20.7 \% \\ & 48.4 \% \end{aligned}$ | $\begin{aligned} & \hline 26.1 \% \\ & 23.0 \% \\ & 50.9 \% \end{aligned}$ |
|  |  | Total | 2,059 | 100.0\% | \$186,176 | 100.0\% |  | 581 | 100.0\% | 100.0\% | \$90,639 | 100.0\% | 100.0\% | 1,478 | 100.0\% | 100.0\% | \$95,537 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{gathered} 12 \\ 17 \\ 6 \end{gathered}$ | $\begin{gathered} 34.3 \% \\ 48.6 \% \\ 17.1 \% \end{gathered}$ | $\begin{gathered} \$ 2,936 \\ \$ 3,186 \\ \$ 524 \end{gathered}$ | $\begin{gathered} 44.2 \% \\ 47.9 \% \\ 7.9 \% \end{gathered}$ | Total Farms <br> $91.1 \%$ <br> $8.4 \%$ <br> $0.5 \%$ | $\begin{gathered} 5 \\ 10 \\ 1 \end{gathered}$ | $\begin{gathered} 31.3 \% \\ 62.5 \% \\ 6.3 \% \end{gathered}$ | 53.7\% | \$1,001 | 28.3\% | 38.9\% | $\begin{aligned} & 7 \\ & 7 \\ & 5 \end{aligned}$ | $\begin{gathered} 36.8 \% \\ 36.8 \% \\ 26.3 \% \end{gathered}$ | 50.0\% | \$1,935 | 62.1\% | 58.1\% |
|  |  | Total | 35 | 100.0\% | \$6,646 | 100.0\% | 100.0\% | 16 | 100.0\% |  |  |  |  |  | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{\sim}{\sigma} \\ & \stackrel{\sim}{0} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{aligned} & 14 \\ & 10 \\ & 11 \end{aligned}$ | $\begin{aligned} & \hline 40.0 \% \\ & 28.6 \% \\ & 31.4 \% \end{aligned}$ | $\begin{gathered} \hline \$ 674 \\ \$ 2,089 \\ \$ 3,883 \end{gathered}$ | $\begin{aligned} & \hline 10.1 \% \\ & 31.4 \% \\ & 58.4 \% \end{aligned}$ |  | $\begin{aligned} & 4 \\ & 6 \\ & 6 \end{aligned}$ | $\begin{aligned} & \hline 25.0 \% \\ & 37.5 \% \\ & 37.5 \% \end{aligned}$ | $\begin{aligned} & \hline 53.7 \% \\ & 26.8 \% \\ & 19.5 \% \end{aligned}$ | $\begin{gathered} \hline \$ 253 \\ \$ 1,254 \\ \$ 2,025 \end{gathered}$ | $\begin{gathered} \hline 7.2 \% \\ 35.5 \% \\ 57.3 \% \end{gathered}$ | $\begin{gathered} \hline 9.4 \% \\ 41.2 \% \\ 49.4 \% \end{gathered}$ | $\begin{gathered} \hline 10 \\ 4 \\ 5 \end{gathered}$ | $\begin{aligned} & \hline 52.6 \% \\ & 21.1 \% \\ & 26.3 \% \end{aligned}$ | $\begin{aligned} & \hline 52.8 \% \\ & 27.8 \% \\ & 19.4 \% \end{aligned}$ | $\begin{gathered} \hline \$ 421 \\ \$ 835 \\ \$ 1,858 \end{gathered}$ | $\begin{aligned} & \hline 13.5 \% \\ & 26.8 \% \\ & 59.7 \% \end{aligned}$ | $\begin{aligned} & \hline 11.3 \% \\ & 36.4 \% \\ & 52.3 \% \end{aligned}$ |
|  |  | Total | 35 | 100.0\% | \$6,646 | 100.0\% |  | 16 | 100.0\% | 100.0\% | \$3,532 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$3,114 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: AR Hot Springs

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg | Ban |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
| HOME PURCHASE | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 8 | 8.4\% | \$691 | 5.1\% | 15.1\% | 5 | 9.1\% | 10.3\% | \$450 | 5.9\% | 6.6\% | 3 | 7.5\% | 7.8\% | \$241 | 4.1\% | 4.2\% |
|  | Middle | 71 | 74.7\% | \$9,610 | 71.3\% | 71.4\% | 43 | 78.2\% | 70.9\% | \$6,140 | 80.3\% | 71.7\% | 28 | 70.0\% | 72.8\% | \$3,470 | 59.5\% | 72.1\% |
|  | Upper | 16 | 16.8\% | \$3,178 | 23.6\% | 13.5\% | 7 | 12.7\% | 18.8\% | \$1,054 | 13.8\% | 21.7\% | 9 | 22.5\% | 19.4\% | \$2,124 | 36.4\% | 23.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 95 | 100.0\% | \$13,479 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$7,644 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$5,835 | 100.0\% | 100.0\% |
|  | 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 | 6.0\% | \$1,306 | 4.1\% | 15.1\% | 7 | 5.1\% | 6.7\% | \$706 | 4.0\% | 4.0\% | 7 | 7.2\% | 5.4\% | \$600 | 4.3\% | 3.1\% |
|  | Middle | 182 | 77.4\% | \$24,939 | 78.5\% | 71.4\% | 106 | 76.8\% | 72.2\% | \$13,465 | 76.2\% | 72.1\% | 76 | 78.4\% | 74.2\% | \$11,474 | 81.5\% | 73.6\% |
|  | Upper | 39 | 16.6\% | \$5,505 | 17.3\% | 13.5\% | 25 | 18.1\% | 21.1\% | \$3,501 | 19.8\% | 23.9\% | 14 | 14.4\% | 20.4\% | \$2,004 | 14.2\% | 23.3\% |
|  | 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 | 235 | 100.0\% | \$31,750 | 100.0\% | 100.0\% | 138 | 100.0\% | 100.0\% | \$17,672 | 100.0\% | 100.0\% | 97 | 100.0\% | 100.0\% | \$14,078 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 5 | 33.3\% | \$26 | 29.5\% | 15.1\% | 4 | 57.1\% | 14.8\% | \$20 | 44.4\% | 6.6\% | 1 | 12.5\% | 13.2\% | \$6 | 14.0\% | 7.4\% |
|  | Middle | 8 | 53.3\% | \$42 | 47.7\% | 71.4\% | 2 | 28.6\% | 68.9\% | \$10 | 22.2\% | 79.0\% | 6 | 75.0\% | 74.4\% | \$32 | 74.4\% | 76.8\% |
|  | Upper | 2 | 13.3\% | \$20 | 22.7\% | 13.5\% | 1 | 14.3\% | 16.3\% | \$15 | 33.3\% | 14.4\% | 1 | 12.5\% | 12.4\% | \$5 | 11.6\% | 15.8\% |
|  | 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 | 15 | 100.0\% | \$88 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$45 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |
| 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\% | 49.4\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 31.9\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 4.7\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 41.5\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 66.4\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 87.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 9.1\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 7.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 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\% |
|  | 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 | 27 | 7.8\% | \$2,023 | 4.5\% | 15.1\% | 16 | 8.0\% | 8.5\% | \$1,176 | 4.6\% | 5.3\% | 11 | 7.6\% | 6.8\% | \$847 | 4.2\% | 3.7\% |
|  | Middle | 261 | 75.7\% | \$34,591 | 76.3\% | 71.4\% | 151 | 75.5\% | 71.5\% | \$19,615 | 77.3\% | 72.0\% | 110 | 75.9\% | 73.5\% | \$14,976 | 75.0\% | 73.5\% |
|  | Upper | 57 | 16.5\% | \$8,703 | 19.2\% | 13.5\% | 33 | 16.5\% | 20.0\% | \$4,570 | 18.0\% | 22.8\% | 24 | 16.6\% | 19.7\% | \$4,133 | 20.7\% | 22.8\% |
|  | 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 | 345 | 100.0\% | \$45,317 | 100.0\% | 100.0\% | 200 | 100.0\% | 100.0\% | \$25,361 | 100.0\% | 100.0\% | 145 | 100.0\% | 100.0\% | \$19,956 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: AR Hot Springs

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small | Coun |  | A | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Do |  | Businesses |  |  |  |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | 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 | 65 | 24.3\% | \$3,866 | 15.8\% | 26.6\% | 16 | 25.4\% | 23.8\% | \$1,334 | 10.9\% | 22.0\% | 49 | 23.9\% | 23.3\% | \$2,532 | 20.7\% | 21.8\% |
|  | Middle | 164 | 61.2\% | \$15,613 | 63.8\% | 60.4\% | 38 | 60.3\% | 58.9\% | \$8,440 | 68.7\% | 60.3\% | 126 | 61.5\% | 59.3\% | \$7,173 | 58.8\% | 61.1\% |
|  | Upper | 39 | 14.6\% | \$5,006 | 20.4\% | 13.0\% | 9 | 14.3\% | 14.8\% | \$2,505 | 20.4\% | 16.6\% | 30 | 14.6\% | 15.6\% | \$2,501 | 20.5\% | 16.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 1.8\% | \$0 | 0.0\% | 0.7\% |
|  | Total | 268 | 100.0\% | \$24,485 | 100.0\% | 100.0\% | 63 | 100.0\% | 100.0\% | \$12,279 | 100.0\% | 100.0\% | 205 | 100.0\% | 100.0\% | \$12,206 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 8.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 3 | 100.0\% | \$458 | 100.0\% | 85.0\% | 0 | 0.0\% | 88.9\% | \$0 | 0.0\% | 96.6\% | 3 | 100.0\% | 81.0\% | \$458 | 100.0\% | 82.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 6.7\% | 0 | 0.0\% | 11.1\% | \$0 | 0.0\% | 3.4\% | 0 | 0.0\% | 19.0\% | \$0 | 0.0\% | 17.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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 | 3 | 100.0\% | \$458 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$458 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: AR Hot Springs

|  | Borrowe $r$ Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Coun |  | Dollar |  | Families by Family Income \% |  | Count <br> ank | Agg |  | Dollar | Agg |  | Count ank | gg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Lo | 9 | 9.5\% | \$665 | 4.9\% | 19.0\% | 6 | 10.9\% | 6.7\% | \$460 | 6.0\% | 3.1\% | 3 | 7.5\% | 7.5\% | \$205 | 3.5\% | 3.4\% |
|  | Moderate | 18 | 18.9\% | \$1,426 | 10.6\% | 18.1\% | 8 | 14.5\% | 16.3\% | \$651 | 8.5\% | 9.8\% | 10 | 25.0\% | 19.7\% | \$775 | 13.3\% | 12.7\% |
|  | Middle | 18 | 18.9\% | \$2,089 | 15.5\% | 23.1\% | 12 | 21.8\% | 21.4\% | \$1,569 | 20.5\% | 17.7\% | 6 | 15.0\% | 18.4\% | \$520 | 8.9\% | 15.4\% |
|  | Upper | 50 | 52.6\% | \$9,299 | 69.0\% | 39.9\% | 29 | 52.7\% | 46.5\% | \$4,964 | 64.9\% | 57.5\% | 21 | 52.5\% | 43.3\% | \$4,335 | 74.3\% | 57.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 11.8\% | 0 | 0.0\% | 11.2\% | \$0 | 0.0\% | 10.6\% |
|  | Total | 95 | 100.0\% | \$13,479 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$7,644 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$5,835 | 100.0\% | 100.0\% |
|  |  | 17 | 7.2\% | \$965 | 3.0\% | 19.0\% | 9 | 6.5\% | 4.0\% | \$579 | 3.3\% | 1.8\% | 8 | 8.2\% | 4.2\% | \$386 | 2.7\% | 2.1\% |
|  | Moderate | 48 | 20.4\% | \$4,412 | 13.9\% | 18.1\% | 26 | 18.8\% | 11.5\% | \$2,254 | 12.8\% | 6.9\% | 22 | 22.7\% | 12.7\% | \$2,158 | 15.3\% | 7.9\% |
|  | Middle | 48 | 20.4\% | \$5,602 | 17.6\% | 23.1\% | 29 | 21.0\% | 16.8\% | \$3,311 | 18.7\% | 12.4\% | 19 | 19.6\% | 17.9\% | \$2,291 | 16.3\% | 13.5\% |
|  | Upper | 120 | 51.1\% | \$20,545 | 64.7\% | 39.9\% | 74 | 53.6\% | 52.3\% | \$11,528 | 65.2\% | 63.7\% | 46 | 47.4\% | 47.4\% | \$9,017 | 64.1\% | 58.9\% |
|  | Unknown | 2 | 0.9\% | \$226 | 0.7\% | 0.0\% | 0 | 0.0\% | 15.4\% | \$0 | 0.0\% | 15.3\% | 2 | 2.1\% | 17.9\% | \$226 | 1.6\% | 17.5\% |
|  | Total | 235 | 100.0\% | \$31,750 | 100.0\% | 100.0\% | 138 | 100.0\% | 100.0\% | \$17,672 | 100.0\% | 100.0\% | 97 | 100.0\% | 100.0\% | \$14,078 | 100.0\% | 100.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 19.0\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 4.0\% | 0 | 0.0\% | 7.0\% | \$0 | 0.0\% | 4.2\% |
|  | Moderate | 3 | 20.0\% | \$13 | 14.8\% | 18.1\% | 2 | 28.6\% | 9.6\% | \$8 | 17.8\% | 5.8\% | 1 | 12.5\% | 14.7\% | \$5 | 11.6\% | 10.3\% |
|  | Middle | 4 | 26.7\% | \$20 | 22.7\% | 23.1\% | 2 | 28.6\% | 25.2\% | \$11 | 24.4\% | 21.2\% | 2 | 25.0\% | 17.1\% | \$9 | 20.9\% | 10.0\% |
|  | Upper | 7 | 46.7\% | \$50 | 56.8\% | 39.9\% | 3 | 42.9\% | 52.6\% | \$26 | 57.8\% | 67.4\% | 4 | 50.0\% | 53.5\% | \$24 | 55.8\% | 65.5\% |
|  | Unknown | 1 | 6.7\% | \$5 | 5.7\% | 0.0\% | 0 | 0.0\% | 5.2\% | \$0 | 0.0\% | 1.6\% | 1 | 12.5\% | 7.8\% | \$5 | 11.6\% | 9.9\% |
|  | Total | 15 | 100.0\% | \$88 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$45 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |
|  | Lo | 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\% | 18.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 23.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 39.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | L | 26 | 7.5\% | \$1,630 | 3.6\% | 19.0\% | 15 | 7.5\% | 5.2\% | \$1,039 | 4.1\% | 2.3\% | 11 | 7.6\% | 5.7\% | \$591 | 3.0\% | 2.6\% |
|  | Moderate | 69 | 20.0\% | \$5,851 | 12.9\% | 18.1\% | 36 | 18.0\% | 13.4\% | \$2,913 | 11.5\% | 8.0\% | 33 | 22.8\% | 15.8\% | \$2,938 | 14.7\% | 9.6\% |
|  | Middle | 70 | 20.3\% | \$7,711 | 17.0\% | 23.1\% | 43 | 21.5\% | 18.9\% | \$4,891 | 19.3\% | 14.5\% | 27 | 18.6\% | 18.0\% | \$2,820 | 14.1\% | 13.8\% |
|  | Upper | 177 | 51.3\% | \$29,894 | 66.0\% | 39.9\% | 106 | 53.0\% | 49.8\% | \$16,518 | 65.1\% | 60.8\% | 71 | 49.0\% | 45.7\% | \$13,376 | 67.0\% | 56.5\% |
|  | Unknown | 3 | 0.9\% | \$231 | 0.5\% | 0.0\% | 0 | 0.0\% | 12.7\% | \$0 | 0.0\% | 14.4\% | 3 | 2.1\% | 14.8\% | \$231 | 1.2\% | 17.5\% |
|  | Total | 345 | 100.0\% | \$45,317 | 100.0\% | 100.0\% | 200 | 100.0\% | 100.0\% | \$25,361 | 100.0\% | 100.0\% | 145 | 100.0\% | 100.0\% | \$19,956 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison   <br> 2010   |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | \# | ount <br> \% | $\begin{aligned} & \text { ank } \\ & \\ & \\ & \text { Doll } \\ & \text { D(000s) } \end{aligned}$ | ar \$ \% | Total Businesses <br> \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bat } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \mathrm{Ba} \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar <br> nk \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  | $\begin{aligned} & \underset{\sim}{\mathcal{D}} \\ & \underset{\sim}{\underset{\omega}{2}} \\ & \underset{\sim}{\mathcal{D}} \end{aligned}$ | \$1 Million or Less Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{gathered} 67 \\ 51 \\ 118 \\ 150 \end{gathered}$ | $\begin{aligned} & \hline 25.0 \% \\ & 19.0 \% \\ & 44.0 \% \\ & 56.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 7,671 \\ \$ 13,306 \\ \$ 20,977 \\ \$ 3,508 \end{gathered}$ | $\begin{aligned} & \hline 31.3 \% \\ & 54.3 \% \\ & 85.6 \% \\ & 14.3 \% \end{aligned}$ | $\begin{gathered} \hline 91.2 \% \\ 4.5 \% \\ 95.7 \% \\ 4.2 \% \end{gathered}$ | 32 24 56 7 | $\begin{gathered} \hline 50.8 \% \\ 38.1 \% \\ 88.9 \% \\ 11.1 \% \end{gathered}$ | 44.6\% | \$4,840 | 39.4\% | 52.3\% | 35 27 62 143 | $\begin{aligned} & \hline 17.1 \% \\ & 13.2 \% \\ & 30.3 \% \\ & 69.8 \% \end{aligned}$ | 46.8\% | \$2,831 | 23.2\% | 51.4\% |
| $\stackrel{\square}{0}$ |  | Total | 268 | 100.0\% | \$24,485 | 100.0\% | 100.0\% | 63 | 100.0\% |  |  |  |  | 205 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\overline{\bar{\sigma}}} \\ & \underset{\mathcal{E}}{0} \end{aligned}$ | $\begin{aligned} & \stackrel{N}{N} \\ & \text { N } \\ & \text { ్ָర } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} \hline 219 \\ 26 \\ 23 \end{gathered}$ | $\begin{gathered} \hline 81.7 \% \\ 9.7 \% \\ 8.6 \% \end{gathered}$ | $\begin{gathered} \hline \$ 6,125 \\ \$ 4,930 \\ \$ 13,430 \end{gathered}$ | $\begin{aligned} & \hline 25.0 \% \\ & 20.1 \% \\ & 54.8 \% \end{aligned}$ |  | $\begin{aligned} & 37 \\ & 10 \\ & 16 \end{aligned}$ | $\begin{aligned} & \hline 58.7 \% \\ & 15.9 \% \\ & 25.4 \% \end{aligned}$ | $\begin{gathered} \hline 91.2 \% \\ 4.3 \% \\ 4.6 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 1,443 \\ & \$ 2,020 \\ & \$ 8,816 \end{aligned}$ | $\begin{gathered} \hline 11.8 \% \\ 16.5 \% \\ 71.8 \% \end{gathered}$ | $\begin{aligned} & \hline 28.6 \% \\ & 15.5 \% \\ & 55.8 \% \end{aligned}$ | $\begin{gathered} 182 \\ 16 \\ 7 \end{gathered}$ | $88.8 \%$ $7.8 \%$ $3.4 \%$ | $\begin{gathered} \hline 92.1 \% \\ 4.3 \% \\ 3.6 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 4,682 \\ & \$ 2,910 \\ & \$ 4,614 \end{aligned}$ | $\begin{aligned} & \hline 38.4 \% \\ & 23.8 \% \\ & 37.8 \% \end{aligned}$ | $\begin{aligned} & \hline 32.7 \% \\ & 18.9 \% \\ & 48.4 \% \end{aligned}$ |
|  |  | Total | 268 | 100.0\% | \$24,485 | 100.0\% |  | 63 | 100.0\% | 100.0\% | \$12,279 | 100.0\% | 100.0\% | 205 | 100.0\% | 100.0\% | \$12,206 | 100.0\% | 100.0\% |
|  | $\stackrel{ \pm}{\stackrel{0}{D}}$ | \$1 Million or Less <br> Over \$1 Million <br> Not Known | 1 | $\begin{gathered} 33.3 \% \\ 33.3 \% \\ 33.3 \% \end{gathered}$ | $\begin{gathered} \$ 100 \\ \$ 350 \\ \$ 8 \end{gathered}$ | $\begin{gathered} 21.8 \% \\ 76.4 \% \\ 1.7 \% \end{gathered}$ | Total Farms <br> $98.4 \%$ <br> $1.6 \%$ <br> $0.0 \%$ | 0 0 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | 55.6\% | \$0 | 0.0\% | 67.3\% | $\begin{aligned} & 1 \\ & 1 \\ & 1 \end{aligned}$ | $\begin{gathered} 33.3 \% \\ 33.3 \% \\ 33.3 \% \end{gathered}$ | 66.7\% | \$100 | 21.8\% | 60.5\% |
|  |  |  | 3 | 100.0\% | \$458 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 3 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{\sim}{\sigma} \\ & \stackrel{\sim}{0} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | 2 0 1 | $\begin{gathered} \hline 66.7 \% \\ 0.0 \% \\ 33.3 \% \end{gathered}$ | $\begin{gathered} \hline \$ 108 \\ \$ 0 \\ \$ 350 \end{gathered}$ | $\begin{gathered} \hline 23.6 \% \\ 0.0 \% \\ 76.4 \% \end{gathered}$ |  | 0 0 0 | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{aligned} & \hline 77.8 \% \\ & 11.1 \% \\ & 11.1 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{aligned} & \hline 24.4 \% \\ & 25.2 \% \\ & 50.4 \% \end{aligned}$ | $\begin{aligned} & 2 \\ & 0 \\ & 1 \end{aligned}$ | $66.7 \%$ $0.0 \%$ $33.3 \%$ | $\begin{gathered} \hline 90.5 \% \\ 4.8 \% \\ 4.8 \% \end{gathered}$ | $\begin{gathered} \hline \$ 108 \\ \$ 0 \\ \$ 350 \end{gathered}$ | $\begin{gathered} \hline 23.6 \% \\ 0.0 \% \\ 76.4 \% \end{gathered}$ | $\begin{aligned} & \hline 56.8 \% \\ & 13.6 \% \\ & 29.7 \% \end{aligned}$ |
|  |  | Total | 3 | 100.0\% | \$458 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$458 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: AR Little Rock

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner Occupied Units \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Ban |  |  | Bank |  |  | Bank |  |  | Bank |  | Agg\$ \% |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | Low | 7 | 1.0\% | \$1,087 | 1.0\% | 1.5\% | 4 | 1.0\% | 0.7\% | \$256 | 0.4\% | 0.5\% | 3 | 0.9\% | 0.6\% | \$831 | 1.6\% | 0.5\% |
|  | Moderate | 58 | 8.1\% | \$5,642 | 5.0\% | 13.8\% | 37 | 9.5\% | 6.1\% | \$3,680 | 6.1\% | 3.7\% | 21 | 6.4\% | 6.1\% | \$1,962 | 3.8\% | 3.4\% |
|  | Middle | 375 | 52.2\% | \$54,050 | 48.3\% | 55.9\% | 201 | 51.7\% | 60.5\% | \$29,367 | 48.5\% | 56.2\% | 174 | 52.9\% | 60.1\% | \$24,683 | 48.1\% | 55.4\% |
|  | Upper | 278 | 38.7\% | \$51,117 | 45.7\% | 28.8\% | 147 | 37.8\% | 32.7\% | \$27,282 | 45.0\% | 39.6\% | 131 | 39.8\% | 33.2\% | \$23,835 | 46.5\% | 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 | 718 | 100.0\% | \$111,896 | 100.0\% | 100.0\% | 389 | 100.0\% | 100.0\% | \$60,585 | 100.0\% | 100.0\% | 329 | 100.0\% | 100.0\% | \$51,311 | 100.0\% | 100.0\% |
|  | Low | 4 | 0.4\% | \$1,445 | 1.0\% | 1.5\% | 2 | 0.3\% | 0.4\% | \$1,077 | 1.2\% | 0.4\% | 2 | 0.6\% | 0.4\% | \$368 | 0.7\% | 0.3\% |
|  | Moderate | 32 | 3.4\% | \$2,447 | 1.7\% | 13.8\% | 19 | 3.2\% | 3.9\% | \$1,208 | 1.4\% | 2.4\% | 13 | 3.7\% | 4.5\% | \$1,239 | 2.2\% | 2.6\% |
|  | Middle | 451 | 47.8\% | \$54,188 | 37.9\% | 55.9\% | 278 | 47.2\% | 53.0\% | \$33,593 | 38.4\% | 47.7\% | 173 | 48.7\% | 53.3\% | \$20,595 | 37.1\% | 47.9\% |
|  | Upper | 457 | 48.4\% | \$84,993 | 59.4\% | 28.8\% | 290 | 49.2\% | 42.7\% | \$51,653 | 59.0\% | 49.5\% | 167 | 47.0\% | 41.9\% | \$33,340 | 60.0\% | 49.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 944 | 100.0\% | \$143,073 | 100.0\% | 100.0\% | 589 | 100.0\% | 100.0\% | \$87,531 | 100.0\% | 100.0\% | 355 | 100.0\% | 100.0\% | \$55,542 | 100.0\% | 100.0\% |
|  | Lo | 2 | 2.2\% | \$9 | 1.0\% | 1.5\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.6\% | 2 | 3.5\% | 1.0\% | \$9 | 1.7\% | 0.2\% |
|  | Moderate | 9 | 9.9\% | \$50 | 5.7\% | 13.8\% | 3 | 8.8\% | 10.7\% | \$13 | 3.7\% | 6.0\% | 6 | 10.5\% | 10.4\% | \$37 | 6.9\% | 4.9\% |
|  | Middle | 57 | 62.6\% | \$517 | 58.6\% | 55.9\% | 21 | 61.8\% | 56.4\% | \$179 | 51.3\% | 47.8\% | 36 | 63.2\% | 60.4\% | \$338 | 63.4\% | 49.5\% |
|  | Upper | 23 | 25.3\% | \$306 | 34.7\% | 28.8\% | 10 | 29.4\% | 31.7\% | \$157 | 45.0\% | 45.6\% | 13 | 22.8\% | 28.2\% | \$149 | 28.0\% | 45.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 91 | 100.0\% | \$882 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$349 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$533 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 7.1\% | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 3.8\% | 0 | 0.0\% | 10.4\% | \$0 | 0.0\% | 3.6\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 16.3\% | 0 | 0.0\% | 7.3\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 14.9\% | \$0 | 0.0\% | 6.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 46.7\% | 0 | 0.0\% | 70.7\% | \$0 | 0.0\% | 67.4\% | 0 | 0.0\% | 61.2\% | \$0 | 0.0\% | 73.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 29.9\% | 0 | 0.0\% | 19.5\% | \$0 | 0.0\% | 27.6\% | 0 | 0.0\% | 13.4\% | \$0 | 0.0\% | 17.2\% |
|  | 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\% |
|  | Lo | 13 | 0.7\% | \$2,541 | 1.0\% | 1.5\% | 6 | 0.6\% | 0.5\% | \$1,333 | 0.9\% | 0.5\% | 7 | 0.9\% | 0.5\% | \$1,208 | 1.1\% | 0.5\% |
|  | Moderate | 99 | 5.6\% | \$8,139 | 3.2\% | 13.8\% | 59 | 5.8\% | 5.1\% | \$4,901 | 3.3\% | 2.9\% | 40 | 5.4\% | 5.4\% | \$3,238 | 3.0\% | 3.1\% |
|  | Middle | 883 | 50.4\% | \$108,755 | 42.5\% | 55.9\% | 500 | 49.4\% | 56.4\% | \$63,139 | 42.5\% | 51.8\% | 383 | 51.7\% | 56.7\% | \$45,616 | 42.5\% | 52.3\% |
|  | Upper | 758 | 43.2\% | \$136,416 | 53.3\% | 28.8\% | 447 | 44.2\% | 37.9\% | \$79,092 | 53.3\% | 44.7\% | 311 | 42.0\% | 37.3\% | \$57,324 | 53.4\% | 44.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,753 | 100.0\% | \$255,851 | 100.0\% | 100.0\% | 1,012 | 100.0\% | 100.0\% | \$148,465 | 100.0\% | 100.0\% | 741 | 100.0\% | 100.0\% | \$107,386 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: AR Little Rock


Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: AR Little Rock

|  | Borrowe r Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  | Agg | Bank |  |  | Bank |  |  |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 89 | 12.4\% | \$7,749 | 6.9\% | 19.6\% | 46 | 11.8\% | 9.4\% | \$3,750 | 6.2\% | 5.3\% | 43 | 13.1\% | 8.8\% | \$3,999 | 7.8\% | 4.9\% |
|  | Moderate | 220 | 30.6\% | \$25,886 | 23.1\% | 18.0\% | 111 | 28.5\% | 23.4\% | \$12,662 | 20.9\% | 18.4\% | 109 | 33.1\% | 22.6\% | \$13,224 | 25.8\% | 17.5\% |
|  | Middle | 159 | 22.1\% | \$21,602 | 19.3\% | 22.5\% | 92 | 23.7\% | 21.6\% | \$12,624 | 20.8\% | 20.8\% | 67 | 20.4\% | 20.6\% | \$8,978 | 17.5\% | 20.1\% |
|  | Upper | 247 | 34.4\% | \$56,184 | 50.2\% | 40.0\% | 139 | 35.7\% | 30.8\% | \$31,269 | 51.6\% | 41.2\% | 108 | 32.8\% | 29.2\% | \$24,915 | 48.6\% | 39.6\% |
|  | Unknown | 3 | 0.4\% | \$475 | 0.4\% | 0.0\% | 1 | 0.3\% | 14.8\% | \$280 | 0.5\% | 14.2\% | 2 | 0.6\% | 18.9\% | \$195 | 0.4\% | 18.0\% |
|  | Total | 718 | 100.0\% | \$111,896 | 100.0\% | 100.0\% | 389 | 100.0\% | 100.0\% | \$60,585 | 100.0\% | 100.0\% | 329 | 100.0\% | 100.0\% | \$51,311 | 100.0\% | 100.0\% |
|  | Low | 75 | 7.9\% | \$5,148 | 3.6\% | 19.6\% | 41 | 7.0\% | 3.7\% | \$2,854 | 3.3\% | 1.9\% | 34 | 9.6\% | 4.3\% | \$2,294 | 4.1\% | 2.1\% |
|  | Moderate | 141 | 14.9\% | \$13,057 | 9.1\% | 18.0\% | 87 | 14.8\% | 11.4\% | \$8,396 | 9.6\% | 7.3\% | 54 | 15.2\% | 12.2\% | \$4,661 | 8.4\% | 8.0\% |
|  | Middle | 197 | 20.9\% | \$22,830 | 16.0\% | 22.5\% | 138 | 23.4\% | 18.5\% | \$15,823 | 18.1\% | 15.0\% | 59 | 16.6\% | 17.8\% | \$7,007 | 12.6\% | 14.0\% |
|  | Upper | 509 | 53.9\% | \$98,184 | 68.6\% | 40.0\% | 314 | 53.3\% | 45.3\% | \$59,019 | 67.4\% | 53.8\% | 195 | 54.9\% | 42.2\% | \$39,165 | 70.5\% | 51.6\% |
|  | Unknown | 22 | 2.3\% | \$3,854 | 2.7\% | 0.0\% | 9 | 1.5\% | 21.1\% | \$1,439 | 1.6\% | 21.9\% | 13 | 3.7\% | 23.4\% | \$2,415 | 4.3\% | 24.3\% |
|  | Total | 944 | 100.0\% | \$143,073 | 100.0\% | 100.0\% | 589 | 100.0\% | 100.0\% | \$87,531 | 100.0\% | 100.0\% | 355 | 100.0\% | 100.0\% | \$55,542 | 100.0\% | 100.0\% |
|  | Lo | 15 | 16.5\% | \$58 | 6.6\% | 19.6\% | 8 | 23.5\% | 9.7\% | \$31 | 8.9\% | 3.1\% | 7 | 12.3\% | 10.0\% | \$27 | 5.1\% | 3.6\% |
|  | Moderate | 22 | 24.2\% | \$157 | 17.8\% | 18.0\% | 7 | 20.6\% | 16.5\% | \$42 | 12.0\% | 11.2\% | 15 | 26.3\% | 18.8\% | \$115 | 21.6\% | 12.5\% |
|  | Middle | 22 | 24.2\% | \$182 | 20.6\% | 22.5\% | 7 | 20.6\% | 20.6\% | \$90 | 25.8\% | 16.8\% | 15 | 26.3\% | 24.2\% | \$92 | 17.3\% | 19.8\% |
|  | Upper | 32 | 35.2\% | \$485 | 55.0\% | 40.0\% | 12 | 35.3\% | 47.1\% | \$186 | 53.3\% | 61.8\% | 20 | 35.1\% | 41.7\% | \$299 | 56.1\% | 55.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.1\% | \$0 | 0.0\% | 7.2\% | 0 | 0.0\% | 5.2\% | \$0 | 0.0\% | 8.3\% |
|  | Total | 91 | 100.0\% | \$882 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$349 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$533 | 100.0\% | 100.0\% |
|  | Lo | 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\% | 22.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 179 | 10.2\% | \$12,955 | 5.1\% | 19.6\% | 95 | 9.4\% | 6.4\% | \$6,635 | 4.5\% | 3.3\% | 84 | 11.3\% | 6.6\% | \$6,320 | 5.9\% | 3.3\% |
|  | Moderate | 383 | 21.8\% | \$39,100 | 15.3\% | 18.0\% | 205 | 20.3\% | 16.8\% | \$21,100 | 14.2\% | 11.9\% | 178 | 24.0\% | 17.2\% | \$18,000 | 16.8\% | 12.0\% |
|  | Middle | 378 | 21.6\% | \$44,614 | 17.4\% | 22.5\% | 237 | 23.4\% | 19.9\% | \$28,537 | 19.2\% | 17.1\% | 141 | 19.0\% | 19.3\% | \$16,077 | 15.0\% | 16.2\% |
|  | Upper | 788 | 45.0\% | \$154,853 | 60.5\% | 40.0\% | 465 | 45.9\% | 38.9\% | \$90,474 | 60.9\% | 47.3\% | 323 | 43.6\% | 36.0\% | \$64,379 | 60.0\% | 44.3\% |
|  | Unknown | 25 | 1.4\% | \$4,329 | 1.7\% | 0.0\% | 10 | 1.0\% | 17.9\% | \$1,719 | 1.2\% | 20.4\% | 15 | 2.0\% | 20.9\% | \$2,610 | 2.4\% | 24.3\% |
|  | Total | 1,753 | 100.0\% | \$255,851 | 100.0\% | 100.0\% | 1,012 | 100.0\% | 100.0\% | \$148,465 | 100.0\% | 100.0\% | 741 | 100.0\% | 100.0\% | \$107,386 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

## Assessment Area: AR Northwest AR

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg | Ban |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
| HOME PURCHASE | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 3 | 2.8\% | \$284 | 2.4\% | 2.2\% | 3 | 5.6\% | 1.6\% | \$284 | 5.2\% | 1.2\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 1.5\% |
|  | Middle | 88 | 80.7\% | \$8,937 | 75.9\% | 82.7\% | 45 | 83.3\% | 74.7\% | \$4,502 | 82.2\% | 71.0\% | 43 | 78.2\% | 79.0\% | \$4,435 | 70.4\% | 75.7\% |
|  | Upper | 18 | 16.5\% | \$2,559 | 21.7\% | 15.0\% | 6 | 11.1\% | 23.2\% | \$691 | 12.6\% | 27.5\% | 12 | 21.8\% | 19.0\% | \$1,868 | 29.6\% | 22.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 109 | 100.0\% | \$11,780 | 100.0\% | 100.0\% | 54 | 100.0\% | 100.0\% | \$5,477 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$6,303 | 100.0\% | 100.0\% |
|  | 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 | 4.2\% | \$1,108 | 4.3\% | 2.2\% | 7 | 3.9\% | 2.3\% | \$699 | 4.5\% | 2.4\% | 5 | 4.9\% | 3.0\% | \$409 | 4.1\% | 4.0\% |
|  | Middle | 229 | 80.6\% | \$19,771 | 77.0\% | 82.7\% | 147 | 81.2\% | 74.9\% | \$11,884 | 75.8\% | 71.2\% | 82 | 79.6\% | 75.2\% | \$7,887 | 78.9\% | 72.9\% |
|  | Upper | 43 | 15.1\% | \$4,797 | 18.7\% | 15.0\% | 27 | 14.9\% | 22.8\% | \$3,096 | 19.7\% | 26.4\% | 16 | 15.5\% | 21.7\% | \$1,701 | 17.0\% | 23.1\% |
|  | 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 | 284 | 100.0\% | \$25,676 | 100.0\% | 100.0\% | 181 | 100.0\% | 100.0\% | \$15,679 | 100.0\% | 100.0\% | 103 | 100.0\% | 100.0\% | \$9,997 | 100.0\% | 100.0\% |
|  | 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\% | 2.2\% | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 4.0\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 3.3\% |
|  | Middle | 49 | 87.5\% | \$315 | 90.5\% | 82.7\% | 23 | 85.2\% | 85.0\% | \$148 | 89.7\% | 78.0\% | 26 | 89.7\% | 84.4\% | \$167 | 91.3\% | 76.7\% |
|  | Upper | 7 | 12.5\% | \$33 | 9.5\% | 15.0\% | 4 | 14.8\% | 12.5\% | \$17 | 10.3\% | 18.0\% | 3 | 10.3\% | 14.2\% | \$16 | 8.7\% | 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\% |
|  | Total | 56 | 100.0\% | \$348 | 100.0\% | 100.0\% | 27 | 100.0\% | 100.0\% | \$165 | 100.0\% | 100.0\% | 29 | 100.0\% | 100.0\% | \$183 | 100.0\% | 100.0\% |
| 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\% | 1.7\% | 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\% | 86.6\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 86.7\% | \$0 | 0.0\% | 98.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 11.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 13.3\% | \$0 | 0.0\% | 1.8\% |
|  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 15 | 3.3\% | \$1,392 | 3.7\% | 2.2\% | 10 | 3.8\% | 2.0\% | \$983 | 4.6\% | 2.0\% | 5 | 2.7\% | 2.4\% | \$409 | 2.5\% | 2.8\% |
|  | Middle | 366 | 81.5\% | \$29,023 | 76.8\% | 82.7\% | 215 | 82.1\% | 75.4\% | \$16,534 | 77.5\% | 71.3\% | 151 | 80.7\% | 77.4\% | \$12,489 | 75.8\% | 74.9\% |
|  | Upper | 68 | 15.1\% | \$7,389 | 19.5\% | 15.0\% | 37 | 14.1\% | 22.3\% | \$3,804 | 17.8\% | 26.6\% | 31 | 16.6\% | 20.1\% | \$3,585 | 21.7\% | 22.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 449 | 100.0\% | \$37,804 | 100.0\% | 100.0\% | 262 | 100.0\% | 100.0\% | \$21,321 | 100.0\% | 100.0\% | 187 | 100.0\% | 100.0\% | \$16,483 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: AR Northwest AR


## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: AR Northwest AR

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | Dollar |  | Families by Family Income \% |  | Count ank | A |  | Dollar | Agg |  | Count Bank | Agg |  | Dollar | gg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 12 | 11.0\% | \$820 | 7.0\% | 17.8\% | 5 | 9.3\% | 8.2\% | \$334 | 6.1\% | 4.7\% | 7 | 12.7\% | 6.4\% | \$486 | 7.7\% | 4.0\% |
|  | Moderat | 25 | 22.9\% | \$1,976 | 16.8\% | 17.7\% | 14 | 25.9\% | 21.9\% | \$1,111 | 20.3\% | 17.1\% | 11 | 20.0\% | 15.3\% | \$865 | 13.7\% | 12.4\% |
|  | Middle | 28 | 25.7\% | \$2,916 | 24.8\% | 22.3\% | 17 | 31.5\% | 23.9\% | \$1,735 | 31.7\% | 22.6\% | 11 | 20.0\% | 16.3\% | \$1,181 | 18.7\% | 15.3\% |
|  | Upper | 44 | 40.4\% | \$6,068 | 51.5\% | 42.2\% | 18 | 33.3\% | 35.3\% | \$2,297 | 41.9\% | 43.8\% | 26 | 47.3\% | 29.1\% | \$3,771 | 59.8\% | 36.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.7\% | \$0 | 0.0\% | 11.8\% | 0 | 0.0\% | 33.0\% | \$0 | 0.0\% | 32.2\% |
|  | Total | 109 | 100.0\% | \$11,780 | 100.0\% | 100.0\% | 54 | 100.0\% | 100.0\% | \$5,477 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$6,303 | 100.0\% | 100.0\% |
|  | Low | 21 | 7.4\% | \$706 | 2.7\% | 17.8\% | 18 | 9.9\% | 4.4\% | \$620 | 4.0\% | 1.9\% | 3 | 2.9\% | 2.7\% | \$86 | 0.9\% | 1.1\% |
|  | M oderate | 48 | 16.9\% | \$2,892 | 11.3\% | 17.7\% | 32 | 17.7\% | 10.3\% | \$2,040 | 13.0\% | 6.9\% | 16 | 15.5\% | 9.0\% | \$852 | 8.5\% | 5.7\% |
|  | Middle | 69 | 24.3\% | \$4,883 | 19.0\% | 22.3\% | 43 | 23.8\% | 19.0\% | \$3,118 | 19.9\% | 15.0\% | 26 | 25.2\% | 12.6\% | \$1,765 | 17.7\% | 9.6\% |
|  | Upper | 143 | 50.4\% | \$16,774 | 65.3\% | 42.2\% | 86 | 47.5\% | 45.0\% | \$9,651 | 61.6\% | 52.9\% | 57 | 55.3\% | 32.3\% | \$7,123 | 71.3\% | 39.7\% |
|  | Unknow | 3 | 1.1\% | \$421 | 1.6\% | 0.0\% | 2 | 1.1\% | 21.3\% | \$250 | 1.6\% | 23.3\% | 1 | 1.0\% | 43.5\% | \$171 | 1.7\% | 43.9\% |
|  | Total | 284 | 100.0\% | \$25,676 | 100.0\% | 100.0\% | 181 | 100.0\% | 100.0\% | \$15,679 | 100.0\% | 100.0\% | 103 | 100.0\% | 100.0\% | \$9,997 | 100.0\% | 100.0\% |
|  | Low | 9 | .1\% | \$37 | 10.6\% | 17.8\% | 4 | .8\% | 9.7\% | \$21 | 12.7\% | 3.4\% | 5 | 17.2\% | 5.5\% | \$16 | 8.7\% | 1.8\% |
|  | Moderate | 12 | 21.4\% | \$81 | 23.3\% | 17.7\% | 4 | 14.8\% | 17.2\% | \$44 | 26.7\% | 11.5\% | 8 | 27.6\% | 10.4\% | \$37 | 20.2\% | 7.0\% |
|  | Middle | 17 | 30.4\% | \$101 | 29.0\% | 22.3\% | 10 | 37.0\% | 22.3\% | \$50 | 30.3\% | 19.2\% | 7 | 24.1\% | 13.1\% | \$51 | 27.9\% | 12.5\% |
|  | Upper | 17 | 30.4\% | \$106 | 30.5\% | 42.2\% | 9 | 33.3\% | 43.9\% | \$50 | 30.3\% | 57.2\% | 8 | 27.6\% | 27.0\% | \$56 | 30.6\% | 27.0\% |
|  | Unknown | 1 | 1.8\% | \$23 | 6.6\% | 0.0\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 8.7\% | 1 | 3.4\% | 43.9\% | \$23 | 12.6\% | 51.7\% |
|  |  | 56 | 100.0\% | \$348 | 100.0\% | 100.0\% | 27 | 100.0\% | 100.0\% | \$165 | 100.0\% | 100.0\% | 29 | 100.0\% | 100.0\% | \$183 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | M oderate | 0 | 0.0\% | \$0 | 0.0\% | 17.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 42.2\% | 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\% |
|  |  | 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\% |
|  | Low | 42 | 9.4\% | \$1,563 | 4.1\% | 17.8\% | 27 | 10.3\% | 6.2\% | \$975 | 4.6\% | 3.0\% | 15 | 8.0\% | 4.4\% | \$588 | 3.6\% | 2.3\% |
|  | Moderate | 85 | 18.9\% | \$4,949 | 13.1\% | 17.7\% | 50 | 19.1\% | 15.3\% | \$3,195 | 15.0\% | 10.9\% | 35 | 18.7\% | 11.6\% | \$1,754 | 10.6\% | 8.3\% |
|  | Middle | 114 | 25.4\% | \$7,900 | 20.9\% | 22.3\% | 70 | 26.7\% | 21.1\% | \$4,903 | 23.0\% | 18.0\% | 44 | 23.5\% | 14.1\% | \$2,997 | 18.2\% | 11.7\% |
|  | Upper | 204 | 45.4\% | \$22,948 | 60.7\% | 42.2\% | 113 | 43.1\% | 41.0\% | \$11,998 | 56.3\% | 49.4\% | 91 | 48.7\% | 30.5\% | \$10,950 | 66.4\% | 36.7\% |
|  | Unknown | 4 | 0.9\% | \$444 | 1.2\% | 0.0\% | 2 | 0.8\% | 16.3\% | \$250 | 1.2\% | 18.7\% | 2 | 1.1\% | 39.3\% | \$194 | 1.2\% | 41.0\% |
|  | Total | 449 | 100.0\% | \$37,804 | 100.0\% | 100.0\% | 262 | 100.0\% | 100.0\% | \$21,321 | 100.0\% | 100.0\% | 187 | 100.0\% | 100.0\% | \$16,483 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

| $\begin{aligned} & \stackrel{0}{2} \\ & \underset{\lambda}{2} \\ & \frac{0}{0} \\ & \frac{0}{2} \end{aligned}$ |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Count ${ }^{\text {Bank }}$ |  |  |  | Total Businesses | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba | Dollar | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ 000s | \$ \% |  | \# | \% |  | \$ 000s | \$ \% |  |
|  |  | \$1 Million or Less | 106 | 27.9\% | \$9,477 | 36.1\% | 90.9\% | 60 | 54.5\% | 50.1\% | \$5,072 | 47.5\% | 65.5\% | 46 | 17.0\% | 49.8\% | \$4,405 | 28.3\% | 59.3\% |
|  |  | Over \$1 Million | 48 | 12.6\% | \$8,539 | 32.5\% | 4.4\% | 22 | 20.0\% |  |  |  |  | 26 | 9.6\% |  |  |  |  |
|  |  | Total Rev. available | 154 | 40.5\% | \$18,016 | 68.6\% | 95.3\% | 82 | 74.5\% |  |  |  |  | 72 | 26.6\% |  |  |  |  |
|  |  | Rev. Not Known | 226 | 59.5\% | \$8,228 | 31.4\% | 4.7\% | 28 | 25.5\% |  |  |  |  | 198 | 73.3\% |  |  |  |  |
|  |  | Total | 380 | 100.0\% | \$26,244 | 100.0\% | 100.0\% | 110 | 100.0\% |  |  |  |  | 270 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \stackrel{N}{\omega} \\ & \stackrel{\Gamma}{\widetilde{0}} \\ & \hline \end{aligned}$ | \$100,000 or Less | 325 | 85.5\% | \$9,143 | 34.8\% |  | 86 | 78.2\% | 92.6\% | \$3,319 | 31.1\% | 42.4\% | 239 | 88.5\% | 92.0\% | \$5,824 | 37.4\% | 35.1\% |
|  |  | \$100,001-\$250,000 | 32 | 8.4\% | \$5,569 | 21.2\% |  | 14 | 12.7\% | 4.2\% | \$2,565 | 24.0\% | 20.2\% | 18 | 6.7\% | 4.5\% | \$3,004 | 19.3\% | 18.7\% |
|  |  | \$250,001-\$1 Million | 23 | 6.1\% | \$11,532 | 43.9\% |  | 10 | 9.1\% | 3.1\% | \$4,803 | 44.9\% | 37.4\% | 13 | 4.8\% | 3.5\% | \$6,729 | 43.3\% | 46.2\% |
|  |  | Total | 380 | 100.0\% | \$26,244 | 100.0\% |  | 110 | 100.0\% | 100.0\% | \$10,687 | 100.0\% | 100.0\% | 270 | 100.0\% | 100.0\% | \$15,557 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less | 68 | 80.0\% | \$6,481 | 80.5\% | Total Farms <br> $98.8 \%$ | 39 | 84.8\% | 88.1\% | \$4,173 | 84.9\% | 87.8\% | 29 | 74.4\% | 90.9\% | \$2,308 | 73.6\% | 86.5\% |
|  |  | Over \$1 M illion | 4 | 4.7\% | \$597 | 7.4\% | 1.0\% | 3 | 6.5\% |  |  |  |  |  | 2.6\% |  |  |  |  |
|  |  | Not Known | 13 | 15.3\% | \$973 | 12.1\% | 0.2\% | 4 | 8.7\% |  |  |  |  | 9 | 23.1\% |  |  |  |  |
|  |  | Total | 85 | 100.0\% | \$8,051 | 100.0\% | 100.0\% | 46 | 100.0\% |  |  |  |  | 39 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{N}{N} \\ & \stackrel{\sim}{0} \\ & \hline \end{aligned}$ | \$100,000 or Less | 59 | 69.4\% | \$2,668 | 33.1\% |  | 30 | 65.2\% | 87.6\% | \$1,477 | 30.0\% | 46.7\% | 29 | 74.4\% | 89.0\% | \$1,191 | 38.0\% | 49.9\% |
|  |  | \$100,001-\$250,000 | 20 | 23.5\% | \$3,310 | 41.1\% |  | 12 | 26.1\% | 9.3\% | \$2,073 | 42.2\% | 32.5\% | 8 | 20.5\% | 8.1\% | \$1,237 | 39.5\% | 27.7\% |
|  |  | \$250,001-\$500,000 | 6 | 7.1\% | \$2,073 | 25.7\% |  | 4 | 8.7\% | 3.1\% | \$1,367 | 27.8\% | 20.7\% | 2 | 5.1\% | 2.9\% | \$706 | 22.5\% | 22.4\% |
|  |  | Total | 85 | 100.0\% | \$8,051 | 100.0\% |  | 46 | 100.0\% | 100.0\% | \$4,917 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$3,134 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: FL Jacksonville


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: FL Jacksonville


Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: FL Jacksonville

|  | Borrowe <br> $r$ Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 47 | 9.1\% | \$4,426 | 4.2\% | 19.3\% | 20 | 7.8\% | 10.8\% | \$1,852 | 3.6\% | 5.3\% | 27 | 10.3\% | 10.0\% | \$2,574 | 4.8\% | 4.8\% |
|  | Moderate | 117 | 22.6\% | \$14,723 | 14.0\% | 18.5\% | 64 | 25.1\% | 24.9\% | \$8,143 | 15.6\% | 18.9\% | 53 | 20.2\% | 23.0\% | \$6,580 | 12.3\% | 16.6\% |
|  | Middle | 122 | 23.6\% | \$20,017 | 19.0\% | 23.0\% | 60 | 23.5\% | 22.1\% | \$10,057 | 19.3\% | 22.1\% | 62 | 23.6\% | 19.8\% | \$9,960 | 18.6\% | 18.9\% |
|  | Upper | 227 | 43.8\% | \$65,908 | 62.5\% | 39.2\% | 111 | 43.5\% | 28.2\% | \$32,005 | 61.5\% | 41.9\% | 116 | 44.1\% | 30.4\% | \$33,903 | 63.4\% | 44.8\% |
|  | Unknown | 5 | 1.0\% | \$451 | 0.4\% | 0.0\% | 0 | 0.0\% | 14.0\% | \$0 | 0.0\% | 11.8\% | 5 | 1.9\% | 16.9\% | \$451 | 0.8\% | 14.9\% |
|  | Total | 518 | 100.0\% | \$105,525 | 100.0\% | 100.0\% | 255 | 100.0\% | 100.0\% | \$52,057 | 100.0\% | 100.0\% | 263 | 100.0\% | 100.0\% | \$53,468 | 100.0\% | 100.0\% |
|  | Low | 17 | 4.2\% | \$2,332 | 2.0\% | 19.3\% | 7 | 2.8\% | 4.6\% | \$802 | 1.1\% | 2.4\% | 10 | 6.4\% | 5.5\% | \$1,530 | 3.2\% | 2.8\% |
|  | Moderate | 52 | 12.8\% | \$7,457 | 6.3\% | 18.5\% | 31 | 12.5\% | 13.5\% | \$4,579 | 6.5\% | 9.1\% | 21 | 13.4\% | 11.5\% | \$2,878 | 6.0\% | 7.5\% |
|  | Middle | 58 | 14.3\% | \$9,887 | 8.4\% | 23.0\% | 41 | 16.5\% | 18.2\% | \$6,626 | 9.4\% | 14.8\% | 17 | 10.8\% | 15.7\% | \$3,261 | 6.8\% | 12.5\% |
|  | Upper | 245 | 60.5\% | \$91,535 | 77.4\% | 39.2\% | 154 | 62.1\% | 41.3\% | \$54,811 | 78.0\% | 51.7\% | 91 | 58.0\% | 38.4\% | \$36,724 | 76.6\% | 49.6\% |
|  | Unknown | 33 | 8.1\% | \$7,029 | 5.9\% | 0.0\% | 15 | 6.0\% | 22.4\% | \$3,489 | 5.0\% | 22.1\% | 18 | 11.5\% | 29.0\% | \$3,540 | 7.4\% | 27.6\% |
|  | Total | 405 | 100.0\% | \$118,240 | 100.0\% | 100.0\% | 248 | 100.0\% | 100.0\% | \$70,307 | 100.0\% | 100.0\% | 157 | 100.0\% | 100.0\% | \$47,933 | 100.0\% | 100.0\% |
|  | L | 6 | 12.8\% | \$29 | 8.0\% | 19.3\% | 2 | 8.3\% | 13.5\% | \$12 | 5.7\% | 7.6\% | 4 | 17.4\% | 10.3\% | \$17 | 11.0\% | 5.9\% |
|  | Moderate | 10 | 21.3\% | \$68 | 18.7\% | 18.5\% | 5 | 20.8\% | 22.6\% | \$34 | 16.3\% | 16.4\% | 5 | 21.7\% | 21.7\% | \$34 | 22.1\% | 12.9\% |
|  | Middle | 9 | 19.1\% | \$50 | 13.8\% | 23.0\% | 5 | 20.8\% | 25.5\% | \$23 | 11.0\% | 22.3\% | 4 | 17.4\% | 24.7\% | \$27 | 17.5\% | 20.7\% |
|  | Upper | 22 | 46.8\% | \$216 | 59.5\% | 39.2\% | 12 | 50.0\% | 35.5\% | \$140 | 67.0\% | 49.2\% | 10 | 43.5\% | 37.9\% | \$76 | 49.4\% | 52.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 4.5\% | 0 | 0.0\% | 5.4\% | \$0 | 0.0\% | 8.1\% |
|  | Total | 47 | 100.0\% | \$363 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$209 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$154 | 100.0\% | 100.0\% |
| $\stackrel{\rangle}{\stackrel{\rightharpoonup}{j}}$ | 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\% | 18.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 23.0\% | 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\% | 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\% |
|  | 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\% |
|  | Low | 70 | 7.2\% | \$6,787 | 3.0\% | 19.3\% | 29 | 5.5\% | 8.0\% | \$2,666 | 2.2\% | 3.7\% | 41 | 9.3\% | 8.0\% | \$4,121 | 4.1\% | 3.7\% |
|  | Moderate | 179 | 18.5\% | \$22,248 | 9.9\% | 18.5\% | 100 | 19.0\% | 19.6\% | \$12,756 | 10.4\% | 13.5\% | 79 | 17.8\% | 17.9\% | \$9,492 | 9.3\% | 11.8\% |
|  | Middle | 189 | 19.5\% | \$29,954 | 13.4\% | 23.0\% | 106 | 20.1\% | 20.4\% | \$16,706 | 13.6\% | 17.8\% | 83 | 18.7\% | 18.1\% | \$13,248 | 13.0\% | 15.3\% |
|  | Upper | 494 | 50.9\% | \$157,659 | 70.3\% | 39.2\% | 277 | 52.6\% | 34.4\% | \$86,956 | 70.9\% | 45.3\% | 217 | 49.0\% | 34.1\% | \$70,703 | 69.6\% | 45.4\% |
|  | Unknown | 38 | 3.9\% | \$7,480 | 3.3\% | 0.0\% | 15 | 2.8\% | 17.6\% | \$3,489 | 2.8\% | 19.7\% | 23 | 5.2\% | 22.0\% | \$3,991 | 3.9\% | 23.7\% |
|  | Total | 970 | 100.0\% | \$224,128 | 100.0\% | 100.0\% | 527 | 100.0\% | 100.0\% | \$122,573 | 100.0\% | 100.0\% | 443 | 100.0\% | 100.0\% | \$101,555 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

| $\begin{aligned} & \stackrel{\circ}{2} \\ & \stackrel{1}{2} \\ & \frac{0}{0} \\ & \frac{0}{2} \end{aligned}$ |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | 2010 |  |  |  |  |  | Comparison 2011 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\text { Count }\left.\quad\right\|^{\text {Bank }} \text { Dollar }$ |  |  |  | Total Businesses \% |  | Count <br> nk <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bar } \\ \$ 000 \mathrm{~s} \end{array}$ | Dollar <br> nk <br> \$ \% | Agg <br> \$ \% | \# ${ }^{\text {Ba }}$ | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{array}{\|c\|} \hline 914 \\ 432 \\ 1,346 \\ 1,029 \end{array}$ | $\begin{aligned} & 38.5 \% \\ & 18.2 \% \\ & 56.7 \% \\ & 43.3 \% \end{aligned}$ | $\begin{gathered} \hline \$ 68,972 \\ \$ 77,656 \\ \$ 146,628 \\ \$ 31,711 \end{gathered}$ | $\begin{aligned} & \hline 38.7 \% \\ & 43.5 \% \\ & 82.2 \% \\ & 17.8 \% \end{aligned}$ | $\begin{gathered} 90.3 \% \\ 5.2 \% \\ 95.5 \% \\ 4.5 \% \end{gathered}$ | $\begin{aligned} & \hline 544 \\ & 228 \\ & 772 \\ & 145 \end{aligned}$ | $\begin{aligned} & \hline 59.3 \% \\ & 24.9 \% \\ & 84.2 \% \\ & 15.8 \% \end{aligned}$ | 31.9\% | \$37,954 | 43.3\% | 36.4\% | 370 204 574 884 | $\begin{gathered} \hline 25.4 \% \\ 14.0 \% \\ 39.4 \% \\ 60.6 \% \end{gathered}$ | 42.4\% | \$31,018 | 34.2\% | 33.0\% |
| $\stackrel{\text { ¢ }}{ }$ |  | Total | 2,375 | 100.0\% | \$178,339 | 100.0\% | 100.0\% | 917 | 100.0\% |  |  |  |  | 1,458 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \underset{\zeta}{\omega} \end{aligned}$ | $\begin{aligned} & \stackrel{N}{N} \\ & \dot{\omega} \\ & \underset{\sim}{\Sigma} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001 \text { - } \$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} \hline 2,072 \\ 159 \\ 144 \end{gathered}$ | $\begin{gathered} \hline 87.2 \% \\ 6.7 \% \\ 6.1 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 79,987 \\ & \$ 27,472 \\ & \$ 70,880 \end{aligned}$ | $\begin{array}{c\|} \hline 44.9 \% \\ 15.4 \% \\ 39.7 \% \end{array}$ |  | $\begin{gathered} \hline 771 \\ 76 \\ 70 \end{gathered}$ | $\begin{gathered} \hline 84.1 \% \\ 8.3 \% \\ 7.6 \% \end{gathered}$ | $\begin{gathered} \hline 94.0 \% \\ 2.8 \% \\ 3.2 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 38,709 \\ & \$ 13,508 \\ & \$ 35,372 \end{aligned}$ | $\begin{aligned} & \hline 44.2 \% \\ & 15.4 \% \\ & 40.4 \% \end{aligned}$ | $\begin{aligned} & \hline 37.4 \% \\ & 13.8 \% \\ & 48.8 \% \end{aligned}$ | $\begin{array}{\|c} \hline 1,301 \\ 83 \\ 74 \end{array}$ | $\begin{gathered} \hline 89.2 \% \\ 5.7 \% \\ 5.1 \% \end{gathered}$ | $\begin{gathered} \hline 94.3 \% \\ 2.8 \% \\ 2.9 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 41,278 \\ & \$ 13,964 \\ & \$ 35,508 \end{aligned}$ | $\begin{aligned} & \hline 45.5 \% \\ & 15.4 \% \\ & 39.1 \% \end{aligned}$ | $\begin{aligned} & \hline 39.3 \% \\ & 14.4 \% \\ & 46.3 \% \end{aligned}$ |
|  |  | Total | 2,375 | 100.0\% | \$178,339 | 100.0\% |  | 917 | 100.0\% | 100.0\% | \$87,589 | 100.0\% | 100.0\% | 1,458 | 100.0\% | 100.0\% | \$90,750 | 100.0\% | 100.0\% |
|  | $\begin{aligned} & \stackrel{0}{\vec{\rightharpoonup}} \\ & \underset{\sim}{\mathbb{D}} \\ & \underset{\sim}{0} \end{aligned}$ | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{aligned} & 0 \\ & 0 \\ & 1 \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 1 \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | Total Farms <br> $93.4 \%$ <br> $4.9 \%$ <br> $1.7 \%$ | $\begin{aligned} & 0 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | 76.9\% | \$0 | 0.0\% | 84.4\% | $\begin{aligned} & 0 \\ & 0 \\ & 1 \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | 46.9\% | \$0 | 0.0\% | 52.6\% |
|  |  | Total | 1 | 100.0\% | \$1 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{aligned} & 1 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 1 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{array}{c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ |  | $\begin{aligned} & \hline 0 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{gathered} \hline 98.1 \% \\ 1.9 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{gathered} \hline 78.5 \% \\ 21.5 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & 1 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 87.8 \% \\ 10.2 \% \\ 2.0 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 1 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 49.3 \% \\ & 37.9 \% \\ & 12.8 \% \end{aligned}$ |
|  |  | Total | 1 | 100.0\% | \$1 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$1 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: FL Orlando

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner Occupied Units \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  |  | Bank |  |  | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 2 | 0.2\% | \$151 | 0.1\% | 0.6\% | 2 | 0.5\% | 0.1\% | \$151 | 0.2\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 103 | 12.4\% | \$11,062 | 7.3\% | 17.9\% | 57 | 13.6\% | 12.3\% | \$6,096 | 8.0\% | 8.6\% | 46 | 11.1\% | 11.8\% | \$4,966 | 6.7\% | 8.7\% |
|  | Middle | 405 | 48.7\% | \$54,286 | 36.0\% | 49.9\% | 201 | 48.0\% | 53.0\% | \$28,049 | 36.6\% | 46.5\% | 204 | 49.4\% | 51.4\% | \$26,237 | 35.2\% | 44.4\% |
|  | Upper | 322 | 38.7\% | \$85,496 | 56.6\% | 31.5\% | 159 | 37.9\% | 34.6\% | \$42,253 | 55.2\% | 44.8\% | 163 | 39.5\% | 36.6\% | \$43,243 | 58.1\% | 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\% |
|  | Total | 832 | 100.0\% | \$150,995 | 100.0\% | 100.0\% | 419 | 100.0\% | 100.0\% | \$76,549 | 100.0\% | 100.0\% | 413 | 100.0\% | 100.0\% | \$74,446 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 23 | 5.0\% | \$2,158 | 2.3\% | 17.9\% | 16 | 6.1\% | 7.4\% | \$1,518 | 2.9\% | 5.3\% | 7 | 3.5\% | 7.7\% | \$640 | 1.6\% | 5.5\% |
|  | Middle | 183 | 39.5\% | \$29,792 | 31.9\% | 49.9\% | 105 | 39.9\% | 42.3\% | \$18,295 | 34.5\% | 36.8\% | 78 | 39.0\% | 42.0\% | \$11,497 | 28.5\% | 35.9\% |
|  | Upper | 257 | 55.5\% | \$61,425 | 65.8\% | 31.5\% | 142 | 54.0\% | 50.1\% | \$33,211 | 62.6\% | 57.8\% | 115 | 57.5\% | 50.2\% | \$28,214 | 69.9\% | 58.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 463 | 100.0\% | \$93,375 | 100.0\% | 100.0\% | 263 | 100.0\% | 100.0\% | \$53,024 | 100.0\% | 100.0\% | 200 | 100.0\% | 100.0\% | \$40,351 | 100.0\% | 100.0\% |
|  | L | 0 | 0.0\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 18 | 16.7\% | \$317 | 13.8\% | 17.9\% | 2 | 6.3\% | 15.2\% | \$57 | 6.1\% | 6.4\% | 16 | 21.1\% | 23.7\% | \$260 | 19.0\% | 6.7\% |
|  | Middle | 52 | 48.1\% | \$1,084 | 47.1\% | 49.9\% | 16 | 50.0\% | 50.2\% | \$519 | 55.9\% | 39.5\% | 36 | 47.4\% | 45.5\% | \$565 | 41.2\% | 40.1\% |
|  | Upper | 38 | 35.2\% | \$899 | 39.1\% | 31.5\% | 14 | 43.8\% | 34.1\% | \$352 | 37.9\% | 53.7\% | 24 | 31.6\% | 30.6\% | \$547 | 39.9\% | 53.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 108 | 100.0\% | \$2,300 | 100.0\% | 100.0\% | 32 | 100.0\% | 100.0\% | \$928 | 100.0\% | 100.0\% | 76 | 100.0\% | 100.0\% | \$1,372 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.4\% | 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\% | 30.4\% | 0 | 0.0\% | 25.8\% | \$0 | 0.0\% | 9.0\% | 0 | 0.0\% | 45.8\% | \$0 | 0.0\% | 29.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 49.9\% | 0 | 0.0\% | 61.3\% | \$0 | 0.0\% | 85.5\% | 0 | 0.0\% | 31.3\% | \$0 | 0.0\% | 31.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 17.2\% | 0 | 0.0\% | 12.9\% | \$0 | 0.0\% | 5.4\% | 0 | 0.0\% | 22.9\% | \$0 | 0.0\% | 39.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 2 | 0.1\% | \$151 | 0.1\% | 0.6\% | 2 | 0.3\% | 0.1\% | \$151 | 0.1\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 144 | 10.3\% | \$13,537 | 5.5\% | 17.9\% | 75 | 10.5\% | 10.5\% | \$7,671 | 5.9\% | 7.3\% | 69 | 10.0\% | 10.6\% | \$5,866 | 5.0\% | 8.3\% |
|  | Middle | 640 | 45.6\% | \$85,162 | 34.5\% | 49.9\% | 322 | 45.1\% | 49.0\% | \$46,863 | 35.9\% | 43.8\% | 318 | 46.2\% | 47.9\% | \$38,299 | 33.0\% | 40.7\% |
|  | Upper | 617 | 44.0\% | \$147,820 | 59.9\% | 31.5\% | 315 | 44.1\% | 40.3\% | \$75,816 | 58.1\% | 48.8\% | 302 | 43.8\% | 41.4\% | \$72,004 | 62.0\% | 50.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,403 | 100.0\% | \$246,670 | 100.0\% | 100.0\% | 714 | 100.0\% | 100.0\% | \$130,501 | 100.0\% | 100.0\% | 689 | 100.0\% | 100.0\% | \$116,169 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: FL Orlando

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Small Businesses \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
| SMALL BUSINESSES | Low | 74 | 1.5\% | \$6,622 | 1.9\% | 1.4\% | 28 | 1.4\% | 1.4\% | \$3,120 | 1.8\% | 2.4\% | 46 | 1.5\% | 1.3\% | \$3,502 | 1.9\% | 2.3\% |
|  | Moderate | 807 | 15.9\% | \$64,049 | 18.0\% | 19.0\% | 306 | 15.8\% | 15.5\% | \$32,332 | 18.5\% | 19.8\% | 501 | 15.9\% | 16.1\% | \$31,717 | 17.6\% | 20.2\% |
|  | Middle | 2,167 | 42.7\% | \$146,509 | 41.3\% | 47.3\% | 821 | 42.5\% | 42.4\% | \$68,966 | 39.5\% | 41.8\% | 1,346 | 42.8\% | 43.5\% | \$77,543 | 43.0\% | 43.6\% |
|  | Upper | 2,026 | 39.9\% | \$137,841 | 38.8\% | 32.3\% | 777 | 40.2\% | 38.6\% | \$70,186 | 40.2\% | 34.5\% | 1,249 | 39.8\% | 37.6\% | \$67,655 | 37.5\% | 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\% | 2.2\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 5,074 | 100.0\% | \$355,021 | 100.0\% | 100.0\% | 1,932 | 100.0\% | 100.0\% | \$174,604 | 100.0\% | 100.0\% | 3,142 | 100.0\% | 100.0\% | \$180,417 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 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\% |
|  | Moderate | 1 | 12.5\% | \$30 | 5.0\% | 19.1\% | 0 | 0.0\% | 11.7\% | \$0 | 0.0\% | 7.7\% | 1 | 14.3\% | 8.6\% | \$30 | 24.0\% | 6.0\% |
|  | Middle | 2 | 25.0\% | \$37 | 6.2\% | 59.3\% | 0 | 0.0\% | 60.4\% | \$0 | 0.0\% | 48.0\% | 2 | 28.6\% | 62.9\% | \$37 | 29.6\% | 75.2\% |
|  | Upper | 5 | 62.5\% | \$534 | 88.9\% | 21.3\% | 1 | 100.0\% | 22.5\% | \$476 | 100.0\% | 43.6\% | 4 | 57.1\% | 24.3\% | \$58 | 46.4\% | 18.4\% |
|  | 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\% | 5.4\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 8 | 100.0\% | \$601 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$476 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$125 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

## Assessment Area: FL Orlando

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Families by Family Income \% | Bank |  |  | Bank |  |  | Bank |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% |  |
|  | Low | 93 | 11.2\% | \$7,470 | 4.9\% | 18.7\% | 49 | 11.7\% | 9.9\% | \$3,968 | 5.2\% | 5.0\% | 44 | 10.7\% | 7.7\% | \$3,502 | 4.7\% | 3.7\% |
|  | Moderate | 206 | 24.8\% | \$22,757 | 15.1\% | 18.8\% | 120 | 28.6\% | 25.1\% | \$13,852 | 18.1\% | 18.9\% | 86 | 20.8\% | 20.4\% | \$8,905 | 12.0\% | 14.3\% |
|  | Middle | 140 | 16.8\% | \$19,113 | 12.7\% | 22.7\% | 74 | 17.7\% | 22.1\% | \$10,117 | 13.2\% | 21.0\% | 66 | 16.0\% | 20.0\% | \$8,996 | 12.1\% | 17.7\% |
|  | Upper | 380 | 45.7\% | \$98,477 | 65.2\% | 39.9\% | 176 | 42.0\% | 32.0\% | \$48,612 | 63.5\% | 45.0\% | 204 | 49.4\% | 37.2\% | \$49,865 | 67.0\% | 49.8\% |
|  | Unknown | 13 | 1.6\% | \$3,178 | 2.1\% | 0.0\% | 0 | 0.0\% | 10.9\% | \$0 | 0.0\% | 10.0\% | 13 | 3.1\% | 14.6\% | \$3,178 | 4.3\% | 14.4\% |
|  | Total | 832 | 100.0\% | \$150,995 | 100.0\% | 100.0\% | 419 | 100.0\% | 100.0\% | \$76,549 | 100.0\% | 100.0\% | 413 | 100.0\% | 100.0\% | \$74,446 | 100.0\% | 100.0\% |
|  | Low | 25 | 5.4\% | \$1,906 | 2.0\% | 18.7\% | 16 | 6.1\% | 4.8\% | \$1,254 | 2.4\% | 2.6\% | 9 | 4.5\% | 4.3\% | \$652 | 1.6\% | 2.2\% |
|  | Moderate | 62 | 13.4\% | \$6,004 | 6.4\% | 18.8\% | 40 | 15.2\% | 11.9\% | \$3,868 | 7.3\% | 7.6\% | 22 | 11.0\% | 9.4\% | \$2,136 | 5.3\% | 5.7\% |
|  | Middle | 86 | 18.6\% | \$10,774 | 11.5\% | 22.7\% | 54 | 20.5\% | 17.6\% | \$7,809 | 14.7\% | 14.2\% | 32 | 16.0\% | 14.5\% | \$2,965 | 7.3\% | 10.8\% |
|  | Upper | 272 | 58.7\% | \$70,834 | 75.9\% | 39.9\% | 147 | 55.9\% | 44.1\% | \$38,781 | 73.1\% | 54.2\% | 125 | 62.5\% | 44.8\% | \$32,053 | 79.4\% | 55.8\% |
|  | Unknown | 18 | 3.9\% | \$3,857 | 4.1\% | 0.0\% | 6 | 2.3\% | 21.5\% | \$1,312 | 2.5\% | 21.5\% | 12 | 6.0\% | 27.1\% | \$2,545 | 6.3\% | 25.6\% |
|  | Total | 463 | 100.0\% | \$93,375 | 100.0\% | 100.0\% | 263 | 100.0\% | 100.0\% | \$53,024 | 100.0\% | 100.0\% | 200 | 100.0\% | 100.0\% | \$40,351 | 100.0\% | 100.0\% |
|  | Lo | 6 | 5.6\% | \$120 | 5.2\% | 18.7\% | 3 | 9.4\% | 16.7\% | \$108 | 11.6\% | 4.9\% | 3 | 3.9\% | 14.3\% | \$12 | 0.9\% | 3.0\% |
|  | Moderate | 17 | 15.7\% | \$117 | 5.1\% | 18.8\% | 6 | 18.8\% | 20.2\% | \$36 | 3.9\% | 11.9\% | 11 | 14.5\% | 20.0\% | \$81 | 5.9\% | 11.4\% |
|  | Middle | 17 | 15.7\% | \$294 | 12.8\% | 22.7\% | 5 | 15.6\% | 22.1\% | \$118 | 12.7\% | 18.3\% | 12 | 15.8\% | 22.5\% | \$176 | 12.8\% | 15.7\% |
|  | Upper | 66 | 61.1\% | \$1,698 | 73.8\% | 39.9\% | 17 | 53.1\% | 36.9\% | \$615 | 66.3\% | 58.8\% | 49 | 64.5\% | 37.8\% | \$1,083 | 78.9\% | 54.3\% |
|  | Unknown | 2 | 1.9\% | \$71 | 3.1\% | 0.0\% | 1 | 3.1\% | 4.1\% | \$51 | 5.5\% | 6.1\% | 1 | 1.3\% | 5.5\% | \$20 | 1.5\% | 15.6\% |
|  | Total | 108 | 100.0\% | \$2,300 | 100.0\% | 100.0\% | 32 | 100.0\% | 100.0\% | \$928 | 100.0\% | 100.0\% | 76 | 100.0\% | 100.0\% | \$1,372 | 100.0\% | 100.0\% |
|  | Lo | 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\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.7\% | 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\% | 39.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Lo | 124 | 8.8\% | \$9,496 | 3.8\% | 18.7\% | 68 | 9.5\% | 8.1\% | \$5,330 | 4.1\% | 3.9\% | 56 | 8.1\% | 6.6\% | \$4,166 | 3.6\% | 3.0\% |
|  | Moderate | 285 | 20.3\% | \$28,878 | 11.7\% | 18.8\% | 166 | 23.2\% | 20.2\% | \$17,756 | 13.6\% | 13.9\% | 119 | 17.3\% | 16.4\% | \$11,122 | 9.6\% | 10.5\% |
|  | Middle | 243 | 17.3\% | \$30,181 | 12.2\% | 22.7\% | 133 | 18.6\% | 20.5\% | \$18,044 | 13.8\% | 17.7\% | 110 | 16.0\% | 18.0\% | \$12,137 | 10.4\% | 14.5\% |
|  | Upper | 718 | 51.2\% | \$171,009 | 69.3\% | 39.9\% | 340 | 47.6\% | 36.5\% | \$88,008 | 67.4\% | 47.3\% | 378 | 54.9\% | 39.9\% | \$83,001 | 71.4\% | 50.2\% |
|  | Unknown | 33 | 2.4\% | \$7,106 | 2.9\% | 0.0\% | 7 | 1.0\% | 14.7\% | \$1,363 | 1.0\% | 17.1\% | 26 | 3.8\% | 19.0\% | \$5,743 | 4.9\% | 21.9\% |
|  | Total | 1,403 | 100.0\% | \$246,670 | 100.0\% | 100.0\% | 714 | 100.0\% | 100.0\% | \$130,501 | 100.0\% | 100.0\% | 689 | 100.0\% | 100.0\% | \$116,169 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: FL Orlando

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | Total Businesses <br> \% |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Ban } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar k | Agg <br> \$ \% |  | Count <br> nk <br> \% | Agg <br> \% | $\begin{array}{r} \text { Bar } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar <br> k \$ \% | Agg \$ \% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known <br> Total | $\begin{aligned} & \hline 1,92 \epsilon \\ & 1,012 \\ & 2,93 € \\ & 2,136 \end{aligned}$ | $\begin{gathered} \hline 38.0 \% \\ 19.9 \% \\ 57.9 \% \\ 42.1 \% \end{gathered}$ | $\begin{gathered} \hline \$ 141,329 \\ \$ 147,108 \\ \$ 288,437 \\ \$ 66,584 \end{gathered}$ | $\begin{aligned} & \hline 39.8 \% \\ & 41.4 \% \\ & 81.2 \% \\ & 18.8 \% \end{aligned}$ | $\begin{gathered} \hline 91.0 \% \\ 4.9 \% \\ 95.9 \% \\ 4.1 \% \end{gathered}$ | $\begin{gathered} \hline 1,068 \\ 562 \\ 1,630 \\ 302 \end{gathered}$ | $\begin{aligned} & 55.3 \% \\ & 29.1 \% \\ & 84.4 \% \\ & 15.6 \% \end{aligned}$ | 28.2\% | \$78,373 | 44.9\% | 33.7\% | 858 450 1,308 1,834 | $\begin{gathered} \hline 27.3 \% \\ 14.3 \% \\ 41.6 \% \\ 58.4 \% \end{gathered}$ | 41.5\% | \$62,956 | 34.9\% | 31.7\% |
|  |  | 5,074 | 100.0\% | \$355,021 | 100.0\% | 100.0\% | 1,932 | 100.0\% |  |  |  |  | 3,142 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \underset{\zeta}{\omega} \end{aligned}$ |  |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} \hline 4,479 \\ 345 \\ 250 \end{gathered}$ | $\begin{gathered} \hline 88.3 \% \\ 6.8 \% \\ 4.9 \% \end{gathered}$ | $\begin{gathered} \hline \$ 168,944 \\ \$ 61,309 \\ \$ 124,768 \end{gathered}$ | $\begin{gathered} \hline 47.6 \% \\ 17.3 \% \\ 35.1 \% \end{gathered}$ |  | $\begin{gathered} \hline 1,632 \\ 184 \\ 116 \end{gathered}$ | $\begin{gathered} \hline 84.5 \% \\ 9.5 \% \\ 6.0 \% \end{gathered}$ | $\begin{gathered} \hline 94.5 \% \\ 2.7 \% \\ 2.8 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 80,143 \\ & \$ 32,854 \\ & \$ 61,607 \end{aligned}$ | $\begin{aligned} & \hline 45.9 \% \\ & 18.8 \% \\ & 35.3 \% \end{aligned}$ | $\begin{aligned} & \hline 36.7 \% \\ & 14.8 \% \\ & 48.6 \% \end{aligned}$ | $\begin{gathered} \hline 2,847 \\ 161 \\ 134 \end{gathered}$ | $\begin{gathered} \hline 90.6 \% \\ 5.1 \% \\ 4.3 \% \end{gathered}$ | $\begin{gathered} \hline 95.6 \% \\ 2.1 \% \\ 2.3 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 88,801 \\ & \$ 28,455 \\ & \$ 63,161 \end{aligned}$ | $\begin{aligned} & \hline 49.2 \% \\ & 15.8 \% \\ & 35.0 \% \end{aligned}$ | $\begin{aligned} & \hline 41.5 \% \\ & 13.7 \% \\ & 44.8 \% \end{aligned}$ |
|  |  |  | 5,074 | 100.0\% | \$355,021 | 100.0\% |  | 1,932 | 100.0\% | 100.0\% | \$174,604 | 100.0\% | 100.0\% | 3,142 | 100.0\% | 100.0\% | \$180,417 | 100.0\% | 100.0\% |
|  | $\stackrel{0}{\Xi}$ <br> $\stackrel{\rightharpoonup}{0}$ <br> $\underset{\sim}{0}$ | \$1 Million or Less <br> Over $\$ 1$ Million <br> Not Known | 5 0 3 | $\begin{gathered} 62.5 \% \\ 0.0 \% \\ 37.5 \% \end{gathered}$ | $\begin{gathered} \$ 578 \\ \$ 0 \\ \$ 23 \end{gathered}$ | $\begin{gathered} 96.2 \% \\ 0.0 \% \\ 3.8 \% \end{gathered}$ | Total Farms <br> $91.6 \%$ <br> $6.2 \%$ <br> $2.2 \%$ | $\begin{aligned} & 1 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | 77.5\% | \$476 | 100.0\% | 62.6\% | 4 0 3 | $\begin{gathered} 57.1 \% \\ 0.0 \% \\ 42.9 \% \end{gathered}$ | 57.1\% | \$102 | 81.6\% | 41.4\% |
|  |  | Total | 8 | 100.0\% | \$601 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 7 | 100.0\% |  |  |  |  |
|  |  | $\$ 100,000$ or Less $\$ 100,001-\$ 250,000$ $\$ 250,001-\$ 500,000$ | 7 0 1 | $\begin{gathered} \hline 87.5 \% \\ 0.0 \% \\ 12.5 \% \end{gathered}$ | $\begin{gathered} \hline \$ 125 \\ \$ 0 \\ \$ 476 \end{gathered}$ | $\begin{gathered} \hline 20.8 \% \\ 0.0 \% \\ 79.2 \% \end{gathered}$ |  | $0$ | $\begin{array}{c\|} \hline 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{array}$ | $\begin{gathered} \hline 91.9 \% \\ 3.6 \% \\ 4.5 \% \end{gathered}$ | $\begin{gathered} \hline \$ 0 \\ \$ 0 \\ \$ 476 \end{gathered}$ | $\begin{gathered} \hline 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | $\begin{aligned} & \hline 22.7 \% \\ & 17.9 \% \\ & 59.4 \% \end{aligned}$ | $7$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 91.4 \% \\ 4.3 \% \\ 4.3 \% \end{gathered}$ | $\begin{gathered} \hline \$ 125 \\ \$ 0 \\ \$ 0 \end{gathered}$ | $\begin{array}{c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ | $\begin{aligned} & \hline 40.7 \% \\ & 16.4 \% \\ & 42.9 \% \end{aligned}$ |
|  |  |  | 8 | 100.0\% | \$601 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$476 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$125 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: FL Pensacola

|  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | O wner <br> Occupied <br> Units <br> $\%$$\|$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  |  | Bank |  |  | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | Low | 6 | 1.1\% | \$461 | 0.6\% | 1.3\% | 4 | 1.6\% | 0.4\% | \$381 | 1.0\% | 0.2\% | 2 | 0.7\% | 0.4\% | \$80 | 0.2\% | 0.2\% |
|  | Moderate | 64 | 11.9\% | \$5,999 | 7.4\% | 16.2\% | 29 | 11.6\% | 7.7\% | \$2,420 | 6.2\% | 5.1\% | 35 | 12.2\% | 6.9\% | \$3,579 | 8.6\% | 4.7\% |
|  | Middle | 294 | 54.6\% | \$38,759 | 48.0\% | 56.9\% | 127 | 50.8\% | 62.1\% | \$17,068 | 43.6\% | 60.9\% | 167 | 58.0\% | 60.3\% | \$21,691 | 52.2\% | 57.6\% |
|  | Upper | 174 | 32.3\% | \$35,528 | 44.0\% | 25.6\% | 90 | 36.0\% | 29.8\% | \$19,293 | 49.3\% | 33.9\% | 84 | 29.2\% | 32.4\% | \$16,235 | 39.0\% | 37.6\% |
|  | Unknow | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 538 | 100.0\% | \$80,747 | 100.0\% | 100.0\% | 250 | 100.0\% | 100.0\% | \$39,162 | 100.0\% | 100.0\% | 288 | 100.0\% | 100.0\% | \$41,585 | 100.0\% | 100.0\% |
|  | Lo | 0 | 0.0\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 46 | 8.5\% | \$6,027 | 6.6\% | 16.2\% | 25 | 8.1\% | 7.1\% | \$3,903 | 7.2\% | 5.7\% | 21 | 8.9\% | 5.6\% | \$2,124 | 5.7\% | 4.3\% |
|  | Middle | 273 | 50.2\% | \$40,204 | 43.9\% | 56.9\% | 157 | 51.1\% | 58.9\% | \$25,269 | 46.8\% | 56.0\% | 116 | 48.9\% | 59.5\% | \$14,935 | 39.8\% | 56.9\% |
|  | Upper | 225 | 41.4\% | \$45,308 | 49.5\% | 25.6\% | 125 | 40.7\% | 33.8\% | \$24,836 | 46.0\% | 38.0\% | 100 | 42.2\% | 34.7\% | \$20,472 | 54.5\% | 38.6\% |
|  | Unknow | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 544 | 100.0\% | \$91,539 | 100.0\% | 100.0\% | 307 | 100.0\% | 100.0\% | \$54,008 | 100.0\% | 100.0\% | 237 | 100.0\% | 100.0\% | \$37,531 | 100.0\% | 100.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 14 | 19.7\% | \$82 | 12.1\% | 16.2\% | 6 | 19.4\% | 13.3\% | \$24 | 8.4\% | 9.6\% | 8 | 20.0\% | 12.2\% | \$58 | 14.9\% | 6.7\% |
|  | Middle | 39 | 54.9\% | \$414 | 61.2\% | 56.9\% | 19 | 61.3\% | 60.6\% | \$220 | 76.9\% | 55.9\% | 20 | 50.0\% | 59.3\% | \$194 | 49.7\% | 53.7\% |
|  | Upper | 18 | 25.4\% | \$180 | 26.6\% | 25.6\% | 6 | 19.4\% | 25.6\% | \$42 | 14.7\% | 34.5\% | 12 | 30.0\% | 27.8\% | \$138 | 35.4\% | 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\% |
|  | Total | 71 | 100.0\% | \$676 | 100.0\% | 100.0\% | 31 | 100.0\% | 100.0\% | \$286 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$390 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Lo | 0 | 0.0\% | \$0 | 0.0\% | \| 3.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.6\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 3.2\% | 0 | 0.0\% | 22.2\% | \$0 | 0.0\% | 19.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 60.5\% | 0 | 0.0\% | 80.0\% | \$0 | 0.0\% | 96.8\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 73.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 18.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 11.1\% | \$0 | 0.0\% | 8.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | Lo | 6 | 0.5\% | \$461 | 0.3\% | 1.3\% | 4 | 0.7\% | 0.3\% | \$381 | 0.4\% | 0.2\% | 2 | 0.4\% | 0.3\% | \$80 | 0.1\% | 0.1\% |
|  | Moderate | 124 | 10.8\% | \$12,108 | 7.0\% | 16.2\% | 60 | 10.2\% | 7.6\% | \$6,347 | 6.8\% | 5.4\% | 64 | 11.3\% | 6.5\% | \$5,761 | 7.2\% | 4.9\% |
|  | Middle | 606 | 52.6\% | \$79,377 | 45.9\% | 56.9\% | 303 | 51.5\% | 60.5\% | \$42,557 | 45.5\% | 59.0\% | 303 | 53.6\% | 59.9\% | \$36,820 | 46.3\% | 57.7\% |
|  | Upper | 417 | 36.2\% | \$81,016 | 46.8\% | 25.6\% | 221 | 37.6\% | 31.6\% | \$44,171 | 47.3\% | 35.4\% | 196 | 34.7\% | 33.3\% | \$36,845 | 46.3\% | 37.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,153 | 100.0\% | \$172,962 | 100.0\% | 100.0\% | 588 | 100.0\% | 100.0\% | \$93,456 | 100.0\% | 100.0\% | 565 | 100.0\% | 100.0\% | \$79,506 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: FL Pensacola


Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: FL Pensacola


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: FL Tampa

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count | Dollar |  |  | Bank |  |  | Bank |  | Agg | Bank |  |  | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
|  |  | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | Low | $90.7 \%$ | \$656 | 0.3\% | 0.8\% | 6 | 0.8\% | 0.3\% | \$385 | 0.3\% | 0.2\% | 3 | 0.5\% | 0.3\% | \$271 | 0.2\% | 0.2\% |
|  | Moderate | 167 12.3\% | \$18,414 | 7.1\% | 21.9\% | 91 | 11.5\% | 16.6\% | \$9,795 | 6.5\% | 11.7\% | 76 | 13.3\% | 15.0\% | \$8,619 | 7.8\% | 10.6\% |
|  | Middle | 578 42.5\% | \$90,224 | 34.6\% | 48.3\% | 352 | 44.6\% | 42.8\% | \$55,880 | 37.3\% | 36.8\% | 226 | 39.5\% | 42.8\% | \$34,344 | 31.1\% | 35.9\% |
|  | Upper | 607 44.6\% | \$151,274 | 58.1\% | 29.0\% | 340 | 43.1\% | 40.3\% | \$83,930 | 56.0\% | 51.4\% | 267 | 46.7\% | 41.9\% | \$67,344 | 60.9\% | 53.4\% |
|  | Unknown | 0 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,361 100.0\% | \$260,568 | 100.0\% | 100.0\% | 789 | 100.0\% | 100.0\% | \$149,990 | 100.0\% | 100.0\% | 572 | 100.0\% | 100.0\% | \$110,578 | 100.0\% | 100.0\% |
|  | Low | $10.1 \%$ | \$34 | 0.0\% | 0.8\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% | 1 | 0.3\% | 0.2\% | \$34 | 0.0\% | 0.1\% |
|  | Moderate | 105 10.3\% | \$11,597 | 5.3\% | 21.9\% | 59 | 9.5\% | 10.2\% | \$6,136 | 4.8\% | 7.0\% | 46 | 11.6\% | 9.7\% | \$5,461 | 6.0\% | 6.7\% |
|  | Middle | 378 37.2\% | \$63,942 | 29.3\% | 48.3\% | 245 | 39.4\% | 37.8\% | \$41,279 | 32.4\% | 32.0\% | 133 | 33.7\% | 38.1\% | \$22,663 | 24.9\% | 32.1\% |
|  | Upper | 533 52.4\% | \$142,878 | 65.4\% | 29.0\% | 318 | 51.1\% | 51.8\% | \$80,094 | 62.8\% | 60.8\% | 215 | 54.4\% | 52.0\% | \$62,784 | 69.0\% | 61.0\% |
|  | Unknown | 0 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,017 100.0\% | \$218,451 | 100.0\% | 100.0\% | 622 | 100.0\% | 100.0\% | \$127,509 | 100.0\% | 100.0\% | 395 | 100.0\% | 100.0\% | \$90,942 | 100.0\% | 100.0\% |
|  | Lo | 0.6\% | \$13 | 0.6\% | 0.8\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.2\% | 1 | 0.9\% | 0.5\% | \$13 | 0.9\% | 0.1\% |
|  | Moderate | 29 17.0\% | \$390 | 18.5\% | 21.9\% | 7 | 11.5\% | 21.7\% | \$65 | 9.6\% | 11.5\% | 22 | 20.0\% | 20.8\% | \$325 | 22.7\% | 10.4\% |
|  | Middle | 86 50.3\% | \$907 | 43.0\% | 48.3\% | 33 | 54.1\% | 42.8\% | \$402 | 59.6\% | 33.6\% | 53 | 48.2\% | 46.0\% | \$505 | 35.2\% | 34.1\% |
|  | Upper | 55 32.2\% | \$798 | 37.9\% | 29.0\% | 21 | 34.4\% | 34.9\% | \$207 | 30.7\% | 54.6\% | 34 | 30.9\% | 32.7\% | \$591 | 41.2\% | 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 | 171 100.0\% | \$2,108 | 100.0\% | 100.0\% | 61 | 100.0\% | 100.0\% | \$674 | 100.0\% | 100.0\% | 110 | 100.0\% | 100.0\% | \$1,434 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Total | 0 0.0\% | \$0 | 0.0\% | 4.3\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 0.6\% | 0 | .0\% | 4.1\% | \$0 | 0.0\% | 1.0\% |
|  |  | 0 0.0\% | \$0 | 0.0\% | 18.9\% | 0 | 0.0\% | 32.3\% | \$0 | 0.0\% | 33.3\% | 0 | 0.0\% | 16.3\% | \$0 | 0.0\% | 20.9\% |
|  |  | 0 0.0\% | \$0 | 0.0\% | 49.2\% | 0 | 0.0\% | 43.1\% | \$0 | 0.0\% | 29.8\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 43.0\% |
|  |  | 0 0.0\% | \$0 | 0.0\% | 27.6\% | 0 | 0.0\% | 23.1\% | \$0 | 0.0\% | 36.2\% | 0 | 0.0\% | 29.6\% | \$0 | 0.0\% | 35.1\% |
|  |  | 0 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$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\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Total | $110.4 \%$ | \$703 | 0.1\% | 0.8\% | 6 | 0.4\% | 0.3\% | \$385 | 0.1\% | 0.2\% | 5 | 0.5\% | 0.3\% | \$318 | 0.2\% | 0.2\% |
|  |  | 301 11.8\% | \$30,401 | 6.3\% | 21.9\% | 157 | 10.7\% | 13.9\% | \$15,996 | 5.8\% | 10.3\% | 144 | 13.4\% | 12.9\% | \$14,405 | 7.1\% | 9.4\% |
|  |  | 1,042 40.9\% | \$155,073 | 32.2\% | 48.3\% | 630 | 42.8\% | 40.6\% | \$97,561 | 35.1\% | 34.4\% | 412 | 38.3\% | 41.0\% | \$57,512 | 28.3\% | 34.5\% |
|  |  | 1,195 46.9\% | \$294,950 | 61.3\% | 29.0\% | 679 | 46.1\% | 45.2\% | \$164,231 | 59.0\% | 55.1\% | 516 | 47.9\% | 45.8\% | \$130,719 | 64.4\% | 55.9\% |
|  |  | 0 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 2,549 100.0\% | \$481,127 | 100.0\% | 100.0\% | 1,472 | 100.0\% | 100.0\% | \$278,173 | 100.0\% | 100.0\% | 1,077 | 100.0\% | 100.0\% | \$202,954 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: FL Tampa

| PRODUCT TYPE | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparis on$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Small Businesses \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | Agg <br> \$ \% | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% |  | \# | \% |  | \$ 000s | \$ \% |  |
|  | Low | 81 | 0.9\% | \$6,554 | 1.2\% | 1.6\% | 34 | 1.0\% | 1.6\% | \$2,416 | 0.9\% | 2.5\% | 47 | 0.9\% | 1.4\% | \$4,138 | 1.5\% | 2.1\% |
|  | Moderate | 1,855 | 20.9\% | \$116,758 | 21.2\% | 23.5\% | 725 | 20.8\% | 20.8\% | \$58,398 | 20.9\% | 27.4\% | 1,130 | 20.9\% | 20.6\% | \$58,360 | 21.6\% | 25.0\% |
|  | Middle | 3,945 | 44.4\% | \$245,870 | 44.7\% | 43.8\% | 1,572 | 45.1\% | 40.9\% | \$127,199 | 45.4\% | 40.7\% | 2,373 | 43.9\% | 41.1\% | \$118,671 | 44.0\% | 42.7\% |
|  | Upper | 3,006 | 33.8\% | \$180,598 | 32.8\% | 31.2\% | 1,154 | 33.1\% | 35.2\% | \$92,055 | 32.9\% | 28.7\% | 1,852 | 34.3\% | 35.9\% | \$88,543 | 32.8\% | 29.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 8,887 | 100.0\% | \$549,780 | 100.0\% | 100.0\% | 3,485 | 100.0\% | 100.0\% | \$280,068 | 100.0\% | 100.0\% | 5,402 | 100.0\% | 100.0\% | \$269,712 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 5.3\% | \$25 | 1.8\% | 21.4\% | 0 | 0.0\% | 25.7\% | \$0 | 0.0\% | 38.5\% | 1 | 6.3\% | 11.3\% | \$25 | 2.1\% | 25.5\% |
|  | Middle | 8 | 42.1\% | \$740 | 52.8\% | 54.3\% | 1 | 33.3\% | 41.2\% | \$150 | 75.0\% | 41.9\% | 7 | 43.8\% | 46.1\% | \$590 | 49.1\% | 41.8\% |
|  | Upper | 10 | 52.6\% | \$636 | 45.4\% | 24.2\% | 2 | 66.7\% | 28.4\% | \$50 | 25.0\% | 18.5\% | 8 | 50.0\% | 40.0\% | \$586 | 48.8\% | 32.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.4\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 19 | 100.0\% | \$1,401 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$200 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$1,201 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Families by Family Income \% | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  |  | Bank |  |  | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 134 | 9.8\% | \$10,599 | 4.1\% | 18.8\% | 80 | 10.1\% | 8.4\% | \$6,305 | 4.2\% | 4.0\% | 54 | 9.4\% | 6.1\% | \$4,294 | 3.9\% | 2.7\% |
|  | Moderate | 300 | 22.0\% | \$31,145 | 12.0\% | 19.1\% | 176 | 22.3\% | 23.4\% | \$19,136 | 12.8\% | 16.0\% | 124 | 21.7\% | 18.7\% | \$12,009 | 10.9\% | 11.7\% |
|  | Middle | 254 | 18.7\% | \$32,739 | 12.6\% | 22.0\% | 162 | 20.5\% | 22.0\% | \$22,142 | 14.8\% | 19.4\% | 92 | 16.1\% | 20.2\% | \$10,597 | 9.6\% | 16.6\% |
|  | Upper | 661 | 48.6\% | \$184,393 | 70.8\% | 40.1\% | 371 | 47.0\% | 36.2\% | \$102,407 | 68.3\% | 50.6\% | 290 | 50.7\% | 41.4\% | \$81,986 | 74.1\% | 56.4\% |
|  | Unknown | 12 | 0.9\% | \$1,692 | 0.6\% | 0.0\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 10.0\% | 12 | 2.1\% | 13.7\% | \$1,692 | 1.5\% | 12.6\% |
|  | Total | 1,361 | 100.0\% | \$260,568 | 100.0\% | 100.0\% | 789 | 100.0\% | 100.0\% | \$149,990 | 100.0\% | 100.0\% | 572 | 100.0\% | 100.0\% | \$110,578 | 100.0\% | 100.0\% |
|  | Low | 66 | 6.5\% | \$4,857 | 2.2\% | 18.8\% | 38 | 6.1\% | 4.7\% | \$3,088 | 2.4\% | 2.3\% | 28 | 7.1\% | 3.5\% | \$1,769 | 1.9\% | 1.6\% |
|  | Moderate | 133 | 13.1\% | \$13,002 | 6.0\% | 19.1\% | 96 | 15.4\% | 11.8\% | \$9,228 | 7.2\% | 7.1\% | 37 | 9.4\% | 9.2\% | \$3,774 | 4.1\% | 5.2\% |
|  | Middle | 191 | 18.8\% | \$24,461 | 11.2\% | 22.0\% | 121 | 19.5\% | 17.3\% | \$15,274 | 12.0\% | 13.2\% | 70 | 17.7\% | 14.4\% | \$9,187 | 10.1\% | 10.2\% |
|  | Upper | 599 | 58.9\% | \$169,942 | 77.8\% | 40.1\% | 351 | 56.4\% | 45.8\% | \$96,065 | 75.3\% | 56.9\% | 248 | 62.8\% | 47.3\% | \$73,877 | 81.2\% | 58.6\% |
|  | Unknown | 28 | 2.8\% | \$6,189 | 2.8\% | 0.0\% | 16 | 2.6\% | 20.5\% | \$3,854 | 3.0\% | 20.5\% | 12 | 3.0\% | 25.7\% | \$2,335 | 2.6\% | 24.4\% |
|  | Total | 1,017 | 100.0\% | \$218,451 | 100.0\% | 100.0\% | 622 | 100.0\% | 100.0\% | \$127,509 | 100.0\% | 100.0\% | 395 | 100.0\% | 100.0\% | \$90,942 | 100.0\% | 100.0\% |
|  | Low | 27 | 15.8\% | \$178 | 8.4\% | 18.8\% | 14 | 23.0\% | 16.1\% | \$84 | 12.5\% | 5.3\% | 13 | 11.8\% | 13.4\% | \$94 | 6.6\% | 3.2\% |
|  | Moderate | 36 | 21.1\% | \$351 | 16.7\% | 19.1\% | 13 | 21.3\% | 21.7\% | \$94 | 13.9\% | 13.8\% | 23 | 20.9\% | 20.9\% | \$257 | 17.9\% | 10.4\% |
|  | Middle | 32 | 18.7\% | \$270 | 12.8\% | 22.0\% | 12 | 19.7\% | 23.6\% | \$112 | 16.6\% | 17.8\% | 20 | 18.2\% | 23.7\% | \$158 | 11.0\% | 18.9\% |
|  | Upper | 74 | 43.3\% | \$1,247 | 59.2\% | 40.1\% | 22 | 36.1\% | 35.5\% | \$384 | 57.0\% | 56.1\% | 52 | 47.3\% | 36.7\% | \$863 | 60.2\% | 56.9\% |
|  | Unknown | 2 | 1.2\% | \$62 | 2.9\% | 0.0\% | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 7.0\% | 2 | 1.8\% | 5.3\% | \$62 | 4.3\% | 10.7\% |
|  | Total | 171 | 100.0\% | \$2,108 | 100.0\% | 100.0\% | 61 | 100.0\% | 100.0\% | \$674 | 100.0\% | 100.0\% | 110 | 100.0\% | 100.0\% | \$1,434 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | M oderate | 0 | 0.0\% | \$0 | 0.0\% | 19.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 227 | 8.9\% | \$15,634 | 3.2\% | 18.8\% | 132 | 9.0\% | 6.9\% | \$9,477 | 3.4\% | 3.1\% | 95 | 8.8\% | 5.2\% | \$6,157 | 3.0\% | 2.1\% |
|  | Moderate | 469 | 18.4\% | \$44,498 | 9.2\% | 19.1\% | 285 | 19.4\% | 18.3\% | \$28,458 | 10.2\% | 11.4\% | 184 | 17.1\% | 14.8\% | \$16,040 | 7.9\% | 8.5\% |
|  | Middle | 477 | 18.7\% | \$57,470 | 11.9\% | 22.0\% | 295 | 20.0\% | 19.9\% | \$37,528 | 13.5\% | 15.9\% | 182 | 16.9\% | 17.9\% | \$19,942 | 9.8\% | 13.2\% |
|  | Upper | 1,334 | 52.3\% | \$355,582 | 73.9\% | 40.1\% | 744 | 50.5\% | 40.3\% | \$198,856 | 71.5\% | 51.8\% | 590 | 54.8\% | 43.6\% | \$156,726 | 77.2\% | 55.1\% |
|  | Unknown | 42 | 1.6\% | \$7,943 | 1.7\% | 0.0\% | 16 | 1.1\% | 14.5\% | \$3,854 | 1.4\% | 17.7\% | 26 | 2.4\% | 18.5\% | \$4,089 | 2.0\% | 21.1\% |
|  | Total | 2,549 | 100.0\% | \$481,127 | 100.0\% | 100.0\% | 1,472 | 100.0\% | 100.0\% | \$278,173 | 100.0\% | 100.0\% | 1,077 | 100.0\% | 100.0\% | \$202,954 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison   <br> 2010   |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount $\%$ | ank <br> Doll <br> \$ (000s) | ar \$ \% | Total Businesses <br> \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { I } \\ \text { Banl } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Bar } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
| $\begin{aligned} & \mathscr{0} \\ & \hline \end{aligned}$ | $\begin{aligned} & \stackrel{\otimes}{\stackrel{1}{\omega}} \\ & \stackrel{\rightharpoonup}{\otimes} \\ & \underset{\sim}{\otimes} \end{aligned}$ | \$1 Million or Less <br> Over $\$ 1$ Million <br> Total Rev. available <br> Rev. Not Known | $\begin{array}{\|c\|} \hline 3,168 \\ 1,487 \\ 4,655 \\ 4,232 \end{array}$ | $\begin{gathered} \hline 35.6 \% \\ 16.7 \% \\ 52.3 \% \\ 47.6 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 210,481 \\ & \$ 212,466 \\ & \$ 422,947 \\ & \$ 126,833 \end{aligned}$ | $\begin{gathered} \hline 38.3 \% \\ 38.6 \% \\ 76.9 \% \\ 23.1 \% \end{gathered}$ | $\begin{gathered} \hline 90.3 \% \\ 5.3 \% \\ 95.6 \% \\ 4.3 \% \end{gathered}$ | $\begin{array}{\|c} \hline 1,884 \\ 858 \\ 2,742 \\ 743 \end{array}$ | $\begin{aligned} & \hline 54.1 \% \\ & 24.6 \% \\ & 78.7 \% \\ & 21.3 \% \end{aligned}$ | 31.7\% | \$127,521 | 45.5\% | 33.3\% | $\begin{array}{\|c\|} \hline 1,284 \\ 629 \\ 1,913 \\ 3,489 \end{array}$ | $\begin{gathered} \hline 23.8 \% \\ 11.6 \% \\ 35.4 \% \\ 64.6 \% \end{gathered}$ | 42.2\% | \$82,960 | 30.8\% | 31.5\% |
|  |  | Total | 8,887 | 100.0\% | \$549,780 | 100.0\% | 100.0\% | 3,485 | 100.0\% |  |  |  |  | 5,402 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \bar{\sigma} \\ & \underset{\sim}{6} \end{aligned}$ | $\begin{aligned} & \stackrel{N}{N} \\ & \text { N } \\ & \text { त्ర } \end{aligned}$ | $\begin{array}{l\|} \hline \$ 100,000 \text { or Less } \\ \$ 100,001 \text { - } \$ 250,000 \\ \$ 250,001 \text { - } \$ 1 \text { Million } \end{array}$ | $\begin{array}{\|c\|} \hline 8,065 \\ 474 \\ 348 \end{array}$ | $\begin{gathered} \hline 90.8 \% \\ 5.3 \% \\ 3.9 \% \end{gathered}$ | $\begin{gathered} \hline \$ 299,930 \\ \$ 84,620 \\ \$ 165,230 \end{gathered}$ | $\begin{aligned} & \hline 54.6 \% \\ & 15.4 \% \\ & 30.1 \% \end{aligned}$ |  | $\begin{array}{\|c\|} \hline 3,038 \\ 263 \\ 184 \end{array}$ | $\begin{array}{c\|} \hline 87.2 \% \\ 7.5 \% \\ 5.3 \% \end{array}$ | $\begin{gathered} \hline 93.5 \% \\ 3.2 \% \\ 3.3 \% \end{gathered}$ | $\begin{gathered} \hline \$ 144,603 \\ \$ 47,100 \\ \$ 88,365 \end{gathered}$ | $\begin{aligned} & \hline 51.6 \% \\ & 16.8 \% \\ & 31.6 \% \end{aligned}$ | $\begin{aligned} & \hline 35.5 \% \\ & 15.7 \% \\ & 48.8 \% \end{aligned}$ | $\begin{array}{\|c\|} \hline 5,027 \\ 211 \\ 164 \end{array}$ | $\begin{gathered} \hline 93.1 \% \\ 3.9 \% \\ 3.0 \% \end{gathered}$ | $\begin{gathered} \hline 95.3 \% \\ 2.4 \% \\ 2.3 \% \end{gathered}$ | $\begin{array}{\|c\|} \hline \$ 155,327 \\ \$ 37,520 \\ \$ 76,865 \end{array}$ | $\begin{aligned} & \hline 57.6 \% \\ & 13.9 \% \\ & 28.5 \% \end{aligned}$ | $\begin{aligned} & \hline 43.2 \% \\ & 14.8 \% \\ & 42.0 \% \end{aligned}$ |
|  |  | Total | 8,887 | 100.0\% | \$549,780 | 100.0\% |  | 3,485 | 100.0\% | 100.0\% | \$280,068 | 100.0\% | 100.0\% | 5,402 | 100.0\% | 100.0\% | \$269,712 | 100.0\% | 100.0\% |
|  | $\stackrel{0}{\stackrel{0}{c}}$ | \$1 Million or Less <br> Over $\$ 1$ Million <br> Not Known | $\begin{gathered} 10 \\ 2 \\ 7 \end{gathered}$ | $\begin{gathered} 52.6 \% \\ 10.5 \% \\ 36.8 \% \end{gathered}$ | $\begin{aligned} & \$ 967 \\ & \$ 300 \\ & \$ 134 \end{aligned}$ | $\begin{gathered} 69.0 \% \\ 21.4 \% \\ 9.6 \% \end{gathered}$ | Total Farms <br> $93.6 \%$ <br> $4.4 \%$ <br> $2.0 \%$ | $\begin{aligned} & 3 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | 71.6\% | \$200 | 100.0\% | 66.6\% | $\begin{aligned} & 7 \\ & 2 \\ & 7 \end{aligned}$ | $\begin{gathered} 43.8 \% \\ 12.5 \% \\ 43.8 \% \end{gathered}$ | 53.0\% | \$767 | 63.9\% | 49.8\% |
|  |  |  | 19 | 100.0\% | \$1,401 | 100.0\% | 100.0\% |  | 100.0\% |  |  |  |  |  | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { స్ } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{gathered} \hline 12 \\ 7 \\ 0 \end{gathered}$ | $\begin{gathered} \hline 63.2 \% \\ 36.8 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline \$ 301 \\ \$ 1,100 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 21.5 \% \\ 78.5 \% \\ 0.0 \% \end{gathered}$ |  | $\begin{aligned} & 2 \\ & 1 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 66.7 \% \\ 33.3 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 91.9 \% \\ 4.7 \% \\ 3.4 \% \end{gathered}$ | $\begin{gathered} \hline \$ 50 \\ \$ 150 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 25.0 \% \\ 75.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 32.5 \% \\ & 25.2 \% \\ & 42.3 \% \end{aligned}$ | $\begin{gathered} \hline 10 \\ 6 \\ 0 \end{gathered}$ | $\begin{gathered} \hline 62.5 \% \\ 37.5 \% \\ 0.0 \% \end{gathered}$ | $\begin{array}{c\|} \hline 91.3 \% \\ 7.8 \% \\ 0.9 \% \end{array}$ | $\begin{gathered} \hline \$ 251 \\ \$ 950 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 20.9 \% \\ 79.1 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 56.3 \% \\ 35.1 \% \\ 8.6 \% \end{gathered}$ |
|  |  | Total | 19 | 100.0\% | \$1,401 | 100.0\% |  | 3 | 100.0\% | 100.0\% | \$200 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$1,201 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: GA Atlanta

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | O wner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  |  | Bank |  |  | Bank |  | Agg\$ \% |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | Low | 15 | 1.2\% | \$2,444 | 1.0\% | 2.5\% | 9 | 1.2\% | 2.3\% | \$1,486 | 1.0\% | 1.9\% | 6 | 1.1\% | 2.1\% | \$958 | 0.9\% | 1.6\% |
|  | Moderate | 167 | 13.2\% | \$16,152 | 6.6\% | 16.7\% | 98 | 13.6\% | 13.5\% | \$10,143 | 7.0\% | 9.3\% | 69 | 12.7\% | 12.0\% | \$6,009 | 5.9\% | 8.4\% |
|  | Middle | 607 | 48.0\% | \$91,811 | 37.3\% | 42.8\% | 344 | 47.7\% | 45.5\% | \$52,265 | 36.2\% | 37.5\% | 263 | 48.4\% | 44.7\% | \$39,546 | 39.0\% | 35.6\% |
|  | Upper | 475 | 37.6\% | \$135,525 | 55.1\% | 38.1\% | 270 | 37.4\% | 38.7\% | \$80,550 | 55.8\% | 51.3\% | 205 | 37.8\% | 41.1\% | \$54,975 | 54.2\% | 54.4\% |
|  | 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 | 1,264 | 100.0\% | \$245,932 | 100.0\% | 100.0\% | 721 | 100.0\% | 100.0\% | \$144,444 | 100.0\% | 100.0\% | 543 | 100.0\% | 100.0\% | \$101,488 | 100.0\% | 100.0\% |
|  | Low | 25 | 1.1\% | \$3,148 | 0.6\% | 2.5\% | 18 | 1.3\% | 1.2\% | \$2,089 | 0.7\% | 1.0\% | 7 | 0.8\% | 1.1\% | \$1,059 | 0.6\% | 0.9\% |
|  | Moderate | 220 | 9.7\% | \$28,709 | 5.8\% | 16.7\% | 144 | 10.1\% | 8.6\% | \$18,182 | 5.8\% | 6.2\% | 76 | 9.1\% | 8.7\% | \$10,527 | 6.0\% | 6.1\% |
|  | Middle | 1,017 | 44.8\% | \$172,853 | 35.2\% | 42.8\% | 628 | 43.9\% | 35.9\% | \$109,628 | 34.8\% | 29.7\% | 389 | 46.5\% | 36.7\% | \$63,225 | 35.9\% | 29.7\% |
|  | Upper | 1,007 | 44.4\% | \$286,207 | 58.3\% | 38.1\% | 642 | 44.8\% | 54.2\% | \$184,704 | 58.7\% | 63.1\% | 365 | 43.6\% | 53.5\% | \$101,503 | 57.6\% | 63.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2,269 | 100.0\% | \$490,917 | 100.0\% | 100.0\% | 1,432 | 100.0\% | 100.0\% | \$314,603 | 100.0\% | 100.0\% | 837 | 100.0\% | 100.0\% | \$176,314 | 100.0\% | 100.0\% |
|  | Lo | 1 | 0.6\% | \$8 | 0.4\% | 2.5\% | 1 | 1.4\% | 1.3\% | \$8 | 1.1\% | 0.5\% | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 1.1\% |
|  | Moderate | 39 | 21.5\% | \$278 | 14.9\% | 16.7\% | 20 | 27.0\% | 14.2\% | \$159 | 21.0\% | 7.4\% | 19 | 17.8\% | 14.8\% | \$119 | 10.7\% | 6.7\% |
|  | Middle | 100 | 55.2\% | \$974 | 52.3\% | 42.8\% | 41 | 55.4\% | 37.4\% | \$450 | 59.4\% | 23.4\% | 59 | 55.1\% | 39.6\% | \$524 | 47.3\% | 26.3\% |
|  | Upper | 41 | 22.7\% | \$604 | 32.4\% | 38.1\% | 12 | 16.2\% | 47.1\% | \$140 | 18.5\% | 68.7\% | 29 | 27.1\% | 44.0\% | \$464 | 41.9\% | 65.9\% |
|  | 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 | 181 | 100.0\% | \$1,864 | 100.0\% | 100.0\% | 74 | 100.0\% | 100.0\% | \$757 | 100.0\% | 100.0\% | 107 | 100.0\% | 100.0\% | \$1,107 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Total | 0 | 0.0\% | \$0 | 0.0\% | 11.5\% | 0 | 0.0\% | 9.7\% | \$0 | 0.0\% | 12.1\% | 0 | 0.0\% | 10.6\% | \$0 | 0.0\% | 4.7\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 30.9\% | 0 | 0.0\% | 34.3\% | \$0 | 0.0\% | 33.6\% | 0 | 0.0\% | 36.2\% | \$0 | 0.0\% | 20.4\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 31.1\% | 0 | 0.0\% | 31.3\% | \$0 | 0.0\% | 26.2\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 31.1\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 26.5\% | 0 | 0.0\% | 24.6\% | \$0 | 0.0\% | 28.1\% | 0 | 0.0\% | 19.9\% | \$0 | 0.0\% | 43.9\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$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\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Total | 41 | 1.1\% | \$5,600 | 0.8\% | 2.5\% | 28 | 1.3\% | 1.7\% | \$3,583 | 0.8\% | 1.6\% | 13 | 0.9\% | 1.5\% | \$2,017 | 0.7\% | 1.3\% |
|  |  | 426 | 11.5\% | \$45,139 | 6.1\% | 16.7\% | 262 | 11.8\% | 10.8\% | \$28,484 | 6.2\% | 8.1\% | 164 | 11.0\% | 10.3\% | \$16,655 | 6.0\% | 7.5\% |
|  |  | 1,724 | 46.4\% | \$265,638 | 36.0\% | 42.8\% | 1,013 | 45.5\% | 39.9\% | \$162,343 | 35.3\% | 32.4\% | 711 | 47.8\% | 40.2\% | \$103,295 | 37.0\% | 32.0\% |
|  |  | 1,523 | 41.0\% | \$422,336 | 57.2\% | 38.1\% | 924 | 41.5\% | 47.7\% | \$265,394 | 57.7\% | 57.9\% | 599 | 40.3\% | 48.0\% | \$156,942 | 56.3\% | 59.3\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 3,714 | 100.0\% | \$738,713 | 100.0\% | 100.0\% | 2,227 | 100.0\% | 100.0\% | \$459,804 | 100.0\% | 100.0\% | 1,487 | 100.0\% | 100.0\% | \$278,909 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: GA Atlanta

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Small Businesses \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 65 | 1.9\% | \$11,757 | 2.9\% | 4.0\% | 20 | 2.0\% | 2.8\% | \$4,976 | 2.5\% | 3.7\% | 45 | 1.8\% | 3.0\% | \$6,781 | 3.3\% | 3.3\% |
|  | Moderate | 641 | 18.3\% | \$86,031 | 21.2\% | 17.6\% | 198 | 19.4\% | 13.2\% | \$42,063 | 20.9\% | 16.0\% | 443 | 17.9\% | 13.1\% | \$43,968 | 21.5\% | 15.9\% |
|  | Middle | 1,476 | 42.2\% | \$152,753 | 37.6\% | 39.6\% | 402 | 39.4\% | 34.9\% | \$71,674 | 35.7\% | 36.2\% | 1,074 | 43.3\% | 34.8\% | \$81,079 | 39.6\% | 35.0\% |
|  | Upper | 1,312 | 37.5\% | \$155,239 | 38.2\% | 38.8\% | 400 | 39.2\% | 47.0\% | \$82,183 | 40.9\% | 43.4\% | 912 | 36.8\% | 47.5\% | \$73,056 | 35.6\% | 45.4\% |
|  | 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 | 6 | 0.2\% | \$91 | 0.0\% |  | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.8\% | 6 | 0.2\% | 1.5\% | \$91 | 0.0\% | 0.3\% |
|  | Total | 3,500 | 100.0\% | \$405,871 | 100.0\% | 100.0\% | 1,020 | 100.0\% | 100.0\% | \$200,896 | 100.0\% | 100.0\% | 2,480 | 100.0\% | 100.0\% | \$204,975 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% | 3.2\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.4\% |
|  | Moderate | 10 | 43.5\% | \$1,202 | 58.9\% | 20.0\% | 5 | 50.0\% | 17.8\% | \$699 | 56.0\% | 27.4\% | 5 | 38.5\% | 22.9\% | \$503 | 63.4\% | 24.1\% |
|  | Middle | 8 | 34.8\% | \$537 | 26.3\% | 47.6\% | 4 | 40.0\% | 49.7\% | \$495 | 39.7\% | 36.1\% | 4 | 30.8\% | 49.4\% | \$42 | 5.3\% | 46.3\% |
|  | Upper | 5 | 21.7\% | \$302 | 14.8\% | 31.0\% | 1 | 10.0\% | 28.6\% | \$54 | 4.3\% | 35.0\% | 4 | 30.8\% | 27.1\% | \$248 | 31.3\% | 29.1\% |
|  | 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\% | 0.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 23 | 100.0\% | \$2,041 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,248 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$793 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

|  | Borrowe $r$ Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count | Bank |  | Dollar | Families by Family Income \% | Bank |  |  | Bank | Dollar |  |  | Count |  | Bank | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 246 | 19.5\% | \$20,020 | 8.1\% | 19.6\% | 144 | 20.0\% | 18.0\% | \$12,349 | 8.5\% | 9.4\% | 102 | 18.8\% | 15.0\% | \$7,671 | 7.6\% | 7.3\% |
|  | Moderate | 284 | 22.5\% | \$34,383 | 14.0\% | 17.8\% | 174 | 24.1\% | 26.3\% | \$21,722 | 15.0\% | 19.7\% | 110 | 20.3\% | 21.8\% | \$12,661 | 12.5\% | 15.3\% |
|  | Middle | 243 | 19.2\% | \$36,410 | 14.8\% | 22.1\% | 135 | 18.7\% | 19.0\% | \$20,866 | 14.4\% | 19.0\% | 108 | 19.9\% | 17.8\% | \$15,544 | 15.3\% | 16.6\% |
|  | Upper | 481 | 38.1\% | \$153,476 | 62.4\% | 40.5\% | 268 | 37.2\% | 27.7\% | \$89,507 | 62.0\% | 43.9\% | 213 | 39.2\% | 31.7\% | \$63,969 | 63.0\% | 48.7\% |
|  | Unknow | 10 | 0.8\% | \$1,643 | 0.7\% | 0.0\% | 0 | 0.0\% | 8.9\% | \$0 | 0.0\% | 8.0\% | 10 | 1.8\% | 13.6\% | \$1,643 | 1.6\% | 12.1\% |
|  | Total | 1,264 | 100.0\% | \$245,932 | 100.0\% | 100.0\% | 721 | 100.0\% | 100.0\% | \$144,444 | 100.0\% | 100.0\% | 543 | 100.0\% | 100.0\% | \$101,488 | 100.0\% | 100.0\% |
|  | Lo | 238 | 10.5\% | \$22,002 | 4.5\% | 19.6\% | 153 | 10.7\% | 5.2\% | \$15,037 | 4.8\% | 2.7\% | 85 | 10.2\% | 4.9\% | \$6,965 | 4.0\% | 2.5\% |
|  | Moderate | 378 | 16.7\% | \$44,767 | 9.1\% | 17.8\% | 256 | 17.9\% | 13.1\% | \$30,141 | 9.6\% | 8.6\% | 122 | 14.6\% | 9.9\% | \$14,626 | 8.3\% | 6.4\% |
|  | Middle | 484 | 21.3\% | \$73,178 | 14.9\% | 22.1\% | 311 | 21.7\% | 18.6\% | \$48,531 | 15.4\% | 15.4\% | 173 | 20.7\% | 15.1\% | \$24,647 | 14.0\% | 12.0\% |
|  | Upper | 1,125 | 49.6\% | \$342,313 | 69.7\% | 40.5\% | 698 | 48.7\% | 44.2\% | \$218,455 | 69.4\% | 56.3\% | 427 | 51.0\% | 45.9\% | \$123,858 | 70.2\% | 58.5\% |
|  | Unknow | 44 | 1.9\% | \$8,657 | 1.8\% | 0.0\% | 14 | 1.0\% | 18.8\% | \$2,439 | 0.8\% | 17.0\% | 30 | 3.6\% | 24.2\% | \$6,218 | 3.5\% | 20.7\% |
|  | Total | 2,269 | 100.0\% | \$490,917 | 100.0\% | 100.0\% | 1,432 | 100.0\% | 100.0\% | \$314,603 | 100.0\% | 100.0\% | 837 | 100.0\% | 100.0\% | \$176,314 | 100.0\% | 100.0\% |
|  |  | 45 | 24.9\% | \$252 | 13.5\% | 19.6\% | 25 | 33.8\% | 12.4\% | \$153 | 20.2\% | 4.1\% | 20 | 18.7\% | 12.3\% | \$99 | 8.9\% | 3.9\% |
|  | Moderate | 47 | 26.0\% | \$283 | 15.2\% | 17.8\% | 20 | 27.0\% | 19.6\% | \$140 | 18.5\% | 10.5\% | 27 | 25.2\% | 19.0\% | \$143 | 12.9\% | 9.3\% |
|  | Middle | 41 | 22.7\% | \$465 | 24.9\% | 22.1\% |  | 21.6\% | 21.2\% | \$285 | 37.6\% | 16.6\% | 25 | 23.4\% | 19.8\% | \$180 | 16.3\% | 14.4\% |
|  | Upper | 47 | 26.0\% | \$856 | 45.9\% | 40.5\% | 13 | 17.6\% | 42.4\% | \$179 | 23.6\% | 61.0\% | 34 | 31.8\% | 41.8\% | \$677 | 61.2\% | 61.7\% |
|  | Unknown | 1 |  | \$8 | 0.4\% |  |  | 0.0\% | 4.4\% | \$0 | 0.0\% | 7.8\% | 1 | 0.9\% | 7.1\% | \$8 | 0.7\% | 10.6\% |
|  | Total | 181 | 100.0\% | \$1,864 | 100.0\% | 100.0\% | 74 | 100.0\% | 100.0\% | \$757 | 100.0\% | 100.0\% | 107 | 100.0\% | 100.0\% | \$1,107 | 100.0\% | 100.0\% |
|  |  | 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\% | 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\% | 22.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 529 | 14.2\% | \$42,274 | 5.7\% | 19.6\% | 322 | 14.5\% | 10.6\% | \$27,539 | 6.0\% | 5.1\% | 207 | 13.9\% | 9.4\% | \$14,735 | 5.3\% | 4.3\% |
|  | Moderate | 709 | 19.1\% | \$79,433 | 10.8\% | 17.8\% | 450 | 20.2\% | 18.7\% | \$52,003 | 11.3\% | 12.5\% | 259 | 17.4\% | 15.2\% | \$27,430 | 9.8\% | 9.6\% |
|  | Middle | 768 | 20.7\% | \$110,053 | 14.9\% | 22.1\% | 462 | 20.7\% | 18.8\% | \$69,682 | 15.2\% | 16.3\% | 306 | 20.6\% | 16.3\% | \$40,371 | 14.5\% | 13.4\% |
|  | Upper | 1,653 | 44.5\% | \$496,645 | 67.2\% | 40.5\% | 979 | 44.0\% | 37.3\% | \$308,141 | 67.0\% | 50.2\% | 674 | 45.3\% | 39.7\% | \$188,504 | 67.6\% | 52.8\% |
|  | Unknown | 55 | 1.5\% | \$10,308 | 1.4\% | 0.0\% | 14 | 0.6\% | 14.5\% | \$2,439 | 0.5\% | 15.9\% | 41 | 2.8\% | 19.4\% | \$7,869 | 2.8\% | 20.0\% |
|  | Total | 3,714 | 100.0\% | \$738,713 | 100.0\% | 100.0\% | 2,227 | 100.0\% | 100.0\% | \$459,804 | 100.0\% | 100.0\% | 1,487 | 100.0\% | 100.0\% | \$278,909 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: GA Northeast GA


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: GA Northeast GA

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | 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 | 424 | 73.9\% | \$32,498 | 77.6\% | 73.2\% | 115 | 84.6\% | 65.1\% | \$15,586 | 90.2\% | 77.3\% | 309 | 70.5\% | 63.6\% | \$16,912 | 68.8\% | 71.0\% |
|  | Upper | 118 | 20.6\% | \$8,851 | 21.1\% | 26.8\% | 19 | 14.0\% | 27.9\% | \$1,633 | 9.4\% | 20.6\% | 99 | 22.6\% | 28.5\% | \$7,218 | 29.4\% | 23.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 32 | 5.6\% | \$507 | 1.2\% |  | 2 | 1.5\% | 7.0\% | \$65 | 0.4\% | 2.1\% | 30 | 6.8\% | 7.9\% | \$442 | 1.8\% | 5.3\% |
|  | Total | 574 | 100.0\% | \$41,856 | 100.0\% | 100.0\% | 136 | 100.0\% | 100.0\% | \$17,284 | 100.0\% | 100.0\% | 438 | 100.0\% | 100.0\% | \$24,572 | 100.0\% | 100.0\% |
|  | 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 | 17 | 70.8\% | \$1,359 | 63.6\% | 71.2\% | 2 | 50.0\% | 64.1\% | \$594 | 56.5\% | 82.7\% | 15 | 75.0\% | 71.8\% | \$765 | 70.6\% | 72.7\% |
|  | Upper | 7 | 29.2\% | \$777 | 36.4\% | 28.8\% | 2 | 50.0\% | 30.8\% | \$458 | 43.5\% | 16.8\% | 5 | 25.0\% | 26.8\% | \$319 | 29.4\% | 25.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 5.1\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 2.2\% |
|  | Total | 24 | 100.0\% | \$2,136 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$1,052 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$1,084 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: GA Northeast GA

| $\stackrel{\text { 山ِ }}{\stackrel{\rightharpoonup}{\swarrow}}$ | Borrower Income Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{aligned} & \text { b } \\ & 0 \\ & 0 \\ & 0 \\ & \underset{\alpha}{\alpha} \end{aligned}$ |  |  | ount | $\begin{array}{ll} \text { Bank } & \\ \\ \$(000 s) \\ \hline \end{array}$ | \$\% | Families by Family Income \% |  | Count Bank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { B } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | B | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \\ & \hline \end{aligned}$ |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 2 \\ 17 \\ 14 \\ 47 \\ 1 \end{gathered}$ | $\begin{gathered} 2.5 \% \\ 21.0 \% \\ 17.3 \% \\ 58.0 \% \\ 1.2 \% \end{gathered}$ | $\begin{gathered} \$ 185 \\ \$ 1,319 \\ \$ 1,556 \\ \$ 15,947 \\ \$ 59 \end{gathered}$ | $\begin{gathered} 1.0 \% \\ 6.9 \% \\ 8.2 \% \\ 83.6 \% \\ 0.3 \% \end{gathered}$ | $\begin{gathered} 15.7 \% \\ 16.5 \% \\ 21.2 \% \\ 46.7 \% \\ 0.0 \% \end{gathered}$ | 23 0 | $\begin{gathered} 2.6 \% \\ 15.4 \% \\ 23.1 \% \\ 59.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} 4.4 \% \\ 19.5 \% \\ 23.3 \% \\ 43.2 \% \\ 9.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 113 \\ \$ 476 \\ \$ 1,070 \\ \$ 8,255 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 1.1 \% \\ 4.8 \% \\ 10.8 \% \\ 83.3 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.3 \% \\ 13.4 \% \\ 19.6 \% \\ 54.1 \% \\ 10.6 \% \end{gathered}$ | 1 <br> 11 <br> 5 <br> 24 <br> 1 | $\begin{gathered} 2.4 \% \\ 26.2 \% \\ 11.9 \% \\ 57.1 \% \\ 2.4 \% \\ \hline \end{gathered}$ | $\begin{gathered} 4.6 \% \\ 19.3 \% \\ 22.6 \% \\ 40.8 \% \\ 12.7 \% \end{gathered}$ | $\begin{gathered} \$ 72 \\ \$ 843 \\ \$ 486 \\ \$ 7,692 \\ \$ 59 \end{gathered}$ | $\begin{gathered} 0.8 \% \\ 9.2 \% \\ 5.3 \% \\ 84.0 \% \\ 0.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.3 \% \\ 13.3 \% \\ 19.8 \% \\ 51.8 \% \\ 12.8 \% \end{gathered}$ |
|  | Total | 81 | 100.0\% | \$19,066 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$9,914 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$9,152 | 100.0\% | 100.0\% |
|  | Low | 37 | 9.0\% | \$2,301 | 3.3\% | 15.7\% | 24 | 10.2\% | 4.8\% | \$1,544 | 4.4\% | 2.5\% | 13 | 7.4\% | 5.0\% | \$757 | 2.1\% | 2.0\% |
|  | Moderate | 60 | 14.6\% | \$4,961 | 7.0\% | 16.5\% | 40 | 17.0\% | 11.0\% | \$2,900 | 8.2\% | 6.7\% | 20 | 11.4\% | 10.1\% | \$2,061 | 5.8\% | 6.0\% |
|  | Middle | 93 | 22.6\% | \$10,628 | 15.0\% | 21.2\% | 61 | 26.0\% | 18.3\% | \$6,901 | 19.6\% | 14.3\% | 32 | 18.2\% | 15.8\% | \$3,727 | 10.5\% | 12.1\% |
|  | Upper | 215 | 52.3\% | \$51,961 | 73.5\% | 46.7\% | 110 | 46.8\% | 47.2\% | \$23,902 | 67.8\% | 57.4\% | 105 | 59.7\% | 47.8\% | \$28,059 | 79.1\% | 57.7\% |
|  | Unknown | 6 | 1.5\% | \$856 | 1.2\% | 0.0\% | 0 | 0.0\% | 18.6\% | \$0 | 0.0\% | 19.1\% | 6 | 3.4\% | 21.4\% | \$856 | 2.4\% | 22.2\% |
|  | Total | 411 | 100.0\% | \$70,707 | 100.0\% | 100.0\% | 235 | 100.0\% | 100.0\% | \$35,247 | 100.0\% | 100.0\% | 176 | 100.0\% | 100.0\% | \$35,460 | 100.0\% | 100.0\% |
|  | Low | 9 | 12.0\% | \$35 | 5.1\% | 15.7\% | 4 | 13.3\% | 15.8\% | \$15 | 4.3\% | 6.7\% | 5 | 11.1\% | 12.1\% | \$20 | 6.0\% | 3.0\% |
|  | Moderate | 20 | 26.7\% | \$93 | 13.7\% | 16.5\% | 12 | 40.0\% | 19.2\% | \$59 | 17.1\% | 4.2\% | 8 | 17.8\% | 18.3\% | \$34 | 10.2\% | 11.5\% |
|  | Middle | 19 | 25.3\% | \$113 | 16.6\% | 21.2\% | 5 | 16.7\% | 16.2\% | \$24 | 6.9\% | 15.8\% | 14 | 31.1\% | 26.7\% | \$89 | 26.6\% | 20.3\% |
|  | Upper | 27 | 36.0\% | \$439 | 64.6\% | 46.7\% | 9 | 30.0\% | 38.9\% | \$248 | 71.7\% | 56.9\% | 18 | 40.0\% | 38.8\% | \$191 | 57.2\% | 58.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.8\% | \$0 | 0.0\% | 16.5\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 6.4\% |
|  | Total | 75 | 100.0\% | \$680 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$346 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$334 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | 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\% | 21.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 46.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 48 | 8.5\% | \$2,521 | 2.8\% | 15.7\% | 29 | 9.5\% | 5.1\% | \$1,672 | 3.7\% | 2.5\% | 19 | 7.2\% | 5.1\% | \$849 | 1.9\% | 2.1\% |
|  | Moderate | 97 | 17.1\% | \$6,373 | 7.0\% | 16.5\% | 58 | 19.1\% | 14.0\% | \$3,435 | 7.5\% | 8.6\% | 39 | 14.8\% | 13.7\% | \$2,938 | 6.5\% | 8.4\% |
|  | Middle | 126 | 22.2\% | \$12,297 | 13.6\% | 21.2\% | 75 | 24.7\% | 19.8\% | \$7,995 | 17.6\% | 15.8\% | 51 | 19.4\% | 18.6\% | \$4,302 | 9.6\% | 14.6\% |
|  | Upper | 289 | 51.0\% | \$68,347 | 75.6\% | 46.7\% | 142 | 46.7\% | 45.6\% | \$32,405 | 71.2\% | 55.8\% | 147 | 55.9\% | 44.9\% | \$35,942 | 80.0\% | 55.4\% |
|  | Unknown | 7 | 1.2\% | \$915 | 1.0\% | 0.0\% | 0 | 0.0\% | 15.6\% | \$0 | 0.0\% | 17.4\% | 7 | 2.7\% | 17.8\% | \$915 | 2.0\% | 19.4\% |
|  | Total | 567 | 100.0\% | \$90,453 | 100.0\% | 100.0\% | 304 | 100.0\% | 100.0\% | \$45,507 | 100.0\% | 100.0\% | 263 | 100.0\% | 100.0\% | \$44,946 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount <br> \% |  | ar <br> \$ \% | Total Businesses \% |  | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar nk \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Bar } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
| $$ |  | \$1 Million or Less Over \$1 Million Total Rev. available Rev. Not Known | $\begin{gathered} 203 \\ 53 \\ 256 \\ 318 \end{gathered}$ | $\begin{gathered} \hline 35.4 \% \\ 9.2 \% \\ 44.6 \% \\ 55.4 \% \end{gathered}$ | $\begin{gathered} \hline \$ 24,826 \\ \$ 11,052 \\ \$ 35,878 \\ \$ 5,978 \end{gathered}$ | $\begin{aligned} & 59.3 \% \\ & 26.4 \% \\ & 85.7 \% \\ & 14.3 \% \end{aligned}$ | $\begin{gathered} \hline 91.9 \% \\ 3.8 \% \\ 95.7 \% \\ 4.3 \% \end{gathered}$ | $\begin{gathered} \hline 99 \\ 19 \\ 118 \\ 18 \end{gathered}$ | $\begin{aligned} & \hline 72.8 \% \\ & 14.0 \% \\ & 86.8 \% \\ & 13.2 \% \end{aligned}$ | 46.0\% | \$13,441 | 77.8\% | 66.7\% | 104 34 138 300 | $\begin{gathered} \hline 23.7 \% \\ 7.8 \% \\ 31.5 \% \\ 68.5 \% \end{gathered}$ | 49.0\% | \$11,385 | 46.3\% | 61.8\% |
| $\stackrel{\sim}{0}$ |  | Total | 574 | 100.0\% | \$41,856 | 100.0\% | 100.0\% | 136 | 100.0\% |  |  |  |  | 438 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \underset{\mathcal{\omega}}{\mathrm{N}} \end{aligned}$ | $\begin{aligned} & \stackrel{N}{N} \\ & \text { N } \\ & \text { 历్ } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | 483 47 44 | $\begin{gathered} \hline 84.1 \% \\ 8.2 \% \\ 7.7 \% \end{gathered}$ | $\begin{gathered} \hline \$ 10,573 \\ \$ 7,708 \\ \$ 23,575 \end{gathered}$ | $\begin{aligned} & \hline 25.3 \% \\ & 18.4 \% \\ & 56.3 \% \end{aligned}$ |  | $\begin{aligned} & 92 \\ & 20 \\ & 24 \end{aligned}$ | $\begin{aligned} & \hline 67.6 \% \\ & 14.7 \% \\ & 17.6 \% \end{aligned}$ | $\begin{gathered} \hline 92.0 \% \\ 3.8 \% \\ 4.2 \% \end{gathered}$ | $\begin{gathered} \hline \$ 2,811 \\ \$ 3,448 \\ \$ 11,025 \end{gathered}$ | $\begin{aligned} & \hline 16.3 \% \\ & 19.9 \% \\ & 63.8 \% \end{aligned}$ | $\begin{aligned} & \hline 30.7 \% \\ & 16.7 \% \\ & 52.6 \% \end{aligned}$ | $\begin{gathered} 391 \\ 27 \\ 20 \end{gathered}$ | $\begin{gathered} \hline 89.3 \% \\ 6.2 \% \\ 4.6 \% \end{gathered}$ | $\begin{gathered} \hline 90.6 \% \\ 4.7 \% \\ 4.7 \% \end{gathered}$ | $\begin{gathered} \hline \$ 7,762 \\ \$ 4,260 \\ \$ 12,550 \end{gathered}$ | $\begin{aligned} & \hline 31.6 \% \\ & 17.3 \% \\ & 51.1 \% \end{aligned}$ | $\begin{aligned} & \hline 27.8 \% \\ & 17.4 \% \\ & 54.8 \% \end{aligned}$ |
|  |  | Total | 574 | 100.0\% | \$41,856 | 100.0\% |  | 136 | 100.0\% | 100.0\% | \$17,284 | 100.0\% | 100.0\% | 438 | 100.0\% | 100.0\% | \$24,572 | 100.0\% | 100.0\% |
|  | O $\stackrel{\rightharpoonup}{0}$ 0 0 | \$1 Million or Less <br> Over \$1 Million <br> Not Known | 13 0 11 | $\begin{gathered} 54.2 \% \\ 0.0 \% \\ 45.8 \% \end{gathered}$ | $\begin{gathered} \$ 2,004 \\ \$ 0 \\ \$ 132 \end{gathered}$ | $\begin{gathered} 93.8 \% \\ 0.0 \% \\ 6.2 \% \end{gathered}$ | Total Farms <br> $98.9 \%$ <br> $1.1 \%$ <br> $0.0 \%$ | $4$ | $\begin{gathered} 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | 79.5\% | \$1,052 | 100.0\% | 88.9\% | $\begin{gathered} 9 \\ 0 \\ 11 \end{gathered}$ | $\begin{gathered} 45.0 \% \\ 0.0 \% \\ 55.0 \% \end{gathered}$ | 69.0\% | \$952 | 87.8\% | 74.9\% |
|  |  |  | 24 | 100.0\% | \$2,136 | 100.0\% | 100.0\% | 4 | 100.0\% |  |  |  |  | 20 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { ᄃ్ర } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{gathered} \hline 17 \\ 3 \\ 4 \end{gathered}$ | $\begin{aligned} & \hline 70.8 \% \\ & 12.5 \% \\ & 16.7 \% \end{aligned}$ | $\begin{gathered} \hline \$ 299 \\ \$ 614 \\ \$ 1,223 \end{gathered}$ | $\begin{aligned} & \hline 14.0 \% \\ & 28.7 \% \\ & 57.3 \% \end{aligned}$ |  | $0$ | $\begin{gathered} \hline 0.0 \% \\ 50.0 \% \\ 50.0 \% \end{gathered}$ | $\begin{aligned} & \hline 59.0 \% \\ & 15.4 \% \\ & 25.6 \% \end{aligned}$ | $\begin{gathered} \hline \$ 0 \\ \$ 393 \\ \$ 659 \end{gathered}$ | $\begin{gathered} \hline 0.0 \% \\ 37.4 \% \\ 62.6 \% \end{gathered}$ | $\begin{array}{c\|} \hline 7.8 \% \\ 20.7 \% \\ 71.5 \% \end{array}$ | $\begin{gathered} 17 \\ 1 \\ 2 \end{gathered}$ | $\begin{gathered} \hline 85.0 \% \\ 5.0 \% \\ 10.0 \% \end{gathered}$ | $\begin{aligned} & \hline 74.6 \% \\ & 14.1 \% \\ & 11.3 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 299 \\ & \$ 221 \\ & \$ 564 \end{aligned}$ | $\begin{aligned} & \hline 27.6 \% \\ & 20.4 \% \\ & 52.0 \% \end{aligned}$ | $\begin{aligned} & \hline 19.8 \% \\ & 30.4 \% \\ & 49.7 \% \end{aligned}$ |
|  |  |  | 24 | 100.0\% | \$2,136 | 100.0\% |  | 4 | 100.0\% | 100.0\% | \$1,052 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$1,084 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: IL Decatur


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: IL Decatur


Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

## Assessment Area: IL Decatur

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Families <br> by Family Income \% | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  |  | Bank |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% |  |
|  | Low | 27 | 12.4\% | \$1,412 | 6.0\% | 20.1\% | 16 | 13.8\% | 12.8\% | \$842 | 7.0\% | 6.5\% | 11 | 10.8\% | 12.3\% | \$570 | 4.9\% | 6.0\% |
|  | M oderate | 66 | 30.3\% | \$5,456 | 23.1\% | 18.5\% | 38 | 32.8\% | 26.8\% | \$3,028 | 25.3\% | 19.4\% | 28 | 27.5\% | 21.9\% | \$2,428 | 20.8\% | 15.9\% |
|  | Middle | 63 | 28.9\% | \$5,835 | 24.7\% | 22.3\% | 33 | 28.4\% | 20.7\% | \$2,876 | 24.1\% | 17.8\% | 30 | 29.4\% | 21.4\% | \$2,959 | 25.3\% | 19.5\% |
|  | Upper | 62 | 28.4\% | \$10,952 | 46.3\% | 39.2\% | 29 | 25.0\% | 33.7\% | \$5,212 | 43.6\% | 51.2\% | 33 | 32.4\% | 32.4\% | \$5,740 | 49.1\% | 48.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.1\% | \$0 | 0.0\% | 5.1\% | 0 | 0.0\% | 12.0\% | \$0 | 0.0\% | 9.8\% |
|  | Total | 218 | 100.0\% | \$23,655 | 100.0\% | 100.0\% | 116 | 100.0\% | 100.0\% | \$11,958 | 100.0\% | 100.0\% | 102 | 100.0\% | 100.0\% | \$11,697 | 100.0\% | 100.0\% |
|  | Low | 16 | 6.0\% | \$983 | 2.9\% | 20.1\% | 9 | 6.0\% | 4.5\% | \$657 | 3.3\% | 2.0\% | 7 | 6.0\% | 6.5\% | \$326 | 2.4\% | 3.3\% |
|  | M oderate | 36 | 13.5\% | \$2,470 | 7.4\% | 18.5\% | 18 | 12.0\% | 13.5\% | \$1,338 | 6.8\% | 8.3\% | 18 | 15.4\% | 15.1\% | \$1,132 | 8.2\% | 9.1\% |
|  | Middle | 55 | 20.6\% | \$4,894 | 14.7\% | 22.3\% | 25 | 16.7\% | 21.2\% | \$2,115 | 10.8\% | 15.9\% | 30 | 25.6\% | 19.3\% | \$2,779 | 20.2\% | 14.3\% |
|  | Upper | 141 | 52.8\% | \$22,812 | 68.3\% | 39.2\% | 83 | 55.3\% | 52.7\% | \$13,739 | 70.0\% | 65.7\% | 58 | 49.6\% | 50.2\% | \$9,073 | 65.9\% | 64.1\% |
|  | Unknown | 19 | 7.1\% | \$2,221 | 6.7\% | 0.0\% | 15 | 10.0\% | 8.1\% | \$1,771 | 9.0\% | 8.0\% | 4 | 3.4\% | 8.9\% | \$450 | 3.3\% | 9.2\% |
|  | Total | 267 | 100.0\% | \$33,380 | 100.0\% | 100.0\% | 150 | 100.0\% | 100.0\% | \$19,620 | 100.0\% | 100.0\% | 117 | 100.0\% | 100.0\% | \$13,760 | 100.0\% | 100.0\% |
|  |  | 1 | 3\% | \$3 | 1.6\% | 20.1\% | 1 | 11.1\% | 14.3\% | \$3 | 7.3\% | 5.8\% | 0 | 0.0\% | 12.3\% | \$0 | 0.0\% | 4.6\% |
|  | Moderate | 4 | 17.4\% | \$18 | 9.5\% | 18.5\% | 3 | 33.3\% | 24.4\% | \$10 | 24.4\% | 13.1\% | 1 | 7.1\% | 22.6\% | \$8 | 5.4\% | 16.7\% |
|  | Middle | 5 | 21.7\% | \$36 | 19.0\% | 22.3\% | 1 | 11.1\% | 28.0\% | \$4 | 9.8\% | 23.2\% | 4 | 28.6\% | 28.0\% | \$32 | 21.6\% | 15.6\% |
|  | Upper | 12 | 52.2\% | \$129 | 68.3\% | 39.2\% | 3 | 33.3\% | 31.9\% | \$21 | 51.2\% | 55.3\% | 9 | 64.3\% | 34.5\% | \$108 | 73.0\% | 59.3\% |
|  | Unknown | 1 | 4.3\% | \$3 | 1.6\% | 0.0\% | 1 | 11.1\% | 1.3\% | \$3 | 7.3\% | 2.6\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 3.8\% |
|  | Total | 23 | 100.0\% | \$189 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$41 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$148 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 20.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.5\% | 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\% | 22.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 39.2\% | 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\% |
|  |  | 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\% |
|  | Low |  | 8.7\% | \$2,398 | 4.2\% | 20.1\% | 26 | 9.5\% | 8.3\% | \$1,502 | 4.8\% | 3.6\% | 18 | 7.7\% | 9.4\% | \$896 | 3.5\% | 4.4\% |
|  | Moderate | 106 | 20.9\% | \$7,944 | 13.9\% | 18.5\% | 59 | 21.5\% | 19.1\% | \$4,376 | 13.8\% | 12.1\% | 47 | 20.2\% | 18.5\% | \$3,568 | 13.9\% | 12.0\% |
|  | Middle | 123 | 24.2\% | \$10,765 | 18.8\% | 22.3\% | 59 | 21.5\% | 21.5\% | \$4,995 | 15.8\% | 16.6\% | 64 | 27.5\% | 20.8\% | \$5,770 | 22.5\% | 16.4\% |
|  | Upper | 215 | 42.3\% | \$33,893 | 59.2\% | 39.2\% | 115 | 41.8\% | 43.9\% | \$18,972 | 60.0\% | 59.7\% | 100 | 42.9\% | 41.3\% | \$14,921 | 58.3\% | 57.3\% |
|  | Unknown | 20 | 3.9\% | \$2,224 | 3.9\% | 0.0\% | 16 | 5.8\% | 7.2\% | \$1,774 | 5.6\% | 8.0\% | 4 | 1.7\% | 9.9\% | \$450 | 1.8\% | 9.9\% |
|  |  | 508 | 100.0\% | \$57,224 | 100.0\% | 100.0\% | 275 | 100.0\% | 100.0\% | \$31,619 | 100.0\% | 100.0\% | 233 | 100.0\% | 100.0\% | \$25,605 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: IL Peoria


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: IL Peoria


Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: IL Peoria

|  | Borrowe $r$ Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 4 | 16.7\% | \$338 | 11.6\% | 19.5\% | 3 | 20.0\% | 17.3\% | \$288 | 15.4\% | 9.9\% | 1 | 11.1\% | 16.0\% | \$50 | 4.7\% | 9.0\% |
|  | Moderate | 9 | 37.5\% | \$950 | 32.5\% | 18.6\% | 6 | 40.0\% | 22.6\% | \$596 | 31.9\% | 17.1\% | 3 | 33.3\% | 23.3\% | \$354 | 33.6\% | 17.9\% |
|  | Middle | 2 | 8.3\% | \$208 | 7.1\% | 23.3\% | 1 | 6.7\% | 22.6\% | \$78 | 4.2\% | 22.7\% | 1 | 11.1\% | 20.9\% | \$130 | 12.3\% | 20.8\% |
|  | Upper | 9 | 37.5\% | \$1,425 | 48.8\% | 38.6\% | 5 | 33.3\% | 26.8\% | \$906 | 48.5\% | 40.0\% | 4 | 44.4\% | 27.3\% | \$519 | 49.3\% | 40.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.7\% | \$0 | 0.0\% | 10.4\% | 0 | 0.0\% | 12.6\% | \$0 | 0.0\% | 11.6\% |
|  | Total | 24 | 100.0\% | \$2,921 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$1,868 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$1,053 | 100.0\% | 100.0\% |
|  | Low | 13 | 14.9\% | \$829 | 8.7\% | 19.5\% | 6 | 10.5\% | 6.9\% | \$465 | 7.1\% | 3.5\% | 7 | 23.3\% | 8.1\% | \$364 | 12.3\% | 4.1\% |
|  | Moderate | 18 | 20.7\% | \$1,437 | 15.1\% | 18.6\% | 13 | 22.8\% | 16.4\% | \$1,149 | 17.5\% | 10.5\% | 5 | 16.7\% | 16.2\% | \$288 | 9.8\% | 10.3\% |
|  | Middle | 24 | 27.6\% | \$2,522 | 26.6\% | 23.3\% | 16 | 28.1\% | 23.0\% | \$1,843 | 28.1\% | 19.3\% | 8 | 26.7\% | 22.5\% | \$679 | 23.0\% | 18.7\% |
|  | Upper | 32 | 36.8\% | \$4,708 | 49.6\% | 38.6\% | 22 | 38.6\% | 39.6\% | \$3,091 | 47.2\% | 51.8\% | 10 | 33.3\% | 39.5\% | \$1,617 | 54.9\% | 53.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.1\% | \$0 | 0.0\% | 15.0\% | 0 | 0.0\% | 13.7\% | \$0 | 0.0\% | 14.0\% |
|  | Total | 87 | 100.0\% | \$9,496 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$6,548 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$2,948 | 100.0\% | 100.0\% |
|  | Low | 2 | 50.0\% | \$6 | 25.0\% | 19.5\% | 1 | 50.0\% | 14.5\% | \$3 | 30.0\% | 5.8\% | 1 | 50.0\% | 16.4\% | \$3 | 21.4\% | 6.6\% |
|  | Moderate | 1 | 25.0\% | \$11 | 45.8\% | 18.6\% | 0 | 0.0\% | 22.1\% | \$0 | 0.0\% | 14.8\% | 1 | 50.0\% | 21.4\% | \$11 | 78.6\% | 13.3\% |
|  | Middle | 1 | 25.0\% | \$7 | 29.2\% | 23.3\% | 1 | 50.0\% | 26.9\% | \$7 | 70.0\% | 23.6\% | 0 | 0.0\% | 23.7\% | \$0 | 0.0\% | 20.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.6\% | 0 | 0.0\% | 31.3\% | \$0 | 0.0\% | 47.2\% | 0 | 0.0\% | 34.7\% | \$0 | 0.0\% | 52.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.2\% | \$0 | 0.0\% | 8.5\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 6.6\% |
|  | Total | 4 | 100.0\% | \$24 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$14 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | 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\% | 23.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 19 | 16.5\% | \$1,173 | 9.4\% | 19.5\% | 10 | 13.5\% | 10.9\% | \$756 | 9.0\% | 5.7\% | 9 | 22.0\% | 11.6\% | \$417 | 10.4\% | 5.9\% |
|  | Moderate | 28 | 24.3\% | \$2,398 | 19.3\% | 18.6\% | 19 | 25.7\% | 18.8\% | \$1,745 | 20.7\% | 12.8\% | 9 | 22.0\% | 19.2\% | \$653 | 16.3\% | 13.0\% |
|  | Middle | 27 | 23.5\% | \$2,737 | 22.0\% | 23.3\% | 18 | 24.3\% | 23.0\% | \$1,928 | 22.9\% | 20.4\% | 9 | 22.0\% | 21.8\% | \$809 | 20.1\% | 19.0\% |
|  | Upper | 41 | 35.7\% | \$6,133 | 49.3\% | 38.6\% | 27 | 36.5\% | 34.5\% | \$3,997 | 47.4\% | 47.3\% | 14 | 34.1\% | 34.2\% | \$2,136 | 53.2\% | 46.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.7\% | \$0 | 0.0\% | 13.9\% | 0 | 0.0\% | 13.2\% | \$0 | 0.0\% | 15.5\% |
|  | Total | 115 | 100.0\% | \$12,441 | 100.0\% | 100.0\% | 74 | 100.0\% | 100.0\% | \$8,426 | 100.0\% | 100.0\% | 41 | 100.0\% | 100.0\% | \$4,015 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: IN Indianapolis


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: IN Indianapolis

| PRODUCT TYPE | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | unt | Bank Dol |  | Small Businesses \% | Count k |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar | Agg |  | Coun <br> ank | Agg | Dollar |  |  |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 41 | 3.4\% | \$7,349 | 5.0\% | 3.2\% | 10 | 2.9\% | 2.6\% | \$2,268 | 3.4\% | 3.6\% | 31 | 3.7\% | 2.4\% | \$5,081 | 6.4\% | 3.0\% |
|  | Moderate | 185 | 15.5\% | \$29,736 | 20.2\% | 16.4\% | 52 | 14.9\% | 12.5\% | \$13,237 | 19.6\% | 15.6\% | 133 | 15.8\% | 13.4\% | \$16,499 | 20.7\% | 17.2\% |
|  | Middle | 503 | 42.2\% | \$65,229 | 44.3\% | 42.2\% | 155 | 44.5\% | 40.1\% | \$30,756 | 45.5\% | 43.2\% | 348 | 41.3\% | 40.1\% | \$34,473 | 43.3\% | 43.4\% |
|  | Upper | 462 | 38.8\% | \$44,805 | 30.5\% | 38.2\% | 131 | 37.6\% | 43.0\% | \$21,322 | 31.5\% | 37.0\% | 331 | 39.3\% | 42.7\% | \$23,483 | 29.5\% | 36.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% | 0.3\% |
|  | Total | 1,191 | 100.0\% | \$147,119 | 100.0\% | 100.0\% | 348 | 100.0\% | 100.0\% | \$67,583 | 100.0\% | 100.0\% | 843 | 100.0\% | 100.0\% | \$79,536 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | 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\% | 3.5\% | 0 | 0.0\% | 5.9\% | \$0 | 0.0\% | 5.4\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 3.6\% |
|  | Middle | 5 | 83.3\% | \$265 | 84.1\% | 67.9\% | 2 | 100.0\% | 76.5\% | \$140 | 100.0\% | 73.5\% | 3 | 75.0\% | 62.0\% | \$125 | 71.4\% | 64.2\% |
|  | Upper | 1 | 16.7\% | \$50 | 15.9\% | 28.3\% | 0 | 0.0\% | 17.6\% | \$0 | 0.0\% | 21.1\% | 1 | 25.0\% | 34.0\% | \$50 | 28.6\% | 32.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 6 | 100.0\% | \$315 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$140 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$175 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: IN Indianapolis

|  | Borrowe r Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | $\begin{aligned} & \text { Bank } \\ & \left\lvert\, \begin{array}{c} \text { Dol } \\ \text { \$ (000s) } \end{array}\right. \end{aligned}$ | \$ \% | Families by Family Income \% | \# | Count <br> Bank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{gathered} \text { Ba } \\ \$(000 \mathrm{~s}) \end{gathered}$ | Dollar <br> k <br> \$ \% | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar k \$ \% | Agg \$ \% |
| 山 |  | 70 | 17.4\% | \$5,215 | 8.5\% | 19.9\% | 44 | 19.8\% | 16.3\% |  | 11.2\% | 9.5\% | 26 | 14.4\% | 13.0\% |  | 5.8\% |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Modera | 117 | 29.1\% | \$12,940 | 21.2\% | 18.4\% | 66 | 29.7\% | 24.5\% | \$7,518 | 24.6\% | 19.2\% | 51 | 28.3\% | 22.7\% | \$5,422 | 17.7\% | 16.8\% |
|  | Middle | 72 | 17.9\% | \$9,113 | 14.9\% | 22.5\% | 46 | 20.7\% | 19.8\% | \$5,735 | 18.8\% | 20.1\% | 26 | 14.4\% | 19.5\% | \$3,378 | 11.1\% | 18.7\% |
|  | Upper | 143 | 35.6\% | \$33,863 | 55.4\% | 39.2\% | 66 | 29.7\% | 25.4\% | \$13,880 | 45.4\% | 38.7\% | 77 | 42.8\% | 29.3\% | \$19,983 | 65.4\% | 44.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 13.9\% | \$0 | 0.0\% | 12.6\% | 0 | 0.0\% | 15.5\% | \$0 | 0.0\% | 13.3\% |
|  | Total | 402 | 100.0\% | \$61,131 | 100.0\% | 100.0\% | 222 | 100.0\% | 100.0\% | \$30,572 | 100.0\% | 100.0\% | 180 | 100.0\% | 100.0\% | \$30,559 | 100.0\% | 100.0\% |
|  |  | 45 | 7.1\% | \$2,878 | 2.5\% | 19.9\% | 26 | 6.8\% | 5.9\% | 704 | 2.3\% | 3.0\% | 19 | 7.4\% | 5.6\% | \$1,174 | 2.8\% | 2.8\% |
|  | Moderate | 97 | 15.2\% | \$10,423 | 8.9\% | 18.4\% | 53 | 13.9\% | 13.8\% | \$6,091 | 8.2\% | 8.9\% | 44 | 17.2\% | 13.0\% | \$4,332 | 10.2\% | 8.1\% |
|  | Middle | 136 | 21.4\% | \$17,676 | 15.1\% | 22.5\% | 91 | 23.9\% | 20.2\% | \$12,528 | 16.9\% | 16.4\% | 45 | 17.6\% | 19.3\% | \$5,148 | 12.1\% | 15.3\% |
|  | Upper | 351 | 55.1\% | \$84,748 | 72.5\% | 39.2\% | 209 | 54.9\% | 41.9\% | \$53,472 | 72.0\% | 53.9\% | 142 | 55.5\% | 43.3\% | \$31,276 | 73.5\% | 55.8\% |
|  | Unknow | 8 | 1.3\% | \$1,094 | 0.9\% | 0.0\% | 2 | 0.5\% | 18.2\% | \$456 | 0.6\% | 17.7\% | 6 | 2.3\% | 18.8\% | \$638 | 1.5\% | 17.9\% |
|  | Total | 637 | 100.0\% | \$116,819 | 100.0\% | 100.0\% | 381 | 100.0\% | 100.0\% | \$74,251 | 100.0\% | 100.0\% | 256 | 100.0\% | 100.0\% | \$42,568 | 100.0\% | 100.0\% |
|  |  | 11 | 26.8\% | \$57 | 14.2\% | 19.9\% | 6 | 31.6\% | 11.9 | \$35 | 21.2\% | 6.8\% | 5 | 22.7\% | 11.9\% | \$22 | 9.3\% | 4.9\% |
|  | Moderate | 11 | 26.8\% | \$81 | 20.1\% | 18.4\% | 4 | 21.1\% | 19.8\% | \$41 | 24.8\% | 14.6\% | 7 | 31.8\% | 19.0\% | \$40 | 16.9\% | 10.5\% |
|  | Middle | 5 | 12.2\% | \$27 | 6.7\% | 22.5\% | 3 | 15.8\% | 21.0\% | \$21 | 12.7\% | 18.9\% | 2 | 9.1\% | 23.4\% | \$6 | 2.5\% | 19.7\% |
|  | Upper | 14 | 34.1\% | \$237 | 59.0\% | 39.2\% | 6 | 31.6\% | 37.6\% | \$68 | 41.2\% | 50.6\% | 8 | 36.4\% | 38.5\% | \$169 | 71.3\% | 51.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 9.0\% | 0 | 0.0\% | 7.2\% | \$0 | 0.0\% | 12.9\% |
|  |  | 41 | 100.0\% | \$402 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$165 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$237 | 100.0\% | 100.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 19.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 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\% |
|  |  | 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\% |
|  | Low | 126 | 11.7\% | \$8,150 | 4.6\% | 19.9\% | 76 | 12.2\% | 9.5\% | \$5,178 | 4.9\% | 4.9\% | 50 | 10.9\% | 8.6\% | \$2,972 | 4.1\% | 4.1\% |
|  | Moderate | 225 | 20.8\% | \$23,444 | 13.1\% | 18.4\% | 123 | 19.8\% | 17.5\% | \$13,650 | 13.0\% | 11.7\% | 102 | 22.3\% | 16.8\% | \$9,794 | 13.3\% | 10.8\% |
|  | Middle | 213 | 19.7\% | \$26,816 | 15.0\% | 22.5\% | 140 | 22.5\% | 20.0\% | \$18,284 | 17.4\% | 16.9\% | 73 | 15.9\% | 19.4\% | \$8,532 | 11.6\% | 15.8\% |
|  | Upper | 508 | 47.0\% | \$118,848 | 66.6\% | 39.2\% | 281 | 45.2\% | 36.2\% | \$67,420 | 64.2\% | 47.2\% | 227 | 49.6\% | 37.8\% | \$51,428 | 70.1\% | 49.2\% |
|  | Unknown | 8 | 0.7\% | \$1,094 | 0.6\% | 0.0\% | 2 | 0.3\% | 16.7\% | \$456 | 0.4\% | 19.2\% | 6 | 1.3\% | 17.5\% | \$638 | 0.9\% | 20.1\% |
|  |  | 1,080 | 100.0\% | \$178,352 | 100.0\% | 100.0\% | 622 | 100.0\% | 100.0\% | \$104,988 | 100.0\% | 100.0\% | 458 | 100.0\% | 100.0\% | \$73,364 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison   <br> 2010   |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Count ${ }^{\text {Bank }}$ Dollar |  |  |  | Total Businesses <br> \% |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Ban } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar nk \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Bar } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar <br> nk <br> \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
| $\begin{aligned} & \mathscr{0} \\ & \hline \end{aligned}$ | $\begin{aligned} & \stackrel{\otimes}{\stackrel{1}{\omega}} \\ & \stackrel{\rightharpoonup}{\otimes} \\ & \underset{\sim}{\otimes} \end{aligned}$ | \$1 Million or Less <br> Over $\$ 1$ Million <br> Total Rev. available <br> Rev. Not Known | $\begin{aligned} & 320 \\ & 327 \\ & 647 \\ & 544 \end{aligned}$ | $\begin{aligned} & \hline 26.9 \% \\ & 27.5 \% \\ & 54.4 \% \\ & 45.7 \% \end{aligned}$ | $\begin{gathered} \hline \$ 32,470 \\ \$ 95,191 \\ \$ 127,661 \\ \$ 19,458 \end{gathered}$ | $\begin{aligned} & 22.1 \% \\ & 64.7 \% \\ & 86.8 \% \\ & 13.2 \% \end{aligned}$ | $\begin{gathered} \hline 87.6 \% \\ 7.0 \% \\ 94.6 \% \\ 5.4 \% \end{gathered}$ | $\begin{gathered} 157 \\ 157 \\ 314 \\ 34 \end{gathered}$ | $\begin{gathered} 45.1 \% \\ 45.1 \% \\ 90.2 \% \\ 9.8 \% \end{gathered}$ | 27.7\% | \$16,385 | 24.2\% | 30.9\% | 163 170 333 510 | $\begin{aligned} & \hline 19.3 \% \\ & 20.2 \% \\ & 39.5 \% \\ & 60.5 \% \end{aligned}$ | 35.4\% | \$16,085 | 20.2\% | 30.1\% |
|  |  | Total | 1,191 | 100.0\% | \$147,119 | 100.0\% | 100.0\% | 348 | 100.0\% |  |  |  |  | 843 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \bar{\sigma} \\ & \underset{\sim}{6} \end{aligned}$ | $\begin{aligned} & \stackrel{N}{N} \\ & \text { N } \\ & \text { त्ర } \end{aligned}$ | $\begin{array}{l\|} \hline \$ 100,000 \text { or Less } \\ \$ 100,001 \text { - } \$ 250,000 \\ \$ 250,001 \text { - } \$ 1 \text { Million } \end{array}$ | $\begin{aligned} & \hline 868 \\ & 150 \\ & 173 \end{aligned}$ | $\begin{gathered} \hline 72.9 \% \\ 12.6 \% \\ 14.5 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 26,289 \\ & \$ 28,098 \\ & \$ 92,732 \end{aligned}$ | $\begin{aligned} & \hline 17.9 \% \\ & 19.1 \% \\ & 63.0 \% \end{aligned}$ |  | $\begin{gathered} \hline 194 \\ 70 \\ 84 \end{gathered}$ | $\begin{aligned} & \hline 55.7 \% \\ & 20.1 \% \\ & 24.1 \% \end{aligned}$ | $\begin{gathered} \hline 85.0 \% \\ 6.5 \% \\ 8.6 \% \end{gathered}$ | $\begin{gathered} \hline \$ 8,249 \\ \$ 12,942 \\ \$ 46,392 \end{gathered}$ | $\begin{aligned} & \hline 12.2 \% \\ & 19.1 \% \\ & 68.6 \% \end{aligned}$ | $\begin{array}{l\|} \hline 18.6 \% \\ 16.2 \% \\ 65.2 \% \end{array}$ | $\begin{gathered} \hline 674 \\ 80 \\ 89 \end{gathered}$ | $\begin{gathered} \hline 80.0 \% \\ 9.5 \% \\ 10.6 \% \end{gathered}$ | $\begin{gathered} \hline 89.5 \% \\ 4.5 \% \\ 5.9 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 18,040 \\ & \$ 15,156 \\ & \$ 46,340 \end{aligned}$ | $\begin{aligned} & \hline 22.7 \% \\ & 19.1 \% \\ & 58.3 \% \end{aligned}$ | $\begin{aligned} & \hline 24.9 \% \\ & 15.2 \% \\ & 59.9 \% \end{aligned}$ |
|  |  | Total | 1,191 | 100.0\% | \$147,119 | 100.0\% |  | 348 | 100.0\% | 100.0\% | \$67,583 | 100.0\% | 100.0\% | 843 | 100.0\% | 100.0\% | \$79,536 | 100.0\% | 100.0\% |
|  | $\stackrel{0}{\stackrel{0}{c}}$ | \$1 Million or Less <br> Over $\$ 1$ Million <br> Not Known | $\begin{aligned} & 5 \\ & 0 \\ & 1 \end{aligned}$ | $\begin{gathered} 83.3 \% \\ 0.0 \% \\ 16.7 \% \end{gathered}$ | $\begin{gathered} \$ 305 \\ \$ 0 \\ \$ 10 \end{gathered}$ | $\begin{gathered} 96.8 \% \\ 0.0 \% \\ 3.2 \% \end{gathered}$ | Total Farms <br> $98.6 \%$ <br> $1.0 \%$ <br> $0.4 \%$ | $2$ | $\begin{gathered} 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | 63.7\% | \$140 | 100.0\% | 74.6\% | $3$ | $\begin{gathered} 75.0 \% \\ 0.0 \% \\ 25.0 \% \end{gathered}$ | 46.0\% | \$165 | 94.3\% | 47.9\% |
|  |  |  |  | 100.0\% | \$315 | 100.0\% | 100.0\% |  | 100.0\% |  |  |  |  | 4 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { त్ర } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{aligned} & \hline 6 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline \$ 315 \\ \$ 0 \\ \$ 0 \end{gathered}$ | $\begin{array}{c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ |  | $\begin{aligned} & 2 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{array}{c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ | $\begin{aligned} & \hline 71.6 \% \\ & 15.7 \% \\ & 12.7 \% \end{aligned}$ | $\begin{gathered} \hline \$ 140 \\ \$ 0 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 20.3 \% \\ & 30.1 \% \\ & 49.5 \% \end{aligned}$ | $\begin{aligned} & 4 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 78.0 \% \\ & 10.0 \% \\ & 12.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 175 \\ \$ 0 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 19.8 \% \\ & 23.3 \% \\ & 56.8 \% \end{aligned}$ |
|  |  | Total | 6 | 100.0\% | \$315 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$140 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$175 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: IA Des Moines

|  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | $\begin{array}{\|c\|\|} \text { O wner } \\ \text { Occupied } \\ \text { Units } \\ \% \\ \hline \end{array}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.0\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 1.2\% |
|  | Moderate | 5 | 7.9\% | \$395 | 4.7\% | 17.8\% | 3 | 10.3\% | 10.4\% | \$227 | 6.7\% | 6.1\% | 2 | 5.9\% | 8.8\% | \$168 | 3.4\% | 4.7\% |
|  | Middle | 47 | 74.6\% | \$5,980 | 71.5\% | 54.3\% | 24 | 82.8\% | 55.4\% | \$2,954 | 87.1\% | 53.1\% | 23 | 67.6\% | 53.3\% | \$3,026 | 60.9\% | 49.8\% |
|  | Upper | 11 | 17.5\% | \$1,986 | 23.8\% | 25.9\% | 2 | 6.9\% | 32.9\% | \$209 | 6.2\% | 39.7\% | 9 | 26.5\% | 36.5\% | \$1,777 | 35.7\% | 44.2\% |
|  | Unknow | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 63 | 100.0\% | \$8,361 | 100.0\% | 100.0\% | 29 | 100.0\% | 100.0\% | \$3,390 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$4,971 | 100.0\% | 100.0\% |
|  |  |  | 2.0\% | \$280 | 1.3\% | 2.0\% | 1 | 1.3\% | 0.9\% | \$117 | 0.9\% | 0.8\% | 2 | 3.0\% | 1.0\% | \$163 | 1.9\% | 0.9\% |
|  | Moderate | 8 | $5.4 \%$ | \$568 | 2.7\% | 17.8\% | 2 | 2.5\% | 6.2\% | \$153 | 1.2\% | 3.4\% | 6 | 9.0\% | 6.1\% | \$415 | 4.9\% | 3.4\% |
|  | Middle | 101 | 68.7\% | \$13,658 | 64.5\% | 54.3\% | 53 | 66.3\% | 50.5\% | \$7,821 | 61.3\% | 46.4\% | 48 | 71.6\% | 51.2\% | \$5,837 | 69.4\% | 47.0\% |
|  | Upper | 35 | 23.8\% | \$6,662 | 31.5\% | 25.9\% | 24 | 30.0\% | 42.4\% | \$4,666 | 36.6\% | 49.5\% | 11 | 16.4\% | 41.7\% | \$1,996 | 23.7\% | 48.8\% |
|  | 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 | 147 | 100.0\% | \$21,168 | 100.0\% | 100.0\% | 80 | 100.0\% | 100.0\% | \$12,757 | 100.0\% | 100.0\% | 67 | 100.0\% | 100.0\% | \$8,411 | 100.0\% | 100.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.0\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 0.9\% |
|  | Moderate | 1 | 14.3\% | \$4 | 8.3\% | 17.8\% | 1 | 33.3\% | 13.5\% | \$4 | 16.7\% | 7.9\% | 0 | 0.0\% | 11.3\% | \$0 | 0.0\% | 4.1\% |
|  | Middle | 6 | 85.7\% | \$44 | 91.7\% | 54.3\% |  | 66.7\% | 54.5\% | \$20 | 83.3\% | 52.7\% | 4 | 100.0\% | 53.0\% | \$24 | 100.0\% | 47.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 25.9\% | 0 | 0.0\% | 30.7\% | \$0 | 0.0\% | 38.0\% | 0 | 0.0\% | 34.1\% | \$0 | 0.0\% | 47.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 7 | 100.0\% | \$48 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$24 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$24 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Lo | 0 | 0.0\% | \$0 | 0.0\% | 14.1\% | 0 | 0.0\% | 20.5\% | \$0 | 0.0\% | 16.2\% | 0 | 0.0\% | 18.5\% | \$0 | 0.0\% | 4.6\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.1\% | 0 | 0.0\% | 14.5\% | \$0 | 0.0\% | 12.3\% | 0 | 0.0\% | 16.3\% | \$0 | 0.0\% | 8.8\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 48.9\% | 0 | 0.0\% | 53.0\% | \$0 | 0.0\% | 42.7\% | 0 | 0.0\% | 46.7\% | \$0 | 0.0\% | 51.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 22.0\% | 0 | 0.0\% | 12.0\% | \$0 | 0.0\% | 28.9\% | 0 | 0.0\% | 18.5\% | \$0 | 0.0\% | 35.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 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\% |
|  | Low | 3 | 1.4\% | \$280 | 0.9\% | 2.0\% | 1 | 0.9\% | 1.1\% | \$117 | 0.7\% | 1.2\% | 2 | 1.9\% | 1.2\% | \$163 | 1.2\% | 1.1\% |
|  | Moderate | 14 | 6.5\% | \$967 | 3.3\% | 17.8\% | 6 | 5.4\% | 7.9\% | \$384 | 2.4\% | 4.4\% | 8 | 7.6\% | 7.3\% | \$583 | 4.3\% | 4.0\% |
|  | Middle | 154 | 71.0\% | \$19,682 | 66.5\% | 54.3\% | 79 | 70.5\% | 52.2\% | \$10,795 | 66.8\% | 48.3\% | 75 | 71.4\% | 51.9\% | \$8,887 | 66.3\% | 48.0\% |
|  | Upper | 46 | 21.2\% | \$8,648 | 29.2\% | 25.9\% | 26 | 23.2\% | 38.8\% | \$4,875 | 30.1\% | 46.0\% | 20 | 19.0\% | 39.6\% | \$3,773 | 28.1\% | 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\% |
|  | Total | 217 | 100.0\% | \$29,577 | 100.0\% | 100.0\% | 112 | 100.0\% | 100.0\% | \$16,171 | 100.0\% | 100.0\% | 105 | 100.0\% | 100.0\% | \$13,406 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: IA Des Moines

| PRODUCT TYPE | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | unt | ank |  | Small Businesses \% | Count Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar | Agg |  | Coun <br> ank | Agg | Dollar |  |  |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 6 | 5.5\% | \$763 | 5.2\% | 9.4\% | 1 | 2.2\% | 9.5\% | \$40 | 0.5\% | 15.9\% | 5 | 7.8\% | 9.0\% | \$723 | 12.3\% | 16.9\% |
|  | Moderate | 12 | 11.0\% | \$6,455 | 43.9\% | 10.0\% | 7 | 15.6\% | 7.3\% | \$4,165 | 47.0\% | 7.5\% | 5 | 7.8\% | 7.8\% | \$2,290 | 39.1\% | 8.3\% |
|  | Middle | 69 | 63.3\% | \$4,472 | 30.4\% | 51.6\% | 32 | 71.1\% | 45.1\% | \$3,396 | 38.4\% | 42.6\% | 37 | 57.8\% | 46.1\% | \$1,076 | 18.4\% | 40.5\% |
|  | Upper | 22 | 20.2\% | \$3,020 | 20.5\% | 29.0\% | 5 | 11.1\% | 34.8\% | \$1,253 | 14.2\% | 32.9\% | 17 | 26.6\% | 35.5\% | \$1,767 | 30.2\% | 33.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.3\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 109 | 100.0\% | \$14,710 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$8,854 | 100.0\% | 100.0\% | 64 | 100.0\% | 100.0\% | \$5,856 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 50 | 94.3\% | \$3,688 | 95.1\% | 77.2\% | 32 | 97.0\% | 75.0\% | \$2,205 | 97.1\% | 79.5\% | 18 | 90.0\% | 73.4\% | \$1,483 | 92.2\% | 78.0\% |
|  | Upper | 3 | 5.7\% | \$190 | 4.9\% | 21.0\% | 1 | 3.0\% | 21.0\% | \$65 | 2.9\% | 17.8\% | 2 | 10.0\% | 24.5\% | \$125 | 7.8\% | 20.7\% |
|  | 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\% | 2.3\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 1.3\% |
|  | Total | 53 | 100.0\% | \$3,878 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$2,270 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$1,608 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: IA Des Moines


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Bank |  |  |  | Total Businesses |  | Count ank | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba | Dollar | Agg | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% |  | \$ 000s | \$ \% |  |
|  |  | \$1 Million or Less | 48 | 44.0\% | \$4,882 | 33.2\% | 87.3\% | 28 | 62.2\% | 45.1\% | \$3,679 | 41.6\% | 39.5\% | 20 | 31.3\% | 48.8\% | \$1,203 | 20.5\% | 36.4\% |
|  |  | Over \$1 Million | 17 | 15.6\% | \$4,491 | 30.5\% | 7.0\% | 8 | 17.8\% |  |  |  |  | 9 | 14.1\% |  |  |  |  |
|  |  | Total Rev. available | 65 | 59.6\% | \$9,373 | 63.7\% | 94.3\% | 36 | 80.0\% |  |  |  |  | 29 | 45.4\% |  |  |  |  |
|  |  | Rev. Not Known | 44 | 40.4\% | \$5,337 | 36.3\% | 5.8\% | 9 | 20.0\% |  |  |  |  | 35 | 54.7\% |  |  |  |  |
|  |  | Total | 109 | 100.0\% | \$14,710 | 100.0\% | 100.0\% | 45 | 100.0\% |  |  |  |  | 64 | 100.0\% |  |  |  |  |
| 产 |  | \$100,000 or Less | 83 | 76.1\% | \$2,007 | 13.6\% |  | 29 | 64.4\% | 89.3\% | \$704 | 8.0\% | 27.8\% | 54 | 84.4\% | 90.3\% | \$1,303 | 22.3\% | 29.0\% |
| ¢ |  | \$100,001-\$250,000 | 7 | 6.4\% | \$1,269 | 8.6\% |  | 4 | 8.9\% | 5.1\% | \$721 | 8.1\% | 16.0\% | 3 | 4.7\% | 4.5\% | \$548 | 9.4\% | 15.7\% |
|  |  | \$250,001 - \$1 Million | 19 | 17.4\% | \$11,434 | 77.7\% |  | 12 | 26.7\% | 5.5\% | \$7,429 | 83.9\% | 56.2\% | 7 | 10.9\% | 5.2\% | \$4,005 | 68.4\% | 55.3\% |
|  |  | Total | 109 | 100.0\% | \$14,710 | 100.0\% |  | 45 | 100.0\% | 100.0\% | \$8,854 | 100.0\% | 100.0\% | 64 | 100.0\% | 100.0\% | \$5,856 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less | 52 | 98.1\% | \$3,803 | 98.1\% | Total Farms <br> $98.7 \%$ | 33 | 100.0\% | 74.4\% | \$2,270 | 100.0\% | 73.3\% | 19 | 95.0\% | 74.1\% | \$1,533 | 95.3\% | 73.3\% |
|  |  | Over \$1 Million | 0 | 0.0\% | \$0 | 0.0\% | 0.8\% |  | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 1 | 1.9\% | \$75 | 1.9\% | 0.5\% |  | 0.0\% |  |  |  |  | 1 | 5.0\% |  |  |  |  |
|  |  | Total | 53 | 100.0\% | \$3,878 | 100.0\% | 100.0\% | 33 | 100.0\% |  |  |  |  | 20 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 43 | 81.1\% | \$1,918 | 49.5\% |  | 27 | 81.8\% | 76.7\% | \$1,090 | 48.0\% | 29.5\% | 16 | 80.0\% | 70.5\% | \$828 | 51.5\% | 28.0\% |
|  |  | \$100,001-\$250,000 | 8 | 15.1\% | \$1,260 | 32.5\% |  | 5 | 15.2\% | 14.8\% | \$830 | 36.6\% | 33.5\% | 3 | 15.0\% | 20.9\% | \$430 | 26.7\% | 39.5\% |
|  |  | \$250,001-\$500,000 | 2 | 3.8\% | \$700 | 18.1\% |  | 1 | 3.0\% | 8.5\% | \$350 | 15.4\% | 36.9\% | 1 | 5.0\% | 8.6\% | \$350 | 21.8\% | 32.5\% |
|  |  | Total | 53 | 100.0\% | \$3,878 | 100.0\% |  | 33 | 100.0\% | 100.0\% | \$2,270 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$1,608 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: IA Waterloo


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: IA Waterloo

| PRODUCT TYPE | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Small <br> Businesses <br> \% |  | Coun <br> ank | Agg |  | Dollar | Agg |  | Coun ank | Agg |  | Dollar k | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 24 | 17.9\% | \$980 | 11.3\% | 9.3\% | 5 | 11.9\% | 13.4\% | \$135 | 3.4\% | 16.9\% | 19 | 20.7\% | 12.9\% | \$845 | 17.9\% | 15.6\% |
|  | Moderate | 20 | 14.9\% | \$2,008 | 23.2\% | 17.9\% | 7 | 16.7\% | 14.7\% | \$802 | 20.3\% | 14.0\% | 13 | 14.1\% | 15.9\% | \$1,206 | 25.6\% | 13.4\% |
|  | Middle | 68 | 50.7\% | \$4,577 | 52.8\% | 49.3\% | 24 | 57.1\% | 42.5\% | \$2,691 | 68.2\% | 39.2\% | 44 | 47.8\% | 44.1\% | \$1,886 | 40.0\% | 45.5\% |
|  | Upper | 22 | 16.4\% | \$1,098 | 12.7\% | 23.5\% | 6 | 14.3\% | 24.5\% | \$315 | 8.0\% | 28.8\% | 16 | 17.4\% | 25.2\% | \$783 | 16.6\% | 25.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 134 | 100.0\% | \$8,663 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$3,943 | 100.0\% | 100.0\% | 92 | 100.0\% | 100.0\% | \$4,720 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\underset{\sim}{c}}^{\underset{\sim}{4}} \\ & \underset{\sim}{4} \\ & \sum_{i}^{\top} \end{aligned}$ | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 11.1\% | \$48 | 1.6\% | 1.9\% | 1 | 12.5\% | 2.6\% | \$13 | 0.9\% | 0.5\% | 1 | 10.0\% | 2.2\% | \$35 | 2.3\% | 1.2\% |
|  | Middle | 13 | 72.2\% | \$2,155 | 73.5\% | 65.9\% | 6 | 75.0\% | 60.6\% | \$1,160 | 83.6\% | 68.2\% | 7 | 70.0\% | 69.1\% | \$995 | 64.4\% | 71.2\% |
|  | Upper | 3 | 16.7\% | \$730 | 24.9\% | 32.2\% | 1 | 12.5\% | 35.5\% | \$215 | 15.5\% | 31.1\% | 2 | 20.0\% | 28.1\% | \$515 | 33.3\% | 27.6\% |
|  | 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\% | 1.3\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 18 | 100.0\% | \$2,933 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$1,388 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,545 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: IA Waterloo

|  | Borrowe <br> $r$ Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | $\begin{aligned} & \text { 3ank } \\ & \\ & \\ & \text { Do (000s) } \end{aligned}$ | \$ \% | Families by Family Income \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba | Dollar k \$ \% | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | Count <br> chent <br> \% | Agg $\%$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 13 | 18.3\% | \$906 | 8.3\% | 17.6\% | 10 | 27.0\% | 12.9\% | \$692 | 12.2\% | 7.8\% | 3 | 8.8\% | 11.5\% | \$214 | 4.1\% | 7.0\% |
|  | Moderate | 13 | 18.3\% | \$1,458 | 13.4\% | 20.6\% | 7 | 18.9\% | 24.3\% | \$721 | 12.8\% | 19.6\% | 6 | 17.6\% | 20.5\% | \$737 | 14.0\% | 16.5\% |
|  | Middle | 17 | 23.9\% | \$2,124 | 19.5\% | 23.3\% | 4 | 10.8\% | 21.1\% | \$442 | 7.8\% | 21.1\% | 13 | 38.2\% | 22.3\% | \$1,682 | 32.0\% | 22.8\% |
|  | Upper | 28 | 39.4\% | \$6,418 | 58.8\% | 38.4\% | 16 | 43.2\% | 26.6\% | \$3,796 | 67.2\% | 37.2\% | 12 | 35.3\% | 27.4\% | \$2,622 | 49.9\% | 37.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 15.1\% | \$0 | 0.0\% | 14.3\% | 0 | 0.0\% | 18.4\% | \$0 | 0.0\% | 15.8\% |
|  | Total | 71 | 100.0\% | \$10,906 | 100.0\% | 100.0\% | 37 | 100.0\% | 100.0\% | \$5,651 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$5,255 | 100.0\% | 100.0\% |
| $$ | Low | 12 | 8.1\% | \$905 | 3.9\% | 17.6\% | 6 | 6.0\% | 5.7\% | \$400 | 2.4\% | 3.1\% | 6 | 12.5\% | 7.4\% | \$505 | 7.4\% | 4.0\% |
|  | Moderate | 26 | 17.6\% | \$2,566 | 10.9\% | 20.6\% | 17 | 17.0\% | 15.6\% | \$1,699 | 10.2\% | 10.9\% | 9 | 18.8\% | 16.1\% | \$867 | 12.7\% | 11.3\% |
|  | Middle | 31 | 20.9\% | \$3,613 | 15.4\% | 23.3\% | 23 | 23.0\% | 23.3\% | \$2,660 | 16.0\% | 19.7\% | 8 | 16.7\% | 23.7\% | \$953 | 14.0\% | 20.2\% |
|  | Upper | 79 | 53.4\% | \$16,380 | 69.8\% | 38.4\% | 54 | 54.0\% | 45.8\% | \$11,878 | 71.4\% | 56.3\% | 25 | 52.1\% | 40.7\% | \$4,502 | 65.9\% | 50.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 10.0\% | 0 | 0.0\% | 12.0\% | \$0 | 0.0\% | 13.9\% |
|  | Total | 148 | 100.0\% | \$23,464 | 100.0\% | 100.0\% | 100 | 100.0\% | 100.0\% | \$16,637 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$6,827 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 17.6\% | 0 | 0.0\% | 12.1\% | \$0 | 0.0\% | 7.7\% | 0 | 0.0\% | 9.3\% | \$0 | 0.0\% | 4.5\% |
|  | Moderate | 3 | 100.0\% | \$16 | 100.0\% | 20.6\% | 1 | 100.0\% | 22.4\% | \$4 | 100.0\% | 16.5\% | 2 | 100.0\% | 26.5\% | \$12 | 100.0\% | 21.9\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 23.3\% | 0 | 0.0\% | 23.4\% | \$0 | 0.0\% | 21.6\% | 0 | 0.0\% | 26.5\% | \$0 | 0.0\% | 19.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.4\% | 0 | 0.0\% | 36.0\% | \$0 | 0.0\% | 47.3\% | 0 | 0.0\% | 28.4\% | \$0 | 0.0\% | 42.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.1\% | \$0 | 0.0\% | 6.9\% | 0 | 0.0\% | 9.3\% | \$0 | 0.0\% | 11.7\% |
|  | Total | 3 | 100.0\% | \$16 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$4 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$12 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | 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\% | 23.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 25 | 11.3\% | \$1,811 | 5.3\% | 17.6\% | 16 | 11.6\% | 8.8\% | \$1,092 | 4.9\% | 4.8\% | 9 | 10.7\% | 9.1\% | \$719 | 5.9\% | 4.9\% |
|  | Moderate | 42 | 18.9\% | \$4,040 | 11.7\% | 20.6\% | 25 | 18.1\% | 19.2\% | \$2,424 | 10.9\% | 13.9\% | 17 | 20.2\% | 18.1\% | \$1,616 | 13.4\% | 12.8\% |
|  | Middle | 48 | 21.6\% | \$5,737 | 16.7\% | 23.3\% | 27 | 19.6\% | 22.3\% | \$3,102 | 13.9\% | 19.7\% | 21 | 25.0\% | 23.0\% | \$2,635 | 21.8\% | 20.1\% |
|  | Upper | 107 | 48.2\% | \$22,798 | 66.3\% | 38.4\% | 70 | 50.7\% | 37.6\% | \$15,674 | 70.3\% | 47.5\% | 37 | 44.0\% | 34.5\% | \$7,124 | 58.9\% | 42.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.1\% | \$0 | 0.0\% | 14.0\% | 0 | 0.0\% | 15.3\% | \$0 | 0.0\% | 19.3\% |
|  | Total | 222 | 100.0\% | \$34,386 | 100.0\% | 100.0\% | 138 | 100.0\% | 100.0\% | \$22,292 | 100.0\% | 100.0\% | 84 | 100.0\% | 100.0\% | \$12,094 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: KY Southwest KY


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: KY Southwest KY

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Bank  Agg <br> $\#$ $\%$ $\%$ |  |  | Dollar Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | Count <br> Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  |  |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% |
|  | 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 | 56 | 13.3\% | \$3,915 | 13.1\% | 9.9\% | 13 | 12.7\% | 11.1\% | \$1,515 | 13.0\% | 17.6\% | 43 | 13.5\% | 12.0\% | \$2,400 | 13.2\% | 20.2\% |
|  | Middle | 148 | 35.2\% | \$11,689 | 39.1\% | 34.6\% | 28 | 27.5\% | 32.7\% | \$3,751 | 32.1\% | 27.4\% | 120 | 37.6\% | 32.0\% | \$7,938 | 43.5\% | 31.2\% |
|  | Upper | 212 | 50.4\% | \$14,239 | 47.6\% | 55.5\% | 60 | 58.8\% | 52.4\% | \$6,408 | 54.9\% | 53.9\% | 152 | 47.6\% | 52.6\% | \$7,831 | 42.9\% | 47.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 5 | 1.2\% | \$71 | 0.2\% |  | 1 | 1.0\% | 3.8\% | \$1 | 0.0\% | 1.1\% | 4 | 1.3\% | 3.3\% | \$70 | 0.4\% | 0.6\% |
|  | Total | 421 | 100.0\% | \$29,914 | 100.0\% | 100.0\% | 102 | 100.0\% | 100.0\% | \$11,675 | 100.0\% | 100.0\% | 319 | 100.0\% | 100.0\% | \$18,239 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 0.9\% | \$17 | 0.1\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 1 | 1.8\% | 0.7\% | \$17 | 0.2\% | 0.1\% |
|  | Middle | 18 | 16.5\% | \$2,655 | 18.2\% | 36.3\% | 8 | 15.4\% | 31.2\% | \$1,101 | 18.7\% | 23.9\% | 10 | 17.5\% | 29.7\% | \$1,554 | 17.9\% | 26.5\% |
|  | Upper | 90 | 82.6\% | \$11,921 | 81.7\% | 63.7\% | 44 | 84.6\% | 67.4\% | \$4,787 | 81.3\% | 75.9\% | 46 | 80.7\% | 69.6\% | \$7,134 | 82.0\% | 73.3\% |
|  | 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\% | 1.4\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 109 | 100.0\% | \$14,593 | 100.0\% | 100.0\% | 52 | 100.0\% | 100.0\% | \$5,888 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$8,705 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: KY Southwest KY

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison0010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | ount |  | lar \$ \% | Families by Family Income \% |  | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { BaI } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> \$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \\ & \hline \end{aligned}$ | B | Count Bank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{gathered} \text { BaI } \\ \$(000 \mathrm{~s}) \end{gathered}$ | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \\ \hline \end{gathered}$ |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 19 \\ 40 \\ 64 \\ 98 \\ 0 \end{gathered}$ | $\begin{gathered} 8.6 \% \\ 18.1 \% \\ 29.0 \% \\ 44.3 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \$ 981 \\ \$ 2,609 \\ \$ 6,180 \\ \$ 13,713 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 4.2 \% \\ 11.1 \% \\ 26.3 \% \\ 58.4 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 15.1 \% \\ 13.7 \% \\ 18.8 \% \\ 52.4 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} 12 \\ 22 \\ 31 \\ 59 \\ 0 \end{gathered}$ | $\begin{gathered} 9.7 \% \\ 17.7 \% \\ 25.0 \% \\ 47.6 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} 5.5 \% \\ 14.3 \% \\ 22.6 \% \\ 46.2 \% \\ 11.5 \% \end{gathered}$ | $\begin{gathered} \$ 610 \\ \$ 1,482 \\ \$ 2,983 \\ \$ 8,470 \\ \$ 0 \end{gathered}$ | $\begin{gathered} 4.5 \% \\ 10.9 \% \\ 22.0 \% \\ 62.5 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} 2.5 \% \\ 9.1 \% \\ 18.7 \% \\ 56.8 \% \\ 12.9 \% \end{gathered}$ | $\begin{gathered} 7 \\ 18 \\ 33 \\ 39 \\ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 7.2 \% \\ 18.6 \% \\ 34.0 \% \\ 40.2 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3.1 \% \\ 13.1 \% \\ 24.3 \% \\ 46.1 \% \\ 13.4 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 371 \\ \$ 1,127 \\ \$ 3,197 \\ \$ 5,243 \\ \$ 0 \end{gathered}$ | $\begin{gathered} 3.7 \% \\ 11.3 \% \\ 32.2 \% \\ 52.8 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} 1.4 \% \\ 7.9 \% \\ 19.9 \% \\ 56.5 \% \\ 14.3 \% \\ \hline \end{gathered}$ |
|  | Total | 221 | 100.0\% | \$23,483 | 100.0\% | 100.0\% | 124 | 100.0\% | 100.0\% | \$13,545 | 100.0\% | 100.0\% | 97 | 100.0\% | 100.0\% | \$9,938 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 35 \\ 57 \\ 85 \\ 282 \\ 7 \\ \hline \end{gathered}$ | $\begin{gathered} 7.5 \% \\ 12.2 \% \\ 18.2 \% \\ 60.5 \% \\ 1.5 \% \end{gathered}$ | $\begin{gathered} \$ 1,626 \\ \$ 4,027 \\ \$ 7,245 \\ \$ 38,965 \\ \$ 792 \\ \hline \end{gathered}$ | $\begin{gathered} 3.1 \% \\ 7.6 \% \\ 13.8 \% \\ 74.0 \% \\ 1.5 \% \\ \hline \end{gathered}$ | $\begin{gathered} 15.1 \% \\ 13.7 \% \\ 18.8 \% \\ 52.4 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 17 \\ 39 \\ 51 \\ 182 \\ 3 \\ \hline \end{gathered}$ | $\begin{gathered} 5.8 \% \\ 13.4 \% \\ 17.5 \% \\ 62.3 \% \\ 1.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.2 \% \\ 7.6 \% \\ 13.8 \% \\ 53.8 \% \\ 22.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 810 \\ \$ 2,824 \\ \$ 4,429 \\ \$ 25,370 \\ \$ 467 \\ \hline \end{gathered}$ | $\begin{gathered} 2.4 \% \\ 8.3 \% \\ 13.1 \% \\ 74.8 \% \\ 1.4 \% \\ \hline \end{gathered}$ | $\begin{gathered} 0.9 \% \\ 4.0 \% \\ 9.4 \% \\ 59.5 \% \\ 26.2 \% \end{gathered}$ | $\begin{gathered} 18 \\ 18 \\ 34 \\ 100 \\ 4 \\ \hline \end{gathered}$ | $\begin{gathered} 10.3 \% \\ 10.3 \% \\ 19.5 \% \\ 57.5 \% \\ 2.3 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.3 \% \\ 7.2 \% \\ 15.3 \% \\ 54.6 \% \\ 20.6 \% \end{gathered}$ | $\begin{gathered} \$ 816 \\ \$ 1,203 \\ \$ 2,816 \\ \$ 13,595 \\ \$ 325 \\ \hline \end{gathered}$ | $\begin{gathered} 4.4 \% \\ 6.4 \% \\ 15.0 \% \\ 72.5 \% \\ 1.7 \% \\ \hline \end{gathered}$ | $\begin{gathered} 0.9 \% \\ 4.0 \% \\ 10.5 \% \\ 60.4 \% \\ 24.3 \% \\ \hline \end{gathered}$ |
|  | Total | 466 | 100.0\% | \$52,655 | 100.0\% | 100.0\% | 292 | 100.0\% | 100.0\% | \$33,900 | 100.0\% | 100.0\% | 174 | 100.0\% | 100.0\% | \$18,755 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 5 \\ 15 \\ 13 \\ 27 \\ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 8.3 \% \\ 25.0 \% \\ 21.7 \% \\ 45.0 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 18 \\ \$ 74 \\ \$ 61 \\ \$ 274 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 4.2 \% \\ 17.3 \% \\ 14.3 \% \\ 64.2 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 15.1 \% \\ 13.7 \% \\ 18.8 \% \\ 52.4 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2 \\ 6 \\ 7 \\ 10 \\ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 8.0 \% \\ 24.0 \% \\ 28.0 \% \\ 40.0 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 6.1 \% \\ 14.0 \% \\ 20.1 \% \\ 55.9 \% \\ 3.9 \% \\ \hline \end{gathered}$ | $\begin{aligned} & \$ 7 \\ & \$ 26 \\ & \$ 21 \\ & \$ 91 \\ & \$ 0 \\ & \hline \end{aligned}$ | $\begin{gathered} 4.8 \% \\ 17.9 \% \\ 14.5 \% \\ 62.8 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3.8 \% \\ 6.3 \% \\ 14.1 \% \\ 67.1 \% \\ 8.7 \% \\ \hline \end{gathered}$ | $\begin{array}{r} 3 \\ 9 \\ 6 \\ 17 \\ 0 \\ \hline \end{array}$ | $\begin{gathered} 8.6 \% \\ 25.7 \% \\ 17.1 \% \\ 48.6 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 8.7 \% \\ 16.5 \% \\ 22.6 \% \\ 47.8 \% \\ 4.3 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 11 \\ \$ 48 \\ \$ 40 \\ \$ 183 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 3.9 \% \\ 17.0 \% \\ 14.2 \% \\ 64.9 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3.2 \% \\ 8.1 \% \\ 19.0 \% \\ 66.8 \% \\ 3.0 \% \\ \hline \end{gathered}$ |
|  |  | 60 | 100.0\% | \$427 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$145 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$282 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{aligned} & 0 \\ & 0 \\ & 0 \\ & 0 \\ & 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 15.1 \% \\ 13.7 \% \\ 18.8 \% \\ 52.4 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & 0 \\ & 0 \\ & 0 \\ & 0 \\ & 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & 0 \\ & 0 \\ & 0 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ |
|  | 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\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 59 \\ 112 \\ 162 \\ 407 \\ 7 \\ \hline \end{gathered}$ | $\begin{gathered} 7.9 \% \\ 15.0 \% \\ 21.7 \% \\ 54.5 \% \\ 0.9 \% \\ \hline \end{gathered}$ | \$2,625 <br> \$6,710 <br> \$13,486 <br> \$52,952 <br> \$792 | $\begin{gathered} 3.4 \% \\ 8.8 \% \\ 17.6 \% \\ 69.2 \% \\ 1.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 15.1 \% \\ 13.7 \% \\ 18.8 \% \\ 52.4 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 31 \\ 67 \\ 89 \\ 251 \\ 3 \\ \hline \end{gathered}$ | $\begin{gathered} 7.0 \% \\ 15.2 \% \\ 20.2 \% \\ 56.9 \% \\ 0.7 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3.4 \% \\ 9.8 \% \\ 16.7 \% \\ 51.5 \% \\ 18.5 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 1,427 \\ \$ 4,332 \\ \$ 7,433 \\ \$ 33,931 \\ \$ 467 \\ \hline \end{gathered}$ | $\begin{gathered} 3.0 \% \\ 9.1 \% \\ 15.6 \% \\ 71.3 \% \\ 1.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 1.4 \% \\ 5.4 \% \\ 11.8 \% \\ 57.6 \% \\ 23.8 \% \\ \hline \end{gathered}$ | $\begin{gathered} 28 \\ 45 \\ 73 \\ 156 \\ 4 \\ \hline \end{gathered}$ | $\begin{gathered} 9.2 \% \\ 14.7 \% \\ 23.9 \% \\ 51.0 \% \\ 1.3 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3.0 \% \\ 9.8 \% \\ 19.0 \% \\ 51.0 \% \\ 17.2 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 1,198 \\ \$ 2,378 \\ \$ 6,053 \\ \$ 19,021 \\ \$ 325 \\ \hline \end{gathered}$ | 4.1\% <br> 8.2\% <br> 20.9\% <br> 65.6\% <br> 1.1\% | 1.1\% <br> 5.4\% <br> 13.9\% <br> 58.9\% <br> 20.6\% |
|  |  | 747 | 100.0\% | \$76,565 | 100.0\% | 100.0\% | 441 | 100.0\% | 100.0\% | \$47,590 | 100.0\% | 100.0\% | 306 | 100.0\% | 100.0\% | \$28,975 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: LA Baton Rouge


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: LA Baton Rouge

| PRODUCT TYPE | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | unt | Bank Dol |  | Small Businesses \% | Count <br> Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar | Agg |  | Count <br> ank | Agg | Dollar |  |  |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 61 | 3.1\% | \$10,289 | 5.3\% | 5.4\% | 17 | 2.5\% | 3.0\% | \$3,267 | 3.5\% | 3.0\% | 44 | 3.4\% | 3.1\% | \$7,022 | 7.0\% | 2.9\% |
|  | Moderate | 221 | 11.2\% | \$24,264 | 12.4\% | 16.1\% | 69 | 10.3\% | 10.8\% | \$10,994 | 11.6\% | 14.3\% | 152 | 11.7\% | 12.0\% | \$13,270 | 13.1\% | 13.4\% |
|  | Middle | 859 | 43.6\% | \$87,913 | 45.0\% | 40.4\% | 312 | 46.6\% | 38.5\% | \$46,509 | 49.3\% | 37.9\% | 547 | 42.1\% | 38.6\% | \$41,404 | 41.0\% | 37.0\% |
|  | Upper | 827 | 42.0\% | \$72,804 | 37.3\% | 38.1\% | 272 | 40.6\% | 45.1\% | \$33,605 | 35.6\% | 43.4\% | 555 | 42.7\% | 43.9\% | \$39,199 | 38.8\% | 45.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 2 | 0.1\% | \$23 | 0.0\% |  | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 1.4\% | 2 | 0.2\% | 2.4\% | \$23 | 0.0\% | 1.1\% |
|  | Total | 1,970 | 100.0\% | \$195,293 | 100.0\% | 100.0\% | 670 | 100.0\% | 100.0\% | \$94,375 | 100.0\% | 100.0\% | 1,300 | 100.0\% | 100.0\% | \$100,918 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 7 | 12.7\% | \$1,208 | 18.2\% | 10.8\% | 5 | 22.7\% | 8.5\% | \$1,149 | 32.5\% | 21.8\% | 2 | 6.1\% | 3.9\% | \$59 | 1.9\% | 1.1\% |
|  | Moderate | 16 | 29.1\% | \$2,361 | 35.5\% | 10.0\% | 5 | 22.7\% | 14.1\% | \$988 | 28.0\% | 25.6\% | 11 | 33.3\% | 27.6\% | \$1,373 | 44.1\% | 45.7\% |
|  | Middle | 30 | 54.5\% | \$3,054 | 45.9\% | 50.8\% | 12 | 54.5\% | 43.7\% | \$1,395 | 39.5\% | 31.9\% | 18 | 54.5\% | 44.7\% | \$1,659 | 53.2\% | 33.7\% |
|  | Upper | 2 | 3.6\% | \$25 | 0.4\% | 28.4\% | 0 | 0.0\% | 28.2\% | \$0 | 0.0\% | 20.0\% | 2 | 6.1\% | 21.1\% | \$25 | 0.8\% | 19.4\% |
|  | 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\% | 5.6\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 55 | 100.0\% | \$6,648 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$3,532 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$3,116 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: LA Baton Rouge

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | Agg | Bank |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% |  |
|  | Low | 45 | 8.8\% | \$4,450 | 4.4\% | 22.3\% | 19 | 7.5\% | 8.0\% | \$1,774 | 3.5\% | 4.7\% | 26 | 10.2\% | 8.9\% | \$2,676 | 5.4\% | 5.1\% |
|  | Moderate | 120 | 23.6\% | \$16,022 | 16.0\% | 16.1\% | 54 | 21.3\% | 25.4\% | \$7,116 | 14.0\% | 20.1\% | 66 | 25.8\% | 23.8\% | \$8,906 | 18.0\% | 18.7\% |
|  | Middle | 113 | 22.2\% | \$17,380 | 17.3\% | 19.2\% | 57 | 22.5\% | 24.7\% | \$8,512 | 16.8\% | 23.4\% | 56 | 21.9\% | 24.0\% | \$8,868 | 17.9\% | 23.4\% |
|  | Upper | 230 | 45.2\% | \$62,126 | 62.0\% | 42.4\% | 123 | 48.6\% | 34.1\% | \$33,299 | 65.7\% | 43.7\% | 107 | 41.8\% | 33.1\% | \$28,827 | 58.2\% | 43.2\% |
|  | Unknown | 1 | 0.2\% | \$221 | 0.2\% | 0.0\% | 0 | 0.0\% | 7.8\% | \$0 | 0.0\% | 8.2\% | 1 | 0.4\% | 10.1\% | \$221 | 0.4\% | 9.7\% |
|  | Total | 509 | 100.0\% | \$100,199 | 100.0\% | 100.0\% | 253 | 100.0\% | 100.0\% | \$50,701 | 100.0\% | 100.0\% | 256 | 100.0\% | 100.0\% | \$49,498 | 100.0\% | 100.0\% |
|  | Low | 33 | 4.0\% | \$2,751 | 1.6\% | 22.3\% | 13 | 2.7\% | 3.4\% | \$985 | 1.0\% | 1.8\% | 20 | 5.9\% | 4.3\% | \$1,766 | 2.4\% | 2.2\% |
|  | Moderate | 80 | 9.7\% | \$8,602 | 5.0\% | 16.1\% | 44 | 9.1\% | 11.6\% | \$4,681 | 4.7\% | 7.8\% | 36 | 10.6\% | 11.1\% | \$3,921 | 5.3\% | 7.4\% |
|  | Middle | 161 | 19.5\% | \$21,807 | 12.6\% | 19.2\% | 100 | 20.6\% | 19.5\% | \$13,373 | 13.4\% | 15.8\% | 61 | 18.0\% | 19.6\% | \$8,434 | 11.5\% | 15.7\% |
|  | Upper | 539 | 65.4\% | \$137,180 | 79.1\% | 42.4\% | 322 | 66.4\% | 49.0\% | \$79,933 | 80.0\% | 58.2\% | 217 | 64.0\% | 47.6\% | \$57,247 | 77.9\% | 58.0\% |
|  | Unknown | 11 | 1.3\% | \$3,043 | 1.8\% | 0.0\% | 6 | 1.2\% | 16.6\% | \$963 | 1.0\% | 16.5\% | 5 | 1.5\% | 17.4\% | \$2,080 | 2.8\% | 16.7\% |
|  | Total | 824 | 100.0\% | \$173,383 | 100.0\% | 100.0\% | 485 | 100.0\% | 100.0\% | \$99,935 | 100.0\% | 100.0\% | 339 | 100.0\% | 100.0\% | \$73,448 | 100.0\% | 100.0\% |
|  | Low | 15 | 15.6\% | \$72 | 7.3\% | 22.3\% | 4 | 10.8\% | 9.1\% | \$19 | 5.0\% | 2.5\% | 11 | 18.6\% | 9.5\% | \$53 | 8.7\% | 3.4\% |
|  | Moderate | 16 | 16.7\% | \$78 | 7.9\% | 16.1\% | 7 | 18.9\% | 17.3\% | \$39 | 10.3\% | 11.2\% | 9 | 15.3\% | 18.3\% | \$39 | 6.4\% | 11.8\% |
|  | Middle | 28 | 29.2\% | \$286 | 28.9\% | 19.2\% | 15 | 40.5\% | 23.0\% | \$113 | 29.9\% | 18.3\% | 13 | 22.0\% | 20.9\% | \$173 | 28.3\% | 17.8\% |
|  | Upper | 35 | 36.5\% | \$541 | 54.7\% | 42.4\% | 10 | 27.0\% | 42.6\% | \$198 | 52.4\% | 61.0\% | 25 | 42.4\% | 42.0\% | \$343 | 56.1\% | 59.0\% |
|  | Unknown | 2 | 2.1\% | \$12 | 1.2\% | 0.0\% | 1 | 2.7\% | 7.9\% | \$9 | 2.4\% | 7.1\% | 1 | 1.7\% | 9.3\% | \$3 | 0.5\% | 8.1\% |
|  | Total | 96 | 100.0\% | \$989 | 100.0\% | 100.0\% | 37 | 100.0\% | 100.0\% | \$378 | 100.0\% | 100.0\% | 59 | 100.0\% | 100.0\% | \$611 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 22.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 16.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 19.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 42.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 93 | 6.5\% | \$7,273 | 2.6\% | 22.3\% | 36 | 4.6\% | 5.4\% | \$2,778 | 1.8\% | 2.8\% | 57 | 8.7\% | 6.5\% | \$4,495 | 3.6\% | 3.3\% |
|  | Moderate | 216 | 15.1\% | \$24,702 | 9.0\% | 16.1\% | 105 | 13.5\% | 17.3\% | \$11,836 | 7.8\% | 12.3\% | 111 | 17.0\% | 16.8\% | \$12,866 | 10.4\% | 11.7\% |
|  | Middle | 302 | 21.1\% | \$39,473 | 14.4\% | 19.2\% | 172 | 22.2\% | 21.7\% | \$21,998 | 14.6\% | 18.2\% | 130 | 19.9\% | 21.5\% | \$17,475 | 14.1\% | 18.1\% |
|  | Upper | 804 | 56.3\% | \$199,847 | 72.8\% | 42.4\% | 455 | 58.7\% | 42.8\% | \$113,430 | 75.1\% | 50.4\% | 349 | 53.4\% | 41.1\% | \$86,417 | 69.9\% | 49.0\% |
|  | Unknown | 14 | 1.0\% | \$3,276 | 1.2\% | 0.0\% | 7 | 0.9\% | 12.9\% | \$972 | 0.6\% | 16.2\% | 7 | 1.1\% | 14.1\% | \$2,304 | 1.9\% | 17.9\% |
|  | Total | 1,429 | 100.0\% | \$274,571 | 100.0\% | 100.0\% | 775 | 100.0\% | 100.0\% | \$151,014 | 100.0\% | 100.0\% | 654 | 100.0\% | 100.0\% | \$123,557 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Total Businesses |  | Count <br> ank | Agg | Ba | Dollar k | Agg |  | Count nk | Agg | Ban | Dollar |  |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | \$1 Million or Less Over \$1 Million Total Rev. available Rev. Not Known Total | 637 | 32.3\% | \$63,948 | 32.7\% | 89.3\% | 354 | 52.8\% | 28.9\% | \$36,348 | 38.5\% | 36.7\% | 283 | 21.8\% | 35.3\% | \$27,600 | 27.3\% | 36.6\% |
|  |  | 398 | 20.2\% | \$103,457 | 53.0\% | 5.6\% | 199 | 29.7\% |  |  |  |  | 199 | 15.3\% |  |  |  |  |
|  |  | 1,035 | 52.5\% | \$167,405 | 85.7\% | 94.9\% | 553 | 82.5\% |  |  |  |  |  | 37.1\% |  |  |  |  |
|  |  | 935 | 47.5\% | \$27,888 | 14.3\% | 5.1\% | 117 | 17.5\% |  |  |  |  | 818 | 62.9\% |  |  |  |  |
|  |  | 1,970 | 100.0\% | \$195,293 | 100.0\% | 100.0\% | 670 | 100.0\% |  |  |  |  | 1,300 | 100.0\% |  |  |  |  |
| $\begin{gathered} \stackrel{\widetilde{\sigma}}{E} \\ \dot{\omega} \end{gathered}$ | \$100,000 or Less | 1,579 | 80.2\% | \$52,993 | 27.1\% |  | 477 | 71.2\% | 87.7\% | \$22,568 | 23.9\% | 24.4\% | 1,102 | 84.8\% | 89.1\% | \$30,425 | 30.1\% | 23.7\% |
|  | \$100,001-\$250,000 | 193 | 9.8\% | \$35,441 | 18.1\% |  | 90 | 13.4\% | 6.0\% | \$16,222 | 17.2\% | 18.2\% | 103 | 7.9\% | 4.9\% | \$19,219 | 19.0\% | 16.7\% |
|  | \$250,001 - \$1 Million | 198 | 10.1\% | \$106,859 | 54.7\% |  | 103 | 15.4\% | 6.3\% | \$55,585 | 58.9\% | 57.5\% | 95 | 7.3\% | 6.0\% | \$51,274 | 50.8\% | 59.7\% |
|  | Total | 1,970 | 100.0\% | \$195,293 | 100.0\% |  | 670 | 100.0\% | 100.0\% | \$94,375 | 100.0\% | 100.0\% | 1,300 | 100.0\% | 100.0\% | \$100,918 | 100.0\% | 100.0\% |
| Small Farm | \$1 Million or Less | 35 | 63.6\% | \$3,719 | 55.9\% | $\begin{gathered} \hline \hline \text { Total Farms } \\ 95.4 \% \end{gathered}$ | 19 | 86.4\% | 59.2\% | \$2,487 | 70.4\% | 67.4\% | 16 | 48.5\% | 40.8\% | \$1,232 | 39.5\% | 52.0\% |
|  | Over \$1 Million | 11 | 20.0\% | \$2,775 | 41.7\% | 3.4\% |  | 13.6\% |  |  |  |  |  | 24.2\% |  |  |  |  |
|  | Not Known |  | 16.4\% | \$154 | 2.3\% | 1.1\% |  | 0.0\% |  |  |  |  |  | 27.3\% |  |  |  |  |
|  | Total | 55 | 100.0\% | \$6,648 | 100.0\% | 100.0\% | 22 | 100.0\% |  |  |  |  | 33 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 33 | 60.0\% | \$1,124 | 16.9\% |  | 10 | 45.5\% | 74.6\% | \$393 | 11.1\% | 18.4\% | 23 | 69.7\% | 78.9\% | \$731 | 23.5\% | 22.9\% |
|  | \$100,001-\$250,000 | 16 | 29.1\% | \$2,688 | 40.4\% |  | 8 | 36.4\% | 18.3\% | \$1,253 | 35.5\% | 37.2\% | 8 | 24.2\% | 14.5\% | \$1,435 | 46.1\% | 35.1\% |
|  | \$250,001-\$500,000 | 6 | 10.9\% | \$2,836 | 42.7\% |  | 4 | 18.2\% | 7.0\% | \$1,886 | 53.4\% | 44.3\% | 2 | 6.1\% | 6.6\% | \$950 | 30.5\% | 42.0\% |
|  | Total | 55 | 100.0\% | \$6,648 | 100.0\% |  | 22 | 100.0\% | 100.0\% | \$3,532 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$3,116 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: LA Monroe


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: LA Monroe

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Bank  Agg <br> $\#$ $\%$ $\%$ |  |  | Dollar <br> Bank |  | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | Count <br> Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  |  |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% |
|  | Low | 21 | 6.5\% | \$2,090 | 9.8\% | 10.1\% | 5 | 5.2\% | 8.5\% |  |  | \$361 | 5.2\% | 15.9\% |  | 16 | 7.0\% | 10.6\% | \$1,729 | 12.0\% | 18.5\% |
|  | Moderate | 58 | 17.8\% | \$5,475 | 25.7\% | 17.8\% | 13 | 13.4\% | 17.5\% | \$975 | 14.1\% | 18.9\% | 45 | 19.7\% | 16.1\% | \$4,500 | 31.3\% | 15.5\% |
|  | Middle | 105 | 32.3\% | \$6,171 | 29.0\% | 37.8\% | 38 | 39.2\% | 31.2\% | \$2,686 | 38.7\% | 26.8\% | 67 | 29.4\% | 30.7\% | \$3,485 | 24.3\% | 26.3\% |
|  | Upper | 141 | 43.4\% | \$7,561 | 35.5\% | 34.3\% | 41 | 42.3\% | 40.6\% | \$2,917 | 42.0\% | 36.0\% | 100 | 43.9\% | 40.6\% | \$4,644 | 32.3\% | 38.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 2.4\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 1.5\% |
|  | Total | 325 | 100.0\% | \$21,297 | 100.0\% | 100.0\% | 97 | 100.0\% | 100.0\% | \$6,939 | 100.0\% | 100.0\% | 228 | 100.0\% | 100.0\% | \$14,358 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 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\% |
|  | Moderate | 2 | 20.0\% | \$600 | 30.1\% | 6.4\% | 1 | 100.0\% | 6.3\% | \$250 | 100.0\% | 26.0\% | 1 | 11.1\% | 7.1\% | \$350 | 20.1\% | 11.7\% |
|  | Middle | 7 | 70.0\% | \$1,195 | 59.9\% | 55.3\% | 0 | 0.0\% | 43.8\% | \$0 | 0.0\% | 36.9\% | 7 | 77.8\% | 67.9\% | \$1,195 | 68.5\% | 73.3\% |
|  | Upper | 1 | 10.0\% | \$200 | 10.0\% | 36.2\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 37.1\% | 1 | 11.1\% | 21.4\% | \$200 | 11.5\% | 10.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.6\% | \$0 | 0.0\% | 4.4\% |
|  | Total | 10 | 100.0\% | \$1,995 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$250 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$1,745 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: LA Monroe

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Bank |  | lar | Families by Family Income \% | Ban |  |  | Bank |  | Agg | Bank |  |  | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% |  |
|  | Low | 7 | 7.0\% | \$469 | 3.0\% | 23.2\% | 5 | 10.4\% | 5.9\% | \$329 | 5.1\% | 3.3\% | 2 | 3.8\% | 6.1\% | \$140 | 1.5\% | 3.2\% |
|  | Moderate | 18 | 18.0\% | \$1,865 | 11.8\% | 16.1\% | 12 | 25.0\% | 21.5\% | \$1,277 | 19.8\% | 15.7\% | 6 | 11.5\% | 14.8\% | \$588 | 6.3\% | 10.6\% |
|  | Middle | 26 | 26.0\% | \$3,436 | 21.8\% | 18.5\% | 10 | 20.8\% | 24.5\% | \$1,216 | 18.9\% | 23.4\% | 16 | 30.8\% | 23.3\% | \$2,220 | 23.8\% | 21.1\% |
|  | Upper | 48 | 48.0\% | \$9,984 | 63.2\% | 42.2\% | 21 | 43.8\% | 39.3\% | \$3,628 | 56.2\% | 49.2\% | 27 | 51.9\% | 42.5\% | \$6,356 | 68.0\% | 53.3\% |
|  | Unknown | 1 | 1.0\% | \$40 | 0.3\% | 0.0\% | 0 | 0.0\% | 8.9\% | \$0 | 0.0\% | 8.4\% | 1 | 1.9\% | 13.4\% | \$40 | 0.4\% | 11.8\% |
|  | Total | 100 | 100.0\% | \$15,794 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$6,450 | 100.0\% | 100.0\% | 52 | 100.0\% | 100.0\% | \$9,344 | 100.0\% | 100.0\% |
|  | Low | 4 | 2.5\% | \$201 | 0.9\% | 23.2\% | 2 | 1.9\% | 3.0\% | \$80 | 0.5\% | 1.2\% | 2 | 3.8\% | 2.7\% | \$121 | 1.5\% | 1.0\% |
|  | Moderate | 15 | 9.6\% | \$1,531 | 6.7\% | 16.1\% | 10 | 9.6\% | 9.6\% | \$913 | 6.1\% | 6.2\% | 5 | 9.4\% | 8.2\% | \$618 | 7.8\% | 4.9\% |
|  | Middle | 32 | 20.4\% | \$3,417 | 14.8\% | 18.5\% | 17 | 16.3\% | 15.6\% | \$1,682 | 11.2\% | 12.0\% | 15 | 28.3\% | 17.6\% | \$1,735 | 21.8\% | 13.9\% |
|  | Upper | 105 | 66.9\% | \$17,591 | 76.4\% | 42.2\% | 74 | 71.2\% | 53.5\% | \$12,114 | 80.4\% | 61.8\% | 31 | 58.5\% | 50.3\% | \$5,477 | 68.9\% | 59.1\% |
|  | Unknown | 1 | 0.6\% | \$274 | 1.2\% | 0.0\% | 1 | 1.0\% | 18.2\% | \$274 | 1.8\% | 18.7\% | 0 | 0.0\% | 21.2\% | \$0 | 0.0\% | 21.0\% |
|  | Total | 157 | 100.0\% | \$23,014 | 100.0\% | 100.0\% | 104 | 100.0\% | 100.0\% | \$15,063 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$7,951 | 100.0\% | 100.0\% |
|  | Lo | 2 | 10.5\% | \$18 | 15.4\% | 23.2\% | 0 | 0.0\% | 6.1\% | \$0 | 0.0\% | 1.4\% | 2 | 15.4\% | 4.1\% | \$18 | 25.0\% | 1.0\% |
|  | Moderate | 6 | 31.6\% | \$27 | 23.1\% | 16.1\% | 2 | 33.3\% | 9.6\% | \$8 | 17.8\% | 3.5\% | 4 | 30.8\% | 16.9\% | \$19 | 26.4\% | 7.5\% |
|  | Middle | 5 | 26.3\% | \$18 | 15.4\% | 18.5\% | 2 | 33.3\% | 21.7\% | \$7 | 15.6\% | 11.8\% | 3 | 23.1\% | 19.0\% | \$11 | 15.3\% | 17.0\% |
|  | Upper | 4 | 21.1\% | \$46 | 39.3\% | 42.2\% | 1 | 16.7\% | 55.1\% | \$27 | 60.0\% | 70.8\% | 3 | 23.1\% | 49.7\% | \$19 | 26.4\% | 56.5\% |
|  | Unknown | 2 | 10.5\% | \$8 | 6.8\% | 0.0\% | 1 | 16.7\% | 7.6\% | \$3 | 6.7\% | 12.5\% | 1 | 7.7\% | 10.3\% | \$5 | 6.9\% | 17.9\% |
|  | Total | 19 | 100.0\% | \$117 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$45 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$72 | 100.0\% | 100.0\% |
|  | 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\% | 16.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 18.5\% | 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 | 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\% |
|  | Low | 13 | 4.7\% | \$688 | 1.8\% | 23.2\% | 7 | 4.4\% | 4.4\% | \$409 | 1.9\% | 2.1\% | 6 | 5.1\% | 4.3\% | \$279 | 1.6\% | 2.0\% |
|  | Moderate | 39 | 14.1\% | \$3,423 | 8.8\% | 16.1\% | 24 | 15.2\% | 14.8\% | \$2,198 | 10.2\% | 10.2\% | 15 | 12.7\% | 11.6\% | \$1,225 | 7.1\% | 7.5\% |
|  | Middle | 63 | 22.8\% | \$6,871 | 17.7\% | 18.5\% | 29 | 18.4\% | 19.7\% | \$2,905 | 13.5\% | 16.9\% | 34 | 28.8\% | 20.2\% | \$3,966 | 22.8\% | 17.0\% |
|  | Upper | 157 | 56.9\% | \$27,621 | 71.0\% | 42.2\% | 96 | 60.8\% | 47.2\% | \$15,769 | 73.1\% | 56.1\% | 61 | 51.7\% | 46.4\% | \$11,852 | 68.2\% | 55.1\% |
|  | Unknown | 4 | 1.4\% | \$322 | 0.8\% | 0.0\% | 2 | 1.3\% | 13.9\% | \$277 | 1.3\% | 14.7\% | 2 | 1.7\% | 17.4\% | \$45 | 0.3\% | 18.4\% |
|  | Total | 276 | 100.0\% | \$38,925 | 100.0\% | 100.0\% | 158 | 100.0\% | 100.0\% | \$21,558 | 100.0\% | 100.0\% | 118 | 100.0\% | 100.0\% | \$17,367 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Count $\quad$ Bank |  |  |  | Total Businesses \% |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { BaI } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar nk \$ \% | Agg <br> \$ \% |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar <br> nk <br> \$ \% | Agg <br> \$ \% |
|  |  |  | $\begin{gathered} \hline 85 \\ 39 \\ 124 \\ 201 \end{gathered}$ | $\begin{gathered} \hline 26.2 \% \\ 12.0 \% \\ 38.2 \% \\ 61.8 \% \end{gathered}$ | $\begin{gathered} \hline \$ 6,963 \\ \$ 9,059 \\ \$ 16,022 \\ \$ 5,275 \end{gathered}$ | $\begin{aligned} & \hline 32.7 \% \\ & 42.5 \% \\ & 75.2 \% \\ & 24.8 \% \end{aligned}$ | $\begin{gathered} \hline 89.8 \% \\ 5.9 \% \\ 95.7 \% \\ 4.3 \% \end{gathered}$ | $\begin{aligned} & 52 \\ & 18 \\ & 70 \\ & 27 \end{aligned}$ | $\begin{aligned} & \text { 53.6\% } \\ & \text { 18.6\% } \\ & 72.2 \% \\ & 27.8 \% \end{aligned}$ | 38.3\% | \$2,907 | 41.9\% | 51.2\% | 33 21 54 174 | $\begin{gathered} 14.5 \% \\ 9.2 \% \\ 23.7 \% \\ 76.3 \% \end{gathered}$ | 39.7\% | \$4,056 | 28.2\% | 46.0\% |
|  |  |  | 325 | 100.0\% | \$21,297 | 100.0\% | 100.0\% | 97 | 100.0\% |  |  |  |  | 228 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \stackrel{N}{n} \\ & \stackrel{N}{\pi} \\ & 0 \end{aligned}$ | $\begin{array}{l\|} \hline \$ 100,000 \text { or Less } \\ \$ 100,001-\$ 250,000 \\ \$ 250,001-\$ 1 \text { Million } \end{array}$ | $\begin{gathered} \hline 287 \\ 22 \\ 16 \end{gathered}$ | $\begin{gathered} \hline 88.3 \% \\ 6.8 \% \\ 4.9 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 8,853 \\ & \$ 3,512 \\ & \$ 8,932 \end{aligned}$ | $\begin{gathered} \hline 41.6 \% \\ 16.5 \% \\ 41.9 \% \end{gathered}$ |  | $\begin{gathered} 83 \\ 10 \\ 4 \end{gathered}$ | $\begin{gathered} \hline 85.6 \% \\ 10.3 \% \\ 4.1 \% \end{gathered}$ | $\begin{gathered} \hline 87.7 \% \\ 6.4 \% \\ 5.9 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 3,439 \\ & \$ 1,497 \\ & \$ 2,003 \end{aligned}$ | $\begin{aligned} & \hline 49.6 \% \\ & 21.6 \% \\ & 28.9 \% \end{aligned}$ | $\begin{aligned} & \hline 28.6 \% \\ & 18.7 \% \\ & 52.7 \% \end{aligned}$ | $\begin{gathered} 204 \\ 12 \\ 12 \end{gathered}$ | $\begin{gathered} \hline 89.5 \% \\ 5.3 \% \\ 5.3 \% \end{gathered}$ | $\begin{gathered} \hline 87.6 \% \\ 6.6 \% \\ 5.8 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 5,414 \\ & \$ 2,015 \\ & \$ 6,929 \end{aligned}$ | $\begin{aligned} & \hline 37.7 \% \\ & 14.0 \% \\ & 48.3 \% \end{aligned}$ | $\begin{aligned} & \hline 27.1 \% \\ & 19.9 \% \\ & 52.9 \% \end{aligned}$ |
|  |  | Total | 325 | 100.0\% | \$21,297 | 100.0\% |  | 97 | 100.0\% | 100.0\% | \$6,939 | 100.0\% | 100.0\% | 228 | 100.0\% | 100.0\% | \$14,358 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $5$ | $\begin{gathered} 50.0 \% \\ 50.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \$ 1,094 \\ \$ 901 \\ \$ 0 \end{gathered}$ | $\begin{gathered} 54.8 \% \\ 45.2 \% \\ 0.0 \% \end{gathered}$ | Total Farms <br> $98.9 \%$ <br> $0.0 \%$ <br> $1.1 \%$ | $\begin{aligned} & 1 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | 87.5\% | \$250 | 100.0\% | 97.8\% | 4 5 0 | $\begin{gathered} 44.4 \% \\ 55.6 \% \\ 0.0 \% \end{gathered}$ | 71.4\% | \$844 | 48.4\% | 66.0\% |
|  |  |  | 10 | 100.0\% | \$1,995 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  |  | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{\otimes}{N} \\ & \stackrel{0}{0} \\ & \stackrel{\widetilde{\pi}}{0} \end{aligned}$ | $\$ 100,000$ or Less $\$ 100,001-\$ 250,000$ $\$ 250,001-\$ 500,000$ | $\begin{aligned} & \hline 2 \\ & 5 \\ & 3 \end{aligned}$ | $\begin{aligned} & \hline 20.0 \% \\ & 50.0 \% \\ & 30.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 104 \\ \$ 890 \\ \$ 1,001 \end{gathered}$ | $\begin{gathered} \hline 5.2 \% \\ 44.6 \% \\ 50.2 \% \end{gathered}$ |  | $\begin{aligned} & \hline 0 \\ & 1 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 0.0 \% \\ 100.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{array}{c\|} \hline 81.3 \% \\ 18.8 \% \\ 0.0 \% \end{array}$ | $\begin{gathered} \hline \$ 0 \\ \$ 250 \\ \$ 0 \end{gathered}$ | $0.0 \%$ $100.0 \%$ $0.0 \%$ | $\begin{gathered} \hline 40.4 \% \\ 59.6 \% \\ 0.0 \% \end{gathered}$ | $2$ | $\begin{aligned} & \hline 22.2 \% \\ & 44.4 \% \\ & 33.3 \% \end{aligned}$ | $\begin{aligned} & \hline 57.1 \% \\ & 28.6 \% \\ & 14.3 \% \end{aligned}$ | $\begin{gathered} \hline \$ 104 \\ \$ 640 \\ \$ 1,001 \end{gathered}$ | $\begin{gathered} \hline 6.0 \% \\ 36.7 \% \\ 57.4 \% \end{gathered}$ | $\begin{aligned} & \hline 16.3 \% \\ & 42.1 \% \\ & 41.7 \% \end{aligned}$ |
|  |  | Total | 10 | 100.0\% | \$1,995 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$250 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$1,745 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: LA Shreveport

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | O wner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  | ount | Doll |  |  |  | ank | Agg | Ban |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 11 | 2.0\% | \$1,814 | 2.0\% | 4.7\% | 10 | 3.0\% | 1.3\% | \$1,645 | 3.0\% | 0.9\% | 1 | 0.4\% | 0.9\% | \$169 | 0.5\% | 0.6\% |
|  | Moderate | 67 | 11.9\% | \$5,884 | 6.5\% | 18.6\% | 36 | 10.9\% | 6.0\% | \$2,776 | 5.1\% | 2.9\% | 31 | 13.2\% | 6.1\% | \$3,108 | 8.6\% | 3.2\% |
|  | Middle | 171 | 30.4\% | \$22,087 | 24.3\% | 30.6\% | 100 | 30.4\% | 27.7\% | \$13,286 | 24.3\% | 23.3\% | 71 | 30.3\% | 26.0\% | \$8,801 | 24.4\% | 21.0\% |
|  | Upper | 314 | 55.8\% | \$60,954 | 67.2\% | 46.1\% | 183 | 55.6\% | 65.0\% | \$36,955 | 67.6\% | 72.8\% | 131 | 56.0\% | 66.9\% | \$23,999 | 66.5\% | 75.2\% |
|  | 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 | 563 | 100.0\% | \$90,739 | 100.0\% | 100.0\% | 329 | 100.0\% | 100.0\% | \$54,662 | 100.0\% | 100.0\% | 234 | 100.0\% | 100.0\% | \$36,077 | 100.0\% | 100.0\% |
|  | Low | 6 | 1.5\% | \$666 | 1.0\% | 4.7\% | 3 | 1.3\% | 1.1\% | \$177 | 0.5\% | 1.3\% | 3 | 1.7\% | 1.2\% | \$489 | 1.6\% | 0.8\% |
|  | Moderate | 15 | 3.6\% | \$1,254 | 1.8\% | 18.6\% | 9 | 3.9\% | 5.3\% | \$828 | 2.2\% | 3.9\% | 6 | 3.3\% | 4.7\% | \$426 | 1.4\% | 2.1\% |
|  | Middle | 90 | 21.8\% | \$13,256 | 19.3\% | 30.6\% | 45 | 19.4\% | 22.3\% | \$6,610 | 17.3\% | 19.0\% | 45 | 24.9\% | 24.4\% | \$6,646 | 21.9\% | 19.5\% |
|  | Upper | 302 | 73.1\% | \$53,373 | 77.9\% | 46.1\% | 175 | 75.4\% | 71.2\% | \$30,572 | 80.1\% | 75.8\% | 127 | 70.2\% | 69.6\% | \$22,801 | 75.1\% | 77.6\% |
|  | 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 | 413 | 100.0\% | \$68,549 | 100.0\% | 100.0\% | 232 | 100.0\% | 100.0\% | \$38,187 | 100.0\% | 100.0\% | 181 | 100.0\% | 100.0\% | \$30,362 | 100.0\% | 100.0\% |
|  | Lo | 1 | 1.7\% | \$3 | 0.5\% | 4.7\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 2.6\% | 1 | 3.4\% | 2.8\% | \$3 | 1.0\% | 1.0\% |
|  | Moderate | 8 | 13.8\% | \$45 | 7.5\% | 18.6\% | 4 | 13.8\% | 18.3\% | \$24 | 8.3\% | 6.9\% | 4 | 13.8\% | 16.7\% | \$21 | 6.7\% | 7.6\% |
|  | Middle | 23 | 39.7\% | \$197 | 32.7\% | 30.6\% | 11 | 37.9\% | 30.5\% | \$55 | 19.1\% | 23.5\% | 12 | 41.4\% | 31.6\% | \$142 | 45.1\% | 25.6\% |
|  | Upper | 26 | 44.8\% | \$358 | 59.4\% | 46.1\% | 14 | 48.3\% | 46.9\% | \$209 | 72.6\% | 67.0\% | 12 | 41.4\% | 48.9\% | \$149 | 47.3\% | 65.8\% |
|  | 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 | 58 | 100.0\% | \$603 | 100.0\% | 100.0\% | 29 | 100.0\% | 100.0\% | \$288 | 100.0\% | 100.0\% | 29 | 100.0\% | 100.0\% | \$315 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\stackrel{\searrow}{\stackrel{~}{\perp}}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 9.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 1.4\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.4\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 3.0\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 1.2\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 40.0\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 64.4\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 83.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 31.2\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 32.7\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 13.8\% |
|  | 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\% |
|  | Lo | 18 | 1.7\% | \$2,483 | 1.6\% | 4.7\% | 13 | 2.2\% | 1.3\% | \$1,822 | 2.0\% | 1.1\% | 5 | 1.1\% | 1.2\% | \$661 | 1.0\% | 0.8\% |
|  | Moderate | 90 | 8.7\% | \$7,183 | 4.5\% | 18.6\% | 49 | 8.3\% | 6.1\% | \$3,628 | 3.9\% | 3.4\% | 41 | 9.2\% | 6.0\% | \$3,555 | 5.3\% | 2.7\% |
|  | Middle | 284 | 27.5\% | \$35,540 | 22.2\% | 30.6\% | 156 | 26.4\% | 25.3\% | \$19,951 | 21.4\% | 22.0\% | 128 | 28.8\% | 25.6\% | \$15,589 | 23.4\% | 23.8\% |
|  | Upper | 642 | 62.1\% | \$114,685 | 71.7\% | 46.1\% | 372 | 63.1\% | 67.2\% | \$67,736 | 72.7\% | 73.5\% | 270 | 60.8\% | 67.3\% | \$46,949 | 70.3\% | 72.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,034 | 100.0\% | \$159,891 | 100.0\% | 100.0\% | 590 | 100.0\% | 100.0\% | \$93,137 | 100.0\% | 100.0\% | 444 | 100.0\% | 100.0\% | \$66,754 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: LA Shreveport

| PRODUCT TYPE | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Small Businesses \% | Count Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar | Agg |  | Count ank | Agg | Dollar |  |  |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 92 | 5.7\% | \$5,693 | 5.1\% | 6.9\% | 30 | 5.4\% | 5.0\% | \$2,903 | 5.3\% | 5.6\% | 62 | 5.9\% | 5.3\% | \$2,790 | 4.9\% | 6.4\% |
|  | Moderate | 301 | 18.8\% | \$23,430 | 21.1\% | 22.3\% | 107 | 19.1\% | 16.7\% | \$8,581 | 15.7\% | 15.8\% | 194 | 18.6\% | 17.7\% | \$14,849 | 26.2\% | 18.7\% |
|  | Middle | 440 | 27.5\% | \$38,785 | 34.9\% | 31.2\% | 154 | 27.5\% | 28.3\% | \$21,339 | 39.1\% | 35.5\% | 286 | 27.4\% | 27.1\% | \$17,446 | 30.8\% | 32.4\% |
|  | Upper | 769 | 48.0\% | \$43,295 | 38.9\% | 39.6\% | 268 | 47.9\% | 47.0\% | \$21,696 | 39.8\% | 40.9\% | 501 | 48.0\% | 47.6\% | \$21,599 | 38.1\% | 41.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 2.2\% | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 1.1\% |
|  | Total | 1,602 | 100.0\% | \$111,203 | 100.0\% | 100.0\% | 559 | 100.0\% | 100.0\% | \$54,519 | 100.0\% | 100.0\% | 1,043 | 100.0\% | 100.0\% | \$56,684 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.7\% | 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\% | 8.1\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 9.7\% | \$0 | 0.0\% | 4.4\% |
|  | Middle | 4 | 80.0\% | \$1,504 | 99.3\% | 33.3\% | 1 | 100.0\% | 34.3\% | \$500 | 100.0\% | 56.4\% | 3 | 75.0\% | 29.0\% | \$1,004 | 98.9\% | 70.5\% |
|  | Upper | 1 | 20.0\% | \$11 | 0.7\% | 55.9\% | 0 | 0.0\% | 45.7\% | \$0 | 0.0\% | 41.8\% | 1 | 25.0\% | 54.8\% | \$11 | 1.1\% | 24.5\% |
|  | 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\% | 5.7\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 6.5\% | \$0 | 0.0\% | 0.7\% |
|  | Total | 5 | 100.0\% | \$1,515 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$500 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$1,015 | 100.0\% | 100.0\% |

## Appendices

Borrower Distribution of HMDA Loans


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## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: LA Southern LA


Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: LA Southern LA

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count | Bank |  | Dollar | Families by <br> Family <br> Income <br> $\%$ | Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \$ \% \\ \hline \end{gathered}$ | Bank |  | Agg | Bank |  | $\begin{gathered} \text { Agg } \\ \$ \% \\ \hline \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$(000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% |  |
|  | Low | 1 | 1.9\% | \$73 | 1.1\% | 24.4\% | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 1.3\% | 1 | 3.3\% | 3.2\% | \$73 | 1.9\% | 1.6\% |
|  | Moderate | 7 | 13.0\% | \$493 | 7.1\% | 14.0\% | 4 | 16.7\% | 12.1\% | \$302 | 9.5\% | 7.0\% | 3 | 10.0\% | 14.8\% | \$191 | 5.1\% | 9.9\% |
|  | Middle | 14 | 25.9\% | \$1,596 | 23.1\% | 17.2\% | 4 | 16.7\% | 23.3\% | \$434 | 13.7\% | 19.5\% | 10 | 33.3\% | 26.0\% | \$1,162 | 30.9\% | 22.9\% |
|  | Upper | 32 | 59.3\% | \$4,762 | 68.8\% | 44.5\% | 16 | 66.7\% | 56.4\% | \$2,433 | 76.8\% | 68.3\% | 16 | 53.3\% | 44.0\% | \$2,329 | 62.0\% | 56.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.1\% | \$0 | 0.0\% | 3.9\% | 0 | 0.0\% | 12.0\% | \$0 | 0.0\% | 8.8\% |
|  | Total | 54 | 100.0\% | \$6,924 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$3,169 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$3,755 | 100.0\% | 100.0\% |
|  | Low | 4 | 2.5\% | \$223 | 1.4\% | 24.4\% | 3 | 3.1\% | 2.3\% | \$155 | 1.6\% | 1.0\% | 1 | 1.6\% | 2.3\% | \$68 | 1.1\% | 0.8\% |
|  | Moderate | 17 | 10.8\% | \$1,033 | 6.4\% | 14.0\% | 11 | 11.5\% | 6.1\% | \$723 | 7.4\% | 3.6\% | 6 | 9.7\% | 7.7\% | \$310 | 4.9\% | 4.3\% |
|  | Middle | 32 | 20.3\% | \$2,648 | 16.4\% | 17.2\% | 17 | 17.7\% | 15.3\% | \$1,359 | 13.8\% | 11.5\% | 15 | 24.2\% | 18.5\% | \$1,289 | 20.5\% | 13.5\% |
|  | Upper | 104 | 65.8\% | \$12,193 | 75.7\% | 44.5\% | 64 | 66.7\% | 63.1\% | \$7,561 | 77.0\% | 68.8\% | 40 | 64.5\% | 57.7\% | \$4,632 | 73.5\% | 67.3\% |
|  | Unknown | 1 | 0.6\% | \$19 | 0.1\% | 0.0\% | 1 | 1.0\% | 13.2\% | \$19 | 0.2\% | 15.1\% | 0 | 0.0\% | 13.8\% | \$0 | 0.0\% | 14.0\% |
|  | Total | 158 | 100.0\% | \$16,116 | 100.0\% | 100.0\% | 96 | 100.0\% | 100.0\% | \$9,817 | 100.0\% | 100.0\% | 62 | 100.0\% | 100.0\% | \$6,299 | 100.0\% | 100.0\% |
|  | Low | 4 | 9.5\% | \$16 | 5.0\% | 24.4\% | 2 | 10.5\% | 10.8\% | \$11 | 7.1\% | 4.5\% | 2 | 8.7\% | 8.8\% | \$5 | 3.0\% | 3.2\% |
|  | Moderate | 13 | 31.0\% | \$77 | 23.9\% | 14.0\% | 5 | 26.3\% | 13.2\% | \$34 | 21.9\% | 6.1\% | 8 | 34.8\% | 13.4\% | \$43 | 25.7\% | 4.9\% |
|  | Middle | 9 | 21.4\% | \$91 | 28.3\% | 17.2\% | 4 | 21.1\% | 14.5\% | \$49 | 31.6\% | 10.4\% | 5 | 21.7\% | 17.3\% | \$42 | 25.1\% | 7.8\% |
|  | Upper | 16 | 38.1\% | \$138 | 42.9\% | 44.5\% | 8 | 42.1\% | 54.1\% | \$61 | 39.4\% | 72.7\% | 8 | 34.8\% | 52.6\% | \$77 | 46.1\% | 78.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 6.3\% | 0 | 0.0\% | 7.8\% | \$0 | 0.0\% | 5.8\% |
|  |  | 42 | 100.0\% | \$322 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$155 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$167 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 24.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 14.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 17.2\% | 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\% | 44.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | 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\% |
|  | Low | 9 | 3.5\% | \$312 | 1.3\% | 24.4\% | 5 | 3.6\% | 3.5\% | \$166 | 1.3\% | 1.2\% | 4 | 3.5\% | 3.5\% | \$146 | 1.4\% | 1.2\% |
|  | Moderate | 37 | 14.6\% | \$1,603 | 6.9\% | 14.0\% | 20 | 14.4\% | 8.8\% | \$1,059 | 8.1\% | 4.8\% | 17 | 14.8\% | 11.0\% | \$544 | 5.3\% | 6.3\% |
|  | Middle | 55 | 21.7\% | \$4,335 | 18.6\% | 17.2\% | 25 | 18.0\% | 17.6\% | \$1,842 | 14.0\% | 13.9\% | 30 | 26.1\% | 21.1\% | \$2,493 | 24.4\% | 16.4\% |
|  | Upper | 152 | 59.8\% | \$17,093 | 73.2\% | 44.5\% | 88 | 63.3\% | 59.6\% | \$10,055 | 76.5\% | 67.7\% | 64 | 55.7\% | 51.9\% | \$7,038 | 68.9\% | 62.2\% |
|  | Unknown | 1 | 0.4\% | \$19 | 0.1\% | 0.0\% | 1 | 0.7\% | 10.5\% | \$19 | 0.1\% | 12.4\% | 0 | 0.0\% | 12.6\% | \$0 | 0.0\% | 13.9\% |
|  |  | 254 | 100.0\% | \$23,362 | 100.0\% | 100.0\% | 139 | 100.0\% | 100.0\% | \$13,141 | 100.0\% | 100.0\% | 115 | 100.0\% | 100.0\% | \$10,221 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: LA Southern LA

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | Do |  | Small Businesses \% | Count k |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ |  | Dollar | Agg |  | Count <br> ank | Agg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 3 | 0.8\% | \$235 | 0.7\% | 2.5\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.0\% | 3 | 1.1\% | 0.6\% | \$235 | 1.3\% | 0.3\% |
|  | Moderate | 41 | 10.7\% | \$2,589 | 7.2\% | 13.7\% | 13 | 11.0\% | 11.3\% | \$612 | 3.4\% | 7.0\% | 28 | 10.6\% | 12.1\% | \$1,977 | 11.1\% | 10.6\% |
|  | Middle | 193 | 50.4\% | \$19,473 | 54.3\% | 45.3\% | 57 | 48.3\% | 38.5\% | \$9,631 | 53.5\% | 40.4\% | 136 | 51.3\% | 42.1\% | \$9,842 | 55.1\% | 43.8\% |
|  | Upper | 146 | 38.1\% | \$13,583 | 37.9\% | 38.5\% | 48 | 40.7\% | 45.5\% | \$7,767 | 43.1\% | 49.6\% | 98 | 37.0\% | 41.4\% | \$5,816 | 32.5\% | 42.5\% |
|  | 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\% | 4.3\% | \$0 | 0.0\% | 3.0\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 2.9\% |
|  | Total | 383 | 100.0\% | \$35,880 | 100.0\% | 100.0\% | 118 | 100.0\% | 100.0\% | \$18,010 | 100.0\% | 100.0\% | 265 | 100.0\% | 100.0\% | \$17,870 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 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\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.9\% | 0 | 0.0\% | 23.8\% | \$0 | 0.0\% | 7.6\% | 0 | 0.0\% | 18.2\% | \$0 | 0.0\% | 17.0\% |
|  | Middle | 6 | 30.0\% | \$768 | 23.6\% | 31.1\% | 2 | 25.0\% | 28.6\% | \$525 | 30.2\% | 46.1\% | 4 | 33.3\% | 45.5\% | \$243 | 16.0\% | 31.7\% |
|  | Upper | 14 | 70.0\% | \$2,489 | 76.4\% | 48.9\% | 6 | 75.0\% | 47.6\% | \$1,214 | 69.8\% | 46.3\% | 8 | 66.7\% | 36.4\% | \$1,275 | 84.0\% | 51.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% | \$3,257 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$1,739 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$1,518 | 100.0\% | 100.0\% |

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: LA Southern LA

| $\begin{aligned} & \stackrel{0}{2} \\ & \stackrel{y}{2} \\ & \frac{0}{2} \\ & \frac{0}{2} \end{aligned}$ |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount \% | $\begin{aligned} & \text { ank } \\ & \quad \text { Doll } \\ & \$(\mathbf{0 0 0}) \end{aligned}$ | ar \$ \% | Total Businesses <br> \% |  | Count <br> ank <br> \% | Agg <br> \% |  | Dollar k \$ \% | Agg <br> \$ \% |  | Count <br> ank <br> \% | Agg <br> \% |  | Dollar <br> k <br> \$ \% | Agg <br> \$ \% |
|  |  | \$1 Million or Less Over \$1 Million Total Rev. available Rev. Not Known | $\begin{gathered} \hline 119 \\ 74 \\ 193 \\ 190 \end{gathered}$ | $\begin{gathered} \hline 31.1 \% \\ 19.3 \% \\ 50.4 \% \\ 49.6 \% \end{gathered}$ | $\begin{gathered} \hline \$ 8,917 \\ \$ 20,831 \\ \$ 29,748 \\ \$ 6,132 \end{gathered}$ | $\begin{aligned} & \hline 24.9 \% \\ & 58.1 \% \\ & 83.0 \% \\ & 17.1 \% \end{aligned}$ | $\begin{gathered} \hline 89.2 \% \\ 6.2 \% \\ 95.4 \% \\ 4.6 \% \end{gathered}$ | $\begin{gathered} \hline 63 \\ 38 \\ 101 \\ 17 \end{gathered}$ | $\begin{gathered} \hline 53.4 \% \\ 32.2 \% \\ 85.6 \% \\ 14.4 \% \end{gathered}$ | 32.4\% | \$4,499 | 25.0\% | 29.2\% | 56 36 92 173 | $\begin{gathered} \hline 21.1 \% \\ 13.6 \% \\ 34.7 \% \\ 65.3 \% \end{gathered}$ | 32.9\% | \$4,418 | 24.7\% | 28.9\% |
|  |  | Total | 383 | 100.0\% | \$35,880 | 100.0\% | 100.0\% | 118 | 100.0\% |  |  |  |  | 265 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{\otimes}{N} \\ & \stackrel{0}{\pi} \\ & \stackrel{\pi}{0} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{array}{r} \hline 307 \\ 36 \\ 40 \end{array}$ | $\begin{gathered} \hline 80.2 \% \\ 9.4 \% \\ 10.4 \% \end{gathered}$ | $\begin{gathered} \hline \$ 8,409 \\ \$ 6,272 \\ \$ 21,199 \end{gathered}$ | $\begin{aligned} & \hline 23.4 \% \\ & 17.5 \% \\ & 59.1 \% \end{aligned}$ |  | $\begin{aligned} & 81 \\ & 13 \\ & 24 \end{aligned}$ | $\begin{aligned} & \hline 68.6 \% \\ & 11.0 \% \\ & 20.3 \% \end{aligned}$ | $\begin{gathered} \hline 87.0 \% \\ 6.6 \% \\ 6.3 \% \end{gathered}$ | $\begin{gathered} \hline \$ 2,723 \\ \$ 2,177 \\ \$ 13,110 \end{gathered}$ | $\begin{aligned} & \hline 15.1 \% \\ & 12.1 \% \\ & 72.8 \% \end{aligned}$ | $\begin{aligned} & \hline 25.0 \% \\ & 18.6 \% \\ & 56.4 \% \end{aligned}$ | $\begin{gathered} \hline 226 \\ 23 \\ 16 \end{gathered}$ | $\begin{gathered} \hline 85.3 \% \\ 8.7 \% \\ 6.0 \% \end{gathered}$ | $\begin{gathered} \hline 89.5 \% \\ 5.6 \% \\ 5.0 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 5,686 \\ & \$ 4,095 \\ & \$ 8,089 \end{aligned}$ | $\begin{aligned} & \hline 31.8 \% \\ & 22.9 \% \\ & 45.3 \% \end{aligned}$ | $\begin{aligned} & \hline 29.6 \% \\ & 19.4 \% \\ & 51.0 \% \end{aligned}$ |
|  |  | Total | 383 | 100.0\% | \$35,880 | 100.0\% |  | 118 | 100.0\% | 100.0\% | \$18,010 | 100.0\% | 100.0\% | 265 | 100.0\% | 100.0\% | \$17,870 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{gathered} 10 \\ 2 \\ 8 \end{gathered}$ | $\begin{gathered} 50.0 \% \\ 10.0 \% \\ 40.0 \% \end{gathered}$ | $\begin{gathered} \$ 2,690 \\ \$ 442 \\ \$ 125 \end{gathered}$ | $\begin{gathered} 82.6 \% \\ 13.6 \% \\ 3.8 \% \end{gathered}$ | Total Farms <br> $89.1 \%$ <br> $9.9 \%$ <br> $1.0 \%$ | $5$ | $\begin{aligned} & 62.5 \% \\ & 12.5 \% \\ & 25.0 \% \end{aligned}$ | 61.9\% | \$1,330 | 76.5\% | 77.2\% | 5 1 6 | $\begin{gathered} 41.7 \% \\ 8.3 \% \\ 50.0 \% \end{gathered}$ | 36.4\% | \$1,360 | 89.6\% | 71.3\% |
|  |  | Total | 20 | 100.0\% | \$3,257 | 100.0\% | 100.0\% | 8 | 100.0\% |  |  |  |  | 12 | 100.0\% |  |  |  |  |
|  |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | 9 6 5 | $\begin{aligned} & \hline 45.0 \% \\ & 30.0 \% \\ & 25.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 192 \\ \$ 1,290 \\ \$ 1,775 \end{gathered}$ | $\begin{gathered} \hline 5.9 \% \\ 39.6 \% \\ 54.5 \% \end{gathered}$ |  | $\begin{aligned} & 2 \\ & 3 \\ & 3 \end{aligned}$ | $\begin{aligned} & \hline 25.0 \% \\ & 37.5 \% \\ & 37.5 \% \end{aligned}$ | $\begin{aligned} & \hline 61.9 \% \\ & 19.0 \% \\ & 19.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 34 \\ \$ 630 \\ \$ 1,075 \end{gathered}$ | $\begin{gathered} \hline 2.0 \% \\ 36.2 \% \\ 61.8 \% \end{gathered}$ | $\begin{aligned} & \hline 12.1 \% \\ & 32.0 \% \\ & 55.9 \% \end{aligned}$ | $7$ | $\begin{aligned} & \hline 58.3 \% \\ & 25.0 \% \\ & 16.7 \% \end{aligned}$ | $\begin{aligned} & \hline 63.6 \% \\ & 22.7 \% \\ & 13.6 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 158 \\ & \$ 660 \\ & \$ 700 \end{aligned}$ | $\begin{aligned} & \hline 10.4 \% \\ & 43.5 \% \\ & 46.1 \% \end{aligned}$ | $\begin{aligned} & \hline 15.6 \% \\ & 42.2 \% \\ & 42.2 \% \end{aligned}$ |
|  |  | Total | 20 | 100.0\% | \$3,257 | 100.0\% |  | 8 | 100.0\% | 100.0\% | \$1,739 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$1,518 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: MS Jackson


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: MS Jackson

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Agg$\%$ |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 173 | 8.2\% | \$16,721 | 9.7\% | 7.3\% | 61 | 7.9\% | 6.5\% | \$8,122 | 9.6\% | 9.3\% | 112 | 8.3\% | 5.9\% | \$8,599 | 9.8\% | 7.8\% |
|  | Moderate | 330 | 15.6\% | \$21,808 | 12.7\% | 20.8\% | 125 | 16.2\% | 13.0\% | \$10,318 | 12.2\% | 13.5\% | 205 | 15.2\% | 13.4\% | \$11,490 | 13.1\% | 12.3\% |
|  | Middle | 502 | 23.7\% | \$31,438 | 18.3\% | 32.9\% | 176 | 22.8\% | 28.5\% | \$16,372 | 19.4\% | 23.5\% | 326 | 24.2\% | 29.5\% | \$15,066 | 17.2\% | 26.6\% |
|  | Upper | 1,114 | 52.6\% | \$102,149 | 59.3\% | 39.1\% | 410 | 53.1\% | 49.1\% | \$49,773 | 58.8\% | 52.9\% | 704 | 52.3\% | 48.5\% | \$52,376 | 59.8\% | 53.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 2,119 | 100.0\% | \$172,116 | 100.0\% | 100.0\% | 772 | 100.0\% | 100.0\% | \$84,585 | 100.0\% | 100.0\% | 1,347 | 100.0\% | 100.0\% | \$87,531 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{\underset{\sim}{4} \\ \underset{~}{4} \\ \underset{\sim}{4} \\ \sum \\ \hline}} \end{aligned}$ | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 1 | 10.0\% | \$44 | 5.6\% | 1.5\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.3\% | 1 | 14.3\% | 1.1\% | \$44 | 23.3\% | 0.9\% |
|  | Moderate | 2 | 20.0\% | \$156 | 19.8\% | 9.0\% | 1 | 33.3\% | 10.4\% | \$73 | 12.2\% | 11.2\% | 1 | 14.3\% | 13.6\% | \$83 | 43.9\% | 18.0\% |
|  | Middle | 4 | 40.0\% | \$538 | 68.2\% | 63.1\% | 2 | 66.7\% | 59.3\% | \$527 | 87.8\% | 54.9\% | 2 | 28.6\% | 62.5\% | \$11 | 5.8\% | 57.6\% |
|  | Upper | 3 | 30.0\% | \$51 | 6.5\% | 26.5\% | 0 | 0.0\% | 28.4\% | \$0 | 0.0\% | 33.5\% | 3 | 42.9\% | 22.0\% | \$51 | 27.0\% | 23.4\% |
|  | 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\% | 0.6\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 10 | 100.0\% | \$789 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$600 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$189 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: MS Jackson


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: MS Central MS


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: MS Central MS

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dank |  | Small <br> Businesses <br> \% | Count <br> Bank |  | $\begin{aligned} & \text { Agg } \\ & \% \end{aligned}$ |  | Dollar | Agg |  | Coun <br> ank | Agg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 34 | 3.8\% | \$2,033 | 3.1\% | 5.3\% | 14 | 3.8\% | 5.4\% | \$1,646 | 5.3\% | 6.1\% | 20 | 3.8\% | 5.2\% | \$387 | 1.1\% | 5.9\% |
|  | M oderate | 90 | 10.0\% | \$6,910 | 10.5\% | 14.5\% | 32 | 8.6\% | 13.8\% | \$2,746 | 8.8\% | 15.9\% | 58 | 11.0\% | 14.0\% | \$4,164 | 12.0\% | 15.6\% |
|  | Middle | 504 | 56.3\% | \$36,981 | 56.1\% | 59.9\% | 208 | 56.2\% | 53.1\% | \$16,465 | 52.5\% | 51.4\% | 296 | 56.3\% | 52.9\% | \$20,516 | 59.2\% | 53.4\% |
|  | Upper | 263 | 29.4\% | \$19,895 | 30.2\% | 20.2\% | 113 | 30.5\% | 23.7\% | \$10,344 | 33.0\% | 25.3\% | 150 | 28.5\% | 24.3\% | \$9,551 | 27.6\% | 24.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 5 | 0.6\% | \$152 | 0.2\% |  | 3 | 0.8\% | 4.0\% | \$135 | 0.4\% | 1.4\% | 2 | 0.4\% | 3.6\% | \$17 | 0.0\% | 0.5\% |
|  | Total | 896 | 100.0\% | \$65,971 | 100.0\% | 100.0\% | 370 | 100.0\% | 100.0\% | \$31,336 | 100.0\% | 100.0\% | 526 | 100.0\% | 100.0\% | \$34,635 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 3 | 3.3\% | \$903 | 7.1\% | 7.9\% | 0 | 0.0\% | 10.5\% | \$0 | 0.0\% | 9.2\% | 3 | 5.5\% | 7.9\% | \$903 | 12.2\% | 10.8\% |
|  | Middle | 86 | 94.5\% | \$11,547 | 91.3\% | 80.4\% | 35 | 97.2\% | 82.9\% | \$5,115 | 97.2\% | 83.1\% | 51 | 92.7\% | 81.6\% | \$6,432 | 87.1\% | 77.7\% |
|  | Upper | 2 | 2.2\% | \$200 | 1.6\% | 11.2\% | 1 | 2.8\% | 6.0\% | \$150 | 2.8\% | 7.6\% | 1 | 1.8\% | 9.0\% | \$50 | 0.7\% | 11.4\% |
|  | 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\% | 0.7\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 91 | 100.0\% | \$12,650 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$5,265 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$7,385 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: MS Central MS

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | ount \% | Bank <br> Do <br> \$(000s) | lar \$ \% | Families by Family Income \% |  | Count Bank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 s) \end{array}$ | Dollar <br> k \$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \\ & \hline \end{aligned}$ | B | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \\ \hline \end{gathered}$ |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 15 \\ 46 \\ 87 \\ 177 \\ 3 \end{gathered}$ | $\begin{gathered} 4.6 \% \\ 14.0 \% \\ 26.5 \% \\ 54.0 \% \\ 0.9 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 851 \\ \$ 3,846 \\ \$ 8,956 \\ \$ 27,529 \\ \$ 266 \\ \hline \end{gathered}$ | $\begin{gathered} 2.1 \% \\ 9.3 \% \\ 21.6 \% \\ 66.4 \% \\ 0.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} 22.9 \% \\ 14.6 \% \\ 18.3 \% \\ 44.1 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} 9 \\ 23 \\ 42 \\ 87 \\ 0 \end{gathered}$ | $\begin{gathered} 5.6 \% \\ 14.3 \% \\ 26.1 \% \\ 54.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} 4.4 \% \\ 13.3 \% \\ 23.0 \% \\ 46.9 \% \\ 12.4 \% \end{gathered}$ | $\begin{gathered} \$ 522 \\ \$ 1,984 \\ \$ 4,468 \\ \$ 14,633 \\ \$ 0 \end{gathered}$ | $\begin{gathered} 2.4 \% \\ 9.2 \% \\ 20.7 \% \\ 67.7 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} 1.8 \% \\ 7.8 \% \\ 19.4 \% \\ 58.1 \% \\ 12.8 \% \end{gathered}$ | $\begin{gathered} 6 \\ 23 \\ 45 \\ 90 \\ 3 \end{gathered}$ | $\begin{gathered} 3.6 \% \\ 13.8 \% \\ 26.9 \% \\ 53.9 \% \\ 1.8 \% \end{gathered}$ | $\begin{gathered} 2.2 \% \\ 13.6 \% \\ 17.6 \% \\ 51.0 \% \\ 15.6 \% \end{gathered}$ | $\begin{gathered} \$ 329 \\ \$ 1,862 \\ \$ 4,488 \\ \$ 12,896 \\ \$ 266 \\ \hline \end{gathered}$ | $\begin{gathered} 1.7 \% \\ 9.4 \% \\ 22.6 \% \\ 65.0 \% \\ 1.3 \% \\ \hline \end{gathered}$ | $\begin{gathered} 1.1 \% \\ 8.1 \% \\ 14.2 \% \\ 63.7 \% \\ 12.9 \% \end{gathered}$ |
|  | Total | 328 | 100.0\% | \$41,448 | 100.0\% | 100.0\% | 161 | 100.0\% | 100.0\% | \$21,607 | 100.0\% | 100.0\% | 167 | 100.0\% | 100.0\% | \$19,841 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 15 \\ 41 \\ 76 \\ 311 \\ 3 \\ \hline \end{gathered}$ | $\begin{gathered} 3.4 \% \\ 9.2 \% \\ 17.0 \% \\ 69.7 \% \\ 0.7 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 830 \\ \$ 2,715 \\ \$ 7,383 \\ \$ 49,307 \\ \$ 594 \\ \hline \end{gathered}$ | $\begin{gathered} 1.4 \% \\ 4.5 \% \\ 12.1 \% \\ 81.1 \% \\ 1.0 \% \end{gathered}$ | $\begin{gathered} 22.9 \% \\ 14.6 \% \\ 18.3 \% \\ 44.1 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 7 \\ 23 \\ 43 \\ 180 \\ 3 \\ \hline \end{gathered}$ | $\begin{gathered} 2.7 \% \\ 9.0 \% \\ 16.8 \% \\ 70.3 \% \\ 1.2 \% \\ \hline \end{gathered}$ | 3.0\% <br> 7.4\% <br> 15.3\% <br> 58.3\% <br> 16.0\% | $\begin{gathered} \$ 436 \\ \$ 1,578 \\ \$ 4,333 \\ \$ 30,014 \\ \$ 594 \\ \hline \end{gathered}$ | $\begin{gathered} 1.2 \% \\ 4.3 \% \\ 11.7 \% \\ 81.2 \% \\ 1.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} 1.1 \% \\ 4.0 \% \\ 10.3 \% \\ 63.5 \% \\ 21.2 \% \\ \hline \end{gathered}$ | $\begin{gathered} 8 \\ 18 \\ 33 \\ 131 \\ 0 \end{gathered}$ | 4.2\% <br> 9.5\% <br> 17.4\% <br> 68.9\% <br> 0.0\% | $\begin{gathered} 2.9 \% \\ 7.0 \% \\ 13.3 \% \\ 59.1 \% \\ 17.7 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 394 \\ \$ 1,137 \\ \$ 3,050 \\ \$ 19,293 \\ \$ 0 \end{gathered}$ | $\begin{gathered} 1.7 \% \\ 4.8 \% \\ 12.8 \% \\ 80.8 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 0.9 \% \\ 3.6 \% \\ 9.0 \% \\ 68.8 \% \\ 17.7 \% \\ \hline \end{gathered}$ |
|  | Total | 446 | 100.0\% | \$60,829 | 100.0\% | 100.0\% | 256 | 100.0\% | 100.0\% | \$36,955 | 100.0\% | 100.0\% | 190 | 100.0\% | 100.0\% | \$23,874 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 16 \\ 17 \\ 27 \\ 47 \\ 3 \\ \hline \end{gathered}$ | $\begin{aligned} & 14.5 \% \\ & 15.5 \% \\ & 24.5 \% \\ & 42.7 \% \\ & 2.7 \% \\ & \hline \end{aligned}$ | $\begin{gathered} \$ 86 \\ \$ 81 \\ \$ 178 \\ \$ 587 \\ \$ 32 \\ \hline \end{gathered}$ | $\begin{gathered} 8.9 \% \\ 8.4 \% \\ 18.5 \% \\ 60.9 \% \\ 3.3 \% \\ \hline \end{gathered}$ | $\begin{gathered} 22.9 \% \\ 14.6 \% \\ 18.3 \% \\ 44.1 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 13 \\ 4 \\ 17 \\ 19 \\ 1 \\ \hline \end{gathered}$ | $\begin{gathered} 24.1 \% \\ 7.4 \% \\ 31.5 \% \\ 35.2 \% \\ 1.9 \% \\ \hline \end{gathered}$ | $\begin{aligned} & 11.7 \% \\ & 16.1 \% \\ & 22.4 \% \\ & 44.4 \% \\ & 5.4 \% \\ & \hline \end{aligned}$ | $\begin{gathered} \$ 77 \\ \$ 19 \\ \$ 115 \\ \$ 191 \\ \$ 5 \\ \hline \end{gathered}$ | $\begin{gathered} 18.9 \% \\ 4.7 \% \\ 28.3 \% \\ 46.9 \% \\ 1.2 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3.3 \% \\ 7.0 \% \\ 16.8 \% \\ 67.2 \% \\ 5.7 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3 \\ 13 \\ 10 \\ 28 \\ 2 \\ \hline \end{gathered}$ | $\begin{gathered} 5.4 \% \\ 23.2 \% \\ 17.9 \% \\ 50.0 \% \\ 3.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} 6.0 \% \\ 17.9 \% \\ 21.1 \% \\ 46.8 \% \\ 8.2 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 9 \\ \$ 62 \\ \$ 63 \\ \$ 396 \\ \$ 27 \\ \hline \end{gathered}$ | $\begin{gathered} 1.6 \% \\ 11.1 \% \\ 11.3 \% \\ 71.1 \% \\ 4.8 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.0 \% \\ 8.0 \% \\ 14.5 \% \\ 64.4 \% \\ 11.1 \% \\ \hline \end{gathered}$ |
|  | Total | 110 | 100.0\% | \$964 | 100.0\% | 100.0\% | 54 | 100.0\% | 100.0\% | \$407 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$557 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{aligned} & 0 \\ & 0 \\ & 0 \\ & 0 \\ & 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 22.9 \% \\ 14.6 \% \\ 18.3 \% \\ 44.1 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & 0 \\ & 0 \\ & 0 \\ & 0 \\ & 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | 0 0 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ |
|  | 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\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 46 \\ 104 \\ 190 \\ 535 \\ 9 \\ \hline \end{gathered}$ | $\begin{gathered} 5.2 \% \\ 11.8 \% \\ 21.5 \% \\ 60.5 \% \\ 1.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 1,767 \\ \$ 6,642 \\ \$ 16,517 \\ \$ 77,423 \\ \$ 892 \\ \hline \end{gathered}$ | $\begin{gathered} 1.7 \% \\ 6.4 \% \\ 16.0 \% \\ 75.0 \% \\ 0.9 \% \\ \hline \end{gathered}$ | $\begin{gathered} 22.9 \% \\ 14.6 \% \\ 18.3 \% \\ 44.1 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 29 \\ 50 \\ 102 \\ 286 \\ 4 \\ \hline \end{gathered}$ | $\begin{gathered} 6.2 \% \\ 10.6 \% \\ 21.7 \% \\ 60.7 \% \\ 0.8 \% \\ \hline \end{gathered}$ | $\begin{gathered} 4.3 \% \\ 10.2 \% \\ 18.5 \% \\ 52.8 \% \\ 14.2 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 1,035 \\ \$ 3,581 \\ \$ 8,916 \\ \$ 44,838 \\ \$ 599 \\ \hline \end{gathered}$ | $\begin{gathered} 1.8 \% \\ 6.1 \% \\ 15.1 \% \\ 76.0 \% \\ 1.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 1.3 \% \\ 5.2 \% \\ 13.1 \% \\ 59.3 \% \\ 21.1 \% \\ \hline \end{gathered}$ | $\begin{gathered} 17 \\ 54 \\ 88 \\ 249 \\ 5 \\ \hline \end{gathered}$ | $\begin{gathered} 4.1 \% \\ 13.1 \% \\ 21.3 \% \\ 60.3 \% \\ 1.2 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.9 \% \\ 10.3 \% \\ 15.5 \% \\ 54.7 \% \\ 16.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 732 \\ \$ 3,061 \\ \$ 7,601 \\ \$ 32,585 \\ \$ 293 \\ \hline \end{gathered}$ | $\begin{gathered} 1.7 \% \\ 6.9 \% \\ 17.2 \% \\ 73.6 \% \\ 0.7 \% \\ \hline \end{gathered}$ | $\begin{gathered} 1.0 \% \\ 5.2 \% \\ 10.6 \% \\ 63.2 \% \\ 20.1 \% \\ \hline \end{gathered}$ |
|  |  | 884 | 100.0\% | \$103,241 | 100.0\% | 100.0\% | 471 | 100.0\% | 100.0\% | \$58,969 | 100.0\% | 100.0\% | 413 | 100.0\% | 100.0\% | \$44,272 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: MS Central MS

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount <br> \% | $\begin{aligned} & \text { ank } \\ & \quad \text { Doll } \\ & \$(\mathbf{0 0 0 0}) \end{aligned}$ | ar <br> \$ \% | Total Businesses \% |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bar } \\ \$ 000 \mathrm{~s} \end{array}$ | Dollar k \$ \% | Agg <br> \$ \% |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \mathbf{\$ 0 0 0 s} \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
| $\begin{aligned} & \mathscr{凶} \\ & \stackrel{\unrhd}{=} \end{aligned}$ | $\begin{aligned} & \stackrel{0}{د} \\ & \stackrel{\rightharpoonup}{\otimes} \\ & \underset{\sim}{\circlearrowright} \\ & \underset{\sim}{2} \end{aligned}$ | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{aligned} & 371 \\ & 148 \\ & 519 \\ & 377 \end{aligned}$ | $\begin{gathered} \hline 41.4 \% \\ 16.5 \% \\ 57.9 \% \\ 42.1 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 25,549 \\ & \$ 26,624 \\ & \$ 52,173 \\ & \$ 13,798 \end{aligned}$ | $\begin{aligned} & \hline 38.7 \% \\ & 40.4 \% \\ & 79.1 \% \\ & 20.9 \% \end{aligned}$ | $\begin{gathered} \hline 91.2 \% \\ 4.5 \% \\ 95.7 \% \\ 4.3 \% \end{gathered}$ | $\begin{gathered} \hline 221 \\ 76 \\ 297 \\ 73 \end{gathered}$ | $\begin{aligned} & 59.7 \% \\ & 20.5 \% \\ & 80.2 \% \\ & 19.7 \% \end{aligned}$ | 55.2\% | \$13,415 | 42.8\% | 54.7\% | 150 72 222 304 | $\begin{aligned} & 28.5 \% \\ & 13.7 \% \\ & 42.2 \% \\ & 57.8 \% \end{aligned}$ | 49.1\% | \$12,134 | 35.0\% | 48.0\% |
| $\stackrel{\square}{0}$ |  | Total | 896 | 100.0\% | \$65,971 | 100.0\% | 100.0\% | 370 | 100.0\% |  |  |  |  | 526 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\widetilde{\sigma}} \\ & \underset{\sim}{n} \end{aligned}$ | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { त्र } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | 768 71 57 | $\begin{gathered} \hline 85.7 \% \\ 7.9 \% \\ 6.4 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 26,756 \\ & \$ 12,226 \\ & \$ 26,989 \end{aligned}$ | $\begin{aligned} & \hline 40.6 \% \\ & 18.5 \% \\ & 40.9 \% \end{aligned}$ |  | $\begin{gathered} \hline 313 \\ 30 \\ 27 \end{gathered}$ | $\begin{gathered} \hline 84.6 \% \\ 8.1 \% \\ 7.3 \% \end{gathered}$ | $\begin{gathered} \hline 88.2 \% \\ 6.6 \% \\ 5.2 \% \end{gathered}$ | $\begin{gathered} \hline \$ 12,673 \\ \$ 5,153 \\ \$ 13,510 \end{gathered}$ | $\begin{aligned} & \hline 40.4 \% \\ & 16.4 \% \\ & 43.1 \% \end{aligned}$ | $\begin{aligned} & \hline 31.8 \% \\ & 19.4 \% \\ & 48.8 \% \end{aligned}$ | $\begin{gathered} \hline 455 \\ 41 \\ 30 \end{gathered}$ | $\begin{gathered} \hline 86.5 \% \\ 7.8 \% \\ 5.7 \% \end{gathered}$ | $\begin{gathered} \hline 89.3 \% \\ 6.5 \% \\ 4.2 \% \end{gathered}$ | $\begin{gathered} \hline \$ 14,083 \\ \$ 7,073 \\ \$ 13,479 \end{gathered}$ | $\begin{aligned} & \hline 40.7 \% \\ & 20.4 \% \\ & 38.9 \% \end{aligned}$ | $\begin{aligned} & \hline 34.2 \% \\ & 22.7 \% \\ & 43.1 \% \end{aligned}$ |
|  |  |  | 896 | 100.0\% | \$65,971 | 100.0\% |  | 370 | 100.0\% | 100.0\% | \$31,336 | 100.0\% | 100.0\% | 526 | 100.0\% | 100.0\% | \$34,635 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over $\$ 1$ Million <br> Not Known | 63 12 16 | $\begin{gathered} 69.2 \% \\ 13.2 \% \\ 17.6 \% \end{gathered}$ | $\begin{aligned} & \$ 9,420 \\ & \$ 1,515 \\ & \$ 1,715 \end{aligned}$ | $\begin{aligned} & 74.5 \% \\ & 12.0 \% \\ & 13.6 \% \end{aligned}$ | Total Farms <br> $97.2 \%$ <br> $2.4 \%$ <br> $0.4 \%$ | $\begin{gathered} 21 \\ 5 \\ 10 \end{gathered}$ | $\begin{gathered} 58.3 \% \\ 13.9 \% \\ 27.8 \% \end{gathered}$ | 86.0\% | \$3,696 | 70.2\% | 79.9\% | $\begin{gathered} 42 \\ 7 \\ 6 \end{gathered}$ | $\begin{gathered} 76.4 \% \\ 12.7 \% \\ 10.9 \% \end{gathered}$ | 88.2\% | \$5,724 | 77.5\% | 83.2\% |
|  |  | Total | 91 | 100.0\% | \$12,650 | 100.0\% | 100.0\% | 36 | 100.0\% |  |  |  |  | 55 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { त्र } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | 52 20 19 | $\begin{aligned} & \hline 57.1 \% \\ & 22.0 \% \\ & 20.9 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 2,343 \\ & \$ 3,439 \\ & \$ 6,868 \end{aligned}$ | $\begin{aligned} & \hline 18.5 \% \\ & 27.2 \% \\ & 54.3 \% \end{aligned}$ |  | $\begin{gathered} 18 \\ 11 \\ 7 \end{gathered}$ | $\begin{aligned} & \hline 50.0 \% \\ & 30.6 \% \\ & 19.4 \% \end{aligned}$ | $\begin{gathered} \hline 82.4 \% \\ 10.2 \% \\ 7.3 \% \end{gathered}$ | $\begin{gathered} \hline \$ 826 \\ \$ 1,902 \\ \$ 2,537 \end{gathered}$ | $\begin{aligned} & \hline 15.7 \% \\ & 36.1 \% \\ & 48.2 \% \end{aligned}$ | $\begin{aligned} & \hline 35.7 \% \\ & 24.6 \% \\ & 39.7 \% \end{aligned}$ | $\begin{gathered} 34 \\ 9 \\ 12 \end{gathered}$ | $\begin{aligned} & \hline 61.8 \% \\ & 16.4 \% \\ & 21.8 \% \end{aligned}$ | $\begin{gathered} \hline 81.4 \% \\ 11.8 \% \\ 6.8 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 1,517 \\ & \$ 1,537 \\ & \$ 4,331 \end{aligned}$ | $\begin{gathered} \hline 20.5 \% \\ 20.8 \% \\ 58.6 \% \end{gathered}$ | $\begin{aligned} & \hline 35.1 \% \\ & 29.1 \% \\ & 35.9 \% \end{aligned}$ |
|  |  |  | 91 | 100.0\% | \$12,650 | 100.0\% |  | 36 | 100.0\% | 100.0\% | \$5,265 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$7,385 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: MO St. Genevieve-Perry

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  |  |  |  | ank | Agg | Ban |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | 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 | 10 | 34.5\% | \$782 | 29.3\% | 24.8\% | 5 | 35.7\% | 22.5\% | \$432 | 33.1\% | 21.4\% | 5 | 33.3\% | 18.0\% | \$350 | 25.7\% | 16.2\% |
|  | Upper | 19 | 65.5\% | \$1,888 | 70.7\% | 75.2\% | 9 | 64.3\% | 76.9\% | \$875 | 66.9\% | 78.5\% | 10 | 66.7\% | 81.7\% | \$1,013 | 74.3\% | 83.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 29 | 100.0\% | \$2,670 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$1,307 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$1,363 | 100.0\% | 100.0\% |
|  | 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 | 24 | 22.2\% | \$2,965 | 22.8\% | 24.8\% | 16 | 23.2\% | 20.4\% | \$2,142 | 24.1\% | 19.1\% | 8 | 20.5\% | 21.7\% | \$823 | 20.0\% | 20.5\% |
|  | Upper | 84 | 77.8\% | \$10,058 | 77.2\% | 75.2\% | 53 | 76.8\% | 79.5\% | \$6,758 | 75.9\% | 80.9\% | 31 | 79.5\% | 78.2\% | \$3,300 | 80.0\% | 79.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 108 | 100.0\% | \$13,023 | 100.0\% | 100.0\% | 69 | 100.0\% | 100.0\% | \$8,900 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$4,123 | 100.0\% | 100.0\% |
|  | 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 | 1 | 16.7\% | \$6 | 12.2\% | 24.8\% | 0 | 0.0\% | 18.1\% | \$0 | 0.0\% | 19.1\% | 1 | 20.0\% | 15.7\% | \$6 | 15.8\% | 19.1\% |
|  | Upper | 5 | 83.3\% | \$43 | 87.8\% | 75.2\% | 1 | 100.0\% | 81.9\% | \$11 | 100.0\% | 80.9\% | 4 | 80.0\% | 84.3\% | \$32 | 84.2\% | 80.9\% |
|  | 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 | 6 | 100.0\% | \$49 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$11 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$38 | 100.0\% | 100.0\% |
| 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\% | 29.0\% | 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\% | 71.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 35 | 24.5\% | \$3,753 | 23.8\% | 24.8\% | 21 | 25.0\% | 20.7\% | \$2,574 | 25.2\% | 19.4\% | 14 | 23.7\% | 20.1\% | \$1,179 | 21.3\% | 19.1\% |
|  | Upper | 108 | 75.5\% | \$11,989 | 76.2\% | 75.2\% | 63 | 75.0\% | 79.0\% | \$7,644 | 74.8\% | 80.5\% | 45 | 76.3\% | 79.7\% | \$4,345 | 78.7\% | 80.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 143 | 100.0\% | \$15,742 | 100.0\% | 100.0\% | 84 | 100.0\% | 100.0\% | \$10,218 | 100.0\% | 100.0\% | 59 | 100.0\% | 100.0\% | \$5,524 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: MO St. Genevieve-Perry

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Bank  Agg <br> $\#$ $\%$ $\%$ |  |  | Dollar Bank |  | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | Count <br> Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  |  |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% |
|  | 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 | 33 | 28.2\% | \$1,569 | 28.5\% | 23.7\% | 15 | 30.6\% | 23.0\% | \$1,056 | 39.5\% | 27.8\% | 18 | 26.5\% | 21.8\% | \$513 | 18.1\% | 16.5\% |
|  | Upper | 83 | 70.9\% | \$3,925 | 71.2\% | 76.3\% | 33 | 67.3\% | 73.7\% | \$1,603 | 59.9\% | 71.9\% | 50 | 73.5\% | 74.5\% | \$2,322 | 81.9\% | 83.1\% |
|  | 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 | 1 | 0.9\% | \$17 | 0.3\% |  | 1 | 2.0\% | 3.3\% | \$17 | 0.6\% | 0.3\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 0.5\% |
|  | Total | 117 | 100.0\% | \$5,511 | 100.0\% | 100.0\% | 49 | 100.0\% | 100.0\% | \$2,676 | 100.0\% | 100.0\% | 68 | 100.0\% | 100.0\% | \$2,835 | 100.0\% | 100.0\% |
|  | 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 | 7 | 20.0\% | \$468 | 14.8\% | 31.8\% | 4 | 25.0\% | 35.1\% | \$358 | 26.6\% | 40.3\% | 3 | 15.8\% | 21.7\% | \$110 | 6.1\% | 10.7\% |
|  | Upper | 28 | 80.0\% | \$2,686 | 85.2\% | 68.2\% | 12 | 75.0\% | 62.2\% | \$986 | 73.4\% | 59.6\% | 16 | 84.2\% | 76.8\% | \$1,700 | 93.9\% | 89.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 35 | 100.0\% | \$3,154 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$1,344 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$1,810 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: MO St. Genevieve-Perry


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## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: MO St. Genevieve-Perry

|  |  |  | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount | Dol | ar | Total Businesses |  | Count ank | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba | Dollar | Agg | Bank |  | Agg$\%$ | Bank | Dollar | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% |  | \$ 000s | \$ \% |  |
|  | $\stackrel{\otimes}{\stackrel{0}{ \pm}}$ | \$1 Million or Less | 59 | 50.4\% | \$2,217 | 40.2\% | 89.5\% | 35 | 71.4\% | 44.1\% | \$1,255 | 46.9\% | 29.3\% | 24 | 35.3\% | 38.8\% | \$962 | 33.9\% | 35.7\% |
|  |  | Over \$1 Million | 17 | 14.5\% | \$2,441 | 44.3\% | 6.1\% |  | 22.4\% |  |  |  |  | 6 | 8.8\% |  |  |  |  |
|  |  | Total Rev. available | 76 | 64.9\% | \$4,658 | 84.5\% | 95.6\% | 46 | 93.8\% |  |  |  |  | 30 | 44.1\% |  |  |  |  |
|  |  | Rev. Not Known | 41 | 35.0\% | \$853 | 15.5\% | 4.4\% | 3 | 6.1\% |  |  |  |  | 38 | 55.9\% |  |  |  |  |
|  |  | Total | 117 | 100.0\% | \$5,511 | 100.0\% | 100.0\% | 49 | 100.0\% |  |  |  |  | 68 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { ᄃ } \\ & \text { O} \end{aligned}$ | \$100,000 or Less | 106 | 90.6\% | \$2,593 | 47.1\% |  | 44 | 89.8\% | 87.5\% | \$1,409 | 52.7\% | 26.3\% | 62 | 91.2\% | 91.0\% | \$1,184 | 41.8\% | 27.2\% |
|  |  | \$100,001-\$250,000 | 5 | 4.3\% | \$892 | 16.2\% |  | 2 | 4.1\% | 6.6\% | \$351 | 13.1\% | 18.3\% | 3 | 4.4\% | 3.8\% | \$541 | 19.1\% | 15.1\% |
|  |  | \$250,001 - \$1 Million | 6 | 5.1\% | \$2,026 | 36.8\% |  | 3 | 6.1\% | 5.9\% | \$916 | 34.2\% | 55.4\% | 3 | 4.4\% | 5.3\% | \$1,110 | 39.2\% | 57.7\% |
|  |  | Total | 117 | 100.0\% | \$5,511 | 100.0\% |  | 49 | 100.0\% | 100.0\% | \$2,676 | 100.0\% | 100.0\% | 68 | 100.0\% | 100.0\% | \$2,835 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less |  | 91.4\% | \$3,042 | 96.4\% | Total Farms $100.0 \%$ | 13 | 81.3\% | 75.7\% | \$1,232 | 91.7\% | 87.2\% | 19 | 100.0\% | 78.3\% | \$1,810 | 100.0\% | 77.5\% |
|  |  | Over \$1 M illion | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 3 | 8.6\% | \$112 | 3.6\% | 0.0\% |  | 18.8\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Total | 35 | 100.0\% | \$3,154 | 100.0\% | 100.0\% | 16 | 100.0\% |  |  |  |  | 19 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{y}{n} \\ & \stackrel{\Gamma}{\widetilde{N}} \end{aligned}$ | \$100,000 or Less | 26 | 74.3\% | \$974 | 30.9\% |  | 12 | 75.0\% | 75.7\% | \$384 | 28.6\% | 33.1\% | 14 | 73.7\% | 72.5\% | \$590 | 32.6\% | 34.4\% |
|  |  | \$100,001-\$250,000 | 7 | 20.0\% | \$1,180 | 37.4\% |  | 3 | 18.8\% | 16.2\% | \$460 | 34.2\% | 32.1\% | 4 | 21.1\% | 21.7\% | \$720 | 39.8\% | 40.3\% |
|  |  | \$250,001-\$500,000 | 2 | 5.7\% | \$1,000 | 31.7\% |  | 1 | 6.3\% | 8.1\% | \$500 | 37.2\% | 34.8\% | 1 | 5.3\% | 5.8\% | \$500 | 27.6\% | 25.3\% |
|  |  | Total | 35 | 100.0\% | \$3,154 | 100.0\% |  | 16 | 100.0\% | 100.0\% | \$1,344 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$1,810 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

## Assessment Area: MO Southeast MO

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Ban |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | 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 | 7.3\% | \$219 | 5.3\% | 13.9\% | 1 | 5.6\% | 17.6\% | \$35 | 2.5\% | 14.0\% | 2 | 8.7\% | 15.1\% | \$184 | 6.8\% | 11.9\% |
|  | Middle | 36 | 87.8\% | \$3,517 | 85.2\% | 84.0\% | 16 | 88.9\% | 78.2\% | \$1,239 | 88.4\% | 80.0\% | 20 | 87.0\% | 81.9\% | \$2,278 | 83.6\% | 83.5\% |
|  | Upper | 2 | 4.9\% | \$390 | 9.5\% | 2.1\% | 1 | 5.6\% | 3.7\% | \$128 | 9.1\% | 5.8\% | 1 | 4.3\% | 3.0\% | \$262 | 9.6\% | 4.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 41 | 100.0\% | \$4,126 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$1,402 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$2,724 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 10 | 8.5\% | \$589 | 4.9\% | 13.9\% | 3 | 4.3\% | 9.8\% | \$193 | 2.6\% | 7.9\% | 7 | 14.6\% | 11.2\% | \$396 | 8.6\% | 8.7\% |
|  | Middle | 104 | 88.9\% | \$11,078 | 92.1\% | 84.0\% | 65 | 94.2\% | 85.4\% | \$7,130 | 96.2\% | 86.0\% | 39 | 81.3\% | 85.7\% | \$3,948 | 85.5\% | 87.5\% |
|  | Upper | 3 | 2.6\% | \$367 | 3.0\% | 2.1\% | 1 | 1.4\% | 4.6\% | \$91 | 1.2\% | 6.0\% | 2 | 4.2\% | 2.9\% | \$276 | 6.0\% | 3.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 117 | 100.0\% | \$12,034 | 100.0\% | 100.0\% | 69 | 100.0\% | 100.0\% | \$7,414 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$4,620 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 7 | 33.3\% | \$102 | 48.1\% | 13.9\% | 3 | 33.3\% | 13.6\% | \$64 | 50.8\% | 9.8\% | 4 | 33.3\% | 12.9\% | \$38 | 44.2\% | 11.2\% |
|  | Middle | 14 | 66.7\% | \$110 | 51.9\% | 84.0\% | 6 | 66.7\% | 85.2\% | \$62 | 49.2\% | 89.7\% | 8 | 66.7\% | 84.8\% | \$48 | 55.8\% | 86.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 2.2\% |
|  | 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 | 21 | 100.0\% | \$212 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$126 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$86 | 100.0\% | 100.0\% |
| 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\% | 38.3\% | 0 | 0.0\% | 28.6\% | \$0 | 0.0\% | 49.6\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 46.9\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 52.9\% | 0 | 0.0\% | 57.1\% | \$0 | 0.0\% | 39.6\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 43.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 8.8\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 10.8\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 9.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | 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 | 20 | 11.2\% | \$910 | 5.6\% | 13.9\% | 7 | 7.3\% | 13.1\% | \$292 | 3.3\% | 10.4\% | 13 | 15.7\% | 13.1\% | \$618 | 8.3\% | 10.4\% |
|  | Middle | 154 | 86.0\% | \$14,705 | 89.8\% | 84.0\% | 87 | 90.6\% | 82.6\% | \$8,431 | 94.3\% | 83.7\% | 67 | 80.7\% | 83.8\% | \$6,274 | 84.4\% | 85.5\% |
|  | Upper | 5 | 2.8\% | \$757 | 4.6\% | 2.1\% | 2 | 2.1\% | 4.1\% | \$219 | 2.4\% | 5.8\% | 3 | 3.6\% | 3.0\% | \$538 | 7.2\% | 4.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 179 | 100.0\% | \$16,372 | 100.0\% | 100.0\% | 96 | 100.0\% | 100.0\% | \$8,942 | 100.0\% | 100.0\% | 83 | 100.0\% | 100.0\% | \$7,430 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: MO Southeast MO

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  | ank | Agg |  |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | 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 | 19.6\% | \$813 | 11.1\% | 19.3\% | 6 | 23.1\% | 17.2\% | \$264 | 9.3\% | 18.0\% | 12 | 18.2\% | 17.8\% | \$549 | 12.2\% | 17.3\% |
|  | Middle | 66 | 71.7\% | \$4,949 | 67.4\% | 76.2\% | 18 | 69.2\% | 69.8\% | \$2,289 | 80.3\% | 69.6\% | 48 | 72.7\% | 71.1\% | \$2,660 | 59.3\% | 73.7\% |
|  | Upper | 7 | 7.6\% | \$1,553 | 21.2\% | 4.6\% | 2 | 7.7\% | 4.4\% | \$299 | 10.5\% | 7.6\% | 5 | 7.6\% | 4.1\% | \$1,254 | 27.9\% | 7.3\% |
|  | 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 | 1 | 1.1\% | \$25 | 0.3\% |  | 0 | 0.0\% | 8.6\% | \$0 | 0.0\% | 4.7\% | 1 | 1.5\% | 6.9\% | \$25 | 0.6\% | 1.7\% |
|  | Total | 92 | 100.0\% | \$7,340 | 100.0\% | 100.0\% | 26 | 100.0\% | 100.0\% | \$2,852 | 100.0\% | 100.0\% | 66 | 100.0\% | 100.0\% | \$4,488 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{\underset{\sim}{4} \\ \underset{\sim}{4}}}^{\underset{\sim}{4}} \end{aligned}$ | 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 | 5 | 15.2\% | \$865 | 16.7\% | 9.8\% | 2 | 14.3\% | 6.8\% | \$455 | 19.2\% | 6.6\% | 3 | 15.8\% | 5.3\% | \$410 | 14.6\% | 7.3\% |
|  | Middle | 28 | 84.8\% | \$4,302 | 83.3\% | 87.4\% | 12 | 85.7\% | 83.5\% | \$1,913 | 80.8\% | 81.1\% | 16 | 84.2\% | 78.9\% | \$2,389 | 85.4\% | 88.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 2.8\% | 0 | 0.0\% | 5.8\% | \$0 | 0.0\% | 10.2\% | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 3.9\% |
|  | 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\% | 3.9\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 10.5\% | \$0 | 0.0\% | 0.6\% |
|  | Total | 33 | 100.0\% | \$5,167 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$2,368 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$2,799 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: MO Southeast MO

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | ount \% | $\begin{aligned} & \text { Bank } \\ & \\ & \text { \$(000s) } \\ & \text { Dol } \end{aligned}$ | lar \$ \% | Families by Family Income \% | \# | Count Bank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} B= \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | Count Bank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} B \\ \$(000 s) \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \\ \hline \end{gathered}$ |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 2 \\ 13 \\ 14 \\ 11 \\ 1 \\ \hline \end{gathered}$ | $\begin{gathered} 4.9 \% \\ 31.7 \% \\ 34.1 \% \\ 26.8 \% \\ 2.4 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 86 \\ \$ 950 \\ \$ 1,451 \\ \$ 1,601 \\ \$ 38 \\ \hline \end{gathered}$ | $\begin{gathered} 2.1 \% \\ 23.0 \% \\ 35.2 \% \\ 38.8 \% \\ 0.9 \% \\ \hline \end{gathered}$ | $\begin{gathered} 22.4 \% \\ 18.6 \% \\ 21.1 \% \\ 37.9 \% \\ 0.0 \% \\ \hline \end{gathered}$ | 2 8 | $\begin{gathered} 11.1 \% \\ 44.4 \% \\ 27.8 \% \\ 16.7 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 6.9 \% \\ 25.4 \% \\ 26.4 \% \\ 35.3 \% \\ 6.1 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 86 \\ \$ 634 \\ \$ 500 \\ \$ 182 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 6.1 \% \\ 45.2 \% \\ 35.7 \% \\ 13.0 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 4.1 \% \\ 19.0 \% \\ 24.5 \% \\ 44.0 \% \\ 8.4 \% \\ \hline \end{gathered}$ | 0 5 9 8 1 | $\begin{gathered} 0.0 \% \\ 21.7 \% \\ 39.1 \% \\ 34.8 \% \\ 4.3 \% \\ \hline \end{gathered}$ | $\begin{gathered} 7.4 \% \\ 25.8 \% \\ 21.9 \% \\ 31.3 \% \\ 13.5 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 0 \\ \$ 316 \\ \$ 951 \\ \$ 1,419 \\ \$ 38 \\ \hline \end{gathered}$ | $\begin{gathered} 0.0 \% \\ 11.6 \% \\ 34.9 \% \\ 52.1 \% \\ 1.4 \% \\ \hline \end{gathered}$ | $\begin{gathered} 4.4 \% \\ 19.8 \% \\ 21.1 \% \\ 41.3 \% \\ 13.3 \% \\ \hline \end{gathered}$ |
|  | Total | 41 | 100.0\% | \$4,126 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$1,402 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$2,724 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 7 \\ 20 \\ 27 \\ 63 \\ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 6.0 \% \\ 17.1 \% \\ 23.1 \% \\ 53.8 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 358 \\ \$ 1,196 \\ \$ 2,212 \\ \$ 8,268 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 3.0 \% \\ 9.9 \% \\ 18.4 \% \\ 68.7 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 22.4 \% \\ 18.6 \% \\ 21.1 \% \\ 37.9 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3 \\ 11 \\ 15 \\ 40 \\ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 4.3 \% \\ 15.9 \% \\ 21.7 \% \\ 58.0 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 4.1 \% \\ 12.1 \% \\ 18.7 \% \\ 53.1 \% \\ 12.0 \% \end{gathered}$ | $\begin{gathered} \$ 180 \\ \$ 610 \\ \$ 1,251 \\ \$ 5,373 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 2.4 \% \\ 8.2 \% \\ 16.9 \% \\ 72.5 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.0 \% \\ 7.6 \% \\ 14.7 \% \\ 61.1 \% \\ 14.6 \% \end{gathered}$ | 4 <br> 9 <br> 12 <br> 23 <br> 0 | $\begin{gathered} 8.3 \% \\ 18.8 \% \\ 25.0 \% \\ 47.9 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 4.8 \% \\ 12.1 \% \\ 17.2 \% \\ 52.0 \% \\ 13.9 \% \end{gathered}$ | $\begin{gathered} \$ 178 \\ \$ 586 \\ \$ 961 \\ \$ 2,895 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 3.9 \% \\ 12.7 \% \\ 20.8 \% \\ 62.7 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.2 \% \\ 7.8 \% \\ 13.2 \% \\ 62.0 \% \\ 14.8 \% \end{gathered}$ |
|  | Total | 117 | 100.0\% | \$12,034 | 100.0\% | 100.0\% | 69 | 100.0\% | 100.0\% | \$7,414 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$4,620 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 0 \\ 1 \\ 9 \\ 11 \\ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 0.0 \% \\ 4.8 \% \\ 42.9 \% \\ 52.4 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 0 \\ \$ 3 \\ \$ 73 \\ \$ 136 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 0.0 \% \\ 1.4 \% \\ 34.4 \% \\ 64.2 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 22.4 \% \\ 18.6 \% \\ 21.1 \% \\ 37.9 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & 0 \\ & 0 \\ & 4 \\ & 5 \\ & 0 \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 44.4 \% \\ 55.6 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 8.9 \% \\ 20.1 \% \\ 23.7 \% \\ 41.4 \% \\ 5.9 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 0 \\ \$ 0 \\ \$ 42 \\ \$ 84 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 33.3 \% \\ 66.7 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 4.3 \% \\ 16.4 \% \\ 20.6 \% \\ 55.8 \% \\ 2.9 \% \\ \hline \end{gathered}$ | 0 1 5 6 0 | $\begin{gathered} 0.0 \% \\ 8.3 \% \\ 41.7 \% \\ 50.0 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & 11.4 \% \\ & 13.3 \% \\ & 22.9 \% \\ & 46.2 \% \\ & 6.2 \% \\ & \hline \end{aligned}$ | $\begin{gathered} \$ 0 \\ \$ 3 \\ \$ 31 \\ \$ 52 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 0.0 \% \\ 3.5 \% \\ 36.0 \% \\ 60.5 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 6.0 \% \\ 10.1 \% \\ 18.2 \% \\ 54.4 \% \\ 11.4 \% \\ \hline \end{gathered}$ |
|  |  | 21 | 100.0\% | \$212 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$126 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$86 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{aligned} & 0 \\ & 0 \\ & 0 \\ & 0 \\ & 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 22.4 \% \\ 18.6 \% \\ 21.1 \% \\ 37.9 \% \\ 0.0 \% \\ \hline \end{gathered}$ | 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | 0 0 0 0 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \$ 0 \\ & \hline \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \\ & \hline \end{aligned}$ | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 0.0 \% \\ 100.0 \% \\ \hline \end{gathered}$ |
|  | 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\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown | $\begin{gathered} 9 \\ 34 \\ 50 \\ 85 \\ 1 \\ \hline \end{gathered}$ | $\begin{gathered} 5.0 \% \\ 19.0 \% \\ 27.9 \% \\ 47.5 \% \\ 0.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 444 \\ \$ 2,149 \\ \$ 3,736 \\ \$ 10,005 \\ \$ 38 \\ \hline \end{gathered}$ | $\begin{gathered} 2.7 \% \\ 13.1 \% \\ 22.8 \% \\ 61.1 \% \\ 0.2 \% \\ \hline \end{gathered}$ | $\begin{gathered} 22.4 \% \\ 18.6 \% \\ 21.1 \% \\ 37.9 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 5 \\ 19 \\ 24 \\ 48 \\ 0 \end{gathered}$ | $\begin{gathered} 5.2 \% \\ 19.8 \% \\ 25.0 \% \\ 50.0 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 5.4 \% \\ 17.6 \% \\ 21.9 \% \\ 45.5 \% \\ 9.6 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 266 \\ \$ 1,244 \\ \$ 1,793 \\ \$ 5,639 \\ \$ 0 \\ \hline \end{gathered}$ | $\begin{gathered} 3.0 \% \\ 13.9 \% \\ 20.1 \% \\ 63.1 \% \\ 0.0 \% \\ \hline \end{gathered}$ | $\begin{gathered} 2.8 \% \\ 11.8 \% \\ 18.3 \% \\ 54.5 \% \\ 12.6 \% \\ \hline \end{gathered}$ | 4 15 26 37 1 | 4.8\% <br> 18.1\% <br> 31.3\% <br> 44.6\% <br> 1.2\% | $\begin{gathered} 6.5 \% \\ 18.2 \% \\ 19.6 \% \\ 42.3 \% \\ 13.5 \% \\ \hline \end{gathered}$ | $\begin{gathered} \$ 178 \\ \$ 905 \\ \$ 1,943 \\ \$ 4,366 \\ \$ 38 \\ \hline \end{gathered}$ | $\begin{gathered} 2.4 \% \\ 12.2 \% \\ 26.2 \% \\ 58.8 \% \\ 0.5 \% \\ \hline \end{gathered}$ | $\begin{gathered} 3.2 \% \\ 12.8 \% \\ 16.6 \% \\ 52.6 \% \\ 14.8 \% \\ \hline \end{gathered}$ |
|  |  | 179 | 100.0\% | \$16,372 | 100.0\% | 100.0\% | 96 | 100.0\% | 100.0\% | \$8,942 | 100.0\% | 100.0\% | 83 | 100.0\% | 100.0\% | \$7,430 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: MO Southeast MO

|  |  |  | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  |  |  |  | 10 | k \& Ag | regate L | ndin | Compa | ison | 11 |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Count |  | Dollar |  | Total <br> Businesses |  | Count ank | Agg | Bank |  | Agg |  | Count ank |  | Bank | Dollar | Agg |
|  |  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  |  | \$1 Million or Less | 23 | 25.0\% | \$1,932 | 26.3\% | 89.3\% | 14 | 53.8\% | 35.2\% | \$1,209 | 42.4\% | 46.4\% | 9 | 13.6\% | 31.7\% | \$723 | 16.1\% | 40.7\% |
|  |  | Over \$1 Million | 16 | 17.4\% | \$2,827 | 38.5\% | 5.5\% | 7 | 26.9\% |  |  |  |  | 9 | 13.6\% |  |  |  |  |
|  |  | Total Rev. available | 39 | 42.4\% | \$4,759 | 64.8\% | 94.8\% | 21 | 80.7\% |  |  |  |  | 18 | 27.2\% |  |  |  |  |
|  |  | Rev. Not Known | 53 | 57.6\% | \$2,581 | 35.2\% | 5.2\% | 5 | 19.2\% |  |  |  |  | 48 | 72.7\% |  |  |  |  |
|  |  | Total | 92 | 100.0\% | \$7,340 | 100.0\% | 100.0\% | 26 | 100.0\% |  |  |  |  | 66 | 100.0\% |  |  |  |  |
| ¢ |  | \$100,000 or Less | 76 | 82.6\% | \$2,509 | 34.2\% |  | 21 | 80.8\% | 93.5\% | \$875 | 30.7\% | 33.6\% | 55 | 83.3\% | 95.0\% | \$1,634 | 36.4\% | 37.7\% |
| い |  | \$100,001-\$250,000 | 10 | 10.9\% | \$1,674 | 22.8\% |  | 2 | 7.7\% | 3.0\% | \$299 | 10.5\% | 12.9\% | 8 | 12.1\% | 2.6\% | \$1,375 | 30.6\% | 15.6\% |
|  |  | \$250,001 - \$1 M illion | 6 | 6.5\% | \$3,157 | 43.0\% |  | 3 | 11.5\% | 3.4\% | \$1,678 | 58.8\% | 53.5\% | 3 | 4.5\% | 2.4\% | \$1,479 | 33.0\% | 46.6\% |
|  |  | Total | 92 | 100.0\% | \$7,340 | 100.0\% |  | 26 | 100.0\% | 100.0\% | \$2,852 | 100.0\% | 100.0\% | 66 | 100.0\% | 100.0\% | \$4,488 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less | 16 | 48.5\% | \$2,708 | 52.4\% | $\begin{gathered} \hline \text { Total Farms } \\ 98.2 \% \end{gathered}$ | 8 | 57.1\% | 63.1\% | \$1,423 | 60.1\% | 72.1\% | 8 | 42.1\% | 64.2\% | \$1,285 | 45.9\% | 75.4\% |
|  |  | Over \$1 Million | 11 | 33.3\% | \$2,391 | 46.3\% | 1.7\% | 5 | 35.7\% |  |  |  |  | 6 | 31.6\% |  |  |  |  |
|  |  | Not Known | 6 | 18.2\% | \$68 | 1.3\% | 0.1\% |  | 7.1\% |  |  |  |  | 5 | 26.3\% |  |  |  |  |
|  |  | Total | 33 | 100.0\% | \$5,167 | 100.0\% | 100.0\% |  | 100.0\% |  |  |  |  | 19 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 15 | 45.5\% | \$546 | 10.6\% |  | 6 | 42.9\% | 73.8\% | \$320 | 13.5\% | 23.4\% | 9 | 47.4\% | 67.4\% | \$226 | 8.1\% | 15.8\% |
|  |  | \$100,001-\$250,000 | 11 | 33.3\% | \$2,070 | 40.1\% |  | 4 | 28.6\% | 14.6\% | \$780 | 32.9\% | 29.3\% | 7 | 36.8\% | 17.9\% | \$1,290 | 46.1\% | 29.8\% |
|  |  | \$250,001-\$500,000 | 7 | 21.2\% | \$2,551 | 49.4\% |  | 4 | 28.6\% | 11.7\% | \$1,268 | 53.5\% | 47.4\% | 3 | 15.8\% | 14.7\% | \$1,283 | 45.8\% | 54.4\% |
|  |  | Total | 33 | 100.0\% | \$5,167 | 100.0\% |  | 14 | 100.0\% | 100.0\% | \$2,368 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$2,799 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: NC Charlotte


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: NC Charlotte

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Bank  Agg <br> $\#$ $\%$ $\%$ |  |  | Dollar <br> Bank |  | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | Count <br> Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  |  |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% |
|  | Low | 17 | 7.9\% | \$1,925 | 5.4\% | 4.4\% | 5 | 7.4\% | 4.6\% |  |  | \$795 | 4.5\% | 6.6\% |  | 12 | 8.2\% | 4.7\% | \$1,130 | 6.3\% | 6.7\% |
|  | Moderate | 20 | 9.3\% | \$5,097 | 14.2\% | 12.8\% | 8 | 11.8\% | 10.7\% | \$3,520 | 19.7\% | 12.5\% | 12 | 8.2\% | 10.6\% | \$1,577 | 8.7\% | 11.6\% |
|  | Middle | 66 | 30.7\% | \$11,785 | 32.8\% | 36.2\% | 19 | 27.9\% | 31.4\% | \$4,538 | 25.4\% | 32.5\% | 47 | 32.0\% | 31.9\% | \$7,247 | 40.1\% | 32.3\% |
|  | Upper | 111 | 51.6\% | \$16,965 | 47.2\% | 46.5\% | 35 | 51.5\% | 50.6\% | \$8,851 | 49.5\% | 47.1\% | 76 | 51.7\% | 51.4\% | \$8,114 | 44.9\% | 49.0\% |
|  | Unknown | 1 | 0.5\% | \$160 | 0.4\% | 0.1\% | 1 | 1.5\% | 0.1\% | \$160 | 0.9\% | 0.3\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.2\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 215 | 100.0\% | \$35,932 | 100.0\% | 100.0\% | 68 | 100.0\% | 100.0\% | \$17,864 | 100.0\% | 100.0\% | 147 | 100.0\% | 100.0\% | \$18,068 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{\underset{\sim}{4} \\ \underset{~}{4} \\ \underset{\sim}{4} \\ \sum \\ \hline}} \end{aligned}$ | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 3.8\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 6.4\% | 0 | 0.0\% | 17.2\% | \$0 | 0.0\% | 39.8\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 0.3\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 26.3\% | 0 | 0.0\% | 37.9\% | \$0 | 0.0\% | 43.1\% | 0 | 0.0\% | 32.0\% | \$0 | 0.0\% | 16.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 64.3\% | 0 | 0.0\% | 41.4\% | \$0 | 0.0\% | 15.9\% | 0 | 0.0\% | 60.0\% | \$0 | 0.0\% | 79.9\% |
|  | 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\% | 3.4\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: NC Charlotte


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

## Assessment Area: SC Columbia

|  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | $\begin{array}{\|c\|\|} \hline \text { O wner } \\ \text { O ccupied } \\ \text { Units } \\ \% \\ \hline \end{array}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% |  |
| HOME PURCHASE | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 9 | 11.4\% | \$961 | 6.0\% | 20.9\% | 7 | 13.2\% | 11.2\% | \$745 | 7.1\% | 7.9\% | 2 | 7.7\% | 10.3\% | \$216 | 3.9\% | 7.2\% |
|  | Middle | 21 | 26.6\% | \$3,625 | 22.5\% | 36.9\% | 16 | 30.2\% | 32.5\% | \$2,301 | 21.8\% | 28.7\% | 5 | 19.2\% | 32.4\% | \$1,324 | 23.9\% | 28.7\% |
|  | Upper | 49 | 62.0\% | \$11,498 | 71.5\% | 41.0\% | 30 | 56.6\% | 55.8\% | \$7,499 | 71.1\% | 63.0\% | 19 | 73.1\% | 56.9\% | \$3,999 | 72.2\% | 63.9\% |
|  | Unknow | 0 | 0.0\% | \$0 | 0.0\% | 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\% | \$16,084 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$10,545 | 100.0\% | 100.0\% | 26 | 100.0\% | 100.0\% | \$5,539 | 100.0\% | 100.0\% |
|  |  | 2 | 1.1\% | \$170 | 0.5\% | 1.2\% | 2 | 1.7\% | 0.4\% | \$170 | 0.8\% | 0.2\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 6 | $3.4 \%$ | \$1,087 | 3.3\% | 20.9\% | 3 | 2.5\% | 7.6\% | \$497 | 2.2\% | 5.3\% | 3 | 5.5\% | 8.5\% | \$590 | 5.5\% | 5.7\% |
|  | Middle | 61 | 34.9\% | \$9,700 | 29.1\% | 36.9\% | 37 | 30.8\% | 29.0\% | \$5,106 | 22.6\% | 24.4\% | 24 | 43.6\% | 28.4\% | \$4,594 | 42.6\% | 23.6\% |
|  | Upper | 106 | 60.6\% | \$22,421 | 67.2\% | 41.0\% | 78 | 65.0\% | 63.0\% | \$16,828 | 74.5\% | 70.0\% | 28 | 50.9\% | 62.8\% | \$5,593 | 51.9\% | 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\% |
|  | Total | 175 | 100.0\% | \$33,378 | 100.0\% | 100.0\% | 120 | 100.0\% | 100.0\% | \$22,601 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$10,777 | 100.0\% | 100.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 1 | 14.3\% | \$15 | 16.9\% | 20.9\% | 1 | 25.0\% | 14.6\% | \$15 | 41.7\% | 9.7\% | 0 | 0.0\% | 14.5\% | \$0 | 0.0\% | 7.4\% |
|  | Middle | 2 | 28.6\% | \$8 | 9.0\% | 36.9\% |  | 25.0\% | 31.1\% | \$4 | 11.1\% | 20.6\% | 1 | 33.3\% | 32.7\% | \$4 | 7.5\% | 29.3\% |
|  | Upper | 4 | 57.1\% | \$66 | 74.2\% | 41.0\% | 2 | 50.0\% | 53.2\% | \$17 | 47.2\% | 69.0\% | 2 | 66.7\% | 51.9\% | \$49 | 92.5\% | 63.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 7 | 100.0\% | \$89 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$36 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$53 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Lo | 0 | 0.0\% | \$0 | 0.0\% | 9.7\% | 0 | 0.0\% | 11.1\% | \$0 | 0.0\% | 9.8\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 1.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 27.1\% | 0 | 0.0\% | 11.1\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 26.1\% | \$0 | 0.0\% | 11.8\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 39.5\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 26.1\% | \$0 | 0.0\% | 60.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 23.3\% | 0 | 0.0\% | 61.1\% | \$0 | 0.0\% | 88.3\% | 0 | 0.0\% | 43.5\% | \$0 | 0.0\% | 27.1\% |
|  | Unknown | 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\% |
|  |  | 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\% |
|  | Low | 2 | 0.8\% | \$170 | 0.3\% | 1.2\% | 2 | 1.1\% | 0.4\% | \$170 | 0.5\% | 0.4\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 16 | 6.1\% | \$2,063 | 4.2\% | 20.9\% | 11 | 6.2\% | 9.2\% | \$1,257 | 3.8\% | 6.2\% | 5 | 6.0\% | 9.4\% | \$806 | 4.9\% | 6.6\% |
|  | Middle | 84 | 32.2\% | \$13,333 | 26.9\% | 36.9\% | 54 | 30.5\% | 30.4\% | \$7,411 | 22.3\% | 25.5\% | 30 | 35.7\% | 30.1\% | \$5,922 | 36.2\% | 27.3\% |
|  | Upper | 159 | 60.9\% | \$33,985 | 68.6\% | 41.0\% | 110 | 62.1\% | 60.0\% | \$24,344 | 73.4\% | 67.8\% | 49 | 58.3\% | 60.2\% | \$9,641 | 58.9\% | 65.9\% |
|  | 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 | 261 | 100.0\% | \$49,551 | 100.0\% | 100.0\% | 177 | 100.0\% | 100.0\% | \$33,182 | 100.0\% | 100.0\% | 84 | 100.0\% | 100.0\% | \$16,369 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: SC Columbia

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | Dol |  | Small Businesses \% | Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ |  | Dollar | Agg |  | Coun <br> ank | Agg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 4 | 2.5\% | \$475 | 3.8\% | 4.6\% | 1 | 2.6\% | 4.1\% | \$460 | 8.5\% | 4.4\% | 3 | 2.5\% | 4.0\% | \$15 | 0.2\% | 5.4\% |
|  | Moderate | 32 | 20.1\% | \$2,546 | 20.5\% | 19.5\% | 7 | 17.9\% | 16.1\% | \$748 | 13.7\% | 18.9\% | 25 | 20.8\% | 17.5\% | \$1,798 | 25.8\% | 22.5\% |
|  | Middle | 39 | 24.5\% | \$3,004 | 24.2\% | 33.2\% | 9 | 23.1\% | 30.3\% | \$1,337 | 24.6\% | 32.3\% | 30 | 25.0\% | 30.3\% | \$1,667 | 23.9\% | 28.6\% |
|  | Upper | 75 | 47.2\% | \$5,730 | 46.2\% | 40.0\% | 20 | 51.3\% | 43.0\% | \$2,837 | 52.1\% | 35.7\% | 55 | 45.8\% | 42.3\% | \$2,893 | 41.6\% | 35.9\% |
|  | Unknown | 9 | 5.7\% | \$648 | 5.2\% | 2.8\% | 2 | 5.1\% | 3.9\% | \$60 | 1.1\% | 7.6\% | 7 | 5.8\% | 3.9\% | \$588 | 8.4\% | 6.8\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.8\% |
|  | Total | 159 | 100.0\% | \$12,403 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$5,442 | 100.0\% | 100.0\% | 120 | 100.0\% | 100.0\% | \$6,961 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 66.7\% | \$95 | 94.1\% | 24.2\% | 0 | 0.0\% | 42.6\% | \$0 | 0.0\% | 67.4\% | 2 | 100.0\% | 45.1\% | \$95 | 100.0\% | 70.9\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 44.4\% | 0 | 0.0\% | 29.6\% | \$0 | 0.0\% | 18.0\% | 0 | 0.0\% | 29.4\% | \$0 | 0.0\% | 17.6\% |
|  | Upper | 1 | 33.3\% | \$6 | 5.9\% | 29.3\% | 1 | 100.0\% | 22.2\% | \$6 | 100.0\% | 12.6\% | 0 | 0.0\% | 25.5\% | \$0 | 0.0\% | 11.6\% |
|  | Unknown | 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\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.7\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 3 | 100.0\% | \$101 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$6 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$95 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: SC Columbia


Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | B <br> ount <br> \% | $\begin{aligned} & \text { ank } \\ & \\ & \\ & \text { Doll } \\ & \text { D(000s) } \end{aligned}$ | \$ \% | Total Businesses \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ban <br> \$ 000s | Dollar k \$ \% | Agg <br> \$ \% |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \mathrm{Ba} \\ \$ \text { 000s } \end{array}$ | Dollar <br> nk <br> \$ \% | Agg <br> \$ \% |
| $\begin{aligned} & \mathscr{0} \\ & \stackrel{\otimes}{0} \end{aligned}$ |  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{aligned} & \hline 54 \\ & 30 \\ & 84 \\ & 75 \end{aligned}$ | $\begin{gathered} \hline 34.0 \% \\ 18.9 \% \\ 52.9 \% \\ 47.2 \% \end{gathered}$ | $\begin{gathered} \hline \$ 6,104 \\ \$ 5,056 \\ \$ 11,160 \\ \$ 1,243 \end{gathered}$ | $\begin{aligned} & \hline 49.2 \% \\ & 40.8 \% \\ & 90.0 \% \\ & 10.0 \% \end{aligned}$ | $\begin{gathered} \hline 89.3 \% \\ 5.8 \% \\ 95.1 \% \\ 4.9 \% \end{gathered}$ | $\begin{gathered} 20 \\ 15 \\ 35 \\ 4 \end{gathered}$ | $\begin{gathered} \hline 51.3 \% \\ 38.5 \% \\ 89.8 \% \\ 10.3 \% \end{gathered}$ | 39.6\% | \$2,657 | 48.8\% | 45.5\% | 34 15 49 71 | $\begin{aligned} & \hline 28.3 \% \\ & 12.5 \% \\ & 40.8 \% \\ & 59.2 \% \end{aligned}$ | 45.0\% | \$3,447 | 49.5\% | 41.0\% |
| $\stackrel{3}{0}$ |  | Total | 159 | 100.0\% | \$12,403 | 100.0\% | 100.0\% | 39 | 100.0\% |  |  |  |  | 120 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \underset{\sim}{6} \end{aligned}$ | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { ᄃ } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} 127 \\ 15 \\ 17 \end{gathered}$ | $\begin{gathered} \hline 79.9 \% \\ 9.4 \% \\ 10.7 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 3,186 \\ & \$ 2,682 \\ & \$ 6,535 \end{aligned}$ | $\begin{aligned} & \hline 25.7 \% \\ & 21.6 \% \\ & 52.7 \% \end{aligned}$ |  | $\begin{gathered} \hline 24 \\ 7 \\ 8 \end{gathered}$ | $\begin{aligned} & \hline 61.5 \% \\ & 17.9 \% \\ & 20.5 \% \end{aligned}$ | $\begin{gathered} \hline 86.7 \% \\ 7.0 \% \\ 6.3 \% \end{gathered}$ | $\begin{gathered} \hline \$ 827 \\ \$ 1,358 \\ \$ 3,257 \end{gathered}$ | $\begin{aligned} & \hline 15.2 \% \\ & 25.0 \% \\ & 59.8 \% \end{aligned}$ | $\begin{aligned} & \hline 23.2 \% \\ & 20.8 \% \\ & 56.0 \% \end{aligned}$ | $\begin{gathered} \hline 103 \\ 8 \\ 9 \end{gathered}$ | $\begin{gathered} \hline 85.8 \% \\ 6.7 \% \\ 7.5 \% \end{gathered}$ | $\begin{gathered} \hline 87.9 \% \\ 6.2 \% \\ 5.9 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 2,359 \\ & \$ 1,324 \\ & \$ 3,278 \end{aligned}$ | $\begin{aligned} & \hline 33.9 \% \\ & 19.0 \% \\ & 47.1 \% \end{aligned}$ | $\begin{aligned} & \hline 25.1 \% \\ & 19.1 \% \\ & 55.9 \% \end{aligned}$ |
|  |  | Total | 159 | 100.0\% | \$12,403 | 100.0\% |  | 39 | 100.0\% | 100.0\% | \$5,442 | 100.0\% | 100.0\% | 120 | 100.0\% | 100.0\% | \$6,961 | 100.0\% | 100.0\% |
| 红 |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | $\begin{aligned} & 2 \\ & 0 \\ & 1 \end{aligned}$ | $\begin{gathered} 66.7 \% \\ 0.0 \% \\ 33.3 \% \end{gathered}$ | $\begin{gathered} \$ 95 \\ \$ 0 \\ \$ 6 \end{gathered}$ | $\begin{gathered} 94.1 \% \\ 0.0 \% \\ 5.9 \% \end{gathered}$ | Total Farms <br> $96.2 \%$ <br> $3.5 \%$ <br> $0.3 \%$ | 0 0 | $\begin{gathered} 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | 74.1\% | \$0 | 0.0\% | 57.5\% | $2$ | $\begin{gathered} 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | 72.5\% | \$95 | 100.0\% | 68.9\% |
|  |  |  | 3 | 100.0\% | \$101 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 2 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \stackrel{N}{N} \\ & \stackrel{\Gamma}{0} \\ & \text { O} \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{aligned} & \hline 3 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline \$ 101 \\ \$ 0 \\ \$ 0 \end{gathered}$ | $\begin{array}{c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ |  | $0$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 75.9 \% \\ 16.7 \% \\ 7.4 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 6 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{array}{c\|} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{array}$ | $\begin{aligned} & \hline 26.9 \% \\ & 36.3 \% \\ & 36.9 \% \end{aligned}$ | $\begin{aligned} & 2 \\ & 0 \\ & 0 \end{aligned}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 72.5 \% \\ & 13.7 \% \\ & 13.7 \% \end{aligned}$ | $\begin{gathered} \$ 95 \\ \$ 0 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 25.6 \% \\ & 26.5 \% \\ & 47.9 \% \end{aligned}$ |
|  |  | Total | 3 | 100.0\% | \$101 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$6 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$95 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: SC Hampton-Jasper-Beaufort

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  |  |  |  | Bank | Agg | Ban |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 2.9\% | \$413 | 5.1\% | 6.6\% | 1 | 5.0\% | 1.5\% | \$413 | 7.5\% | 1.7\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.8\% |
|  | Middle | 9 | 26.5\% | \$1,269 | 15.8\% | 47.0\% | 5 | 25.0\% | 21.6\% | \$720 | 13.1\% | 15.3\% | 4 | 28.6\% | 22.8\% | \$549 | 21.4\% | 16.6\% |
|  | Upper | 24 | 70.6\% | \$6,365 | 79.1\% | 46.4\% | 14 | 70.0\% | 76.8\% | \$4,351 | 79.3\% | 83.0\% | 10 | 71.4\% | 76.2\% | \$2,014 | 78.6\% | 82.5\% |
|  | 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 | 34 | 100.0\% | \$8,047 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$5,484 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$2,563 | 100.0\% | 100.0\% |
|  | 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 | 2.3\% | \$306 | 1.2\% | 6.6\% | 2 | 2.2\% | 1.4\% | \$133 | 0.9\% | 1.5\% | 2 | 2.5\% | 1.6\% | \$173 | 1.5\% | 1.8\% |
|  | Middle | 52 | 30.2\% | \$7,515 | 28.8\% | 47.0\% | 25 | 27.5\% | 19.6\% | \$3,440 | 24.2\% | 13.7\% | 27 | 33.3\% | 20.4\% | \$4,075 | 34.2\% | 14.7\% |
|  | Upper | 116 | 67.4\% | \$18,318 | 70.1\% | 46.4\% | 64 | 70.3\% | 79.0\% | \$10,641 | 74.9\% | 84.8\% | 52 | 64.2\% | 78.0\% | \$7,677 | 64.4\% | 83.4\% |
|  | 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 | 172 | 100.0\% | \$26,139 | 100.0\% | 100.0\% | 91 | 100.0\% | 100.0\% | \$14,214 | 100.0\% | 100.0\% | 81 | 100.0\% | 100.0\% | \$11,925 | 100.0\% | 100.0\% |
|  | ow | 0 | 0.0\% | \$0 | 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 | 9.1\% | \$8 | 2.5\% | 6.6\% | 1 | 14.3\% | 8.4\% | \$8 | 2.9\% | 8.4\% | 0 | 0.0\% | 5.1\% | \$0 | 0.0\% | 4.5\% |
|  | Middle | 6 | 54.5\% | \$64 | 19.9\% | 47.0\% | 3 | 42.9\% | 43.5\% | \$24 | 8.6\% | 30.3\% | 3 | 75.0\% | 54.2\% | \$40 | 93.0\% | 30.7\% |
|  | Upper | 4 | 36.4\% | \$249 | 77.6\% | 46.4\% | 3 | 42.9\% | 48.1\% | \$246 | 88.5\% | 61.3\% | 1 | 25.0\% | 40.7\% | \$3 | 7.0\% | 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 | 11 | 100.0\% | \$321 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$278 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |
| 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\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 19.7\% | 0 | 0.0\% | 62.5\% | \$0 | 0.0\% | 78.3\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 11.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 80.1\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 21.7\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 88.2\% |
|  | 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\% |
|  | 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 | 2.8\% | \$727 | 2.1\% | 6.6\% | 4 | 3.4\% | 1.6\% | \$554 | 2.8\% | 1.6\% | 2 | 2.0\% | 1.4\% | \$173 | 1.2\% | 1.4\% |
|  | Middle | 67 | 30.9\% | \$8,848 | 25.6\% | 47.0\% | 33 | 28.0\% | 20.7\% | \$4,184 | 20.9\% | 14.6\% | 34 | 34.3\% | 22.1\% | \$4,664 | 32.1\% | 15.5\% |
|  | Upper | 144 | 66.4\% | \$24,932 | 72.3\% | 46.4\% | 81 | 68.6\% | 77.7\% | \$15,238 | 76.3\% | 83.8\% | 63 | 63.6\% | 76.5\% | \$9,694 | 66.7\% | 83.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 217 | 100.0\% | \$34,507 | 100.0\% | 100.0\% | 118 | 100.0\% | 100.0\% | \$19,976 | 100.0\% | 100.0\% | 99 | 100.0\% | 100.0\% | \$14,531 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: SC Hampton-Jasper-Beaufort

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small Businesses \% | Bank  Agg <br> $\#$ $\%$ $\%$ |  |  | Dollar <br> Bank |  | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | Count <br> Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  |  |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% |
|  | 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 | 4.3\% | \$127 | 0.6\% | 3.4\% | 4 | 4.9\% | 2.3\% | \$87 | 0.8\% | 2.2\% | 5 | 3.9\% | 3.1\% | \$40 | 0.4\% | 3.8\% |
|  | Middle | 111 | 52.9\% | \$7,953 | 38.0\% | 40.6\% | 45 | 54.9\% | 31.6\% | \$4,367 | 40.0\% | 40.3\% | 66 | 51.6\% | 31.2\% | \$3,586 | 36.0\% | 41.1\% |
|  | Upper | 89 | 42.4\% | \$12,795 | 61.2\% | 56.0\% | 33 | 40.2\% | 61.8\% | \$6,475 | 59.2\% | 55.8\% | 56 | 43.8\% | 62.1\% | \$6,320 | 63.4\% | 54.2\% |
|  | 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 | 1 | 0.5\% | \$28 | 0.1\% |  | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 1.7\% | 1 | 0.8\% | 3.5\% | \$28 | 0.3\% | 0.9\% |
|  | Total | 210 | 100.0\% | \$20,903 | 100.0\% | 100.0\% | 82 | 100.0\% | 100.0\% | \$10,929 | 100.0\% | 100.0\% | 128 | 100.0\% | 100.0\% | \$9,974 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{\underset{\sim}{4} \\ \underset{~}{4} \\ \underset{\sim}{4} \\ \sum \\ \hline}} \end{aligned}$ | 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\% | 5.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 5.3\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 65.0\% | 0 | 0.0\% | 58.3\% | \$0 | 0.0\% | 85.7\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 71.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 29.2\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 14.3\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 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\% | 8.3\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 3.2\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: SC Hampton-Jasper-Beaufort

|  | Borrowe r Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Families by Family Income \% |  | Count <br> Bank | Agg | BaI | Dollar k | Agg |  | Count ank | Agg | Ban | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 15.5\% | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 5 | 14.7\% | \$557 | 6.9\% | 14.5\% | 2 | 10.0\% | 7.6\% | \$199 | 3.6\% | 3.5\% | 3 | 21.4\% | 4.4\% | \$358 | 14.0\% | 2.0\% |
|  | Middle | 6 | 17.6\% | \$635 | 7.9\% | 18.3\% | 3 | 15.0\% | 15.2\% | \$273 | 5.0\% | 9.2\% | 3 | 21.4\% | 8.0\% | \$362 | 14.1\% | 4.8\% |
|  | Upper | 23 | 67.6\% | \$6,855 | 85.2\% | 51.7\% | 15 | 75.0\% | 65.2\% | \$5,012 | 91.4\% | 75.8\% | 8 | 57.1\% | 32.3\% | \$1,843 | 71.9\% | 38.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.4\% | \$0 | 0.0\% | 11.1\% | 0 | 0.0\% | 54.4\% | \$0 | 0.0\% | 54.0\% |
|  | Total | 34 | 100.0\% | \$8,047 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$5,484 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$2,563 | 100.0\% | 100.0\% |
|  | Low | 7 | 4.1\% | \$293 | 1.1\% | 15.5\% | 5 | 5.5\% | 1.4\% | \$202 | 1.4\% | 0.5\% | 2 | 2.5\% | 1.0\% | \$91 | 0.8\% | 0.4\% |
|  | Moderate | 18 | 10.5\% | \$1,515 | 5.8\% | 14.5\% | 9 | 9.9\% | 5.1\% | \$467 | 3.3\% | 2.3\% | 9 | 11.1\% | 3.4\% | \$1,048 | 8.8\% | 1.4\% |
|  | Middle | 28 | 16.3\% | \$2,946 | 11.3\% | 18.3\% | 13 | 14.3\% | 10.9\% | \$1,523 | 10.7\% | 6.2\% | 15 | 18.5\% | 5.8\% | \$1,423 | 11.9\% | 3.3\% |
|  | Upper | 119 | 69.2\% | \$21,385 | 81.8\% | 51.7\% | 64 | 70.3\% | 61.9\% | \$12,022 | 84.6\% | 71.4\% | 55 | 67.9\% | 32.3\% | \$9,363 | 78.5\% | 35.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 20.7\% | \$0 | 0.0\% | 19.5\% | 0 | 0.0\% | 57.6\% | \$0 | 0.0\% | 58.9\% |
|  | Total | 172 | 100.0\% | \$26,139 | 100.0\% | 100.0\% | 91 | 100.0\% | 100.0\% | \$14,214 | 100.0\% | 100.0\% | 81 | 100.0\% | 100.0\% | \$11,925 | 100.0\% | 100.0\% |
|  | Low | 3 | 27.3\% | \$15 | 4.7\% | 15.5\% | 3 | 42.9\% | 7.6\% | \$15 | 5.4\% | 2.2\% | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 1 | 9.1\% | \$30 | 9.3\% | 14.5\% | 0 | 0.0\% | 12.2\% | \$0 | 0.0\% | 2.7\% | 1 | 25.0\% | 9.0\% | \$30 | 69.8\% | 3.5\% |
|  | Middle | 3 | 27.3\% | \$14 | 4.4\% | 18.3\% | 1 | 14.3\% | 19.1\% | \$4 | 1.4\% | 7.1\% | 2 | 50.0\% | 15.8\% | \$10 | 23.3\% | 7.5\% |
|  | Upper | 3 | 27.3\% | \$259 | 80.7\% | 51.7\% | 3 | 42.9\% | 58.0\% | \$259 | 93.2\% | 85.2\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 20.0\% |
|  | Unknown | 1 | 9.1\% | \$3 | 0.9\% | 0.0\% | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 2.8\% | 1 | 25.0\% | 39.0\% | \$3 | 7.0\% | 68.8\% |
|  |  | 11 | 100.0\% | \$321 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$278 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |
| $\begin{aligned} & \searrow \\ & \underset{\gtrless}{\sum} \\ & \vdots \\ & \vdots \\ & \sum \\ & \sum \end{aligned}$ | Lo | 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\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 14.5\% | 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\% | 51.7\% | 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\% |
|  |  | 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\% |
|  | Low | 10 | 4.6\% | \$308 | 0.9\% | 15.5\% | 8 | 6.8\% | 1.5\% | \$217 | 1.1\% | 0.5\% | 2 | 2.0\% | 1.0\% | \$91 | 0.6\% | 0.4\% |
|  | Moderate | 24 | 11.1\% | \$2,102 | 6.1\% | 14.5\% | 11 | 9.3\% | 6.1\% | \$666 | 3.3\% | 2.7\% | 13 | 13.1\% | 3.9\% | \$1,436 | 9.9\% | 1.6\% |
|  | Middle | 37 | 17.1\% | \$3,595 | 10.4\% | 18.3\% | 17 | 14.4\% | 12.6\% | \$1,800 | 9.0\% | 7.2\% | 20 | 20.2\% | 6.9\% | \$1,795 | 12.4\% | 3.8\% |
|  | Upper | 145 | 66.8\% | \$28,499 | 82.6\% | 51.7\% | 82 | 69.5\% | 63.0\% | \$17,293 | 86.6\% | 72.7\% | 63 | 63.6\% | 32.3\% | \$11,206 | 77.1\% | 36.6\% |
|  | Unknown | 1 | 0.5\% | \$3 | 0.0\% | 0.0\% | 0 | 0.0\% | 16.8\% | \$0 | 0.0\% | 16.9\% | 1 | 1.0\% | 55.9\% | \$3 | 0.0\% | 57.6\% |
|  |  | 217 | 100.0\% | \$34,507 | 100.0\% | 100.0\% | 118 | 100.0\% | 100.0\% | \$19,976 | 100.0\% | 100.0\% | 99 | 100.0\% | 100.0\% | \$14,531 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: SC Hampton-Jasper-Beaufort

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount | $\begin{aligned} & \text { ank } \\ & \\ & \\ & \text { Doll } \\ & \text { \$(000s) } \end{aligned}$ | \$ \% | Total Businesses \% | \# | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Bar } \\ \$ \mathbf{0 0 0 s} \end{array}$ | Dollar k \$ \% | Agg <br> \$ \% |  | Count <br> ank <br> \% | Agg <br> \% |  | Dollar k \$ \% | Agg \$ \% |
|  |  | \$1 Million or Less <br> Over $\$ 1$ Million <br> Total Rev. available <br> Rev. Not Known <br> Total | 64 39 103 107 | $\begin{aligned} & \hline 30.5 \% \\ & 18.6 \% \\ & 49.1 \% \\ & 51.0 \% \end{aligned}$ | $\begin{gathered} \hline \$ 8,490 \\ \$ 8,321 \\ \$ 16,811 \\ \$ 4,092 \end{gathered}$ | $\begin{gathered} \hline 40.6 \% \\ 39.8 \% \\ 80.4 \% \\ 19.6 \% \end{gathered}$ | $\begin{gathered} \hline 89.9 \% \\ 5.4 \% \\ 95.3 \% \\ 4.7 \% \end{gathered}$ | 35 24 59 23 | $\begin{aligned} & 42.7 \% \\ & 29.3 \% \\ & 72.0 \% \\ & 28.0 \% \end{aligned}$ | 39.4\% | \$3,990 | 36.5\% | 56.4\% | 29 15 44 84 | $\begin{gathered} 22.7 \% \\ 11.7 \% \\ 34.4 \% \\ 65.6 \% \end{gathered}$ | 48.6\% | \$4,500 | 45.1\% | 52.6\% |
|  |  | 210 | 100.0\% | \$20,903 | 100.0\% | 100.0\% | 82 | 100.0\% |  |  |  |  | 128 | 100.0\% |  |  |  |  |
| $\begin{array}{\|l\|l\|} \overline{\bar{\sigma}} \\ \underset{\sim}{E} \end{array}$ | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { 厄 } \\ & \text { ָ } \end{aligned}$ |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | 170 13 27 | $\begin{gathered} \hline 81.0 \% \\ 6.2 \% \\ 12.9 \% \end{gathered}$ | $\begin{gathered} \hline \$ 4,631 \\ \$ 2,423 \\ \$ 13,849 \end{gathered}$ | $\begin{aligned} & \hline 22.2 \% \\ & 11.6 \% \\ & 66.3 \% \end{aligned}$ |  | 62 7 13 | $\begin{gathered} \hline 75.6 \% \\ 8.5 \% \\ 15.9 \% \end{gathered}$ | $\begin{gathered} \hline 88.2 \% \\ 6.5 \% \\ 5.3 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 2,230 \\ & \$ 1,295 \\ & \$ 7,404 \end{aligned}$ | $\begin{aligned} & \hline 20.4 \% \\ & 11.8 \% \\ & 67.7 \% \end{aligned}$ | $\begin{aligned} & \hline 26.1 \% \\ & 21.7 \% \\ & 52.2 \% \end{aligned}$ | $\begin{gathered} \hline 108 \\ 6 \\ 14 \end{gathered}$ | $\begin{gathered} \hline 84.4 \% \\ 4.7 \% \\ 10.9 \% \end{gathered}$ | $\begin{gathered} \hline 89.4 \% \\ 5.5 \% \\ 5.0 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 2,401 \\ & \$ 1,128 \\ & \$ 6,445 \end{aligned}$ | $\begin{aligned} & \hline 24.1 \% \\ & 11.3 \% \\ & 64.6 \% \end{aligned}$ | $\begin{aligned} & \hline 28.1 \% \\ & 19.5 \% \\ & 52.4 \% \end{aligned}$ |
|  |  | Total | 210 | 100.0\% | \$20,903 | 100.0\% |  | 82 | 100.0\% | 100.0\% | \$10,929 | 100.0\% | 100.0\% | 128 | 100.0\% | 100.0\% | \$9,974 | 100.0\% | 100.0\% |
|  | $\stackrel{0}{\Xi}$ <br> $\stackrel{\rightharpoonup}{0}$ <br> $\underset{\sim}{\otimes}$ | \$1 Million or Less <br> Over \$1 Million <br> Not Known | 0 0 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{aligned} & \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | Total Farms <br> $86.3 \%$ <br> $12.2 \%$ <br> $1.4 \%$ | 0 0 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | 83.3\% | \$0 | 0.0\% | 76.1\% | 0 0 0 | $\begin{aligned} & 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | 75.0\% | \$0 | 0.0\% | 87.1\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $0$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ |  | 0 0 0 | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{array}{c\|} \hline 91.7 \% \\ 8.3 \% \\ 0.0 \% \end{array}$ | $\begin{aligned} & \hline \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{gathered} \hline 60.2 \% \\ 39.8 \% \\ 0.0 \% \end{gathered}$ | $0$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{gathered} \hline 91.7 \% \\ 8.3 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 0 \\ & \$ 0 \\ & \$ 0 \end{aligned}$ | $\begin{aligned} & \hline 0.0 \% \\ & 0.0 \% \\ & 0.0 \% \end{aligned}$ | $\begin{gathered} \hline 68.4 \% \\ 31.6 \% \\ 0.0 \% \end{gathered}$ |
|  |  |  | 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\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: TN Nashville

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  |  | Bank |  |  | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | Low | 13 | 0.9\% | \$1,735 | 0.6\% | 1.8\% | 10 | 1.3\% | 1.8\% | \$1,468 | 1.0\% | 1.2\% | 3 | 0.5\% | 1.2\% | \$267 | 0.2\% | 0.8\% |
|  | Moderate | 118 | 8.4\% | \$15,707 | 5.4\% | 14.1\% | 66 | 8.6\% | 9.3\% | \$8,215 | 5.5\% | 5.8\% | 52 | 8.0\% | 8.9\% | \$7,492 | 5.4\% | 6.2\% |
|  | Middle | 785 | 55.6\% | \$127,881 | 44.4\% | 58.4\% | 438 | 57.3\% | 56.0\% | \$71,143 | 47.4\% | 50.0\% | 347 | 53.6\% | 59.3\% | \$56,738 | 41.1\% | 49.6\% |
|  | Upper | 496 | 35.1\% | \$142,880 | 49.6\% | 25.7\% | 251 | 32.8\% | 32.9\% | \$69,388 | 46.2\% | 43.0\% | 245 | 37.9\% | 30.6\% | \$73,492 | 53.3\% | 43.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,412 | 100.0\% | \$288,203 | 100.0\% | 100.0\% | 765 | 100.0\% | 100.0\% | \$150,214 | 100.0\% | 100.0\% | 647 | 100.0\% | 100.0\% | \$137,989 | 100.0\% | 100.0\% |
|  | Low | 24 | 0.8\% | \$2,602 | 0.4\% | 1.8\% | 18 | 1.0\% | 1.1\% | \$2,025 | 0.5\% | 0.7\% | 6 | 0.5\% | 0.8\% | \$577 | 0.2\% | 0.6\% |
|  | Moderate | 202 | 6.4\% | \$23,173 | 3.6\% | 14.1\% | 111 | 5.9\% | 6.3\% | \$13,163 | 3.5\% | 4.1\% | 91 | 7.1\% | 7.5\% | \$10,010 | 3.9\% | 5.2\% |
|  | Middle | 1,557 | 49.4\% | \$238,947 | 37.6\% | 58.4\% | 907 | 48.5\% | 55.2\% | \$140,854 | 37.0\% | 49.3\% | 650 | 50.7\% | 56.4\% | \$98,093 | 38.5\% | 47.0\% |
|  | Upper | 1,370 | 43.5\% | \$370,782 | 58.3\% | 25.7\% | 834 | 44.6\% | 37.3\% | \$224,880 | 59.0\% | 45.9\% | 536 | 41.8\% | 35.2\% | \$145,902 | 57.3\% | 47.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 3,153 | 100.0\% | \$635,504 | 100.0\% | 100.0\% | 1,870 | 100.0\% | 100.0\% | \$380,922 | 100.0\% | 100.0\% | 1,283 | 100.0\% | 100.0\% | \$254,582 | 100.0\% | 100.0\% |
|  | Lo | 5 | 1.6\% | \$51 | 1.7\% | 1.8\% | 2 | 1.4\% | 2.3\% | \$32 | 2.4\% | 1.4\% | 3 | 1.7\% | 1.7\% | \$19 | 1.1\% | 0.6\% |
|  | Moderate | 55 | 17.3\% | \$441 | 14.6\% | 14.1\% | 24 | 16.7\% | 11.7\% | \$205 | 15.5\% | 6.0\% | 31 | 17.8\% | 15.4\% | \$236 | 13.8\% | 8.3\% |
|  | Middle | 210 | 66.0\% | \$1,825 | 60.3\% | 58.4\% | 97 | 67.4\% | 59.1\% | \$839 | 63.6\% | 50.7\% | 113 | 64.9\% | 57.5\% | \$986 | 57.7\% | 46.1\% |
|  | Upper | 48 | 15.1\% | \$712 | 23.5\% | 25.7\% | 21 | 14.6\% | 26.9\% | \$243 | 18.4\% | 41.8\% | 27 | 15.5\% | 25.4\% | \$469 | 27.4\% | 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\% |
|  | Total | 318 | 100.0\% | \$3,029 | 100.0\% | 100.0\% | 144 | 100.0\% | 100.0\% | \$1,319 | 100.0\% | 100.0\% | 174 | 100.0\% | 100.0\% | \$1,710 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Lo | 0 | 0\% | \$0 | 0.0\% | 7.9\% | 0 | 0\% | 9.3\% | \$0 | 0.0\% | 5.1\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 5.6\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 24.1\% | 0 | 0.0\% | 27.9\% | \$0 | 0.0\% | 12.9\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 20.7\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 51.4\% | 0 | 0.0\% | 55.8\% | \$0 | 0.0\% | 77.9\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 40.6\% |
|  | Uppe | 0 | 0.0\% | \$0 | 0.0\% | 16.6\% | 0 | 0.0\% | 7.0\% | \$0 | 0.0\% | 4.1\% | 0 | 0.0\% | 13.3\% | \$0 | 0.0\% | 33.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 42 | 0.9\% | \$4,388 | 0.5\% | 1.8\% | 30 | 1.1\% | 1.4\% | \$3,525 | 0.7\% | 0.9\% | 12 | 0.6\% | 1.0\% | \$863 | 0.2\% | 0.8\% |
|  | Moderate | 375 | 7.7\% | \$39,321 | 4.2\% | 14.1\% | 201 | 7.2\% | 7.5\% | \$21,583 | 4.1\% | 4.7\% | 174 | 8.3\% | 8.3\% | \$17,738 | 4.5\% | 6.2\% |
|  | Middle | 2,552 | 52.3\% | \$368,653 | 39.8\% | 58.4\% | 1,442 | 51.9\% | 55.6\% | \$212,836 | 40.0\% | 49.9\% | 1,110 | 52.8\% | 57.6\% | \$155,817 | 39.5\% | 47.8\% |
|  | Upper | 1,914 | 39.2\% | \$514,374 | 55.5\% | 25.7\% | 1,106 | 39.8\% | 35.4\% | \$294,511 | 55.3\% | 44.4\% | 808 | 38.4\% | 33.1\% | \$219,863 | 55.8\% | 45.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 4,883 | 100.0\% | \$926,736 | 100.0\% | 100.0\% | 2,779 | 100.0\% | 100.0\% | \$532,455 | 100.0\% | 100.0\% | 2,104 | 100.0\% | 100.0\% | \$394,281 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: TN Nashville

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | Bank |  | Small Businesses \% | Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 200 | 3.5\% | \$17,064 | 4.0\% | 3.1\% | 77 | 3.4\% |  | 7.4\% | \$8,836 | 4.3\% | 11.3\% | 123 | 3.6\% | 3.0\% | \$8,228 | 3.7\% | 4.0\% |
|  | Moderate | 1,084 | 19.1\% | \$100,581 | 23.6\% | 19.3\% | 426 | 18.9\% | 11.0\% | \$48,267 | 23.5\% | 10.3\% | 658 | 19.2\% | 17.5\% | \$52,314 | 23.6\% | 21.6\% |
|  | Middle | 2,570 | 45.2\% | \$176,305 | 41.3\% | 50.5\% | 1,031 | 45.8\% | 41.9\% | \$83,925 | 40.8\% | 37.4\% | 1,539 | 44.8\% | 44.1\% | \$92,380 | 41.7\% | 39.1\% |
|  | Upper | 1,810 | 31.8\% | \$131,277 | 30.8\% | 27.0\% | 712 | 31.6\% | 37.1\% | \$63,928 | 31.1\% | 40.1\% | 1,098 | 32.0\% | 33.4\% | \$67,349 | 30.4\% | 34.2\% |
|  | Unknown | 20 | 0.4\% | \$1,623 | 0.4\% | 0.2\% | 4 | 0.2\% | 0.0\% | \$600 | 0.3\% | 0.0\% | 16 | 0.5\% | 0.4\% | \$1,023 | 0.5\% | 0.8\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 5,684 | 100.0\% | \$426,850 | 100.0\% | 100.0\% | 2,250 | 100.0\% | 100.0\% | \$205,556 | 100.0\% | 100.0\% | 3,434 | 100.0\% | 100.0\% | \$221,294 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{\underset{\sim}{4} \\ \underset{~}{4} \\ \underset{\sim}{4} \\ \sum \\ \hline}} \end{aligned}$ | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 7 | 26.9\% | \$829 | 28.8\% | 11.9\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 3.9\% | 7 | 30.4\% | 25.7\% | \$829 | 35.5\% | 16.4\% |
|  | Middle | 16 | 61.5\% | \$1,825 | 63.4\% | 71.6\% | 3 | 100.0\% | 69.7\% | \$545 | 100.0\% | 92.9\% | 13 | 56.5\% | 59.7\% | \$1,280 | 54.8\% | 64.3\% |
|  | Upper | 3 | 11.5\% | \$226 | 7.8\% | 16.2\% | 0 | 0.0\% | 15.2\% | \$0 | 0.0\% | 2.5\% | 3 | 13.0\% | 14.6\% | \$226 | 9.7\% | 19.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 26 | 100.0\% | \$2,880 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$545 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$2,335 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: TN Nashville

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  |  | Bank |  | Agg | Bank |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% |  |
| HOME PURCHASE | Low | 190 | 13.5\% | \$18,436 | 6.4\% | 18.4\% | 111 | 14.5\% | 12.3\% | \$10,784 | 7.2\% | 6.4\% | 79 | 12.2\% | 12.6\% | \$7,652 | 5.5\% | 6.7\% |
|  | Moderate | 322 | 22.8\% | \$43,339 | 15.0\% | 17.7\% | 186 | 24.3\% | 25.1\% | \$24,856 | 16.5\% | 18.3\% | 136 | 21.0\% | 22.4\% | \$18,483 | 13.4\% | 16.3\% |
|  | Middle | 321 | 22.7\% | \$55,454 | 19.2\% | 23.3\% | 185 | 24.2\% | 22.3\% | \$32,719 | 21.8\% | 21.0\% | 136 | 21.0\% | 19.8\% | \$22,735 | 16.5\% | 18.3\% |
|  | Upper | 572 | 40.5\% | \$170,059 | 59.0\% | 40.5\% | 283 | 37.0\% | 33.0\% | \$81,855 | 54.5\% | 47.0\% | 289 | 44.7\% | 32.6\% | \$88,204 | 63.9\% | 47.0\% |
|  | Unknown | 7 | 0.5\% | \$915 | 0.3\% | 0.0\% | 0 | 0.0\% | 7.3\% | \$0 | 0.0\% | 7.3\% | 7 | 1.1\% | 12.6\% | \$915 | 0.7\% | 11.7\% |
|  | Total | 1,412 | 100.0\% | \$288,203 | 100.0\% | 100.0\% | 765 | 100.0\% | 100.0\% | \$150,214 | 100.0\% | 100.0\% | 647 | 100.0\% | 100.0\% | \$137,989 | 100.0\% | 100.0\% |
|  | Low | 232 | 7.4\% | \$18,997 | 3.0\% | 18.4\% | 119 | 6.4\% | 6.0\% | \$10,230 | 2.7\% | 3.2\% | 113 | 8.8\% | 6.2\% | \$8,767 | 3.4\% | 3.1\% |
|  | Moderate | 517 | 16.4\% | \$60,621 | 9.5\% | 17.7\% | 297 | 15.9\% | 15.5\% | \$35,596 | 9.3\% | 10.2\% | 220 | 17.1\% | 15.2\% | \$25,025 | 9.8\% | 10.1\% |
|  | Middle | 698 | 22.1\% | \$102,670 | 16.2\% | 23.3\% | 439 | 23.5\% | 20.7\% | \$65,400 | 17.2\% | 17.0\% | 259 | 20.2\% | 19.8\% | \$37,270 | 14.6\% | 16.3\% |
|  | Upper | 1,646 | 52.2\% | \$441,167 | 69.4\% | 40.5\% | 994 | 53.2\% | 41.6\% | \$265,466 | 69.7\% | 53.9\% | 652 | 50.8\% | 39.1\% | \$175,701 | 69.0\% | 51.7\% |
|  | Unknown | 60 | 1.9\% | \$12,049 | 1.9\% | 0.0\% | 21 | 1.1\% | 16.2\% | \$4,230 | 1.1\% | 15.7\% | 39 | 3.0\% | 19.7\% | \$7,819 | 3.1\% | 18.8\% |
|  | Total | 3,153 | 100.0\% | \$635,504 | 100.0\% | 100.0\% | 1,870 | 100.0\% | 100.0\% | \$380,922 | 100.0\% | 100.0\% | 1,283 | 100.0\% | 100.0\% | \$254,582 | 100.0\% | 100.0\% |
|  | Low | 47 | 14.8\% | \$302 | 10.0\% | 18.4\% | 23 | 16.0\% | 15.7\% | \$166 | 12.6\% | 5.2\% | 24 | 13.8\% | 14.9\% | \$136 | 8.0\% | 5.7\% |
|  | Moderate | 85 | 26.7\% | \$638 | 21.1\% | 17.7\% | 38 | 26.4\% | 19.6\% | \$291 | 22.1\% | 12.1\% | 47 | 27.0\% | 19.9\% | \$347 | 20.3\% | 14.2\% |
|  | Middle | 100 | 31.4\% | \$874 | 28.9\% | 23.3\% | 56 | 38.9\% | 22.1\% | \$445 | 33.7\% | 18.1\% | 44 | 25.3\% | 22.8\% | \$429 | 25.1\% | 20.5\% |
|  | Uppe | 80 | 25.2\% | \$1,165 | 38.5\% | 40.5\% | 23 | 16.0\% | 36.2\% | \$382 | 29.0\% | 53.8\% | 57 | 32.8\% | 35.8\% | \$783 | 45.8\% | 51.8\% |
|  | Unknown | 6 | 1.9\% | \$50 | 1.7\% | 0.0\% | 4 | 2.8\% | 6.4\% | \$35 | 2.7\% | 10.7\% | 2 | 1.1\% | 6.7\% | \$15 | 0.9\% | 7.9\% |
|  | Total | 318 | 100.0\% | \$3,029 | 100.0\% | 100.0\% | 144 | 100.0\% | 100.0\% | \$1,319 | 100.0\% | 100.0\% | 174 | 100.0\% | 100.0\% | \$1,710 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 23.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 469 | 9.6\% | \$37,735 | 4.1\% | 18.4\% | 253 | 9.1\% | 8.4\% | \$21,180 | 4.0\% | 4.2\% | 216 | 10.3\% | 9.0\% | \$16,555 | 4.2\% | 4.4\% |
|  | M oderate | 924 | 18.9\% | \$104,598 | 11.3\% | 17.7\% | 521 | 18.7\% | 18.8\% | \$60,743 | 11.4\% | 12.8\% | 403 | 19.2\% | 18.2\% | \$43,855 | 11.1\% | 12.2\% |
|  | Middle | 1,119 | 22.9\% | \$158,998 | 17.2\% | 23.3\% | 680 | 24.5\% | 21.2\% | \$98,564 | 18.5\% | 18.1\% | 439 | 20.9\% | 19.9\% | \$60,434 | 15.3\% | 16.5\% |
|  | Upper | 2,298 | 47.1\% | \$612,391 | 66.1\% | 40.5\% | 1,300 | 46.8\% | 38.5\% | \$347,703 | 65.3\% | 51.1\% | 998 | 47.4\% | 36.3\% | \$264,688 | 67.1\% | 47.9\% |
|  | Unknown | 73 | 1.5\% | \$13,014 | 1.4\% | 0.0\% | 25 | 0.9\% | 13.0\% | \$4,265 | 0.8\% | 13.9\% | 48 | 2.3\% | 16.6\% | \$8,749 | 2.2\% | 18.9\% |
|  | Total | 4,883 | 100.0\% | \$926,736 | 100.0\% | 100.0\% | 2,779 | 100.0\% | 100.0\% | \$532,455 | 100.0\% | 100.0\% | 2,104 | 100.0\% | 100.0\% | \$394,281 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

## Assessment Area: TN Eastern TN

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba | Dollar | Agg |  | Count |  | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | 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 | 6.5\% | \$769 | 4.2\% | 10.1\% | 7 | 10.0\% | 6.2\% | \$699 | 7.9\% | 5.5\% | 2 | 2.9\% | 6.7\% | \$70 | 0.7\% | 5.5\% |
|  | Middle | 120 | 86.3\% | \$15,884 | 87.3\% | 83.3\% | 57 | 81.4\% | 86.0\% | \$7,477 | 84.5\% | 85.0\% | 63 | 91.3\% | 85.9\% | \$8,407 | 90.0\% | 86.2\% |
|  | Upper | 10 | 7.2\% | \$1,537 | 8.4\% | 6.6\% | 6 | 8.6\% | 7.6\% | \$673 | 7.6\% | 9.4\% | 4 | 5.8\% | 7.3\% | \$864 | 9.2\% | 8.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 139 | 100.0\% | \$18,190 | 100.0\% | 100.0\% | 70 | 100.0\% | 100.0\% | \$8,849 | 100.0\% | 100.0\% | 69 | 100.0\% | 100.0\% | \$9,341 | 100.0\% | 100.0\% |
| $\begin{aligned} & 山 己 \\ & \underset{\sim}{u} \\ & \vdots \\ & \underset{\sim}{\underset{\sim}{u}} \end{aligned}$ | 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 | 2.6\% | \$1,371 | 2.3\% | 10.1\% | 5 | 2.0\% | 7.7\% | \$430 | 1.4\% | 6.6\% | 7 | 3.4\% | 8.0\% | \$941 | 3.5\% | 7.0\% |
|  | Middle | 420 | 91.9\% | \$52,451 | 88.9\% | 83.3\% | 233 | 92.8\% | 82.4\% | \$28,968 | 91.0\% | 81.9\% | 187 | 90.8\% | 82.7\% | \$23,483 | 86.5\% | 83.0\% |
|  | Upper | 25 | 5.5\% | \$5,179 | 8.8\% | 6.6\% | 13 | 5.2\% | 9.8\% | \$2,452 | 7.7\% | 11.5\% | 12 | 5.8\% | 9.2\% | \$2,727 | 10.0\% | 9.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 457 | 100.0\% | \$59,001 | 100.0\% | 100.0\% | 251 | 100.0\% | 100.0\% | \$31,850 | 100.0\% | 100.0\% | 206 | 100.0\% | 100.0\% | \$27,151 | 100.0\% | 100.0\% |
|  | 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 | 2.0\% | \$7 | 0.8\% | 10.1\% | 1 | 2.2\% | 14.8\% | \$4 | 1.0\% | 12.5\% | 1 | 1.8\% | 12.0\% | \$3 | 0.7\% | 9.0\% |
|  | Middle | 96 | 95.0\% | \$803 | 96.2\% | 83.3\% | 43 | 93.5\% | 78.6\% | \$359 | 93.7\% | 74.5\% | 53 | 96.4\% | 79.3\% | \$444 | 98.2\% | 78.5\% |
|  | Upper | 3 | 3.0\% | \$25 | 3.0\% | 6.6\% | 2 | 4.3\% | 6.3\% | \$20 | 5.2\% | 12.2\% | 1 | 1.8\% | 7.7\% | \$5 | 1.1\% | 12.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 101 | 100.0\% | \$835 | 100.0\% | 100.0\% | 46 | 100.0\% | 100.0\% | \$383 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$452 | 100.0\% | 100.0\% |
| 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\% | 28.2\% | 0 | 0.0\% | 19.0\% | \$0 | 0.0\% | 10.2\% | 0 | 0.0\% | 29.6\% | \$0 | 0.0\% | 56.2\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 61.0\% | 0 | 0.0\% | 71.4\% | \$0 | 0.0\% | 60.2\% | 0 | 0.0\% | 70.4\% | \$0 | 0.0\% | 43.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 10.9\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 29.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 23 | 3.3\% | \$2,147 | 2.8\% | 10.1\% | 13 | 3.5\% | 7.7\% | \$1,133 | 2.8\% | 6.4\% | 10 | 3.0\% | 7.8\% | \$1,014 | 2.7\% | 7.9\% |
|  | Middle | 636 | 91.2\% | \$69,138 | 88.6\% | 83.3\% | 333 | 90.7\% | 83.2\% | \$36,804 | 89.6\% | 82.5\% | 303 | 91.8\% | 83.5\% | \$32,334 | 87.5\% | 82.9\% |
|  | Upper | 38 | 5.5\% | \$6,741 | 8.6\% | 6.6\% | 21 | 5.7\% | 8.9\% | \$3,145 | 7.7\% | 11.1\% | 17 | 5.2\% | 8.4\% | \$3,596 | 9.7\% | 9.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 697 | 100.0\% | \$78,026 | 100.0\% | 100.0\% | 367 | 100.0\% | 100.0\% | \$41,082 | 100.0\% | 100.0\% | 330 | 100.0\% | 100.0\% | \$36,944 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: TN Eastern TN


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: TN Eastern TN

|  | Tract <br> Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | 号 |  | Small Businesses \% | Coun Bank |  | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ |  | Dollar | Agg |  | Coun <br> ank | Agg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | 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 | 67 | 8.2\% | \$3,463 | 7.0\% | 14.0\% | 19 | 7.5\% | 13.3\% | \$1,520 | 6.0\% | 15.3\% | 48 | 8.5\% | 12.4\% | \$1,943 | 7.9\% | 17.3\% |
|  | Middle | 673 | 82.7\% | \$43,003 | 86.4\% | 78.9\% | 211 | 83.7\% | 73.2\% | \$22,512 | 89.3\% | 71.7\% | 462 | 82.2\% | 74.7\% | \$20,491 | 83.4\% | 73.1\% |
|  | Upper | 70 | 8.6\% | \$3,120 | 6.3\% | 7.0\% | 21 | 8.3\% | 9.7\% | \$1,089 | 4.3\% | 11.3\% | 49 | 8.7\% | 9.1\% | \$2,031 | 8.3\% | 8.5\% |
|  | 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 | 4 | 0.5\% | \$212 | 0.4\% |  | 1 | 0.4\% | 3.9\% | \$100 | 0.4\% | 1.7\% | 3 | 0.5\% | 3.8\% | \$112 | 0.5\% | 1.1\% |
|  | Total | 814 | 100.0\% | \$49,798 | 100.0\% | 100.0\% | 252 | 100.0\% | 100.0\% | \$25,221 | 100.0\% | 100.0\% | 562 | 100.0\% | 100.0\% | \$24,577 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 8.5\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 6 | 100.0\% | \$696 | 100.0\% | 88.2\% | 1 | 100.0\% | 96.3\% | \$320 | 100.0\% | 97.2\% | 5 | 100.0\% | 96.0\% | \$376 | 100.0\% | 99.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 3.3\% | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 0.9\% |
|  | 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\% |
|  | Total | 6 | 100.0\% | \$696 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$320 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$376 | 100.0\% | 100.0\% |

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: TN Eastern TN

|  |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | ount $\quad$ Bank |  |  |  | Total Businesses \% | B | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$ \text { 000s } \end{array}$ | Dollar nk \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |  | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bar } \\ \$ 000 \mathrm{~s} \end{array}$ | Dollar <br> k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{gathered} 218 \\ 70 \\ 288 \\ 526 \end{gathered}$ | $\begin{gathered} \hline 26.8 \% \\ 8.6 \% \\ 35.4 \% \\ 64.6 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 17,092 \\ & \$ 14,224 \\ & \$ 31,316 \\ & \$ 18,482 \end{aligned}$ | $\begin{aligned} & \hline 34.3 \% \\ & 28.6 \% \\ & 62.9 \% \\ & 37.1 \% \end{aligned}$ | $\begin{gathered} \hline 91.0 \% \\ 4.5 \% \\ 95.5 \% \\ 4.5 \% \end{gathered}$ | 130 39 169 83 | $\begin{gathered} \hline 51.6 \% \\ \text { 15.5\% } \\ 67.1 \% \\ 32.9 \% \end{gathered}$ | 38.2\% | \$10,345 | 41.0\% | 44.5\% | 88 31 119 443 | $\begin{gathered} \hline 15.7 \% \\ 5.5 \% \\ 21.2 \% \\ 78.8 \% \end{gathered}$ | 35.8\% | \$6,747 | 27.5\% | 37.4\% |
| $\infty$ |  | Total | 814 | 100.0\% | \$49,798 | 100.0\% | 100.0\% | 252 | 100.0\% |  |  |  |  | 562 | 100.0\% |  |  |  |  |
| $\begin{aligned} & \overline{\bar{\sigma}} \\ & \dot{\omega} \end{aligned}$ | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { त्र } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001 \text { - } \$ 250,000 \\ & \$ 250,001 \text { - } \$ 1 \text { Million } \end{aligned}$ | $\begin{gathered} 741 \\ 38 \\ 35 \end{gathered}$ | $\begin{array}{c\|} \hline 91.0 \% \\ 4.7 \% \\ 4.3 \% \end{array}$ | $\begin{gathered} \hline \$ 23,400 \\ \$ 7,011 \\ \$ 19,387 \end{gathered}$ | $\begin{aligned} & \hline 47.0 \% \\ & 14.1 \% \\ & 38.9 \% \end{aligned}$ |  | $\begin{gathered} \hline 219 \\ 15 \\ 18 \end{gathered}$ | $\begin{gathered} \hline 86.9 \% \\ 6.0 \% \\ 7.1 \% \end{gathered}$ | $\begin{gathered} \hline 91.9 \% \\ 4.0 \% \\ 4.1 \% \end{gathered}$ | $\begin{gathered} \hline \$ 10,637 \\ \$ 2,897 \\ \$ 11,687 \end{gathered}$ | $\begin{aligned} & \hline 42.2 \% \\ & 11.5 \% \\ & 46.3 \% \end{aligned}$ | $\begin{aligned} & \hline 34.5 \% \\ & 16.6 \% \\ & 48.9 \% \end{aligned}$ | $\begin{gathered} 522 \\ 23 \\ 17 \end{gathered}$ | $\begin{gathered} \hline 92.9 \% \\ 4.1 \% \\ 3.0 \% \end{gathered}$ | $\begin{gathered} \hline 93.6 \% \\ 3.2 \% \\ 3.2 \% \end{gathered}$ | $\begin{gathered} \hline \$ 12,763 \\ \$ 4,114 \\ \$ 7,700 \end{gathered}$ | $\begin{aligned} & \hline 51.9 \% \\ & 16.7 \% \\ & 31.3 \% \end{aligned}$ | $\begin{aligned} & \hline 36.2 \% \\ & 15.5 \% \\ & 48.2 \% \end{aligned}$ |
|  |  | Total | 814 | 100.0\% | \$49,798 | 100.0\% |  | 252 | 100.0\% | 100.0\% | \$25,221 | 100.0\% | 100.0\% | 562 | 100.0\% | 100.0\% | \$24,577 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | 5 0 1 | $\begin{gathered} 83.3 \% \\ 0.0 \% \\ 16.7 \% \end{gathered}$ | $\begin{gathered} \$ 692 \\ \$ 0 \\ \$ 4 \end{gathered}$ | $\begin{gathered} 99.4 \% \\ 0.0 \% \\ 0.6 \% \end{gathered}$ | Total Farms <br> $99.4 \%$ <br> $0.6 \%$ <br> $0.0 \%$ | 1 0 0 | $\begin{gathered} 100.0 \% \\ 0.0 \% \\ 0.0 \% \end{gathered}$ | 65.4\% | \$320 | 100.0\% | 75.9\% | 4 0 1 | $\begin{gathered} 80.0 \% \\ 0.0 \% \\ 20.0 \% \end{gathered}$ | 56.0\% | \$372 | 98.9\% | 61.3\% |
|  |  | Total | 6 | 100.0\% | \$696 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 5 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{0}{N} \\ & \text { N } \\ & \text { ָ } \\ & \text { © } \end{aligned}$ | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 500,000 \end{aligned}$ | $\begin{aligned} & 3 \\ & 2 \\ & 1 \end{aligned}$ | $\begin{aligned} & \hline 50.0 \% \\ & 33.3 \% \\ & 16.7 \% \end{aligned}$ | $\begin{gathered} \hline \$ 73 \\ \$ 303 \\ \$ 320 \end{gathered}$ | $\begin{aligned} & \hline 10.5 \% \\ & 43.5 \% \\ & 46.0 \% \end{aligned}$ |  | 0 0 | $\begin{gathered} \hline 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | $\begin{gathered} \hline 87.7 \% \\ 6.2 \% \\ 6.2 \% \end{gathered}$ | $\begin{gathered} \hline \$ 0 \\ \$ 0 \\ \$ 320 \end{gathered}$ | $\begin{gathered} \hline 0.0 \% \\ 0.0 \% \\ 100.0 \% \end{gathered}$ | $\begin{aligned} & \hline 37.0 \% \\ & 19.2 \% \\ & 43.7 \% \end{aligned}$ | $3$ | $\begin{gathered} \hline 60.0 \% \\ 40.0 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 80.0 \% \\ 14.0 \% \\ 6.0 \% \end{gathered}$ | $\begin{gathered} \hline \$ 73 \\ \$ 303 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 19.4 \% \\ 80.6 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 41.2 \% \\ & 33.8 \% \\ & 24.9 \% \end{aligned}$ |
|  |  |  | 6 | 100.0\% | \$696 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$320 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$376 | 100.0\% | 100.0\% |

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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: TX Austin

|  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | $\begin{array}{\|c\|\|} \hline \text { O wner } \\ \text { O ccupied } \\ \text { Units } \\ \% \\ \hline \end{array}$ | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | Bank |  |  | Bank |  | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% |  |
| HOME PURCHASE | Low | 2 | 2.3\% | \$203 | 0.7\% | 3.0\% | 1 | 2.5\% | 2.1\% | \$50 | 0.4\% | 1.6\% | 1 | 2.1\% | 1.9\% | \$153 | 0.9\% | 1.5\% |
|  | Moderate | 6 | 6.9\% | \$1,550 | 5.3\% | 16.7\% | 3 | 7.5\% | 10.6\% | \$1,210 | 9.5\% | 8.8\% | 3 | 6.4\% | 10.3\% | \$340 | 2.0\% | 8.3\% |
|  | Middle | 30 | 34.5\% | \$4,903 | 16.7\% | 40.2\% | 14 | 35.0\% | 46.5\% | \$2,549 | 20.1\% | 38.7\% | 16 | 34.0\% | 45.7\% | \$2,354 | 14.1\% | 37.0\% |
|  | Upper | 49 | 56.3\% | \$22,744 | 77.4\% | 40.1\% | 22 | 55.0\% | 40.8\% | \$8,876 | 70.0\% | 50.9\% | 27 | 57.4\% | 42.1\% | \$13,868 | 83.0\% | 53.3\% |
|  | Unknow | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 87 | 100.0\% | \$29,400 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$12,685 | 100.0\% | 100.0\% | 47 | 100.0\% | 100.0\% | \$16,715 | 100.0\% | 100.0\% |
|  |  |  | 2.0\% | \$833 | 1.1\% | 3.0\% | 4 | 3.2\% | 1.3\% | \$833 | 1.9\% | 1.1\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 1.2\% |
|  | Moderate | 6 | $3.0 \%$ | \$1,711 | 2.3\% | 16.7\% | 6 | 4.8\% | 8.7\% | \$1,711 | 4.0\% | 7.1\% | 0 | 0.0\% | 8.6\% | \$0 | 0.0\% | 6.7\% |
|  | Middle | 59 | 29.9\% | \$11,417 | 15.6\% | 40.2\% | 40 | 32.3\% | 35.3\% | \$7,220 | 16.9\% | 28.0\% | 19 | 26.0\% | 36.5\% | \$4,197 | 13.9\% | 28.0\% |
|  | Upper | 128 | 65.0\% | \$59,106 | 80.9\% | 40.1\% | 74 | 59.7\% | 54.7\% | \$33,082 | 77.2\% | 63.9\% | 54 | 74.0\% | 53.5\% | \$26,024 | 86.1\% | 64.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 197 | 100.0\% | \$73,067 | 100.0\% | 100.0\% | 124 | 100.0\% | 100.0\% | \$42,846 | 100.0\% | 100.0\% | 73 | 100.0\% | 100.0\% | \$30,221 | 100.0\% | 100.0\% |
|  |  | 0 | 0\% | \$0 | 0.0\% | 3.0\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 1.4\% |
|  | Moderate | 2 | 20.0\% | \$7 | 10.1\% | 16.7\% | 0 | 0.0\% | 11.4\% | \$0 | 0.0\% | 9.1\% | 2 | 28.6\% | 15.0\% | \$7 | 14.6\% | 9.3\% |
|  | Middle | 4 | 40.0\% | \$28 | 40.6\% | 40.2\% | 1 | 33.3\% | 38.5\% | \$3 | 14.3\% | 28.4\% | 3 | 42.9\% | 35.7\% | \$25 | 52.1\% | 24.6\% |
|  | Upper | 4 | 40.0\% | \$34 | 49.3\% | 40.1\% | 2 | 66.7\% | 48.6\% | \$18 | 85.7\% | 60.9\% | 2 | 28.6\% | 47.0\% | \$16 | 33.3\% | 64.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 10 | 100.0\% | \$69 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$21 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$48 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Lo | 0 | 0.0\% | \$0 | 0.0\% | 17.8\% | 0 | 0.0\% | 14.0\% | \$0 | 0.0\% | 9.9\% | 0 | 0.0\% | 21.1\% | \$0 | 0.0\% | 30.6\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 30.8\% | 0 | 0.0\% | 24.6\% | \$0 | 0.0\% | 9.2\% | 0 | 0.0\% | 26.8\% | \$0 | 0.0\% | 17.9\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 35.6\% | 0 | 0.0\% | 43.9\% | \$0 | 0.0\% | 49.3\% | 0 | 0.0\% | 33.8\% | \$0 | 0.0\% | 29.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 15.7\% | 0 | 0.0\% | 17.5\% | \$0 | 0.0\% | 31.5\% | 0 | 0.0\% | 18.3\% | \$0 | 0.0\% | 21.8\% |
|  | 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\% |
|  |  | 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\% |
|  | Low | 6 | 2.0\% | \$1,036 | 1.0\% | 3.0\% | 5 | 3.0\% | 1.7\% | \$883 | 1.6\% | 1.5\% | 1 | 0.8\% | 1.7\% | \$153 | 0.3\% | 2.3\% |
|  | Moderate | 14 | 4.8\% | \$3,268 | 3.2\% | 16.7\% | 9 | 5.4\% | 9.6\% | \$2,921 | 5.3\% | 7.9\% | 5 | 3.9\% | 9.6\% | \$347 | 0.7\% | 7.9\% |
|  | Middle | 93 | 31.6\% | \$16,348 | 15.9\% | 40.2\% | 55 | 32.9\% | 40.5\% | \$9,772 | 17.6\% | 33.2\% | 38 | 29.9\% | 40.9\% | \$6,576 | 14.0\% | 32.3\% |
|  | Upper | 181 | 61.6\% | \$81,884 | 79.9\% | 40.1\% | 98 | 58.7\% | 48.1\% | \$41,976 | 75.6\% | 57.4\% | 83 | 65.4\% | 47.8\% | \$39,908 | 84.9\% | 57.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 294 | 100.0\% | \$102,536 | 100.0\% | 100.0\% | 167 | 100.0\% | 100.0\% | \$55,552 | 100.0\% | 100.0\% | 127 | 100.0\% | 100.0\% | \$46,984 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: TX Austin

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparis on |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  | 2010 |  |  |  |  |  | 2011 |  |  |  |  |  |
|  |  | Count |  | ank |  | Small <br> Businesses <br> \% | Agg$\%$ |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  |  |  |  |  |  |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  |  |  |  | \$ 000s | \$ \% | \$ \% | \# | \% | \% | \$ 000s | \$ \% | \$ \% |
|  | Low | 2 | 0.5\% | \$58 | 0.1\% | 3.8\% | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 3.3\% | 2 | 0.8\% | 3.2\% | \$58 | 0.3\% | 3.8\% |
|  | Moderate | 45 | 11.8\% | \$5,111 | 11.9\% | 15.3\% | 14 | 10.9\% | 13.1\% | \$2,583 | 11.3\% | 14.2\% | 31 | 12.3\% | 13.1\% | \$2,528 | 12.5\% | 15.0\% |
|  | Middle | 194 | 50.8\% | \$22,461 | 52.1\% | 37.9\% | 73 | 56.6\% | 34.3\% | \$12,282 | 53.8\% | 33.9\% | 121 | 47.8\% | 35.4\% | \$10,179 | 50.3\% | 35.5\% |
|  | Upper | 141 | 36.9\% | \$15,459 | 35.9\% | 43.0\% | 42 | 32.6\% | 46.1\% | \$7,975 | 34.9\% | 45.7\% | 99 | 39.1\% | 46.9\% | \$7,484 | 37.0\% | 45.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.4\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.6\% |
|  | Total | 382 | 100.0\% | \$43,089 | 100.0\% | 100.0\% | 129 | 100.0\% | 100.0\% | \$22,840 | 100.0\% | 100.0\% | 253 | 100.0\% | 100.0\% | \$20,249 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 13.3\% | 0 | 0.0\% | 20.3\% | \$0 | 0.0\% | 20.5\% | 0 | 0.0\% | 18.8\% | \$0 | 0.0\% | 31.5\% |
|  | Middle | 1 | 100.0\% | \$66 | 100.0\% | 50.1\% | 0 | 0.0\% | 49.2\% | \$0 | 0.0\% | 53.8\% | 1 | 100.0\% | 47.7\% | \$66 | 100.0\% | 53.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 35.6\% | 0 | 0.0\% | 27.2\% | \$0 | 0.0\% | 24.7\% | 0 | 0.0\% | 32.6\% | \$0 | 0.0\% | 14.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$66 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$66 | 100.0\% | 100.0\% |

## Appendices

## Borrower Distribution of HMDA Loans



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## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size



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## Appendices

## Geographic Distribution of HMDA Loans

Assessment Area: TX Houston


Originations \& Purchases

## Appendices

## Geographic Distribution of Small Business \& Small Farm Loans

Assessment Area: TX Houston


## Appendices

## Borrower Distribution of HMDA Loans

Assessment Area: TX Houston

|  | Borrowe <br> $r$ Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison$2010$ |  |  |  |  |  | Bank \& Aggregate Lending Comparison$2011$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  |  | \$ \% | Families by Family Income \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( ${ }^{\text {Ba }}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count <br> chent <br> \% | Agg $\%$ | ( ${ }^{\text {Ba }}$ | Dollar k \$ \% | Agg \$ \% |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 6 | 2.4\% |  | 0.9\% | 22.3\% | 3 | 2.1\% | 6.3\% | \$249 | 0.8\% | 3.2\% | 3 | 2.8\% | 5.0\% | \$253 | 1.0\% | 2.3\% |
|  | Moderate | 43 | 17.1\% | \$4,991 | 9.1\% | 17.2\% | 29 | 20.4\% | 20.6\% | \$3,517 | 11.9\% | 13.6\% | 14 | 12.8\% | 17.4\% | \$1,474 | 5.9\% | 10.7\% |
|  | Middle | 50 | 19.9\% | \$7,002 | 12.8\% | 18.8\% | 30 | 21.1\% | 21.3\% | \$4,165 | 14.1\% | 17.7\% | 20 | 18.3\% | 19.8\% | \$2,837 | 11.3\% | 15.7\% |
|  | Upper | 148 | 59.0\% | \$41,738 | 76.3\% | 41.7\% | 80 | 56.3\% | 44.0\% | \$21,706 | 73.2\% | 58.0\% | 68 | 62.4\% | 47.1\% | \$20,032 | 79.9\% | 61.8\% |
|  | Unknown | 4 | 1.6\% | \$475 | 0.9\% | 0.0\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 7.5\% | 4 | 3.7\% | 10.7\% | \$475 | 1.9\% | 9.5\% |
|  | Total | 251 | 100.0\% | \$54,708 | 100.0\% | 100.0\% | 142 | 100.0\% | 100.0\% | \$29,637 | 100.0\% | 100.0\% | 109 | 100.0\% | 100.0\% | \$25,071 | 100.0\% | 100.0\% |
| $$ | Low | 6 | 1.8\% | \$399 | 0.6\% | 22.3\% | 4 | 1.9\% | 1.9\% | \$314 | 0.8\% | 0.9\% | 2 | 1.5\% | 2.1\% | \$85 | 0.4\% | 0.9\% |
|  | Moderate | 40 | 11.8\% | \$3,616 | 5.7\% | 17.2\% | 25 | 11.9\% | 7.4\% | \$2,385 | 6.0\% | 4.2\% | 15 | 11.5\% | 7.3\% | \$1,231 | 5.2\% | 4.0\% |
|  | Middle | 74 | 21.8\% | \$9,195 | 14.4\% | 18.8\% | 42 | 20.0\% | 14.4\% | \$5,278 | 13.2\% | 9.9\% | 32 | 24.6\% | 13.8\% | \$3,917 | 16.4\% | 9.4\% |
|  | Upper | 216 | 63.5\% | \$49,656 | 78.0\% | 41.7\% | 137 | 65.2\% | 61.6\% | \$31,498 | 79.0\% | 71.6\% | 79 | 60.8\% | 56.7\% | \$18,158 | 76.2\% | 68.9\% |
|  | Unknown | 4 | 1.2\% | \$811 | 1.3\% | 0.0\% | 2 | 1.0\% | 14.7\% | \$384 | 1.0\% | 13.4\% | 2 | 1.5\% | 20.2\% | \$427 | 1.8\% | 16.8\% |
|  | Total | 340 | 100.0\% | \$63,677 | 100.0\% | 100.0\% | 210 | 100.0\% | 100.0\% | \$39,859 | 100.0\% | 100.0\% | 130 | 100.0\% | 100.0\% | \$23,818 | 100.0\% | 100.0\% |
|  | Low | 13 | 17.8\% | \$173 | 15.1\% | 22.3\% | 7 | 20.6\% | 7.4\% | \$128 | 25.4\% | 2.5\% | 6 | 15.4\% | 5.8\% | \$45 | 7.0\% | 2.1\% |
|  | Moderate | 15 | 20.5\% | \$198 | 17.2\% | 17.2\% | 11 | 32.4\% | 12.6\% | \$119 | 23.6\% | 7.0\% | 4 | 10.3\% | 10.9\% | \$79 | 12.2\% | 5.4\% |
|  | Middle | 9 | 12.3\% | \$80 | 7.0\% | 18.8\% | 5 | 14.7\% | 17.1\% | \$58 | 11.5\% | 11.3\% | 4 | 10.3\% | 17.6\% | \$22 | 3.4\% | 11.9\% |
|  | Upper | 33 | 45.2\% | \$590 | 51.3\% | 41.7\% | 11 | 32.4\% | 58.9\% | \$199 | 39.5\% | 73.5\% | 22 | 56.4\% | 60.3\% | \$391 | 60.6\% | 72.7\% |
|  | Unknown | 3 | 4.1\% | \$108 | 9.4\% | 0.0\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 5.7\% | 3 | 7.7\% | 5.4\% | \$108 | 16.7\% | 7.8\% |
|  | Total | 73 | 100.0\% | \$1,149 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$504 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$645 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 22.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 18.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 41.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 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\% |
|  | Low | 25 | 3.8\% | \$1,074 | 0.9\% | 22.3\% | 14 | 3.6\% | 4.4\% | \$691 | 1.0\% | 2.1\% | 11 | 4.0\% | 3.7\% | \$383 | 0.8\% | 1.6\% |
|  | Moderate | 98 | 14.8\% | \$8,805 | 7.4\% | 17.2\% | 65 | 16.8\% | 14.7\% | \$6,021 | 8.6\% | 8.9\% | 33 | 11.9\% | 12.7\% | \$2,784 | 5.6\% | 7.3\% |
|  | Middle | 133 | 20.0\% | \$16,277 | 13.6\% | 18.8\% | 77 | 19.9\% | 18.2\% | \$9,501 | 13.6\% | 13.7\% | 56 | 20.1\% | 17.0\% | \$6,776 | 13.7\% | 12.3\% |
|  | Upper | 397 | 59.8\% | \$91,984 | 77.0\% | 41.7\% | 228 | 59.1\% | 51.9\% | \$53,403 | 76.3\% | 62.6\% | 169 | 60.8\% | 51.7\% | \$38,581 | 77.9\% | 63.0\% |
|  | Unknown | 11 | 1.7\% | \$1,394 | 1.2\% | 0.0\% | 2 | 0.5\% | 10.8\% | \$384 | 0.5\% | 12.7\% | 9 | 3.2\% | 14.9\% | \$1,010 | 2.0\% | 15.7\% |
|  | Total | 664 | 100.0\% | \$119,534 | 100.0\% | 100.0\% | 386 | 100.0\% | 100.0\% | \$70,000 | 100.0\% | 100.0\% | 278 | 100.0\% | 100.0\% | \$49,534 | 100.0\% | 100.0\% |

Originations \& Purchases

## Appendices

## Small Business \& Small Farm Lending By Revenue \& Loan Size

Assessment Area: TX Houston

| $\begin{aligned} & \stackrel{0}{2} \\ & \underset{\lambda}{4} \\ & \frac{0}{0} \\ & \frac{0}{2} \end{aligned}$ |  |  | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Aggregate Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount <br> \% | $\begin{aligned} & \text { Doll: } \\ & \$(\mathbf{0 0 0} \mathbf{s}) \end{aligned}$ | ar | Total Businesses \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar k \$ \% | Agg <br> \$ \% |  | Count <br> ank <br> \% | Agg <br> \% | $\begin{array}{r} \text { Ba } \\ \$ \mathbf{0 0 0} \end{array}$ | Dollar <br> k \$ \% | Agg \$ \% |
|  | $\begin{aligned} & \stackrel{0}{\stackrel{0}{0}} \\ & \stackrel{\rightharpoonup}{0} \\ & \underset{\sim}{0} \end{aligned}$ | \$1 Million or Less Over \$1 Million <br> Total Rev. available <br> Rev. Not Known | $\begin{aligned} & \hline 309 \\ & 258 \\ & 567 \\ & 393 \end{aligned}$ | $\begin{gathered} \hline 32.2 \% \\ 26.9 \% \\ 59.1 \% \\ 40.9 \% \end{gathered}$ | $\begin{gathered} \hline \$ 39,682 \\ \$ 77,616 \\ \$ 117,298 \\ \$ 15,785 \end{gathered}$ | $\begin{aligned} & \hline 29.8 \% \\ & 58.3 \% \\ & 88.1 \% \\ & 11.9 \% \end{aligned}$ | $\begin{gathered} \hline 89.8 \% \\ 5.3 \% \\ 95.1 \% \\ 4.9 \% \end{gathered}$ | 157 126 283 33 | $\begin{gathered} \hline 49.7 \% \\ 39.9 \% \\ 89.6 \% \\ 10.4 \% \end{gathered}$ | 29.8\% | \$21,114 | 31.5\% | 30.7\% | 152 132 284 360 | $\begin{aligned} & \hline 23.6 \% \\ & 20.5 \% \\ & 44.1 \% \\ & 55.9 \% \end{aligned}$ | 39.4\% | \$18,568 | 28.1\% | 32.6\% |
| - |  | Total | 960 | 100.0\% | \$133,083 | 100.0\% | 100.0\% | 316 | 100.0\% |  |  |  |  | 644 | 100.0\% |  |  |  |  |
| $\begin{array}{\|l\|l\|} \overline{\bar{\sigma}} \\ \underset{\sim}{n} \end{array}$ |  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \text { Million } \end{aligned}$ | $\begin{aligned} & 697 \\ & 111 \\ & 152 \end{aligned}$ | $\begin{aligned} & \hline 72.6 \% \\ & 11.6 \% \\ & 15.8 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 22,873 \\ & \$ 19,721 \\ & \$ 90,489 \end{aligned}$ | $\begin{aligned} & \hline 17.2 \% \\ & 14.8 \% \\ & 68.0 \% \end{aligned}$ |  | $\begin{gathered} \hline 178 \\ 51 \\ 87 \end{gathered}$ | $\begin{aligned} & \hline 56.3 \% \\ & 16.1 \% \\ & 27.5 \% \end{aligned}$ | $\begin{array}{c\|} \hline 93.2 \% \\ 3.3 \% \\ 3.6 \% \end{array}$ | $\begin{gathered} \hline \$ 8,290 \\ \$ 8,751 \\ \$ 49,928 \end{gathered}$ | $\begin{aligned} & \hline 12.4 \% \\ & 13.1 \% \\ & 74.6 \% \end{aligned}$ | $\begin{gathered} \hline 33.4 \% \\ 15.1 \% \\ 51.5 \% \end{gathered}$ | $\begin{gathered} \hline 519 \\ 60 \\ 65 \end{gathered}$ | $\begin{gathered} \hline 80.6 \% \\ 9.3 \% \\ 10.1 \% \end{gathered}$ | $\begin{gathered} \hline 94.1 \% \\ 2.8 \% \\ 3.1 \% \end{gathered}$ | $\begin{aligned} & \hline \$ 14,583 \\ & \$ 10,970 \\ & \$ 40,561 \end{aligned}$ | $\begin{aligned} & \hline 22.1 \% \\ & 16.6 \% \\ & 61.4 \% \end{aligned}$ | $\begin{aligned} & \hline 35.5 \% \\ & 14.4 \% \\ & 50.1 \% \end{aligned}$ |
|  |  | Total | 960 | 100.0\% | \$133,083 | 100.0\% |  | 316 | 100.0\% | 100.0\% | \$66,969 | 100.0\% | 100.0\% | 644 | 100.0\% | 100.0\% | \$66,114 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known | 3 | $\begin{aligned} & 60.0 \% \\ & 20.0 \% \\ & 20.0 \% \end{aligned}$ | $\begin{gathered} \$ 260 \\ \$ 253 \\ \$ 10 \end{gathered}$ | $\begin{gathered} 49.7 \% \\ 48.4 \% \\ 1.9 \% \end{gathered}$ | Total Farms <br> $97.7 \%$ <br> $1.2 \%$ <br> $1.1 \%$ | 1 0 | $\begin{gathered} 50.0 \% \\ 50.0 \% \\ 0.0 \% \end{gathered}$ | 70.4\% | \$25 | 9.0\% | 77.5\% | $\begin{aligned} & 2 \\ & 0 \\ & 1 \end{aligned}$ | $\begin{gathered} 66.7 \% \\ 0.0 \% \\ 33.3 \% \end{gathered}$ | 67.5\% | \$235 | 95.9\% | 76.8\% |
|  |  | Total | 5 | 100.0\% | \$523 | 100.0\% | 100.0\% | 2 | 100.0\% |  |  |  |  | 3 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { ᄃ } \\ & \text { © } \end{aligned}$ | $\$ 100,000$ or Less $\$ 100,001-\$ 250,000$ $\$ 250,001-\$ 500,000$ | 3 | $\begin{aligned} & \hline 60.0 \% \\ & 20.0 \% \\ & 20.0 \% \end{aligned}$ | $\begin{aligned} & \hline \$ 131 \\ & \$ 139 \\ & \$ 253 \end{aligned}$ | $\begin{aligned} & \hline 25.0 \% \\ & 26.6 \% \\ & 48.4 \% \end{aligned}$ |  | 1 0 1 | $\begin{gathered} \hline 50.0 \% \\ 0.0 \% \\ 50.0 \% \end{gathered}$ | $\begin{array}{c\|} \hline 88.8 \% \\ 6.4 \% \\ 4.8 \% \end{array}$ | $\begin{gathered} \hline \$ 25 \\ \$ 0 \\ \$ 253 \end{gathered}$ | $\begin{gathered} \hline 9.0 \% \\ 0.0 \% \\ 91.0 \% \end{gathered}$ | $\begin{aligned} & \hline 40.2 \% \\ & 21.1 \% \\ & 38.6 \% \end{aligned}$ | $2$ | $\begin{gathered} \hline 66.7 \% \\ 33.3 \% \\ 0.0 \% \end{gathered}$ | $\begin{gathered} \hline 85.3 \% \\ 8.8 \% \\ 5.9 \% \end{gathered}$ | $\begin{gathered} \hline \$ 106 \\ \$ 139 \\ \$ 0 \end{gathered}$ | $\begin{gathered} \hline 43.3 \% \\ 56.7 \% \\ 0.0 \% \end{gathered}$ | $\begin{aligned} & \hline 37.5 \% \\ & 24.2 \% \\ & 38.3 \% \end{aligned}$ |
|  |  |  | 5 | 100.0\% | \$523 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$278 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$245 | 100.0\% | 100.0\% |

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## Appendices

## APPENDIX G: LIMITED SCOPE TABLES

## Combined Demographics Report



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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AL Anniston


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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: AL Anniston


[^280]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: AL Auburn


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: AL Auburn

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  | Agg$\%$ | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 6 | 7.1\% | \$970 | 7.7\% | 1.7\% | 4 | 8.9\% | 2.4\% | \$495 | 8.1\% | 1.7\% | 2 | 5.0\% | 4.2\% | \$475 | 7.3\% | 3.6\% |
|  | Moderate | 10 | 11.8\% | \$1,388 | 11.0\% | 15.3\% | 6 | 13.3\% | 16.9\% | \$729 | 11.9\% | 17.3\% | 4 | 10.0\% | 15.8\% | \$659 | 10.2\% | 15.3\% |
|  | Middle | 56 | 65.9\% | \$7,530 | 59.7\% | 63.5\% | 28 | 62.2\% | 58.3\% | \$3,637 | 59.2\% | 54.0\% | 28 | 70.0\% | 59.1\% | \$3,893 | 60.1\% | 55.6\% |
|  | Upper | 13 | 15.3\% | \$2,728 | 21.6\% | 19.6\% | 7 | 15.6\% | 22.4\% | \$1,282 | 20.9\% | 27.0\% | 6 | 15.0\% | 20.9\% | \$1,446 | 22.3\% | 25.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 85 | 100.0\% | \$12,616 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$6,143 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$6,473 | 100.0\% | 100.0\% |
|  | Low | 4 | 3.1\% | \$600 | 3.0\% | 1.7\% | 1 | 1.3\% | 1.7\% | \$249 | 2.0\% | 1.7\% | 3 | 5.7\% | 2.3\% | \$351 | 4.9\% | 1.7\% |
|  | Moderate | 9 | 6.9\% | \$1,369 | 6.9\% | 15.3\% | 6 | 7.7\% | 11.2\% | \$1,055 | 8.3\% | 12.2\% | 3 | 5.7\% | 13.2\% | \$314 | 4.4\% | 14.7\% |
|  | Middle | 83 | 63.4\% | \$12,154 | 61.5\% | 63.5\% | 48 | 61.5\% | 54.6\% | \$7,231 | 57.2\% | 49.8\% | 35 | 66.0\% | 56.8\% | \$4,923 | 69.2\% | 52.7\% |
|  | Upper | 35 | 26.7\% | \$5,634 | 28.5\% | 19.6\% | 23 | 29.5\% | 32.6\% | \$4,110 | 32.5\% | 36.3\% | 12 | 22.6\% | 27.8\% | \$1,524 | 21.4\% | 31.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 131 | 100.0\% | \$19,757 | 100.0\% | 100.0\% | 78 | 100.0\% | 100.0\% | \$12,645 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$7,112 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 2 | 8.3\% | \$9 | 5.7\% | 15.3\% | 1 | 6.7\% | 11.4\% | \$4 | 4.0\% | 9.4\% | 1 | 11.1\% | 14.4\% | \$5 | 8.3\% | 12.6\% |
|  | Middle | 19 | 79.2\% | \$120 | 75.5\% | 63.5\% | 12 | 80.0\% | 64.2\% | \$69 | 69.7\% | 50.3\% | 7 | 77.8\% | 63.1\% | \$51 | 85.0\% | 64.0\% |
|  | Upper | 3 | 12.5\% | \$30 | 18.9\% | 19.6\% | 2 | 13.3\% | 23.9\% | \$26 | 26.3\% | 39.8\% | 1 | 11.1\% | 21.9\% | \$4 | 6.7\% | 23.2\% |
|  | 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 | 24 | 100.0\% | \$159 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$99 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$60 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 31.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 16.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 8.5\% | 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\% | 51.6\% | 0 | 0.0\% | 60.0\% | \$0 | 0.0\% | 54.9\% | 0 | 0.0\% | 56.3\% | \$0 | 0.0\% | 83.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 8.5\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 45.1\% | 0 | 0.0\% | 6.3\% | \$0 | 0.0\% | 0.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 10 | 4.2\% | \$1,570 | 4.8\% | 1.7\% | 5 | 3.6\% | 2.0\% | \$744 | 3.9\% | 1.6\% | 5 | 4.9\% | 3.3\% | \$826 | 6.1\% | 3.0\% |
|  | Moderate | 21 | 8.8\% | \$2,766 | 8.5\% | 15.3\% | 13 | 9.4\% | 13.8\% | \$1,788 | 9.5\% | 13.6\% | 8 | 7.8\% | 14.4\% | \$978 | 7.2\% | 14.4\% |
|  | Middle | 158 | 65.8\% | \$19,804 | 60.9\% | 63.5\% | 88 | 63.8\% | 56.6\% | \$10,937 | 57.9\% | 51.9\% | 70 | 68.6\% | 58.1\% | \$8,867 | 65.0\% | 55.2\% |
|  | Upper | 51 | 21.3\% | \$8,392 | 25.8\% | 19.6\% | 32 | 23.2\% | 27.6\% | \$5,418 | 28.7\% | 32.9\% | 19 | 18.6\% | 24.2\% | \$2,974 | 21.8\% | 27.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 240 | 100.0\% | \$32,532 | 100.0\% | 100.0\% | 138 | 100.0\% | 100.0\% | \$18,887 | 100.0\% | 100.0\% | 102 | 100.0\% | 100.0\% | \$13,645 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 18 | 8.7\% | \$697 | 3.1\% | 7.8\% | 6 | 7.3\% | 7.2\% | \$279 | 2.2\% | 5.3\% | 12 | 9.5\% | 7.7\% | \$418 | 4.4\% | 7.3\% |
|  | Moderate | 38 | 18.3\% | \$8,292 | 37.0\% | 11.6\% | 27 | 32.9\% | 12.2\% | \$7,488 | 58.3\% | 25.3\% | 11 | 8.7\% | 9.5\% | \$804 | 8.4\% | 9.4\% |
|  | Middle | 123 | 59.1\% | \$10,573 | 47.1\% | 63.8\% | 43 | 52.4\% | 56.6\% | \$4,507 | 35.1\% | 49.8\% | 80 | 63.5\% | 58.6\% | \$6,066 | 63.3\% | 55.6\% |
|  | Upper | 29 | 13.9\% | \$2,865 | 12.8\% | 16.7\% | 6 | 7.3\% | 20.5\% | \$575 | 4.5\% | 18.5\% | 23 | 18.3\% | 21.5\% | \$2,290 | 23.9\% | 27.3\% |
|  | 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\% | 3.6\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 208 | 100.0\% | \$22,427 | 100.0\% | 100.0\% | 82 | 100.0\% | 100.0\% | \$12,849 | 100.0\% | 100.0\% | 126 | 100.0\% | 100.0\% | \$9,578 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 4.0\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 65.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.3\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 15.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 52.0\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 63.6\% | \$0 | 0.0\% | 81.0\% |
|  | Upper | 1 | 100.0\% | \$150 | 100.0\% | 26.7\% | 1 | 100.0\% | 50.0\% | \$150 | 100.0\% | 33.5\% | 0 | 0.0\% | 18.2\% | \$0 | 0.0\% | 3.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 1 | 100.0\% | \$150 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$150 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: AL Auburn

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | nk |  | Families <br> by Family <br> Income <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol | lar |  |  | nk | Agg | Ban |  | Agg |  | nk | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 13 | 15.3\% | \$1,178 | 9.3\% | 22.6\% | 7 | 15.6\% | 8.6\% | \$594 | 9.7\% | 4.7\% | 6 | 15.0\% | 7.8\% | \$584 | 9.0\% | 4.2\% |
|  | Moderate | 13 | 15.3\% | \$1,626 | 12.9\% | 16.2\% | 7 | 15.6\% | 22.9\% | \$867 | 14.1\% | 18.2\% | 6 | 15.0\% | 18.9\% | \$759 | 11.7\% | 14.9\% |
|  | Middle | 20 | 23.5\% | \$2,938 | 23.3\% | 21.7\% | 11 | 24.4\% | 25.4\% | \$1,581 | 25.7\% | 26.0\% | 9 | 22.5\% | 25.4\% | \$1,357 | 21.0\% | 26.0\% |
|  | Upper | 39 | 45.9\% | \$6,874 | 54.5\% | 39.5\% | 20 | 44.4\% | 33.4\% | \$3,101 | 50.5\% | 41.1\% | 19 | 47.5\% | 35.4\% | \$3,773 | 58.3\% | 43.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.8\% | \$0 | 0.0\% | 10.0\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 11.1\% |
|  | Total | 85 | 100.0\% | \$12,616 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$6,143 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$6,473 | 100.0\% | 100.0\% |
|  | Low | 9 | 6.9\% | \$964 | 4.9\% | 22.6\% | 6 | 7.7\% | 4.8\% | \$650 | 5.1\% | 2.6\% | 3 | 5.7\% | 4.2\% | \$314 | 4.4\% | 2.6\% |
|  | Moderate | 22 | 16.8\% | \$2,300 | 11.6\% | 16.2\% | 12 | 15.4\% | 14.5\% | \$1,130 | 8.9\% | 10.1\% | 10 | 18.9\% | 10.8\% | \$1,170 | 16.5\% | 7.2\% |
|  | Middle | 32 | 24.4\% | \$4,196 | 21.2\% | 21.7\% | 19 | 24.4\% | 19.8\% | \$2,845 | 22.5\% | 17.4\% | 13 | 24.5\% | 17.3\% | \$1,351 | 19.0\% | 14.8\% |
|  | Upper | 60 | 45.8\% | \$11,262 | 57.0\% | 39.5\% | 37 | 47.4\% | 41.2\% | \$7,404 | 58.6\% | 48.4\% | 23 | 43.4\% | 42.5\% | \$3,858 | 54.2\% | 51.5\% |
|  | Unknown | 8 | 6.1\% | \$1,035 | 5.2\% | 0.0\% | 4 | 5.1\% | 19.7\% | \$616 | 4.9\% | 21.5\% | 4 | 7.5\% | 25.2\% | \$419 | 5.9\% | 23.9\% |
|  | Total | 131 | 100.0\% | \$19,757 | 100.0\% | 100.0\% | 78 | 100.0\% | 100.0\% | \$12,645 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$7,112 | 100.0\% | 100.0\% |
|  | Low | 8 | 33.3\% | \$36 | 22.6\% | 22.6\% | 4 | 26.7\% | 17.0\% | \$20 | 20.2\% | 4.0\% | 4 | 44.4\% | 13.8\% | \$16 | 26.7\% | 3.1\% |
|  | Moderate | 3 | 12.5\% | \$19 | 11.9\% | 16.2\% | 1 | 6.7\% | 14.8\% | \$5 | 5.1\% | 8.3\% | 2 | 22.2\% | 23.8\% | \$14 | 23.3\% | 13.3\% |
|  | Middle | 5 | 20.8\% | \$30 | 18.9\% | 21.7\% | 5 | 33.3\% | 23.9\% | \$30 | 30.3\% | 24.2\% | 0 | 0.0\% | 18.8\% | \$0 | 0.0\% | 11.7\% |
|  | Upper | 8 | 33.3\% | \$74 | 46.5\% | 39.5\% | 5 | 33.3\% | 38.6\% | \$44 | 44.4\% | 59.7\% | 3 | 33.3\% | 39.4\% | \$30 | 50.0\% | 43.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.7\% | \$0 | 0.0\% | 3.8\% | 0 | 0.0\% | 4.4\% | \$0 | 0.0\% | 28.2\% |
|  | Total | 24 | 100.0\% | \$159 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$99 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$60 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{\stackrel{\rightharpoonup}{2}}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 22.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 16.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 21.7\% | 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\% | 39.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 30 | 12.5\% | \$2,178 | 6.7\% | 22.6\% | 17 | 12.3\% | 6.9\% | \$1,264 | 6.7\% | 3.3\% | 13 | 12.7\% | 6.2\% | \$914 | 6.7\% | 3.3\% |
|  | Moderate | 38 | 15.8\% | \$3,945 | 12.1\% | 16.2\% | 20 | 14.5\% | 18.4\% | \$2,002 | 10.6\% | 12.9\% | 18 | 17.6\% | 15.0\% | \$1,943 | 14.2\% | 10.6\% |
|  | Middle | 57 | 23.8\% | \$7,164 | 22.0\% | 21.7\% | 35 | 25.4\% | 22.5\% | \$4,456 | 23.6\% | 20.0\% | 22 | 21.6\% | 21.1\% | \$2,708 | 19.8\% | 19.4\% |
|  | Upper | 107 | 44.6\% | \$18,210 | 56.0\% | 39.5\% | 62 | 44.9\% | 37.4\% | \$10,549 | 55.9\% | 42.4\% | 45 | 44.1\% | 38.9\% | \$7,661 | 56.1\% | 46.2\% |
|  | Unknown | 8 | 3.3\% | \$1,035 | 3.2\% | 0.0\% | 4 | 2.9\% | 14.8\% | \$616 | 3.3\% | 21.4\% | 4 | 3.9\% | 18.8\% | \$419 | 3.1\% | 20.6\% |
|  | Total | 240 | 100.0\% | \$32,532 | 100.0\% | 100.0\% | 138 | 100.0\% | 100.0\% | \$18,887 | 100.0\% | 100.0\% | 102 | 100.0\% | 100.0\% | \$13,645 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 62 | 29.8\% | \$5,510 | 24.6\% | 90.6\% | 31 | 37.8\% | 38.5\% | \$2,040 | 15.9\% | 45.7\% | 31 | 24.6\% | 45.7\% | \$3,470 | 36.2\% | 54.8\% |
|  | Over \$1 Million | 48 | 23.1\% | \$13,622 | 60.7\% | 5.3\% | 33 | 40.2\% |  |  |  |  | 15 | 11.9\% |  |  |  |  |
|  | Total Rev. available | 110 | 52.9\% | \$19,132 | 85.3\% | 95.9\% | 64 | 78.0\% |  |  |  |  | 46 | 36.5\% |  |  |  |  |
|  | Rev. Not Known | 98 | 47.1\% | \$3,295 | 14.7\% | 4.2\% | 18 | 22.0\% |  |  |  |  | 80 | 63.5\% |  |  |  |  |
|  | Total | 208 | 100.0\% | \$22,427 | 100.0\% | 100.0\% | 82 | 100.0\% |  |  |  |  | 126 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 164 | 78.8\% | \$5,627 | 25.1\% |  | 56 | 68.3\% | 90.6\% | \$2,282 | 17.8\% | 29.5\% | 108 | 85.7\% | 92.1\% | \$3,345 | 34.9\% | 34.8\% |
|  | \$100,001-\$250,000 | 16 | 7.7\% | \$2,611 | 11.6\% |  | 8 | 9.8\% | 4.3\% | \$1,136 | 8.8\% | 14.6\% | 8 | 6.3\% | 3.6\% | \$1,475 | 15.4\% | 15.7\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ | 28 | 13.5\% | \$14,189 | 63.3\% |  | 18 | 22.0\% | 5.1\% | \$9,431 | 73.4\% | 55.9\% | 10 | 7.9\% | 4.3\% | \$4,758 | 49.7\% | 49.6\% |
|  | Total | 208 | 100.0\% | \$22,427 | 100.0\% |  | 82 | 100.0\% | 100.0\% | \$12,849 | 100.0\% | 100.0\% | 126 | 100.0\% | 100.0\% | \$9,578 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 1 | 100.0\% | \$150 | 100.0\% | 98.7\% | 1 | 100.0\% | 62.5\% | \$150 | 100.0\% | 98.6\% | 0 | 0.0\% | 72.7\% | \$0 | 0.0\% | 96.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 1.3\% |  | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 1 | 100.0\% | \$150 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 5.3\% | 0 | 0.0\% | 54.5\% | \$0 | 0.0\% | 8.3\% |
|  | \$100,001-\$250,000 | 1 | 100.0\% | \$150 | 100.0\% |  | 1 | 100.0\% | 12.5\% | \$150 | 100.0\% | 29.5\% | 0 | 0.0\% | 18.2\% | \$0 | 0.0\% | 27.2\% |
|  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 65.2\% | 0 | 0.0\% | 27.3\% | \$0 | 0.0\% | 64.5\% |
|  | Total | 1 | 100.0\% | \$150 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$150 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

[^282]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: AL Baldwin-Coffee-Covington-Escambia


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AL Baldwin-Coffee-Covington-Escambia


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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: AL Baldwin-Coffee-Covington-Escambia

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | Dollar |  | Families by Family Income | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ban | Dollar | Agg |  | Count ank | Agg | Ban | Dollar | Agg |
|  |  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  |  | Low | 19 | 3.1\% | \$1,197 | 1.1\% | 16.5\% | 12 | 4.0\% | 2.8\% | \$858 | 1.7\% | 1.1\% | 7 | 2.3\% | 2.2\% | \$339 | 0.5\% | 0.9\% |
|  |  | Moderate | 81 | 13.2\% | \$7,634 | 6.7\% | 14.9\% | 39 | 12.9\% | 13.2\% | \$3,885 | 7.7\% | 7.8\% | 42 | 13.6\% | 12.6\% | \$3,749 | 5.9\% | 7.4\% |
|  |  | Middle | 117 | 19.1\% | \$15,196 | 13.4\% | 20.6\% | 63 | 20.8\% | 21.1\% | \$8,297 | 16.4\% | 15.9\% | 54 | 17.5\% | 19.2\% | \$6,899 | 10.9\% | 13.9\% |
|  |  | Upper | 393 | 64.2\% | \$89,223 | 78.5\% | 47.9\% | 189 | 62.4\% | 52.8\% | \$37,666 | 74.3\% | 62.1\% | 204 | 66.0\% | 54.0\% | \$51,557 | 81.8\% | 65.6\% |
|  |  | Unknown | 2 | 0.3\% | \$480 | 0.4\% | 0.0\% | 0 | 0.0\% | 10.2\% | \$0 | 0.0\% | 13.1\% | 2 | 0.6\% | 11.9\% | \$480 | 0.8\% | 12.1\% |
|  |  | Total | 612 | 100.0\% | \$113,730 | 100.0\% | 100.0\% | 303 | 100.0\% | 100.0\% | \$50,706 | 100.0\% | 100.0\% | 309 | 100.0\% | 100.0\% | \$63,024 | 100.0\% | 100.0\% |
|  |  | Low | 40 | 3.7\% | \$2,619 | 1.4\% | 16.5\% | 26 | 4.1\% | 2.6\% | \$1,756 | 1.6\% | 1.0\% | 14 | 3.1\% | 2.2\% | \$863 | 1.1\% | 0.9\% |
|  |  | Moderate | 116 | 10.8\% | \$10,183 | 5.3\% | 14.9\% | 67 | 10.7\% | 7.8\% | \$5,677 | 5.2\% | 4.3\% | 49 | 11.0\% | 6.2\% | \$4,506 | 5.5\% | 3.4\% |
|  |  | Middle | 182 | 16.9\% | \$20,952 | 10.9\% | 20.6\% | 115 | 18.3\% | 15.0\% | \$13,340 | 12.1\% | 11.0\% | 67 | 15.0\% | 14.3\% | \$7,612 | 9.3\% | 9.5\% |
|  |  | Upper | 715 | 66.6\% | \$152,845 | 79.6\% | 47.9\% | 409 | 65.2\% | 54.6\% | \$86,932 | 79.0\% | 63.4\% | 306 | 68.5\% | 52.7\% | \$65,913 | 80.2\% | 61.9\% |
|  |  | Unknown | 21 | 2.0\% | \$5,522 | 2.9\% | 0.0\% | 10 | 1.6\% | 20.0\% | \$2,272 | 2.1\% | 20.3\% | 11 | 2.5\% | 24.5\% | \$3,250 | 4.0\% | 24.2\% |
|  |  | Total | 1,074 | 100.0\% | \$192,121 | 100.0\% | 100.0\% | 627 | 100.0\% | 100.0\% | \$109,977 | 100.0\% | 100.0\% | 447 | 100.0\% | 100.0\% | \$82,144 | 100.0\% | 100.0\% |
|  |  | Low | 16 | 14.7\% | \$66 | 6.5\% | 16.5\% | 8 | 16.3\% | 12.1\% | \$30 | 7.4\% | 3.6\% | 8 | 13.3\% | 10.5\% | \$36 | 5.9\% | 2.6\% |
|  |  | Moderate | 22 | 20.2\% | \$123 | 12.1\% | 14.9\% | 8 | 16.3\% | 14.2\% | \$42 | 10.3\% | 6.6\% | 14 | 23.3\% | 19.5\% | \$81 | 13.3\% | 11.0\% |
|  |  | Middle | 27 | 24.8\% | \$262 | 25.8\% | 20.6\% | 14 | 28.6\% | 23.3\% | \$139 | 34.2\% | 17.9\% | 13 | 21.7\% | 20.1\% | \$123 | 20.2\% | 12.4\% |
|  |  | Upper | 44 | 40.4\% | \$563 | 55.5\% | 47.9\% | 19 | 38.8\% | 45.2\% | \$195 | 48.0\% | 63.6\% | 25 | 41.7\% | 45.0\% | \$368 | 60.5\% | 65.1\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.2\% | \$0 | 0.0\% | 8.3\% | 0 | 0.0\% | 4.9\% | \$0 | 0.0\% | 8.8\% |
|  |  | Total | 109 | 100.0\% | \$1,014 | 100.0\% | 100.0\% | 49 | 100.0\% | 100.0\% | \$406 | 100.0\% | 100.0\% | 60 | 100.0\% | 100.0\% | \$608 | 100.0\% | 100.0\% |
|  |  | Low | 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\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 14.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 20.6\% | 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\% | 47.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 75 | 4.2\% | \$3,882 | 1.3\% | 16.5\% | 46 | 4.7\% | 2.9\% | \$2,644 | 1.6\% | 1.1\% | 29 | 3.6\% | 2.5\% | \$1,238 | 0.8\% | 1.0\% |
|  |  | Moderate | 219 | 12.2\% | \$17,940 | 5.8\% | 14.9\% | 114 | 11.6\% | 10.3\% | \$9,604 | 6.0\% | 5.7\% | 105 | 12.9\% | 9.7\% | \$8,336 | 5.7\% | 5.3\% |
|  |  | Middle | 326 | 18.2\% | \$36,410 | 11.9\% | 20.6\% | 192 | 19.6\% | 17.8\% | \$21,776 | 13.5\% | 13.0\% | 134 | 16.4\% | 16.8\% | \$14,634 | 10.0\% | 11.5\% |
|  |  | Upper | 1,152 | 64.2\% | \$242,631 | 79.1\% | 47.9\% | 617 | 63.0\% | 53.5\% | \$124,793 | 77.5\% | 62.4\% | 535 | 65.6\% | 53.0\% | \$117,838 | 80.8\% | 63.5\% |
|  |  | Unknown | 23 | 1.3\% | \$6,002 | 2.0\% | 0.0\% | 10 | 1.0\% | 15.5\% | \$2,272 | 1.4\% | 17.8\% | 13 | 1.6\% | 18.0\% | \$3,730 | 2.6\% | 18.8\% |
|  |  | Total | 1,795 | 100.0\% | \$306,865 | 100.0\% | 100.0\% | 979 | 100.0\% | 100.0\% | \$161,089 | 100.0\% | 100.0\% | 816 | 100.0\% | 100.0\% | \$145,776 | 100.0\% | 100.0\% |
|  |  |  |  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 265 | 25.5\% | \$27,374 | 36.1\% | 90.6\% | 152 | 51.2\% | 38.8\% | \$15,604 | 46.3\% | 59.4\% | 113 | 15.2\% | 44.6\% | \$11,770 | 27.9\% | 52.3\% |
|  |  | Over \$1 Million | 119 | 11.5\% | \$30,230 | 39.9\% | 4.7\% | 55 | 18.5\% |  |  |  |  | 64 | 8.6\% |  |  |  |  |
|  |  | Total Rev. available | 384 | 37.0\% | \$57,604 | 76.0\% | 95.3\% | 207 | 69.7\% |  |  |  |  | 177 | 23.8\% |  |  |  |  |
|  |  | Rev. Not Known | 654 | 63.0\% | \$18,199 | 24.0\% | 4.7\% | 90 | 30.3\% |  |  |  |  | 564 | 76.1\% |  |  |  |  |
|  |  | Total | 1,038 | 100.0\% | \$75,803 | 100.0\% | 100.0\% | 297 | 100.0\% |  |  |  |  | 741 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 892 | 85.9\% | \$24,802 | 32.7\% |  | 234 | 78.8\% | 89.9\% | \$9,984 | 29.6\% | 27.5\% | 658 | 88.8\% | 90.4\% | \$14,818 | 35.2\% | 29.5\% |
|  |  | \$100,001 - \$250,000 | 79 | 7.6\% | $\$ 13,741$ | 18.1\% |  | 32 | 10.8\% | 4.9\% | \$5,418 | 16.1\% | 16.7\% | 47 | 6.3\% | 5.0\% | \$8,323 | 19.8\% | 18.9\% |
|  |  | \$250,001 - \$1 Million | 67 | 6.5\% | \$37,260 | 49.2\% |  | 31 | 10.4\% | 5.2\% | \$18,272 | 54.3\% | 55.8\% | 36 | 4.9\% | 4.6\% | \$18,988 | 45.1\% | 51.6\% |
|  |  | Total | 1,038 | 100.0\% | \$75,803 | 100.0\% |  | 297 | 100.0\% | 100.0\% | \$33,674 | 100.0\% | 100.0\% | 741 | 100.0\% | 100.0\% | \$42,129 | 100.0\% | 100.0\% |
| $\begin{gathered} \underset{\bar{N}}{\tilde{\sigma}} \\ \overline{\tilde{\sigma}} \\ \overline{\bar{\sigma}} \end{gathered}$ |  | \$1 Million or Less Over \$1 Million Not Known Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 10 | 41.7\% | \$1,169 | 36.0\% | 96.2\% | 5 | 55.6\% | 74.7\% | \$207 | 13.0\% | 73.2\% | 5 | 33.3\% | 62.1\% | \$962 | 58.2\% | 69.7\% |
|  |  |  | 7 | 29.2\% | \$1,931 | 59.5\% | 2.4\% | 4 | 44.4\% |  |  |  |  | 3 | 20.0\% |  |  |  |  |
|  |  |  | 7 | 29.2\% | \$146 | 4.5\% | 1.4\% | 0 | 0.0\% |  |  |  |  |  | 46.7\% |  |  |  |  |
|  |  |  | 24 | 100.0\% | \$3,246 | 100.0\% | 100.0\% | 9 | 100.0\% |  |  |  |  | 15 | 100.0\% |  |  |  |  |
|  | $\begin{array}{ll} \hline \stackrel{ }{0} & \$ 100,000 \text { or Less } \\ \stackrel{\sim}{\omega} & \$ 100,001-\$ 250,000 \\ \stackrel{\widetilde{\widetilde{N}}}{\mathrm{O}} & \$ 250,001-\$ 500,000 \\ & \text { Total } \end{array}$ |  | 14 | 58.3\% | \$478 | 14.7\% |  | 5 | 55.6\% | 77.1\% | \$207 | 13.0\% | 26.7\% | 9 | 60.0\% | 69.0\% | \$271 | 16.4\% | 18.8\% |
|  |  |  | 7 | 29.2\% | \$1,268 | 39.1\% |  | 2 | 22.2\% | 13.3\% | \$386 | 24.2\% | 28.1\% | 5 | 33.3\% | 19.5\% | \$882 | 53.4\% | 34.5\% |
|  |  |  |  | 12.5\% | \$1,500 | 46.2\% |  | 2 | 22.2\% | 9.6\% | \$1,000 | 62.8\% | 45.2\% | 1 | 6.7\% | 11.5\% | \$500 | 30.2\% | 46.6\% |
|  |  |  | 24 | 100.0\% | \$3,246 | 100.0\% |  | 9 | 100.0\% | 100.0\% | \$1,593 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$1,653 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: AL Decatur


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: AL Decatur

|  | Tract Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | B |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol |  | Units |  | ank | Agg | Ba |  | Agg |  | nk | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 7 | 12.7\% | \$660 | 9.1\% | 17.5\% | 3 | 13.6\% | 14.3\% | \$256 | 9.7\% | 10.6\% | 4 | 12.1\% | 13.1\% | \$404 | 8.8\% | 10.2\% |
|  | Middle | 26 | 47.3\% | \$3,147 | 43.4\% | 53.9\% | 11 | 50.0\% | 44.3\% | \$1,323 | 50.1\% | 42.2\% | 15 | 45.5\% | 48.7\% | \$1,824 | 39.5\% | 46.2\% |
|  | Upper | 22 | 40.0\% | \$3,448 | 47.5\% | 27.1\% | 8 | 36.4\% | 41.2\% | \$1,062 | 40.2\% | 47.2\% | 14 | 42.4\% | 38.1\% | \$2,386 | 51.7\% | 43.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 55 | 100.0\% | \$7,255 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$2,641 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$4,614 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | M oderate | 21 | 9.5\% | \$2,232 | 8.9\% | 17.5\% | 11 | 8.8\% | 10.6\% | \$1,143 | 8.0\% | 8.3\% | 10 | 10.4\% | 11.4\% | \$1,089 | 10.0\% | 8.8\% |
|  | Middle | 120 | 54.3\% | \$13,064 | 52.0\% | 53.9\% | 74 | 59.2\% | 46.6\% | \$8,605 | 60.3\% | 44.0\% | 46 | 47.9\% | 47.6\% | \$4,459 | 41.1\% | 46.7\% |
|  | Upper | 80 | 36.2\% | \$9,829 | 39.1\% | 27.1\% | 40 | 32.0\% | 42.7\% | \$4,531 | 31.7\% | 47.6\% | 40 | 41.7\% | 40.7\% | \$5,298 | 48.8\% | 44.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 221 | 100.0\% | \$25,125 | 100.0\% | 100.0\% | 125 | 100.0\% | 100.0\% | \$14,279 | 100.0\% | 100.0\% | 96 | 100.0\% | 100.0\% | \$10,846 | 100.0\% | 100.0\% |
|  | Low | 3 | 7.3\% | \$12 | 4.2\% | 1.4\% | 2 | 11.1\% | 1.4\% | \$7 | 6.7\% | 0.2\% | 1 | 4.3\% | 1.1\% | \$5 | 2.8\% | 0.2\% |
|  | Moderate | 6 | 14.6\% | \$23 | 8.1\% | 17.5\% | 2 | 11.1\% | 16.0\% | \$8 | 7.7\% | 10.7\% | 4 | 17.4\% | 18.3\% | \$15 | 8.4\% | 11.4\% |
|  | Middle | 21 | 51.2\% | \$181 | 64.0\% | 53.9\% | 7 | 38.9\% | 52.4\% | \$41 | 39.4\% | 44.4\% | 14 | 60.9\% | 54.8\% | \$140 | 78.2\% | 47.7\% |
|  | Upper | 11 | 26.8\% | \$67 | 23.7\% | 27.1\% | 7 | 38.9\% | 30.1\% | \$48 | 46.2\% | 44.7\% | 4 | 17.4\% | 25.8\% | \$19 | 10.6\% | 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 | 41 | 100.0\% | \$283 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$104 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$179 | 100.0\% | 100.0\% |
|  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 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\% | 36.1\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 43.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 40.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 54.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 23.4\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 3 | 0.9\% | \$12 | 0.0\% | 1.4\% | 2 | 1.2\% | 0.2\% | \$7 | 0.0\% | 0.0\% | 1 | 0.7\% | 0.3\% | \$5 | 0.0\% | 0.1\% |
|  | M oderate | 34 | 10.7\% | \$2,915 | 8.9\% | 17.5\% | 16 | 9.7\% | 12.3\% | \$1,407 | 8.3\% | 9.3\% | 18 | 11.8\% | 12.7\% | \$1,508 | 9.6\% | 9.3\% |
|  | Middle | 167 | 52.7\% | \$16,392 | 50.2\% | 53.9\% | 92 | 55.8\% | 46.1\% | \$9,969 | 58.6\% | 43.5\% | 75 | 49.3\% | 48.7\% | \$6,423 | 41.1\% | 46.4\% |
|  | Upper | 113 | 35.6\% | \$13,344 | 40.9\% | 27.1\% | 55 | 33.3\% | 41.3\% | \$5,641 | 33.1\% | 47.2\% | 58 | 38.2\% | 38.4\% | \$7,703 | 49.3\% | 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\% |
|  | Total | 317 | 100.0\% | \$32,663 | 100.0\% | 100.0\% | 165 | 100.0\% | 100.0\% | \$17,024 | 100.0\% | 100.0\% | 152 | 100.0\% | 100.0\% | \$15,639 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 9 | 1.7\% | \$1,536 | 3.6\% | 1.5\% | 3 | 1.9\% | 1.1\% | \$362 | 2.0\% | 0.9\% | 6 | 1.6\% | 1.2\% | \$1,174 | 4.9\% | 4.7\% |
|  | Moderate | 163 | 30.2\% | \$10,860 | 25.7\% | 24.4\% | 44 | 28.4\% | 27.5\% | \$5,178 | 28.0\% | 28.9\% | 119 | 30.9\% | 26.4\% | \$5,682 | 23.9\% | 31.2\% |
|  | Middle | 221 | 40.9\% | \$17,509 | 41.4\% | 50.3\% | 63 | 40.6\% | 41.4\% | \$8,022 | 43.4\% | 42.6\% | 158 | 41.0\% | 41.8\% | \$9,487 | 39.8\% | 35.8\% |
|  | Upper | 147 | 27.2\% | \$12,418 | 29.3\% | 23.8\% | 45 | 29.0\% | 26.5\% | \$4,943 | 26.7\% | 26.8\% | 102 | 26.5\% | 28.6\% | \$7,475 | 31.4\% | 27.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.5\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 540 | 100.0\% | \$42,323 | 100.0\% | 100.0\% | 155 | 100.0\% | 100.0\% | \$18,505 | 100.0\% | 100.0\% | 385 | 100.0\% | 100.0\% | \$23,818 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 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\% |
|  |  | 2 | 22.2\% | \$505 | 46.2\% | 14.1\% | 0 | 0.0\% | 13.3\% | \$0 | 0.0\% | 18.5\% | 2 | 28.6\% | 17.3\% | \$505 | 73.5\% | 30.9\% |
|  |  | 5 | 55.6\% | \$436 | 39.9\% | 68.7\% | 2 | 100.0\% | 83.1\% | \$405 | 100.0\% | 69.0\% | 3 | 42.9\% | 76.5\% | \$31 | 4.5\% | 62.6\% |
|  |  | 2 | 22.2\% | \$151 | 13.8\% | 16.7\% | 0 | 0.0\% | 3.6\% | \$0 | 0.0\% | 12.5\% | 2 | 28.6\% | 6.2\% | \$151 | 22.0\% | 6.5\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 9 | 100.0\% | \$1,092 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$405 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$687 | 100.0\% | 100.0\% |

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## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: AL Decatur

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparis on 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | nk |  | Families <br> by Family <br> Income <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol |  |  |  | nk | Agg |  |  | Agg |  | nk | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 5 | 9.1\% | \$329 | 4.5\% | 20.4\% | 2 | 9.1\% | 15.9\% | \$116 | 4.4\% | 9.3\% | 3 | 9.1\% | 12.7\% | \$213 | 4.6\% | 7.1\% |
|  | Moderate | 18 | 32.7\% | \$1,489 | 20.5\% | 18.4\% | 5 | 22.7\% | 26.5\% | \$459 | 17.4\% | 21.5\% | 13 | 39.4\% | 25.6\% | \$1,030 | 22.3\% | 19.5\% |
|  | Middle | 15 | 27.3\% | \$1,753 | 24.2\% | 21.0\% | 9 | 40.9\% | 23.5\% | \$918 | 34.8\% | 24.1\% | 6 | 18.2\% | 22.7\% | \$835 | 18.1\% | 22.8\% |
|  | Upper | 17 | 30.9\% | \$3,684 | 50.8\% | 40.1\% | 6 | 27.3\% | 27.4\% | \$1,148 | 43.5\% | 38.3\% | 11 | 33.3\% | 27.8\% | \$2,536 | 55.0\% | 39.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.6\% | \$0 | 0.0\% | 6.7\% | 0 | 0.0\% | 11.2\% | \$0 | 0.0\% | 11.2\% |
|  | Total | 55 | 100.0\% | \$7,255 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$2,641 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$4,614 | 100.0\% | 100.0\% |
|  | Low | 18 | 8.1\% | \$1,077 | 4.3\% | 20.4\% | 8 | 6.4\% | 6.6\% | \$581 | 4.1\% | 3.6\% | 10 | 10.4\% | 6.1\% | \$496 | 4.6\% | 3.3\% |
|  | Moderate | 31 | 14.0\% | \$2,603 | 10.4\% | 18.4\% | 19 | 15.2\% | 14.3\% | \$1,701 | 11.9\% | 10.1\% | 12 | 12.5\% | 15.5\% | \$902 | 8.3\% | 11.0\% |
|  | Middle | 63 | 28.5\% | \$6,315 | 25.1\% | 21.0\% | 33 | 26.4\% | 24.8\% | \$3,244 | 22.7\% | 21.8\% | 30 | 31.3\% | 20.4\% | \$3,071 | 28.3\% | 18.2\% |
|  | Upper | 103 | 46.6\% | \$13,793 | 54.9\% | 40.1\% | 64 | 51.2\% | 41.2\% | \$8,632 | 60.5\% | 51.2\% | 39 | 40.6\% | 41.6\% | \$5,161 | 47.6\% | 50.9\% |
|  | Unknown | 6 | 2.7\% | \$1,337 | 5.3\% | 0.0\% | 1 | 0.8\% | 13.1\% | \$121 | 0.8\% | 13.4\% | 5 | 5.2\% | 16.5\% | \$1,216 | 11.2\% | 16.6\% |
|  | Total | 221 | 100.0\% | \$25,125 | 100.0\% | 100.0\% | 125 | 100.0\% | 100.0\% | \$14,279 | 100.0\% | 100.0\% | 96 | 100.0\% | 100.0\% | \$10,846 | 100.0\% | 100.0\% |
|  | Low | 6 | 14.6\% | \$28 | 9.9\% | 20.4\% | 3 | 16.7\% | 17.5\% | \$11 | 10.6\% | 4.8\% | 3 | 13.0\% | 18.3\% | \$17 | 9.5\% | 6.7\% |
|  | M oderate | 13 | 31.7\% | \$85 | 30.0\% | 18.4\% | 4 | 22.2\% | 26.4\% | \$17 | 16.3\% | 17.4\% | 9 | 39.1\% | 26.7\% | \$68 | 38.0\% | 16.9\% |
|  | Middle | 10 | 24.4\% | \$64 | 22.6\% | 21.0\% | 5 | 27.8\% | 24.4\% | \$22 | 21.2\% | 19.4\% | 5 | 21.7\% | 24.9\% | \$42 | 23.5\% | 23.4\% |
|  | Upper | 10 | 24.4\% | \$97 | 34.3\% | 40.1\% | 4 | 22.2\% | 29.5\% | \$45 | 43.3\% | 52.4\% | 6 | 26.1\% | 28.1\% | \$52 | 29.1\% | 44.6\% |
|  | Unknown | 2 | 4.9\% | \$9 | 3.2\% | 0.0\% | 2 | 11.1\% | 2.3\% | \$9 | 8.7\% | 6.0\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 8.3\% |
|  | Total | 41 | 100.0\% | \$283 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$104 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$179 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 20.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | M oderate | 0 | 0.0\% | \$0 | 0.0\% | 18.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 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\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 29 | 9.1\% | \$1,434 | 4.4\% | 20.4\% | 13 | 7.9\% | 10.7\% | \$708 | 4.2\% | 5.6\% | 16 | 10.5\% | 9.6\% | \$726 | 4.6\% | 4.7\% |
|  | M oderate | 62 | 19.6\% | \$4,177 | 12.8\% | 18.4\% | 28 | 17.0\% | 19.5\% | \$2,177 | 12.8\% | 14.2\% | 34 | 22.4\% | 20.2\% | \$2,000 | 12.8\% | 14.2\% |
|  | Middle | 88 | 27.8\% | \$8,132 | 24.9\% | 21.0\% | 47 | 28.5\% | 24.3\% | \$4,184 | 24.6\% | 22.5\% | 41 | 27.0\% | 21.7\% | \$3,948 | 25.2\% | 19.9\% |
|  | Upper | 130 | 41.0\% | \$17,574 | 53.8\% | 40.1\% | 74 | 44.8\% | 35.4\% | \$9,825 | 57.7\% | 46.4\% | 56 | 36.8\% | 35.3\% | \$7,749 | 49.5\% | 46.5\% |
|  | Unknown | 8 | 2.5\% | \$1,346 | 4.1\% | 0.0\% | 3 | 1.8\% | 10.1\% | \$130 | 0.8\% | 11.3\% | 5 | 3.3\% | 13.2\% | \$1,216 | 7.8\% | 14.7\% |
|  | Total | 317 | 100.0\% | \$32,663 | 100.0\% | 100.0\% | 165 | 100.0\% | 100.0\% | \$17,024 | 100.0\% | 100.0\% | 152 | 100.0\% | 100.0\% | \$15,639 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known <br> Total | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 131 | 24.3\% | \$11,822 | 27.9\% | 90.7\% | 76 | 49.0\% | 42.1\% | \$6,297 | 34.0\% | 50.3\% | 55 | 14.3\% | 42.6\% | \$5,525 | 23.2\% | 52.4\% |
|  |  | 71 | 13.1\% | \$18,439 | 43.6\% | 5.1\% | 32 | 20.6\% |  |  |  |  | 39 | 10.1\% |  |  |  |  |
|  |  | 202 | 37.4\% | \$30,261 | 71.5\% | 95.8\% | 108 | 69.6\% |  |  |  |  | 94 | 24.4\% |  |  |  |  |
|  |  | 338 | 62.6\% | \$12,062 | 28.5\% | 4.2\% | 47 | 30.3\% |  |  |  |  | 291 | 75.6\% |  |  |  |  |
|  |  | 540 | 100.0\% | \$42,323 | 100.0\% | 100.0\% | 155 | 100.0\% |  |  |  |  | 385 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 461 | 85.4\% | \$13,059 | 30.9\% |  | 117 | 75.5\% | 87.2\% | \$5,170 | 27.9\% | 32.0\% | 344 | 89.4\% | 88.0\% | \$7,889 | 33.1\% | 29.0\% |
|  | \$100,001-\$250,000 | 32 | 5.9\% | \$5,396 | 12.7\% |  | 19 | 12.3\% | 8.3\% | \$3,243 | 17.5\% | 28.0\% | 13 | 3.4\% | 6.9\% | \$2,153 | 9.0\% | 21.3\% |
|  | \$250,001-\$1 <br> Million | 47 | 8.7\% | \$23,868 | 56.4\% |  | 19 | 12.3\% | 4.4\% | \$10,092 | 54.5\% | 40.0\% | 28 | 7.3\% | 5.2\% | \$13,776 | 57.8\% | 49.7\% |
|  | Total | 540 | 100.0\% | \$42,323 | 100.0\% |  | 155 | 100.0\% | 100.0\% | \$18,505 | 100.0\% | 100.0\% | 385 | 100.0\% | 100.0\% | \$23,818 | 100.0\% | 100.0\% |
|  | \$1 Million or LessOver \$1 MillionNot KnownTotal | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 6 | 66.7\% | \$1,061 | 97.2\% | 97.8\% | 2 | 100.0\% | 90.4\% | \$405 | 100.0\% | 86.9\% | 4 | 57.1\% | 91.4\% | \$656 | 95.5\% | 86.3\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.2\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 3 | 33.3\% | \$31 | 2.8\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 3 | 42.9\% |  |  |  |  |
|  |  | 9 | 100.0\% | \$1,092 | 100.0\% | 100.0\% | 2 | 100.0\% |  |  |  |  | 7 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 4 | 44.4\% | \$81 | 7.4\% |  | 0 | 0.0\% | 88.0\% | \$0 | 0.0\% | 39.0\% | 4 | 57.1\% | 90.1\% | \$81 | 11.8\% | 48.0\% |
|  | \$100,001-\$250,000 | 3 | 33.3\% | \$358 | 32.8\% |  | 1 | 50.0\% | 8.4\% | \$152 | 37.5\% | 33.5\% | 2 | 28.6\% | 6.2\% | \$206 | 30.0\% | 19.6\% |
|  | \$250,001-\$500,000 | 2 | 22.2\% | \$653 | 59.8\% |  | 1 | 50.0\% | 3.6\% | \$253 | 62.5\% | 27.5\% | 1 | 14.3\% | 3.7\% | \$400 | 58.2\% | 32.4\% |
|  | Total | 9 | 100.0\% | \$1,092 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$405 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$687 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: AL Dothan



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size


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

Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: AL Fayette


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: AL Fayette



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

## Assessment Area: AL Fayette

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {Ba }}$ | Dollar |  | Families <br> by Family <br> Income <br> $\%$ |  | Count <br> ank | Agg | Ba | Dollar <br> nk | Agg |  | Count ank | Agg | Dollar |  | Agg |
|  |  | \# | \% | \$ (000s) |  | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  |  |  | Low | 2 | 15.4\% | \$103 | 9.7\% | 20.6\% | 2 | 40.0\% | 4.8\% | \$103 | 18.6\% | 2.7\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 4.7\% |
|  |  | Moderate | 2 | 15.4\% | \$108 | 10.2\% | 18.8\% | 0 | 0.0\% | 22.9\% | \$0 | 0.0\% | 16.7\% | 2 | 25.0\% | 19.8\% | \$108 | 21.3\% | 16.2\% |
|  |  | Middle | 5 | 38.5\% | \$426 | 40.1\% | 23.4\% | 1 | 20.0\% | 38.1\% | \$119 | 21.4\% | 36.4\% | 4 | 50.0\% | 34.7\% | \$307 | 60.6\% | 34.0\% |
|  |  | Upper | 4 | 30.8\% | \$425 | 40.0\% | 37.2\% | 2 | 40.0\% | 31.4\% | \$333 | 60.0\% | 42.4\% | 2 | 25.0\% | 28.7\% | \$92 | 18.1\% | 34.5\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 1.8\% | 0 | 0.0\% | 9.9\% | \$0 | 0.0\% | 10.5\% |
|  |  | Total | 13 | 100.0\% | \$1,062 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$555 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$507 | 100.0\% | 100.0\% |
|  |  |  | Low | 3 | 8.1\% |  | 3.7\% | 20.6\% | 1 | 3.4\% | 3.9\% | \$32 | 1.2\% | 2.4\% | 2 | 25.0\% | 2.5\% | \$77 | 19.5\% | 1.0\% |
|  |  | Moderate | 13 | 35.1\% | \$663 | 22.3\% | 18.8\% | 8 | 27.6\% | 13.8\% | \$408 | 15.8\% | 9.3\% | 5 | 62.5\% | 26.1\% | \$255 | 64.7\% | 16.9\% |
|  |  | Middle | 9 | 24.3\% | \$661 | 22.2\% | 23.4\% | 9 | 31.0\% | 22.2\% | \$661 | 25.6\% | 19.7\% | 0 | 0.0\% | 17.6\% | \$0 | 0.0\% | 15.4\% |
|  |  | Upper | 12 | 32.4\% | \$1,546 | 51.9\% | 37.2\% | 11 | 37.9\% | 45.3\% | \$1,484 | 57.4\% | 54.3\% | 1 | 12.5\% | 37.8\% | \$62 | 15.7\% | 50.3\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.8\% | \$0 | 0.0\% | 14.3\% | 0 | 0.0\% | 16.0\% | \$0 | 0.0\% | 16.4\% |
|  |  | Total | 37 | 100.0\% | \$2,979 | 100.0\% | 100.0\% | 29 | 100.0\% | 100.0\% | \$2,585 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$394 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 20.6\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 10.2\% | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 6.6\% |
|  |  | Moderate | 2 | 25.0\% | \$22 | 41.5\% | 18.8\% | 1 | 50.0\% | 23.1\% | \$7 | 53.8\% | 6.5\% | 1 | 16.7\% | 26.3\% | \$15 | 37.5\% | 17.5\% |
|  |  | Middle | 5 | 62.5\% | \$24 | 45.3\% | 23.4\% | 1 | 50.0\% | 30.8\% | \$6 | 46.2\% | 7.0\% | 4 | 66.7\% | 31.6\% | \$18 | 45.0\% | 16.6\% |
|  |  | Upper | 1 | 12.5\% | \$7 | 13.2\% | 37.2\% | 0 | 0.0\% | 38.5\% | \$0 | 0.0\% | 76.3\% | 1 | 16.7\% | 36.8\% | \$7 | 17.5\% | 59.2\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Total | 8 | 100.0\% | \$53 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$13 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$40 | 100.0\% | 100.0\% |
|  |  | Low | 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\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.8\% | 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\% | 23.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 37.2\% | 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\% |
|  |  | 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\% |
|  |  | Low | 5 | 8.6\% | \$212 | 5.2\% | 20.6\% | 3 | 8.3\% | 4.4\% | \$135 | 4.3\% | 2.6\% | 2 | 9.1\% | 4.6\% | \$77 | 8.2\% | 2.5\% |
|  |  | Moderate | 17 | 29.3\% | \$793 | 19.4\% | 18.8\% | 9 | 25.0\% | 17.1\% | \$415 | 13.2\% | 11.6\% | 8 | 36.4\% | 23.4\% | \$378 | 40.2\% | 16.6\% |
|  |  | Middle | 19 | 32.8\% | \$1,111 | 27.1\% | 23.4\% | 11 | 30.6\% | 27.7\% | \$786 | 24.9\% | 24.9\% | 8 | 36.4\% | 25.9\% | \$325 | 34.5\% | 22.6\% |
|  |  | Upper | 17 | 29.3\% | \$1,978 | 48.3\% | 37.2\% | 13 | 36.1\% | 40.5\% | \$1,817 | 57.6\% | 50.8\% | 4 | 18.2\% | 33.9\% | \$161 | 17.1\% | 44.4\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.3\% | \$0 | 0.0\% | 10.1\% | 0 | 0.0\% | 12.1\% | \$0 | 0.0\% | 13.9\% |
|  |  |  | 58 | 100.0\% | \$4,094 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$3,153 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$941 | 100.0\% | 100.0\% |
| ssəu!̣ng ॥rews | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 10 | 30.3\% | \$234 | 16.4\% | 91.5\% | 4 | 66.7\% | 53.6\% | \$43 | 5.3\% | 35.2\% | 6 | 22.2\% | 49.3\% | \$191 | 31.5\% | 54.6\% |
|  |  |  | 4 | 12.1\% | \$900 | 63.2\% | 3.9\% | 2 | 33.3\% |  |  |  |  | 2 | 7.4\% |  |  |  |  |
|  |  |  | 14 | 42.4\% | \$1,134 | 79.6\% | 95.4\% | 6 | 100.0\% |  |  |  |  | 8 | 29.6\% |  |  |  |  |
|  |  |  | 19 | 57.6\% | \$291 | 20.4\% | 4.6\% | 0 | 0.0\% |  |  |  |  | 19 | 70.4\% |  |  |  |  |
|  |  |  | 33 | 100.0\% | \$1,425 | 100.0\% | 100.0\% | 6 | 100.0\% |  |  |  |  | 27 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { त్ } \\ & \text { O} \end{aligned}$ | \$100,000 or Less | 32 | 97.0\% | \$675 | 47.4\% |  | 5 | 83.3\% | 89.3\% | \$68 | 8.3\% | 29.9\% | 27 | 100.0\% | 95.4\% | \$607 | 100.0\% | 53.4\% |
|  |  | \$100,001 - \$250,000 | 0 | $0.0 \%$ | \$0 | 0.0\% |  | 0 | 0.0\% | 7.1\% | \$0 | 0.0\% | 24.6\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 17.5\% |
|  |  | \$250,001 - \$1 Million | 1 | 3.0\% | \$750 | 52.6\% |  | 1 | 16.7\% | 3.6\% | \$750 | 91.7\% | 45.5\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 29.1\% |
|  |  |  | 33 | 100.0\% | \$1,425 | 100.0\% |  | 6 | 100.0\% | 100.0\% | \$818 | 100.0\% | 100.0\% | 27 | 100.0\% | 100.0\% | \$607 | 100.0\% | 100.0\% |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 91.5\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 41.9\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 12.9\% |
|  |  | Over \$1 Million | 1 | 100.0\% | \$162 | 100.0\% | 8.5\% | 0 | $0.0 \%$ |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | Not Known | 0 |  | \$0 | 0.0\% |  | 0 | 0.0\% |  |  |  |  | 0 |  |  |  |  |  |
|  |  | Total | 1 | 100.0\% | \$162 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 12.9\% |
|  |  | 1 | 100.0\% | \$162 | 100.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 1 | 100.0\% | 50.0\% | \$162 | 100.0\% | 87.1\% |
|  |  | 0 | $0.0 \%$ |  | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 1 | 100.0\% | \$162 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$162 | 100.0\% | 100.0\% |

[^289]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: AL Florence


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AL Florence


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Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

## Assessment Area: AL Florence



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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: AL Gadsden

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  | ount | Dol |  |  |  | ank | Agg | Ba |  | Agg |  | ank | Agg | Ban |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 1.0\% |
|  | Moderate | 6 | 10.3\% | \$407 | 4.2\% | 17.3\% | 1 | 4.0\% | 8.8\% | \$123 | 2.9\% | 4.2\% | 5 | 15.2\% | 10.0\% | \$284 | 5.3\% | 6.2\% |
|  | Middle | 25 | 43.1\% | \$2,992 | 31.1\% | 55.5\% | 16 | 64.0\% | 49.6\% | \$2,215 | 51.5\% | 42.3\% | 9 | 27.3\% | 44.1\% | \$777 | 14.6\% | 36.3\% |
|  | Upper | 27 | 46.6\% | \$6,222 | 64.7\% | 25.6\% | 8 | 32.0\% | 40.4\% | \$1,966 | 45.7\% | 53.0\% | 19 | 57.6\% | 44.3\% | \$4,256 | 80.0\% | 56.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 58 | 100.0\% | \$9,621 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$4,304 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$5,317 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.4\% |
|  | Moderate | 7 | 6.1\% | \$576 | 3.2\% | 17.3\% | 3 | 4.5\% | 5.7\% | \$249 | 2.4\% | 4.2\% | 4 | 8.3\% | 7.2\% | \$327 | 4.4\% | 5.1\% |
|  | Middle | 49 | 42.6\% | \$5,909 | 33.1\% | 55.5\% | 32 | 47.8\% | 47.3\% | \$3,945 | 37.6\% | 41.4\% | 17 | 35.4\% | 45.9\% | \$1,964 | 26.6\% | 39.5\% |
|  | Upper | 59 | 51.3\% | \$11,390 | 63.7\% | 25.6\% | 32 | 47.8\% | 46.8\% | \$6,296 | 60.0\% | 54.4\% | 27 | 56.3\% | 46.1\% | \$5,094 | 69.0\% | 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 | 115 | 100.0\% | \$17,875 | 100.0\% | 100.0\% | 67 | 100.0\% | 100.0\% | \$10,490 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$7,385 | 100.0\% | 100.0\% |
|  | Low | 1 | 2.7\% | \$3 | 1.2\% | 1.6\% | 1 | 7.1\% | 0.6\% | \$3 | 2.7\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 6 | 16.2\% | \$47 | 18.6\% | 17.3\% | 2 | 14.3\% | 7.7\% | \$22 | 20.0\% | 3.5\% | 4 | 17.4\% | 8.5\% | \$25 | 17.5\% | 6.7\% |
|  | Middle | 20 | 54.1\% | \$136 | 53.8\% | 55.5\% | 6 | 42.9\% | 53.5\% | \$37 | 33.6\% | 42.2\% | 14 | 60.9\% | 65.6\% | \$99 | 69.2\% | 54.1\% |
|  | Upper | 10 | 27.0\% | \$67 | 26.5\% | 25.6\% | 5 | 35.7\% | 38.1\% | \$48 | 43.6\% | 54.4\% | 5 | 21.7\% | 25.4\% | \$19 | 13.3\% | 39.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 37 | 100.0\% | \$253 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$110 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$143 | 100.0\% | 100.0\% |
|  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 3.5\% | 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\% | 19.2\% | 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\% | 50.5\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 94.7\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 26.8\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 5.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 1 | 0.5\% | \$3 | 0.0\% | 1.6\% | 1 | 0.9\% | 0.6\% | \$3 | 0.0\% | 0.2\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.6\% |
|  | Moderate | 19 | 9.0\% | \$1,030 | 3.7\% | 17.3\% | 6 | 5.7\% | 6.8\% | \$394 | 2.6\% | 4.1\% | 13 | 12.5\% | 8.5\% | \$636 | 5.0\% | 5.5\% |
|  | Middle | 94 | 44.8\% | \$9,037 | 32.6\% | 55.5\% | 54 | 50.9\% | 48.4\% | \$6,197 | 41.6\% | 42.1\% | 40 | 38.5\% | 46.8\% | \$2,840 | 22.1\% | 38.9\% |
|  | Upper | 96 | 45.7\% | \$17,679 | 63.7\% | 25.6\% | 45 | 42.5\% | 44.3\% | \$8,310 | 55.8\% | 53.6\% | 51 | 49.0\% | 43.7\% | \$9,369 | 72.9\% | 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 | 210 | 100.0\% | \$27,749 | 100.0\% | 100.0\% | 106 | 100.0\% | 100.0\% | \$14,904 | 100.0\% | 100.0\% | 104 | 100.0\% | 100.0\% | \$12,845 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 24 | 4.8\% | \$2,728 | 8.0\% | 2.9\% | 13 | 6.4\% | 3.4\% | \$1,447 | 7.6\% | 5.7\% | 11 | 3.7\% | 3.2\% | \$1,281 | 8.7\% | 6.3\% |
|  | Moderate | 48 | 9.6\% | \$4,715 | 13.9\% | 16.2\% | 17 | 8.4\% | 10.8\% | \$2,551 | 13.3\% | 11.2\% | 31 | 10.4\% | 10.1\% | \$2,164 | 14.6\% | 14.4\% |
|  | Middle | 242 | 48.2\% | \$14,697 | 43.3\% | 52.7\% | 106 | 52.2\% | 47.4\% | \$8,809 | 46.0\% | 48.9\% | 136 | 45.5\% | 47.4\% | \$5,888 | 39.9\% | 43.5\% |
|  | Upper | 188 | 37.5\% | \$11,796 | 34.8\% | 28.3\% | 67 | 33.0\% | 34.2\% | \$6,357 | 33.2\% | 32.8\% | 121 | 40.5\% | 36.5\% | \$5,439 | 36.8\% | 35.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.2\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 0.9\% |
|  | Total | 502 | 100.0\% | \$33,936 | 100.0\% | 100.0\% | 203 | 100.0\% | 100.0\% | \$19,164 | 100.0\% | 100.0\% | 299 | 100.0\% | 100.0\% | \$14,772 | 100.0\% | 100.0\% |
|  | 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 | 3 | 50.0\% | \$490 | 50.2\% | 14.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 3 | 75.0\% | 50.0\% | \$490 | 91.6\% | 54.5\% |
|  | Middle | 2 | 33.3\% | \$345 | 35.3\% | 69.0\% | 1 | 50.0\% | 55.6\% | \$300 | 68.0\% | 70.3\% | 1 | 25.0\% | 20.0\% | \$45 | 8.4\% | 37.6\% |
|  | Upper | 1 | 16.7\% | \$141 | 14.4\% | 16.1\% | 1 | 50.0\% | 44.4\% | \$141 | 32.0\% | 29.7\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 7.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 6 | 100.0\% | \$976 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$441 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$535 | 100.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: AL Gadsden


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## Appendices

## Combined Demographics Report

Assessment Area: AL Montgomery


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AL Montgomery

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | B |  | ank $\$(000 s)$ | \$ \% | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( ${ }^{\text {Bank }}$ | Dollar k \$ \% | Agg \$ \% | \# | Count <br> ank <br> \% | Agg $\%$ | Ba \$ (000s) | Dollar k \$ \% | Agg \$ \% |
|  | Low | 1 | 0.3\% | \$73 | 0.1\% | 3.6\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.1\% | 1 | 0.6\% | 0.3\% | \$73 | 0.3\% | 0.1\% |
|  | Moderate | 14 | 3.5\% | \$1,235 | 1.9\% | 14.4\% | 9 | 4.0\% | 4.7\% | \$755 | 2.1\% | 2.5\% | 5 | 2.8\% | 4.3\% | \$480 | 1.7\% | 2.1\% |
|  | Middle | 191 | 47.9\% | \$25,421 | 39.4\% | 51.9\% | 106 | 47.5\% | 47.0\% | \$14,917 | 40.8\% | 41.8\% | 85 | 48.3\% | 50.5\% | \$10,504 | 37.7\% | 44.3\% |
|  | Upper | 193 | 48.4\% | \$37,740 | 58.5\% | 30.2\% | 108 | 48.4\% | 47.9\% | \$20,910 | 57.2\% | 55.6\% | 85 | 48.3\% | 44.9\% | \$16,830 | 60.4\% | 53.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 399 | 100.0\% | \$64,469 | 100.0\% | 100.0\% | 223 | 100.0\% | 100.0\% | \$36,582 | 100.0\% | 100.0\% | 176 | 100.0\% | 100.0\% | \$27,887 | 100.0\% | 100.0\% |
|  | Low | 3 | 0.3\% | \$156 | 0.1\% | 3.6\% | 1 | 0.2\% | 0.4\% | \$28 | 0.0\% | 0.2\% | 2 | 0.5\% | 0.4\% | \$128 | 0.2\% | 0.2\% |
|  | Moderate | 49 | 4.9\% | \$4,162 | 2.6\% | 14.4\% | 27 | 4.5\% | 3.1\% | \$2,583 | 2.5\% | 1.7\% | 22 | 5.5\% | 3.7\% | \$1,579 | 2.6\% | 2.2\% |
|  | Middle | 477 | 47.7\% | \$72,135 | 44.6\% | 51.9\% | 283 | 47.4\% | 46.6\% | \$45,016 | 44.1\% | 41.6\% | 194 | 48.3\% | 46.7\% | \$27,119 | 45.4\% | 42.2\% |
|  | Upper | 470 | 47.0\% | \$85,300 | 52.7\% | 30.2\% | 286 | 47.9\% | 49.9\% | \$54,446 | 53.3\% | 56.6\% | 184 | 45.8\% | 49.2\% | \$30,854 | 51.7\% | 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 | 999 | 100.0\% | \$161,753 | 100.0\% | 100.0\% | 597 | 100.0\% | 100.0\% | \$102,073 | 100.0\% | 100.0\% | 402 | 100.0\% | 100.0\% | \$59,680 | 100.0\% | 100.0\% |
|  | Low | 9 | 6.9\% | \$42 | 3.6\% | 3.6\% | 3 | 4.7\% | 1.9\% | \$12 | 2.3\% | 0.7\% | 6 | 9.0\% | 1.2\% | \$30 | 4.6\% | 0.9\% |
|  | Moderate | 15 | 11.5\% | \$92 | 7.9\% | 14.4\% | 7 | 10.9\% | 9.1\% | \$51 | 9.9\% | 3.8\% | 8 | 11.9\% | 5.0\% | \$41 | 6.3\% | 4.5\% |
|  | Middle | 66 | 50.4\% | \$598 | 51.4\% | 51.9\% | 31 | 48.4\% | 57.6\% | \$236 | 45.6\% | 50.8\% | 35 | 52.2\% | 77.8\% | \$362 | 56.0\% | 54.5\% |
|  | Upper | 41 | 31.3\% | \$431 | 37.1\% | 30.2\% | 23 | 35.9\% | 31.4\% | \$218 | 42.2\% | 44.7\% | 18 | 26.9\% | 16.0\% | \$213 | 33.0\% | 40.1\% |
|  | 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 | 131 | 100.0\% | \$1,163 | 100.0\% | 100.0\% | 64 | 100.0\% | 100.0\% | \$517 | 100.0\% | 100.0\% | 67 | 100.0\% | 100.0\% | \$646 | 100.0\% | 100.0\% |
|  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 16.8\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 18.9\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 13.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.3\% | \$0 | 0.0\% | 1.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 33.3\% | 0 | 0.0\% | 26.7\% | \$0 | 0.0\% | 10.8\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 37.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 36.6\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 87.7\% | 0 | 0.0\% | 43.8\% | \$0 | 0.0\% | 42.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 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\% |
|  | Low | 13 | 0.9\% | \$271 | 0.1\% | 3.6\% | 4 | 0.5\% | 0.4\% | \$40 | 0.0\% | 0.2\% | 9 | 1.4\% | 0.4\% | \$231 | 0.3\% | 1.2\% |
|  | Moderate | 78 | 5.1\% | \$5,489 | 2.4\% | 14.4\% | 43 | 4.9\% | 3.9\% | \$3,389 | 2.4\% | 1.9\% | 35 | 5.4\% | 4.1\% | \$2,100 | 2.4\% | 2.1\% |
|  | Middle | 734 | 48.0\% | \$98,154 | 43.2\% | 51.9\% | 420 | 47.5\% | 47.0\% | \$60,169 | 43.2\% | 40.7\% | 314 | 48.7\% | 50.3\% | \$37,985 | 43.1\% | 42.9\% |
|  | Upper | 704 | 46.0\% | \$123,471 | 54.3\% | 30.2\% | 417 | 47.2\% | 48.6\% | \$75,574 | 54.3\% | 57.2\% | 287 | 44.5\% | 45.3\% | \$47,897 | 54.3\% | 53.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,529 | 100.0\% | \$227,385 | 100.0\% | 100.0\% | 884 | 100.0\% | 100.0\% | \$139,172 | 100.0\% | 100.0\% | 645 | 100.0\% | 100.0\% | \$88,213 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 236 | 15.1\% | \$22,600 | 16.1\% | 9.0\% | 71 | 15.5\% | 11.6\% | \$10,059 | 15.0\% | 18.2\% | 165 | 14.9\% | 12.1\% | \$12,541 | 17.0\% | 16.7\% |
|  | Moderate | 191 | 12.2\% | \$17,452 | 12.4\% | 11.5\% | 66 | 14.4\% | 10.4\% | \$7,828 | 11.7\% | 9.9\% | 125 | 11.3\% | 9.6\% | \$9,624 | 13.1\% | 11.6\% |
|  | Middle | 527 | 33.6\% | \$39,697 | 28.2\% | 43.5\% | 136 | 29.7\% | 33.4\% | \$18,909 | 28.2\% | 26.4\% | 391 | 35.3\% | 34.2\% | \$20,788 | 28.2\% | 26.7\% |
|  | Upper | 613 | 39.1\% | \$60,893 | 43.3\% | 35.9\% | 185 | 40.4\% | 41.5\% | \$30,246 | 45.1\% | 44.8\% | 428 | 38.6\% | 41.9\% | \$30,647 | 41.6\% | 44.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 1,567 | 100.0\% | \$140,642 | 100.0\% | 100.0\% | 458 | 100.0\% | 100.0\% | \$67,042 | 100.0\% | 100.0\% | 1,109 | 100.0\% | 100.0\% | \$73,600 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 13.3\% | \$505 | 34.0\% | 7.4\% | 0 | 0.0\% | 8.0\% | \$0 | 0.0\% | 5.4\% | 2 | 15.4\% | 5.4\% | \$505 | 37.3\% | 14.7\% |
|  | Middle | 6 | 40.0\% | \$108 | 7.3\% | 65.7\% | 1 | 50.0\% | 50.0\% | \$30 | 23.1\% | 68.2\% | 5 | 38.5\% | 53.6\% | \$78 | 5.8\% | 57.4\% |
|  | Upper | 7 | 46.7\% | \$871 | 58.7\% | 25.0\% | 1 | 50.0\% | 34.0\% | \$100 | 76.9\% | 25.6\% | 6 | 46.2\% | 35.7\% | \$771 | 56.9\% | 27.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 8.0\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 5.4\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 15 | 100.0\% | \$1,484 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$130 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$1,354 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: AL Montgomery

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Families | Count |  |  | Dolla |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Income | Bank |  | Agg | Bank |  | Agg | Bank |  | gg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 56 | 14.0\% | \$4,681 | 7.3\% | 21.1\% | 32 | 14.3\% | 11.6\% | \$2,859 | 7.8\% | 5.9\% | 24 | 13.6\% | 10.2\% | \$1,822 | 6.5\% | 5.2\% |
|  | M oderate | 100 | 25.1\% | \$12,448 | 19.3\% | 17.0\% | 58 | 26.0\% | 22.7\% | \$7,463 | 20.4\% | 16.7\% | 42 | 23.9\% | 21.8\% | \$4,985 | 17.9\% | 16.5\% |
|  | Middle | 94 | 23.6\% | \$13,856 | 21.5\% | 21.1\% | 52 | 23.3\% | 20.2\% | \$7,860 | 21.5\% | 19.7\% | 42 | 23.9\% | 22.1\% | \$5,996 | 21.5\% | 21.0\% |
|  | Upper | 147 | 36.8\% | \$33,296 | 51.6\% | 40.8\% | 81 | 36.3\% | 28.3\% | \$18,400 | 50.3\% | 40.1\% | 66 | 37.5\% | 28.3\% | \$14,896 | 53.4\% | 41.0\% |
|  | Unknown | 2 | 0.5\% | \$188 | 0.3\% | 0.0\% | 0 | 0.0\% | 17.2\% | \$0 | 0.0\% | 17.5\% | 2 | 1.1\% | 17.5\% | \$188 | 0.7\% | 16.3\% |
|  | Total | 399 | 100.0\% | \$64,469 | 100.0\% | 100.0\% | 223 | 100.0\% | 100.0\% | \$36,582 | 100.0\% | 100.0\% | 176 | 100.0\% | 100.0\% | \$27,887 | 100.0\% | 100.0\% |
|  | Low | 71 | 7.1\% | \$5,393 | 3.3\% | 21.1\% | 35 | 5.9\% | 4.6\% | \$2,819 | 2.8\% | 2.3\% | 36 | 9.0\% | 4.2\% | \$2,574 | 4.3\% | 2.2\% |
|  | M oderate | 147 | 14.7\% | \$15,713 | 9.7\% | 17.0\% | 80 | 13.4\% | 11.9\% | \$8,232 | 8.1\% | 7.9\% | 67 | 16.7\% | 12.2\% | \$7,481 | 12.5\% | 8.2\% |
|  | Middle | 290 | 29.0\% | \$39,065 | 24.2\% | 21.1\% | 176 | 29.5\% | 18.6\% | \$24,216 | 23.7\% | 15.2\% | 114 | 28.4\% | 19.0\% | \$14,849 | 24.9\% | 15.8\% |
|  | Upper | 465 | 46.5\% | \$96,355 | 59.6\% | 40.8\% | 294 | 49.2\% | 40.9\% | \$64,783 | 63.5\% | 50.8\% | 171 | 42.5\% | 38.0\% | \$31,572 | 52.9\% | 46.6\% |
|  | Unknown | 26 | 2.6\% | \$5,227 | 3.2\% | 0.0\% | 12 | 2.0\% | 24.0\% | \$2,023 | 2.0\% | 23.9\% | 14 | 3.5\% | 26.7\% | \$3,204 | 5.4\% | 27.3\% |
|  | Total | 999 | 100.0\% | \$161,753 | 100.0\% | 100.0\% | 597 | 100.0\% | 100.0\% | \$102,073 | 100.0\% | 100.0\% | 402 | 100.0\% | 100.0\% | \$59,680 | 100.0\% | 100.0\% |
|  | Low | 31 | 23.7\% | \$144 | 12.4\% | 21.1\% | 13 | 20.3\% | 15.5\% | \$71 | 13.7\% | 6.2\% | 18 | 26.9\% | 19.6\% | \$73 | 11.3\% | 6.9\% |
|  | Moderate | 33 | 25.2\% | \$232 | 19.9\% | 17.0\% | 21 | 32.8\% | 26.5\% | \$140 | 27.1\% | 17.3\% | 12 | 17.9\% | 26.4\% | \$92 | 14.2\% | 17.0\% |
|  | Middle | 31 | 23.7\% | \$278 | 23.9\% | 21.1\% | 15 | 23.4\% | 22.8\% | \$138 | 26.7\% | 16.1\% | 16 | 23.9\% | 23.3\% | \$140 | 21.7\% | 21.8\% |
|  | Upper | 35 | 26.7\% | \$499 | 42.9\% | 40.8\% | 15 | 23.4\% | 30.6\% | \$168 | 32.5\% | 50.7\% | 20 | 29.9\% | 25.7\% | \$331 | 51.2\% | 41.8\% |
|  | Unknown | 1 | 0.8\% | \$10 | 0.9\% | 0.0\% | 0 | 0.0\% | 4.6\% | \$0 | 0.0\% | 9.6\% | 1 | 1.5\% | 5.0\% | \$10 | 1.5\% | 12.4\% |
|  | Total | 131 | 100.0\% | \$1,163 | 100.0\% | 100.0\% | 64 | 100.0\% | 100.0\% | \$517 | 100.0\% | 100.0\% | 67 | 100.0\% | 100.0\% | \$646 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 21.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.0\% | 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\% | 21.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 158 | 10.3\% | \$10,218 | 4.5\% | 21.1\% | 80 | 9.0\% | 7.6\% | \$5,749 | 4.1\% | 3.6\% | 78 | 12.1\% | 7.6\% | \$4,469 | 5.1\% | 3.2\% |
|  | M oderate | 280 | 18.3\% | \$28,393 | 12.5\% | 17.0\% | 159 | 18.0\% | 16.5\% | \$15,835 | 11.4\% | 10.9\% | 121 | 18.8\% | 16.9\% | \$12,558 | 14.2\% | 11.0\% |
|  | Middle | 415 | 27.1\% | \$53,199 | 23.4\% | 21.1\% | 243 | 27.5\% | 19.3\% | \$32,214 | 23.1\% | 16.3\% | 172 | 26.7\% | 20.5\% | \$20,985 | 23.8\% | 17.0\% |
|  | Upper | 647 | 42.3\% | \$130,150 | 57.2\% | 40.8\% | 390 | 44.1\% | 35.6\% | \$83,351 | 59.9\% | 45.1\% | 257 | 39.8\% | 33.3\% | \$46,799 | 53.1\% | 41.9\% |
|  | Unknown | 29 | 1.9\% | \$5,425 | 2.4\% | 0.0\% | 12 | 1.4\% | 20.9\% | \$2,023 | 1.5\% | 24.1\% | 17 | 2.6\% | 21.7\% | \$3,402 | 3.9\% | 26.8\% |
|  | Total | 1,529 | 100.0\% | \$227,385 | 100.0\% | 100.0\% | 884 | 100.0\% | 100.0\% | \$139,172 | 100.0\% | 100.0\% | 645 | 100.0\% | 100.0\% | \$88,213 | 100.0\% | 100.0\% |
|  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 417 | 26.6\% | \$48,545 | 34.5\% | 88.7\% | 217 | 47.4\% | 36.8\% | \$24,619 | 36.7\% | 45.7\% | 200 | 18.0\% | 39.3\% | \$23,926 | 32.5\% | 42.3\% |
|  | Over \$1 Million | 259 | 16.5\% | \$62,900 | 44.7\% | 6.0\% | 131 | 28.6\% |  |  |  |  | 128 | 11.5\% |  |  |  |  |
|  | Total Rev. available | 676 | 43.1\% | \$111,445 | 79.2\% | 94.7\% | 348 | 76.0\% |  |  |  |  | 328 | 29.5\% |  |  |  |  |
|  | Rev. Not Known | 891 | 56.9\% | \$29,197 | 20.8\% | 5.3\% | 110 | 24.0\% |  |  |  |  | 781 | 70.4\% |  |  |  |  |
|  | Total | 1,567 | 100.0\% | \$140,642 | 100.0\% | 100.0\% | 458 | 100.0\% |  |  |  |  | 1,109 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 1,276 | 81.4\% | \$35,627 | 25.3\% |  | 313 | 68.3\% | 85.5\% | \$13,637 | 20.3\% | 24.4\% | 963 | 86.8\% | 87.4\% | \$21,990 | 29.9\% | 26.0\% |
|  | \$100,001-\$250,000 | 141 | 9.0\% | \$24,869 | 17.7\% |  | 71 | 15.5\% | 7.3\% | \$12,818 | 19.1\% | 19.3\% | 70 | 6.3\% | 6.4\% | \$12,051 | 16.4\% | 19.4\% |
|  | Million | 150 | 9.6\% | \$80,146 | 57.0\% |  | 74 | 16.2\% | 7.2\% | \$40,587 | 60.5\% | 56.2\% | 76 | 6.9\% | 6.2\% | \$39,559 | 53.7\% | 54.6\% |
|  | Total | 1,567 | 100.0\% | \$140,642 | 100.0\% |  | 458 | 100.0\% | 100.0\% | \$67,042 | 100.0\% | 100.0\% | 1,109 | 100.0\% | 100.0\% | \$73,600 | 100.0\% | 100.0\% |
|  <br> $\underset{\sim}{\underset{\sim}{2}}$ $\qquad$ $\stackrel{N}{0}$ 둔 | \$1 MilOver \$Not KTotal | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 8 | 53.3\% | \$1,315 | 88.6\% | 95.6\% | 1 | 50.0\% | 76.0\% | \$30 | 23.1\% | 94.0\% | 7 | 53.8\% | 71.4\% | \$1,285 | 94.9\% | 95.9\% |
|  |  | 1 | 6.7\% | \$100 | 6.7\% | 2.7\% | 1 | 50.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 6 | 40.0\% | \$69 | 4.6\% | 1.8\% | 0 | 0.0\% |  |  |  |  | 6 | 46.2\% |  |  |  |  |
|  |  | 15 | 100.0\% | \$1,484 | 100.0\% | 100.0\% | 2 | 100.0\% |  |  |  |  | 13 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 12 | 80.0\% | \$529 | 35.6\% |  | 2 | 100.0\% | 78.0\% | \$130 | 100.0\% | 32.1\% | 10 | 76.9\% | 73.2\% | \$399 | 29.5\% | 25.2\% |
|  | \$100,001-\$250,000 | 1 | 6.7\% | \$150 | 10.1\% |  | 0 | 0.0\% | 18.0\% | \$0 | 0.0\% | 42.8\% | 1 | 7.7\% | 17.9\% | \$150 | 11.1\% | 36.7\% |
|  | \$250,001-\$500,000 | 2 | 13.3\% | \$805 | 54.2\% |  | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 25.0\% | 2 | 15.4\% | 8.9\% | \$805 | 59.5\% | 38.0\% |
|  | Total | 15 | 100.0\% | \$1,484 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$130 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$1,354 | 100.0\% | 100.0\% |

[^295]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: AL Northern AL


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AL Northern AL

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | B |  | $\begin{aligned} & \text { Doll } \\ & \$(\mathbf{0 0 0} \mathbf{s}) \end{aligned}$ | \$\% | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar k \$ \% | Agg \$ \% | \# | Count <br> ank <br> \% | Agg $\%$ | ( ${ }^{\text {Ba }}$ | Dollar k \$ \% | Agg \$ \% |
|  | 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 | 200 | 81.0\% | \$26,356 | 72.2\% | 88.4\% | 101 | 78.9\% | 81.7\% | \$13,341 | 69.9\% | 76.4\% | 99 | 83.2\% | 82.4\% | \$13,015 | 74.8\% | 77.7\% |
|  | Upper | 47 | 19.0\% | \$10,144 | 27.8\% | 11.6\% | 27 | 21.1\% | 18.3\% | \$5,751 | 30.1\% | 23.6\% | 20 | 16.8\% | 17.6\% | \$4,393 | 25.2\% | 22.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 247 | 100.0\% | \$36,500 | 100.0\% | 100.0\% | 128 | 100.0\% | 100.0\% | \$19,092 | 100.0\% | 100.0\% | 119 | 100.0\% | 100.0\% | \$17,408 | 100.0\% | 100.0\% |
|  | 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 | 486 | 80.3\% | \$69,069 | 78.8\% | 88.4\% | 286 | 79.9\% | 82.9\% | \$41,342 | 78.3\% | 80.7\% | 200 | 81.0\% | 83.4\% | \$27,727 | 79.4\% | 80.7\% |
|  | Upper | 119 | 19.7\% | \$18,633 | 21.2\% | 11.6\% | 72 | 20.1\% | 17.1\% | \$11,453 | 21.7\% | 19.3\% | 47 | 19.0\% | 16.6\% | \$7,180 | 20.6\% | 19.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 605 | 100.0\% | \$87,702 | 100.0\% | 100.0\% | 358 | 100.0\% | 100.0\% | \$52,795 | 100.0\% | 100.0\% | 247 | 100.0\% | 100.0\% | \$34,907 | 100.0\% | 100.0\% |
|  | 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 | 87 | 82.1\% | \$660 | 78.1\% | 88.4\% | 36 | 83.7\% | 89.1\% | \$252 | 81.6\% | 86.8\% | 51 | 81.0\% | 88.2\% | \$408 | 76.1\% | 81.7\% |
|  | Upper | 19 | 17.9\% | \$185 | 21.9\% | 11.6\% | 7 | 16.3\% | 10.9\% | \$57 | 18.4\% | 13.2\% | 12 | 19.0\% | 11.8\% | \$128 | 23.9\% | 18.3\% |
|  | 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 | 106 | 100.0\% | \$845 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$309 | 100.0\% | 100.0\% | 63 | 100.0\% | 100.0\% | \$536 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | ily 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\% | 90.6\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 91.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 9.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 8.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 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\% |
|  | 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 | 773 | 80.7\% | \$96,085 | 76.8\% | 88.4\% | 423 | 80.0\% | 82.8\% | \$54,935 | 76.1\% | 79.7\% | 350 | 81.6\% | 83.3\% | \$41,150 | 77.9\% | 79.7\% |
|  | Upper | 185 | 19.3\% | \$28,962 | 23.2\% | 11.6\% | 106 | 20.0\% | 17.2\% | \$17,261 | 23.9\% | 20.3\% | 79 | 18.4\% | 16.7\% | \$11,701 | 22.1\% | 20.3\% |
|  | 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 | 958 | 100.0\% | \$125,047 | 100.0\% | 100.0\% | 529 | 100.0\% | 100.0\% | \$72,196 | 100.0\% | 100.0\% | 429 | 100.0\% | 100.0\% | \$52,851 | 100.0\% | 100.0\% |
|  |  |  |  |  | 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 | 989 | 80.8\% | \$68,394 | 76.4\% | 87.5\% | 369 | 82.7\% | 78.6\% | \$31,000 | 79.9\% | 78.4\% | 620 | 79.7\% | 79.1\% | \$37,394 | 73.7\% | 71.4\% |
|  | Upper | 232 | 19.0\% | \$21,086 | 23.6\% | 12.5\% | 75 | 16.8\% | 15.3\% | \$7,765 | 20.0\% | 18.1\% | 157 | 20.2\% | 16.5\% | \$13,321 | 26.3\% | 26.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 3 | 0.2\% | \$50 | 0.1\% |  | 2 | 0.4\% | 6.1\% | \$30 | 0.1\% | 3.5\% | 1 | 0.1\% | 4.3\% | \$20 | 0.0\% | 1.8\% |
|  | Total | 1,224 | 100.0\% | \$89,530 | 100.0\% | 100.0\% | 446 | 100.0\% | 100.0\% | \$38,795 | 100.0\% | 100.0\% | 778 | 100.0\% | 100.0\% | \$50,735 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | nall 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 | 25 | 75.8\% | \$1,915 | 84.1\% | 92.6\% | 7 | 77.8\% | 86.6\% | \$1,040 | 92.9\% | 87.4\% | 18 | 75.0\% | 85.2\% | \$875 | 75.6\% | 85.2\% |
|  | Upper | 8 | 24.2\% | \$363 | 15.9\% | 7.4\% | 2 | 22.2\% | 13.4\% | \$80 | 7.1\% | 12.6\% | 6 | 25.0\% | 14.8\% | \$283 | 24.4\% | 14.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 33 | 100.0\% | \$2,278 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$1,120 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$1,158 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: AL Northern AL


[^297]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: AL Southern AL


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AL Southern AL


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: AL Southern AL

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ | $\begin{aligned} & 3 \text { Dank } \\ & \$(000 \mathrm{~s}) \end{aligned}$ | \$ \% | Families by Family Income <br> \% |  | Count ank $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \mathrm{Ba} \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar <br> k \$ \% | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  |  |  | Low | 9 | 9.2\% | \$591 | 5.0\% | 29.7\% | 5 | 8.5\% | 6.6\% | \$354 | 4.8\% | 3.3\% | 4 | 10.3\% | 8.1\% | \$237 | 5.3\% | 4.0\% |
|  |  | Moderate | 16 | 16.3\% | \$1,475 | 12.4\% | 16.2\% | 11 | 18.6\% | 23.2\% | \$948 | 12.8\% | 17.5\% | 5 | 12.8\% | 17.2\% | \$527 | 11.7\% | 13.2\% |
|  |  | Middle | 23 | 23.5\% | \$2,485 | 20.8\% | 18.0\% | 8 | 13.6\% | 23.7\% | \$992 | 13.4\% | 24.1\% | 15 | 38.5\% | 24.5\% | \$1,493 | 33.1\% | 24.1\% |
|  |  | Upper | 49 | 50.0\% | \$7,278 | 61.0\% | 36.1\% | 35 | 59.3\% | 38.8\% | \$5,127 | 69.1\% | 47.0\% | 14 | 35.9\% | 33.0\% | \$2,151 | 47.7\% | 45.4\% |
|  |  | Unknown | 1 | 1.0\% | \$103 | 0.9\% | 0.0\% | 0 | 0.0\% | 7.6\% | \$0 | 0.0\% | 8.1\% | 1 | 2.6\% | 17.2\% | \$103 | 2.3\% | 13.4\% |
|  |  | Total | 98 | 100.0\% | \$11,932 | 100.0\% | 100.0\% | 59 | 100.0\% | 100.0\% | \$7,421 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$4,511 | 100.0\% | 100.0\% |
|  |  | Low | 10 | 4.1\% | \$447 | 1.6\% | 29.7\% | 7 | 4.4\% | 5.3\% | \$212 | 1.2\% | 2.1\% | 3 | 3.5\% | 3.6\% | \$235 | 2.3\% | 1.6\% |
|  |  | Moderate | 27 | 11.1\% | \$1,883 | 6.7\% | 16.2\% | 19 | 12.0\% | 10.7\% | \$1,271 | 7.1\% | 7.3\% | 8 | 9.3\% | 6.9\% | \$612 | 6.0\% | 4.6\% |
|  |  | Middle | 62 | 25.4\% | \$5,878 | 20.9\% | 18.0\% | 44 | 27.8\% | 20.9\% | \$4,450 | 24.9\% | 17.9\% | 18 | 20.9\% | 21.1\% | \$1,428 | 14.0\% | 17.9\% |
|  |  | Upper | 143 | 58.6\% | \$19,632 | 69.9\% | 36.1\% | 86 | 54.4\% | 50.7\% | \$11,688 | 65.4\% | 58.5\% | 57 | 66.3\% | 53.9\% | \$7,944 | 77.7\% | 62.2\% |
|  |  | Unknown | 2 | 0.8\% | \$262 | 0.9\% | 0.0\% | 2 | 1.3\% | 12.4\% | \$262 | 1.5\% | 14.2\% | 0 | 0.0\% | 14.4\% | \$0 | 0.0\% | 13.7\% |
|  |  | Total | 244 | 100.0\% | \$28,102 | 100.0\% | 100.0\% | 158 | 100.0\% | 100.0\% | \$17,883 | 100.0\% | 100.0\% | 86 | 100.0\% | 100.0\% | \$10,219 | 100.0\% | 100.0\% |
|  |  | Low | 18 | 15.0\% | \$68 | 7.8\% | 29.7\% | 10 | 20.0\% | 16.0\% | \$43 | 11.0\% | 7.7\% | 8 | 11.4\% | 12.4\% | \$25 | 5.3\% | 4.2\% |
|  |  | Moderate | 28 | 23.3\% | \$159 | 18.3\% | 16.2\% | 9 | 18.0\% | 18.7\% | \$80 | 20.5\% | 11.1\% | 19 | 27.1\% | 20.3\% | \$79 | 16.6\% | 7.8\% |
|  |  | Middle | 27 | 22.5\% | \$141 | 16.3\% | 18.0\% | 9 | 18.0\% | 21.7\% | \$54 | 13.8\% | 21.4\% | 18 | 25.7\% | 24.8\% | \$87 | 18.3\% | 20.3\% |
|  |  | Upper | 45 | 37.5\% | \$489 | 56.4\% | 36.1\% | 21 | 42.0\% | 41.0\% | \$210 | 53.7\% | 56.6\% | 24 | 34.3\% | 37.9\% | \$279 | 58.6\% | 61.5\% |
|  |  | Unknown | 2 | 1.7\% | \$10 | 1.2\% | 0.0\% | 1 | 2.0\% | 2.7\% | \$4 | 1.0\% | 3.2\% | 1 | 1.4\% | 4.5\% | \$6 | 1.3\% | 6.2\% |
|  |  | Total | 120 | 100.0\% | \$867 | 100.0\% | 100.0\% | 50 | 100.0\% | 100.0\% | \$391 | 100.0\% | 100.0\% | 70 | 100.0\% | 100.0\% | \$476 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 29.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 16.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 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\% | 36.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 37 | 8.0\% | \$1,106 | 2.7\% | 29.7\% | 22 | 8.2\% | 6.8\% | \$609 | 2.4\% | 2.6\% | 15 | 7.7\% | 6.0\% | \$497 | 3.3\% | 2.5\% |
|  |  | Moderate | 71 | 15.4\% | \$3,517 | 8.6\% | 16.2\% | 39 | 14.6\% | 15.4\% | \$2,299 | 8.9\% | 10.5\% | 32 | 16.4\% | 11.8\% | \$1,218 | 8.0\% | 7.6\% |
|  |  | Middle | 112 | 24.2\% | \$8,504 | 20.8\% | 18.0\% | 61 | 22.8\% | 21.8\% | \$5,496 | 21.4\% | 19.7\% | 51 | 26.2\% | 22.6\% | \$3,008 | 19.8\% | 20.1\% |
|  |  | Upper | 237 | 51.3\% | \$27,399 | 67.0\% | 36.1\% | 142 | 53.2\% | 45.9\% | \$17,025 | 66.3\% | 53.8\% | 95 | 48.7\% | 45.1\% | \$10,374 | 68.2\% | 56.4\% |
|  |  | Unknown | 5 | 1.1\% | \$375 | 0.9\% | 0.0\% | 3 | 1.1\% | 10.1\% | \$266 | 1.0\% | 13.4\% | 2 | 1.0\% | 14.5\% | \$109 | 0.7\% | 13.4\% |
|  |  | Total | 462 | 100.0\% | \$40,901 | 100.0\% | 100.0\% | 267 | 100.0\% | 100.0\% | \$25,695 | 100.0\% | 100.0\% | 195 | 100.0\% | 100.0\% | \$15,206 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Total | Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 130 | 30.8\% | \$7,249 | 29.8\% | 90.0\% | 56 | 48.3\% | 38.5\% | \$1,821 | 19.5\% | 50.6\% | 74 | 24.2\% | 40.7\% | \$5,428 | 36.1\% | 45.5\% |
|  |  | Over \$1 Million | 62 | 14.7\% | \$11,118 | 45.6\% | 4.7\% | 32 | 27.6\% |  |  |  |  | 30 | 9.8\% |  |  |  |  |
|  | $\underset{\sim}{\stackrel{\omega}{0}}$ | Total Rev. available | 192 | 45.5\% | \$18,367 | 75.4\% | 94.7\% | 88 | 75.9\% |  |  |  |  | 104 | 34.0\% |  |  |  |  |
|  | ๕ | Rev. Not Known | 230 | 54.5\% | \$5,997 | 24.6\% | 5.4\% | 28 | 24.1\% |  |  |  |  | 202 | 66.0\% |  |  |  |  |
|  |  | Total | 422 | 100.0\% | \$24,364 | 100.0\% | 100.0\% | 116 | 100.0\% |  |  |  |  | 306 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 378 | 89.6\% | \$10,358 | 42.5\% |  | 98 | 84.5\% | 93.3\% | \$3,738 | 40.0\% | 42.7\% | 280 | 91.5\% | 93.4\% | \$6,620 | 44.1\% | 39.6\% |
|  | ज | \$100,001-\$250,000 | 21 | 5.0\% | \$3,005 | 12.3\% |  | 9 | 7.8\% | 4.0\% | \$1,100 | 11.8\% | 18.1\% | 12 | 3.9\% | 3.5\% | \$1,905 | 12.7\% | 16.2\% |
|  | ธ్ర్ర | \$250,001-\$1 Million | 23 | 5.5\% | \$11,001 | 45.2\% |  | 9 | 7.8\% | 2.7\% | \$4,499 | 48.2\% | 39.2\% | 14 | 4.6\% | 3.1\% | \$6,502 | 43.3\% | 44.2\% |
|  |  | Total | 422 | 100.0\% | \$24,364 | 100.0\% |  | 116 | 100.0\% | 100.0\% | \$9,337 | 100.0\% | 100.0\% | 306 | 100.0\% | 100.0\% | \$15,027 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 13 | 61.9\% | \$2,525 | 72.9\% | 94.8\% | 7 | 70.0\% | 63.2\% | \$1,761 | 76.3\% | 67.6\% | 6 | 54.5\% | 73.5\% | \$764 | 66.2\% | 77.0\% |
|  |  | Over \$1 Million | 4 | 19.0\% | \$899 | 26.0\% | 4.9\% | 3 | 30.0\% |  |  |  |  | 1 | 9.1\% |  |  |  |  |
|  |  | Not Known | 4 | 19.0\% | \$39 | 1.1\% | 0.2\% | 0 | 0.0\% |  |  |  |  | 4 | 36.4\% |  |  |  |  |
|  |  | Total | 21 | 100.0\% | \$3,463 | 100.0\% | 100.0\% | 10 | 100.0\% |  |  |  |  | 11 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 8 | 38.1\% | \$173 | 5.0\% |  | 0 | 0.0\% | 78.9\% | \$0 | 0.0\% | 32.1\% | 8 | 72.7\% | 83.8\% | \$173 | 15.0\% | 38.5\% |
|  |  | \$100,001-\$250,000 | 5 | 23.8\% | \$797 | 23.0\% |  | 5 | 50.0\% | 14.5\% | \$797 | 34.5\% | 36.4\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 17.2\% |
|  | గ్ర్ | \$250,001-\$500,000 | 8 | 38.1\% | \$2,493 | 72.0\% |  | 5 | 50.0\% | 6.6\% | \$1,512 | 65.5\% | 31.5\% | 3 | 27.3\% | 8.8\% | \$981 | 85.0\% | 44.4\% |
|  |  | Total | 21 | 100.0\% | \$3,463 | 100.0\% |  | 10 | 100.0\% | 100.0\% | \$2,309 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$1,154 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: AL Tallapoosa-Talladega

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 7,010 | 20.7 |
| Moderate-income | 3 | 10.7 |  | 4.9 | 382 | 23.3 | 5,449 | 16.1 |
| Middle-income | 22 | 78.6 |  | 80.5 | 3,878 | 14.2 | 7,232 | 21.4 |
| Upper-income | 3 | 10.7 |  | 14.6 | 404 | 8.2 | 14,161 | 41.8 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 28 | 100.0 |  | 100.0 | 4,664 | 13.8 | 33,852 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 2,788 | 1,456 |  | 52.2 | 979 | 35.1 | 353 | 12.7 |
| Middle-income | 42,691 | 29,172 |  | 68.3 | 8,831 | 20.7 | 4,688 | 11.0 |
| Upper-income | 9,500 | 5,510 |  | 58.0 | 1,382 | 14.5 | 2,608 | 27.5 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 54,979 | 36,138 |  | 65.7 | 11,192 | 20.4 | 7,649 | 13.9 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 129 | 2.6 |  | 2.5 | 11 | 5.2 | 5 | 2.3 |
| Middle-income | 3,873 | 78.2 |  | 78.2 | 172 | 81.5 | 170 | 76.6 |
| Upper-income | 948 | 19.2 |  | 19.3 | 28 | 13.3 | 47 | 21.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 4,950 | 100.0 |  | 100.0 | 211 | 100.0 | 222 | 100.0 |
|  | Percentage of Total Businesses: |  |  | $91.3$ |  | 4.3 |  | 4.5 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 1 | 0.9 |  | 1.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 103 | 95.4 |  | 95.2 | 2 | 100.0 | 2 | 100.0 |
| Upper-income | 4 | 3.7 |  | 3.8 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 108 | 100.0 |  | 100.0 | 2 | 100.0 | 2 | 100.0 |
|  | Percentage of Total Farms: |  |  | 96.3 |  | 1.9 |  | 1.9 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AL Tallapoosa-Talladega

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison  <br> 2010  <br> 01  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  |  | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 1.5\% | \$25 | 0.2\% | 4.0\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 0.7\% | 1 | 2.9\% | 1.4\% | \$25 | 0.3\% | 0.4\% |
|  | Middle | 27 | 39.7\% | \$3,837 | 26.1\% | 80.7\% | 12 | 36.4\% | 75.3\% | \$1,404 | 20.5\% | 64.7\% | 15 | 42.9\% | 73.2\% | \$2,433 | 31.0\% | 63.6\% |
|  | Upper | 40 | 58.8\% | \$10,830 | 73.7\% | 15.2\% | 21 | 63.6\% | 23.1\% | \$5,442 | 79.5\% | 34.6\% | 19 | 54.3\% | 25.4\% | \$5,388 | 68.7\% | 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\% |
|  | Total | 68 | 100.0\% | \$14,692 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$6,846 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$7,846 | 100.0\% | 100.0\% |
|  | 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\% | 0.9\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.3\% |
|  | Middle | 92 | 68.7\% | \$13,461 | 54.0\% | 80.7\% | 60 | 71.4\% | 69.6\% | \$8,941 | 56.5\% | 59.0\% | 32 | 64.0\% | 69.2\% | \$4,520 | 49.7\% | 58.2\% |
|  | Upper | 42 | 31.3\% | \$11,458 | 46.0\% | 15.2\% | 24 | 28.6\% | 29.6\% | \$6,880 | 43.5\% | 40.5\% | 18 | 36.0\% | 30.1\% | \$4,578 | 50.3\% | 41.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 134 | 100.0\% | \$24,919 | 100.0\% | 100.0\% | 84 | 100.0\% | 100.0\% | \$15,821 | 100.0\% | 100.0\% | 50 | 100.0\% | 100.0\% | \$9,098 | 100.0\% | 100.0\% |
|  | 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 | 5.9\% | \$8 | 3.5\% | 4.0\% | 1 | 5.0\% | 3.2\% | \$3 | 2.6\% | 2.2\% | 1 | 7.1\% | 0.7\% | \$5 | 4.4\% | 0.1\% |
|  | Middle | 27 | 79.4\% | \$194 | 85.1\% | 80.7\% | 15 | 75.0\% | 72.9\% | \$89 | 77.4\% | 46.5\% | 12 | 85.7\% | 82.1\% | \$105 | 92.9\% | 60.8\% |
|  | Upper | 5 | 14.7\% | \$26 | 11.4\% | 15.2\% | 4 | 20.0\% | 23.9\% | \$23 | 20.0\% | 51.3\% | 1 | 7.1\% | 17.2\% | \$3 | 2.7\% | 39.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 34 | 100.0\% | \$228 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$115 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$113 | 100.0\% | 100.0\% |
| 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\% | 7.8\% | 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\% | 77.7\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 40.1\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 14.5\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 59.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 1.3\% | \$33 | 0.1\% | 4.0\% | 1 | 0.7\% | 1.2\% | \$3 | 0.0\% | 0.6\% | 2 | 2.0\% | 0.9\% | \$30 | 0.2\% | 0.4\% |
|  | Middle | 146 | 61.9\% | \$17,492 | 43.9\% | 80.7\% | 87 | 63.5\% | 71.7\% | \$10,434 | 45.8\% | 60.6\% | 59 | 59.6\% | 71.4\% | \$7,058 | 41.4\% | 60.7\% |
|  | Upper | 87 | 36.9\% | \$22,314 | 56.0\% | 15.2\% | 49 | 35.8\% | 27.1\% | \$12,345 | 54.2\% | 38.8\% | 38 | 38.4\% | 27.6\% | \$9,969 | 58.4\% | 39.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 236 | 100.0\% | \$39,839 | 100.0\% | 100.0\% | 137 | 100.0\% | 100.0\% | \$22,782 | 100.0\% | 100.0\% | 99 | 100.0\% | 100.0\% | \$17,057 | 100.0\% | 100.0\% |
|  | 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 | 8 | 4.2\% | \$1,429 | 5.6\% | 2.5\% | 4 | 6.5\% | 3.0\% | \$890 | 7.0\% | 3.1\% | 4 | 3.1\% | 1.8\% | \$539 | 4.3\% | 3.4\% |
|  | Middle | 158 | 83.6\% | \$22,642 | 89.1\% | 78.2\% | 52 | 83.9\% | 66.8\% | \$11,355 | 88.8\% | 74.0\% | 106 | 83.5\% | 70.6\% | \$11,287 | 89.4\% | 71.6\% |
|  | Upper | 23 | 12.2\% | \$1,340 | 5.3\% | 19.3\% | 6 | 9.7\% | 24.1\% | \$542 | 4.2\% | 20.2\% | 17 | 13.4\% | 23.1\% | \$798 | 6.3\% | 24.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 6.1\% | \$0 | 0.0\% | 2.8\% | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 0.8\% |
|  | Total | 189 | 100.0\% | \$25,411 | 100.0\% | 100.0\% | 62 | 100.0\% | 100.0\% | \$12,787 | 100.0\% | 100.0\% | 127 | 100.0\% | 100.0\% | \$12,624 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 43.6\% |
|  | Middle | 2 | 100.0\% | \$43 | 100.0\% | 95.2\% | 0 | 0.0\% | 88.9\% | \$0 | 0.0\% | 99.1\% | 2 | 100.0\% | 75.0\% | \$43 | 100.0\% | 51.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 3.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 5.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 11.1\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2 | 100.0\% | \$43 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: AL Tallapoosa-Talladega

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | B | Dollar |  | Families by Family Income | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar | Agg |  | Count ank | Agg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# |  | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  |  |  | Low | 2 | 2.9\% | \$84 | 0.6\% | 20.7\% | 1 | 3.0\% | 7.2\% | \$40 | 0.6\% | 2.9\% | 1 | 2.9\% | 5.9\% | \$44 | 0.6\% | 2.2\% |
|  |  | Moderate | 8 | 11.8\% | \$598 | 4.1\% | 16.1\% | 2 | 6.1\% | 17.7\% | \$159 | 2.3\% | 10.3\% | 6 | 17.1\% | 18.7\% | \$439 | 5.6\% | 11.1\% |
|  |  | Middle | 7 | 10.3\% | \$619 | 4.2\% | 21.4\% | 4 | 12.1\% | 23.7\% | \$364 | 5.3\% | 19.1\% | 3 | 8.6\% | 18.4\% | \$255 | 3.3\% | 14.2\% |
|  |  | Upper | 50 | 73.5\% | \$13,063 | 88.9\% | 41.8\% | 26 | 78.8\% | 45.0\% | \$6,283 | 91.8\% | 61.3\% | 24 | 68.6\% | 44.1\% | \$6,780 | 86.4\% | 60.6\% |
|  |  | Unknown | 1 | 1.5\% | \$328 | 2.2\% | 0.0\% | 0 | 0.0\% | 6.4\% | \$0 | 0.0\% | 6.4\% | 1 | 2.9\% | 12.9\% | \$328 | 4.2\% | 12.0\% |
|  |  | Total | 68 | 100.0\% | \$14,692 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$6,846 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$7,846 | 100.0\% | 100.0\% |
|  |  |  | Low | 8 | 6.0\% | \$307 | 1.2\% | 20.7\% | 5 | 6.0\% | 2.8\% | \$172 | 1.1\% | 1.2\% | 3 | 6.0\% | 4.0\% | \$135 | 1.5\% | 1.6\% |
|  |  | Moderate | 12 | 9.0\% | \$1,062 | 4.3\% | 16.1\% | 8 | 9.5\% | 11.0\% | \$783 | 4.9\% | 6.8\% | 4 | 8.0\% | 10.8\% | \$279 | 3.1\% | 5.9\% |
|  |  | Middle | 20 | 14.9\% | \$2,010 | 8.1\% | 21.4\% | 13 | 15.5\% | 20.0\% | \$1,171 | 7.4\% | 14.8\% | 7 | 14.0\% | 15.1\% | \$839 | 9.2\% | 10.6\% |
|  |  | Upper | 93 | 69.4\% | \$21,413 | 85.9\% | 41.8\% | 57 | 67.9\% | 46.8\% | \$13,568 | 85.8\% | 57.4\% | 36 | 72.0\% | 50.6\% | \$7,845 | 86.2\% | 61.6\% |
|  |  | Unknown | 1 | 0.7\% | \$127 | 0.5\% | 0.0\% | 1 | 1.2\% | 19.3\% | \$127 | 0.8\% | 19.8\% | 0 | 0.0\% | 19.6\% | \$0 | 0.0\% | 20.2\% |
|  |  | Total | 134 | 100.0\% | \$24,919 | 100.0\% | 100.0\% | 84 | 100.0\% | 100.0\% | \$15,821 | 100.0\% | 100.0\% | 50 | 100.0\% | 100.0\% | \$9,098 | 100.0\% | 100.0\% |
|  |  | Low | 3 | 8.8\% | \$11 | 4.8\% | 20.7\% | 2 | 10.0\% | 9.0\% | \$7 | 6.1\% | 1.6\% | 1 | 7.1\% | 9.3\% | \$4 | 3.5\% | 2.0\% |
|  |  | Moderate | 9 | 26.5\% | \$40 | 17.5\% | 16.1\% | 6 | 30.0\% | 18.1\% | \$25 | 21.7\% | 9.7\% | 3 | 21.4\% | 15.9\% | \$15 | 13.3\% | 5.4\% |
|  |  | Middle | 7 | 20.6\% | \$49 | 21.5\% | 21.4\% | 4 | 20.0\% | 20.6\% | \$24 | 20.9\% | 13.7\% | 3 | 21.4\% | 27.8\% | \$25 | 22.1\% | 27.5\% |
|  |  | Upper | 14 | 41.2\% | \$125 | 54.8\% | 41.8\% | 7 | 35.0\% | 48.4\% | \$56 | 48.7\% | 68.6\% | 7 | 50.0\% | 42.4\% | \$69 | 61.1\% | 60.8\% |
|  |  | Unknown | 1 | 2.9\% | \$3 | 1.3\% | 0.0\% | 1 | 5.0\% | 3.9\% | \$3 | 2.6\% | 6.5\% | 0 | 0.0\% | 4.6\% | \$0 | 0.0\% | 4.3\% |
|  |  | Total | 34 | 100.0\% | \$228 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$115 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$113 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 20.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 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\% | 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\% | 41.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 13 | 5.5\% | \$402 | 1.0\% | 20.7\% | 8 | 5.8\% | 4.6\% | \$219 | 1.0\% | 1.7\% | 5 | 5.1\% | 5.0\% | \$183 | 1.1\% | 1.8\% |
|  |  | Moderate | 29 | 12.3\% | \$1,700 | 4.3\% | 16.1\% | 16 | 11.7\% | 13.6\% | \$967 | 4.2\% | 8.0\% | 13 | 13.1\% | 14.0\% | \$733 | 4.3\% | 7.6\% |
|  |  | Middle | 34 | 14.4\% | \$2,678 | 6.7\% | 21.4\% | 21 | 15.3\% | 21.3\% | \$1,559 | 6.8\% | 16.1\% | 13 | 13.1\% | 17.0\% | \$1,119 | 6.6\% | 12.0\% |
|  |  | Upper | 157 | 66.5\% | \$34,601 | 86.9\% | 41.8\% | 90 | 65.7\% | 46.2\% | \$19,907 | 87.4\% | 58.6\% | 67 | 67.7\% | 47.7\% | \$14,694 | 86.1\% | 60.3\% |
|  |  | Unknown | 3 | 1.3\% | \$458 | 1.1\% | 0.0\% | 2 | 1.5\% | 14.2\% | \$130 | 0.6\% | 15.5\% | 1 | 1.0\% | 16.4\% | \$328 | 1.9\% | 18.2\% |
|  |  | Total | 236 | 100.0\% | \$39,839 | 100.0\% | 100.0\% | 137 | 100.0\% | 100.0\% | \$22,782 | 100.0\% | 100.0\% | 99 | 100.0\% | 100.0\% | \$17,057 | 100.0\% | 100.0\% |
|  |  |  |  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 54 | 28.6\% | \$5,971 | 23.5\% | 91.3\% | 29 | 46.8\% | 32.4\% | \$3,160 | 24.7\% | 37.3\% | 25 | 19.7\% | 37.4\% | \$2,811 | 22.3\% | 29.2\% |
|  |  | Over \$1 Million | 40 | 21.2\% | \$15,622 | 61.5\% | 4.3\% | 22 | 35.5\% |  |  |  |  | 18 | 14.2\% |  |  |  |  |
|  |  | Total Rev. available | 94 | 49.8\% | \$21,593 | 85.0\% | 95.6\% | 51 | 82.3\% |  |  |  |  | 43 | 33.9\% |  |  |  |  |
|  |  | Rev. Not Known | 95 | 50.3\% | \$3,818 | 15.0\% | 4.5\% | 11 | 17.7\% |  |  |  |  | 84 | 66.1\% |  |  |  |  |
|  |  | Total | 189 | 100.0\% | \$25,411 | 100.0\% | 100.0\% | 62 | 100.0\% |  |  |  |  | 127 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{0}{N} \\ & \stackrel{1}{6} \\ & \stackrel{\widetilde{N}}{\mathbf{O}} \end{aligned}$ | \$100,000 or Less | 141 | 74.6\% | \$4,032 | 15.9\% |  | 38 | 61.3\% | 92.1\% | \$1,578 | 12.3\% | 29.2\% | 103 | 81.1\% | 94.3\% | \$2,454 | 19.4\% | 33.8\% |
|  |  | \$100,001 - \$250,000 | 20 | 10.6\% | \$3,705 | 14.6\% |  | 9 | 14.5\% | 4.1\% | \$1,624 | 12.7\% | 16.9\% | 11 | 8.7\% | 2.4\% | \$2,081 | 16.5\% | 12.0\% |
|  |  | \$250,001 - \$1 Million | 28 | 14.8\% | \$17,674 | 69.6\% |  | 15 | 24.2\% | 3.8\% | \$9,585 | 75.0\% | 54.0\% | 13 | 10.2\% | 3.3\% | \$8,089 | 64.1\% | 54.2\% |
|  |  | Total | 189 | 100.0\% | \$25,411 | 100.0\% |  | 62 | 100.0\% | 100.0\% | \$12,787 | 100.0\% | 100.0\% | 127 | 100.0\% | 100.0\% | \$12,624 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% | 96.3\% | 0 | 0.0\% | 77.8\% | \$0 | 0.0\% | 97.2\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 50.3\% |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  |  | 2 | 100.0\% | \$43 | 100.0\% | 1.9\% | 0 | 0.0\% |  |  |  |  | 2 | 100.0\% |  |  |  |  |
|  |  |  | 2 | 100.0\% | \$43 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 2 | 100.0\% |  |  |  |  |
|  | $\begin{array}{ll} \text { ® } & \$ 100,000 \text { or Less } \\ \stackrel{\text { N }}{ } & \$ 100,001-\$ 250,000 \\ \text { 둔 } & \$ 250,001-\$ 500,000 \\ & \text { Total } \\ \hline \end{array}$ |  | 2 | 100.0\% | \$43 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  |  | 2 | 100.0\% | \$43 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: AL Tuscaloosa

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 2.2 |  | 0.3 | 68 | 48.9 | 8,393 | 19.9 |
| Moderate-income | 12 | 26.7 |  | 24.2 | 2,184 | 21.4 | 7,046 | 16.7 |
| Middle-income | 21 | 46.7 |  | 51.5 | 2,075 | 9.6 | 8,434 | 20.0 |
| Upper-income | 11 | 24.4 |  | 24.0 | 413 | 4.1 | 18,234 | 43.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 45 | 100.0 |  | 100.0 | 4,740 | 11.3 | 42,107 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 666 |  | 26 | 3.9 | 601 | 90.2 | 39 | 5.9 |
| Moderate-income | 20,478 |  |  | 38.1 | 10,454 | 51.0 | 2,229 | 10.9 |
| Middle-income | 35,167 | 22,156 |  | 63.0 | 9,588 | 27.3 | 3,423 | 9.7 |
| Upper-income | 15,118 | 10,981 |  | 72.6 | 2,916 | 19.3 | 1,221 | 8.1 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 71,429 | 40,958 |  | 57.3 | 23,559 | 33.0 | 6,912 | 9.7 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \text { \$1 Million } \end{gathered}$ |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 131 | 1.7 |  | 1.5 | 17 | 3.7 | 9 | 2.6 |
| Moderate-income | 2,237 | 29.2 |  | 28.3 | 173 | 37.4 | 128 | 37.4 |
| Middle-income | 3,330 | 43.5 |  | 44.2 | 168 | 36.3 | 135 | 39.5 |
| Upper-income | 1,954 | 25.5 |  | 26.0 | 105 | 22.7 | 70 | 20.5 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 7,652 | 100.0 |  | 100.0 | 463 | 100.0 | 342 | 100.0 |
|  | Percentage of Total Businesses: |  |  | $89.5$ |  | 6.1 | 4.5 |  |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 11 | 11.5 |  | 11.0 | 0 | 0.0 | 1 | 50.0 |
| Middle-income | 68 | 70.8 |  | 72.5 | 1 | 33.3 | 1 | 50.0 |
| Upper-income | 17 | 17.7 |  | 16.5 | 2 | 66.7 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 96 | 100.0 |  | 100.0 | 3 | 100.0 | 2 | 100.0 |
|  | Percentage of Total Farms: |  |  | 94.8 |  | 3.1 |  | 2.1 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AL Tuscaloosa


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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: AL Tuscaloosa

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Families <br> by Family <br> Income <br> \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  |  |  |  | ank | Agg | Ba | k | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 7 | 3.6\% | \$604 | 1.8\% | 19.9\% | 2 | 2.3\% | 8.7\% | \$203 | 1.4\% | 5.3\% | 5 | 4.6\% | 6.6\% | \$401 | 2.2\% | 3.6\% |
|  | M oderate | 52 | 26.7\% | \$6,236 | 18.8\% | 16.7\% | 25 | 28.7\% | 25.6\% | \$3,160 | 21.3\% | 20.3\% | 27 | 25.0\% | 19.4\% | \$3,076 | 16.8\% | 15.0\% |
|  | Middle | 46 | 23.6\% | \$6,438 | 19.4\% | 20.0\% | 23 | 26.4\% | 24.4\% | \$3,253 | 21.9\% | 22.7\% | 23 | 21.3\% | 20.7\% | \$3,185 | 17.4\% | 18.8\% |
|  | Upper | 88 | 45.1\% | \$19,439 | 58.7\% | 43.3\% | 37 | 42.5\% | 32.2\% | \$8,210 | 55.4\% | 43.0\% | 51 | 47.2\% | 31.2\% | \$11,229 | 61.4\% | 41.2\% |
|  | Unknown | 2 | 1.0\% | \$385 | 1.2\% | 0.0\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 8.7\% | 2 | 1.9\% | 22.2\% | \$385 | 2.1\% | 21.5\% |
|  | Total | 195 | 100.0\% | \$33,102 | 100.0\% | 100.0\% | 87 | 100.0\% | 100.0\% | \$14,826 | 100.0\% | 100.0\% | 108 | 100.0\% | 100.0\% | \$18,276 | 100.0\% | 100.0\% |
|  | Low | 11 | 3.6\% | \$677 | 1.3\% | 19.9\% | 5 | 2.6\% | 3.8\% | \$260 | 0.8\% | 2.1\% | 6 | 5.2\% | 2.7\% | \$417 | 2.1\% | 1.3\% |
|  | Moderate | 39 | 12.6\% | \$3,897 | 7.5\% | 16.7\% | 30 | 15.5\% | 13.8\% | \$2,864 | 8.8\% | 9.2\% | 9 | 7.8\% | 10.7\% | \$1,033 | 5.2\% | 7.2\% |
|  | Middle | 74 | 23.9\% | \$9,346 | 17.9\% | 20.0\% | 47 | 24.4\% | 19.9\% | \$5,929 | 18.2\% | 16.6\% | 27 | 23.3\% | 18.1\% | \$3,417 | 17.3\% | 14.5\% |
|  | Upper | 179 | 57.9\% | \$37,473 | 71.7\% | 43.3\% | 106 | 54.9\% | 45.7\% | \$22,645 | 69.7\% | 55.0\% | 73 | 62.9\% | 46.6\% | \$14,828 | 74.9\% | 55.7\% |
|  | Unknown | 6 | 1.9\% | \$888 | 1.7\% | 0.0\% | 5 | 2.6\% | 16.8\% | \$791 | 2.4\% | 17.0\% | 1 | 0.9\% | 21.9\% | \$97 | 0.5\% | 21.4\% |
|  | Total | 309 | 100.0\% | \$52,281 | 100.0\% | 100.0\% | 193 | 100.0\% | 100.0\% | \$32,489 | 100.0\% | 100.0\% | 116 | 100.0\% | 100.0\% | \$19,792 | 100.0\% | 100.0\% |
|  | Low | 5 | 9.4\% | \$39 | 7.6\% | 19.9\% | 1 | 3.7\% | 11.2\% | \$9 | 3.4\% | 4.2\% | 4 | 15.4\% | 7.1\% | \$30 | 12.2\% | 2.0\% |
|  | Moderate | 11 | 20.8\% | \$60 | 11.7\% | 16.7\% | 6 | 22.2\% | 16.8\% | \$40 | 15.0\% | 11.1\% | 5 | 19.2\% | 22.8\% | \$20 | 8.2\% | 18.0\% |
|  | Middle | 14 | 26.4\% | \$98 | 19.2\% | 20.0\% | 7 | 25.9\% | 25.5\% | \$43 | 16.2\% | 18.1\% | 7 | 26.9\% | 20.5\% | \$55 | 22.4\% | 14.9\% |
|  | Upper | 22 | 41.5\% | \$303 | 59.3\% | 43.3\% | 12 | 44.4\% | 39.1\% | \$163 | 61.3\% | 55.2\% | 10 | 38.5\% | 39.4\% | \$140 | 57.1\% | 48.5\% |
|  | Unknown | 1 | 1.9\% | \$11 | 2.2\% | 0.0\% | 1 | 3.7\% | 7.5\% | \$11 | 4.1\% | 11.4\% | 0 | 0.0\% | 10.2\% | \$0 | 0.0\% | 16.6\% |
|  | Total | 53 | 100.0\% | \$511 | 100.0\% | 100.0\% | 27 | 100.0\% | 100.0\% | \$266 | 100.0\% | 100.0\% | 26 | 100.0\% | 100.0\% | \$245 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{\stackrel{\rightharpoonup}{2}}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 19.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 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\% | 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\% | 43.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 23 | 4.1\% | \$1,320 | 1.5\% | 19.9\% | 8 | 2.6\% | 5.9\% | \$472 | 1.0\% | 3.3\% | 15 | 6.0\% | 4.7\% | \$848 | 2.2\% | 2.3\% |
|  | M oderate | 102 | 18.3\% | \$10,193 | 11.9\% | 16.7\% | 61 | 19.9\% | 18.6\% | \$6,064 | 12.7\% | 13.3\% | 41 | 16.4\% | 15.3\% | \$4,129 | 10.8\% | 10.6\% |
|  | Middle | 134 | 24.1\% | \$15,882 | 18.5\% | 20.0\% | 77 | 25.1\% | 21.8\% | \$9,225 | 19.4\% | 18.7\% | 57 | 22.8\% | 19.4\% | \$6,657 | 17.4\% | 15.8\% |
|  | Upper | 289 | 51.9\% | \$57,215 | 66.6\% | 43.3\% | 155 | 50.5\% | 40.1\% | \$31,018 | 65.2\% | 49.7\% | 134 | 53.6\% | 38.7\% | \$26,197 | 68.4\% | 46.4\% |
|  | Unknown | 9 | 1.6\% | \$1,284 | 1.5\% | 0.0\% | 6 | 2.0\% | 13.6\% | \$802 | 1.7\% | 14.9\% | 3 | 1.2\% | 21.9\% | \$482 | 1.3\% | 24.8\% |
|  | Total | 557 | 100.0\% | \$85,894 | 100.0\% | 100.0\% | 307 | 100.0\% | 100.0\% | \$47,581 | 100.0\% | 100.0\% | 250 | 100.0\% | 100.0\% | \$38,313 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known <br> Total | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 196 | 26.0\% | \$27,693 | 42.5\% | 89.5\% | 112 | 57.4\% | 43.8\% | \$16,218 | 51.0\% | 50.6\% | 84 | 15.0\% | 41.7\% | \$11,475 | 34.4\% | 42.0\% |
|  |  | 90 | 11.9\% | \$26,354 | 40.4\% | 6.1\% | 48 | 24.6\% |  |  |  |  | 42 | 7.5\% |  |  |  |  |
|  |  | 286 | 37.9\% | \$54,047 | 82.9\% | 95.6\% | 160 | 82.0\% |  |  |  |  | 126 | 22.5\% |  |  |  |  |
|  |  | 469 | 62.1\% | \$11,175 | 17.1\% | 4.5\% | 35 | 17.9\% |  |  |  |  | 434 | 77.5\% |  |  |  |  |
|  |  | 755 | 100.0\% | \$65,222 | 100.0\% | 100.0\% | 195 | 100.0\% |  |  |  |  | 560 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 613 | 81.2\% | \$14,670 | 22.5\% |  | 121 | 62.1\% | 83.0\% | \$4,785 | 15.0\% | 23.6\% | 492 | 87.9\% | 88.0\% | \$9,885 | 29.6\% | 28.7\% |
|  | \$100,001-\$250,000 | 69 | 9.1\% | \$12,535 | 19.2\% |  | 34 | 17.4\% | 9.5\% | \$6,059 | 19.0\% | 22.5\% | 35 | 6.3\% | 6.8\% | \$6,476 | 19.4\% | 22.5\% |
|  | \$250,001 - \$1 <br> Million | 73 | 9.7\% | \$38,017 | 58.3\% |  | 40 | 20.5\% | 7.5\% | \$20,984 | 65.9\% | 53.9\% | 33 | 5.9\% | 5.2\% | \$17,033 | 51.0\% | 48.7\% |
|  | Total | 755 | 100.0\% | \$65,222 | 100.0\% |  | 195 | 100.0\% | 100.0\% | \$31,828 | 100.0\% | 100.0\% | 560 | 100.0\% | 100.0\% | \$33,394 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 1 | 12.5\% | \$43 | 9.9\% | 94.8\% | 1 | 50.0\% | 61.3\% | \$43 | 13.1\% | 60.0\% | 0 | 0.0\% | 34.6\% | \$0 | 0.0\% | 62.7\% |
|  |  | 1 | 12.5\% | \$285 | 65.8\% | 3.1\% | 1 | 50.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 6 | 75.0\% | \$105 | 24.2\% | 2.1\% | 0 | 0.0\% |  |  |  |  | 6 | 100.0\% |  |  |  |  |
|  |  | 8 | 100.0\% | \$433 | 100.0\% | 100.0\% | 2 | 100.0\% |  |  |  |  | 6 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 7 | 87.5\% | \$148 | 34.2\% |  | 1 | 50.0\% | 80.6\% | \$43 | 13.1\% | 24.8\% | 6 | 100.0\% | 84.6\% | \$105 | 100.0\% | 39.0\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 12.9\% | \$0 | 0.0\% | 38.1\% | 0 | 0.0\% | 11.5\% | \$0 | 0.0\% | 34.8\% |
|  | \$250,001-\$500,000 | 1 | 12.5\% | \$285 | 65.8\% |  | 1 | 50.0\% | 6.5\% | \$285 | 86.9\% | 37.1\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 26.3\% |
|  | Total | 8 | 100.0\% | \$433 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$328 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$105 | 100.0\% | 100.0\% |

* Aggregate data is unavailable for loans to businesses with revenue over $\$ 1$ million or revenue unknow $n$, and for loan size by revenue category. Originations \& Purchases


## Appendices

## Combined Demographics Report

Assessment Area: AR Fayetteville


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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AR Fayetteville


[^304]Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: AR Fayetteville

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Count <br> \% | $\begin{aligned} & \text { Donk } \\ & \\ & \\ & \text { D (000s) } \end{aligned}$ | \$ \% | Families <br> by Family <br> Income <br> \% | \# | Count <br> chen <br> $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% | \# |  | Agg \% | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  |  |  | Low | 11 | 8.5\% | \$752 | 4.1\% | 17.2\% | 4 | 6.6\% | 10.0\% | \$242 | 2.7\% | 5.2\% | 7 | 10.3\% | 10.5\% | \$510 | 5.5\% | 5.2\% |
|  |  | Moderate | 31 | 24.0\% | \$3,241 | 17.7\% | 18.0\% | 17 | 27.9\% | 20.4\% | \$1,840 | 20.5\% | 13.9\% | 14 | 20.6\% | 18.8\% | \$1,401 | 15.0\% | 12.5\% |
|  |  | Middle | 34 | 26.4\% | \$4,285 | 23.4\% | 24.1\% | 16 | 26.2\% | 20.3\% | \$2,197 | 24.5\% | 17.5\% | 18 | 26.5\% | 17.9\% | \$2,088 | 22.3\% | 15.2\% |
|  |  | Upper | 53 | 41.1\% | \$10,022 | 54.8\% | 40.6\% | 24 | 39.3\% | 37.8\% | \$4,678 | 52.2\% | 48.2\% | 29 | 42.6\% | 36.2\% | \$5,344 | 57.2\% | 48.7\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 11.6\% | \$0 | 0.0\% | 15.1\% | 0 | 0.0\% | 16.6\% | \$0 | 0.0\% | 18.4\% |
|  |  | Total | 129 | 100.0\% | \$18,300 | 100.0\% | 100.0\% | 61 | 100.0\% | 100.0\% | \$8,957 | 100.0\% | 100.0\% | 68 | 100.0\% | 100.0\% | \$9,343 | 100.0\% | 100.0\% |
|  |  | Low | 19 | 11.0\% | \$1,499 | 5.8\% | 17.2\% | 12 | 11.4\% | 5.1\% | \$1,091 | 6.8\% | 2.5\% | 7 | 10.3\% | 5.4\% | \$408 | 4.2\% | 2.5\% |
|  |  | Moderate | 23 | 13.3\% | \$2,338 | 9.1\% | 18.0\% | 14 | 13.3\% | 11.6\% | \$1,477 | 9.2\% | 7.3\% | 9 | 13.2\% | 11.7\% | \$861 | 8.8\% | 7.2\% |
|  |  | Middle | 47 | 27.2\% | \$6,294 | 24.4\% | 24.1\% | 32 | 30.5\% | 17.2\% | \$4,458 | 27.8\% | 13.2\% | 15 | 22.1\% | 17.4\% | \$1,836 | 18.8\% | 13.2\% |
|  |  | Upper | 81 | 46.8\% | \$15,355 | 59.5\% | 40.6\% | 46 | 43.8\% | 50.8\% | \$8,902 | 55.5\% | 61.4\% | 35 | 51.5\% | 49.7\% | \$6,453 | 66.0\% | 60.6\% |
|  |  | Unknown | 3 | 1.7\% | \$322 | 1.2\% | 0.0\% | 1 | 1.0\% | 15.3\% | \$108 | 0.7\% | 15.5\% | 2 | 2.9\% | 15.8\% | \$214 | 2.2\% | 16.6\% |
|  |  | Total | 173 | 100.0\% | \$25,808 | 100.0\% | 100.0\% | 105 | 100.0\% | 100.0\% | \$16,036 | 100.0\% | 100.0\% | 68 | 100.0\% | 100.0\% | \$9,772 | 100.0\% | 100.0\% |
|  |  | Low | 2 | 15.4\% | \$7 | 5.8\% | 17.2\% | 1 | 16.7\% | 11.5\% | \$3 | 5.5\% | 6.2\% | 1 | 14.3\% | 11.2\% | \$4 | 6.2\% | 4.6\% |
|  |  | Moderate | 1 | 7.7\% | \$5 | 4.2\% | 18.0\% | 0 | 0.0\% | 13.9\% | \$0 | 0.0\% | 8.9\% | 1 | 14.3\% | 17.9\% | \$5 | 7.7\% | 13.2\% |
|  |  | Middle | 3 | 23.1\% | \$17 | 14.2\% | 24.1\% | 1 | 16.7\% | 19.3\% | \$3 | 5.5\% | 11.6\% | 2 | 28.6\% | 22.4\% | \$14 | 21.5\% | 16.2\% |
|  |  | Upper | 7 | 53.8\% | \$91 | 75.8\% | 40.6\% | 4 | 66.7\% | 46.5\% | \$49 | 89.1\% | 59.6\% | 3 | 42.9\% | 40.7\% | \$42 | 64.6\% | 57.2\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 8.8\% | \$0 | 0.0\% | 13.7\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 8.8\% |
|  |  | Total | 13 | 100.0\% | \$120 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$55 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$65 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 17.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 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\% | 24.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 32 | 10.2\% | \$2,258 | 5.1\% | 17.2\% | 17 | 9.9\% | 7.3\% | \$1,336 | 5.3\% | 3.6\% | 15 | 10.5\% | 7.8\% | \$922 | 4.8\% | 3.6\% |
|  |  | M oderate | 55 | 17.5\% | \$5,584 | 12.6\% | 18.0\% | 31 | 18.0\% | 15.3\% | \$3,317 | 13.2\% | 9.8\% | 24 | 16.8\% | 15.0\% | \$2,267 | 11.8\% | 9.2\% |
|  |  | Middle | 84 | 26.7\% | \$10,596 | 24.0\% | 24.1\% | 49 | 28.5\% | 18.5\% | \$6,658 | 26.6\% | 14.7\% | 35 | 24.5\% | 17.7\% | \$3,938 | 20.5\% | 13.4\% |
|  |  | Upper | 141 | 44.8\% | \$25,468 | 57.6\% | 40.6\% | 74 | 43.0\% | 45.1\% | \$13,629 | 54.4\% | 54.6\% | 67 | 46.9\% | 43.2\% | \$11,839 | 61.7\% | 52.3\% |
|  |  | Unknown | 3 | 1.0\% | \$322 | 0.7\% | 0.0\% | 1 | 0.6\% | 13.8\% | \$108 | 0.4\% | 17.3\% | 2 | 1.4\% | 16.3\% | \$214 | 1.1\% | 21.5\% |
|  |  | Total | 315 | 100.0\% | \$44,228 | 100.0\% | 100.0\% | 172 | 100.0\% | 100.0\% | \$25,048 | 100.0\% | 100.0\% | 143 | 100.0\% | 100.0\% | \$19,180 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Total | usinesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 23 | 20.7\% | \$5,842 | 34.5\% | 90.2\% | 10 | 34.5\% | 55.1\% | \$1,043 | 23.3\% | 71.3\% | 13 | 15.9\% | 60.5\% | \$4,799 | 38.5\% | 74.1\% |
|  |  | Over \$1 Million | 28 | 25.2\% | \$7,597 | 44.9\% | 4.9\% | 12 | 41.4\% |  |  |  |  | 16 | 19.5\% |  |  |  |  |
|  | $\stackrel{\text { O }}{ }$ | Total Rev. available | 51 | 45.9\% | \$13,439 | 79.4\% | 95.1\% | 22 | 75.9\% |  |  |  |  | 29 | 35.4\% |  |  |  |  |
|  | ฯ | Rev. Not Known | 60 | 54.1\% | \$3,492 | 20.6\% | 4.9\% | 7 | 24.1\% |  |  |  |  | 53 | 64.6\% |  |  |  |  |
|  |  | Total | 111 | 100.0\% | \$16,931 | 100.0\% | 100.0\% | 29 | 100.0\% |  |  |  |  | 82 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 71 | 64.0\% | \$1,738 | 10.3\% |  | 17 | 58.6\% | 85.1\% | \$691 | 15.4\% | 23.1\% | 54 | 65.9\% | 85.4\% | \$1,047 | 8.4\% | 22.8\% |
|  |  | \$100,001-\$250,000 | 19 | 17.1\% | \$3,262 | 19.3\% |  | 6 | 20.7\% | 7.7\% | \$902 | 20.1\% | 19.7\% | 13 | 15.9\% | 7.6\% | \$2,360 | 19.0\% | 20.6\% |
|  | గ్ర | \$250,001 - \$1 <br> Million | 21 | 18.9\% | \$11,931 | 70.5\% |  | 6 | 20.7\% | 7.2\% | \$2,889 | 64.5\% | 57.1\% | 15 | 18.3\% | 7.0\% | \$9,042 | 72.6\% | 56.6\% |
|  |  | Total | 111 | 100.0\% | \$16,931 | 100.0\% |  | 29 | 100.0\% | 100.0\% | \$4,482 | 100.0\% | 100.0\% | 82 | 100.0\% | 100.0\% | \$12,449 | 100.0\% | 100.0\% |
|  |  |  |  |  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 97.7\% | 0 | 0.0\% | 96.6\% | \$0 | 0.0\% | 96.8\% | 0 | 0.0\% | 95.3\% | \$0 | 0.0\% | 94.9\% |
|  |  | Over \$1 Million | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 1 | 100.0\% | \$30 | 100.0\% | 1.4\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | Total | 1 | 100.0\% | \$30 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 1 | 100.0\% | \$30 | 100.0\% |  | 0 | 0.0\% | 84.1\% | \$0 | 0.0\% | 38.9\% | 1 | 100.0\% | 86.5\% | \$30 | 100.0\% | 43.3\% |
|  |  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 11.5\% | \$0 | 0.0\% | 31.7\% | 0 | 0.0\% | 9.9\% | \$0 | 0.0\% | 30.6\% |
|  |  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.4\% | \$0 | 0.0\% | 29.4\% | 0 | 0.0\% | 3.7\% | \$0 | 0.0\% | 26.0\% |
|  |  | Total | 1 | 100.0\% | \$30 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$30 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: AR Ft. Smith



[^306]Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount ${ }^{\text {Ba }}$ |  | ank |  | Families | Count |  | Agg$\%$ | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  | Income |  |  | Ban | k | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 6 | 8.2\% | \$487 | 5.2\% | 16.6\% | 4 | 9.3\% |  | 10.5\% | \$349 | 6.6\% | 6.0\% | 2 | 6.7\% | 8.3\% | \$138 | 3.3\% | 4.4\% |
|  | Moderate | 13 | 17.8\% | \$1,181 | 12.5\% | 16.1\% | 9 | 20.9\% | 19.5\% | \$898 | 17.1\% | 14.6\% | 4 | 13.3\% | 20.2\% | \$283 | 6.7\% | 14.6\% |
|  | Middle | 15 | 20.5\% | \$1,845 | 19.5\% | 21.7\% | 7 | 16.3\% | 21.6\% | \$960 | 18.3\% | 19.5\% | 8 | 26.7\% | 19.5\% | \$885 | 21.1\% | 17.6\% |
|  | Upper | 39 | 53.4\% | \$5,935 | 62.8\% | 45.5\% | 23 | 53.5\% | 34.8\% | \$3,047 | 58.0\% | 47.1\% | 16 | 53.3\% | 34.7\% | \$2,888 | 68.9\% | 47.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 13.6\% | \$0 | 0.0\% | 12.8\% | 0 | 0.0\% | 17.4\% | \$0 | 0.0\% | 15.7\% |
|  | Total | 73 | 100.0\% | \$9,448 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$5,254 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$4,194 | 100.0\% | 100.0\% |
|  | Low | 7 | 5.9\% | \$413 | 2.8\% | 16.6\% | 3 | 4.3\% | 5.1\% | \$120 | 1.4\% | 2.2\% | 4 | 8.2\% | 4.9\% | \$293 | 4.5\% | 2.3\% |
|  | Moderate | 10 | 8.4\% | \$623 | 4.2\% | 16.1\% | 5 | 7.1\% | 11.5\% | \$321 | 3.9\% | 6.9\% | 5 | 10.2\% | 13.5\% | \$302 | 4.6\% | 7.9\% |
|  | Middle | 17 | 14.3\% | \$1,074 | 7.2\% | 21.7\% | 10 | 14.3\% | 19.2\% | \$564 | 6.8\% | 14.7\% | 7 | 14.3\% | 16.6\% | \$510 | 7.8\% | 12.0\% |
|  | Upper | 85 | 71.4\% | \$12,740 | 85.8\% | 45.5\% | 52 | 74.3\% | 50.2\% | \$7,315 | 87.9\% | 61.8\% | 33 | 67.3\% | 49.2\% | \$5,425 | 83.1\% | 60.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.0\% | \$0 | 0.0\% | 14.5\% | 0 | 0.0\% | 15.9\% | \$0 | 0.0\% | 17.4\% |
|  | Total | 119 | 100.0\% | \$14,850 | 100.0\% | 100.0\% | 70 | 100.0\% | 100.0\% | \$8,320 | 100.0\% | 100.0\% | 49 | 100.0\% | 100.0\% | \$6,530 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 16.6\% | 0 | 0.0\% | 13.0\% | \$0 | 0.0\% | 5.4\% | 0 | 0.0\% | 9.3\% | \$0 | 0.0\% | 2.8\% |
|  | Moderate | 4 | 80.0\% | \$19 | 43.2\% | 16.1\% | 2 | 66.7\% | 15.4\% | \$8 | 24.2\% | 8.2\% | 2 | 100.0\% | 19.7\% | \$11 | 100.0\% | 12.4\% |
|  | Middle | 1 | 20.0\% | \$25 | 56.8\% | 21.7\% | 1 | 33.3\% | 22.7\% | \$25 | 75.8\% | 21.4\% | 0 | 0.0\% | 24.3\% | \$0 | 0.0\% | 19.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 45.5\% | 0 | 0.0\% | 41.1\% | \$0 | 0.0\% | 49.9\% | 0 | 0.0\% | 42.9\% | \$0 | 0.0\% | 58.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 15.0\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 6.7\% |
|  | Total | 5 | 100.0\% | \$44 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$33 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$11 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 16.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% | 21.7\% | 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\% | 45.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 13 | 6.6\% | \$900 | 3.7\% | 16.6\% | 7 | 6.0\% | 7.8\% | \$469 | 3.4\% | 3.8\% | 6 | 7.4\% | 6.6\% | \$431 | 4.0\% | 3.2\% |
|  | M oderate | 27 | 13.7\% | \$1,823 | 7.5\% | 16.1\% | 16 | 13.8\% | 15.0\% | \$1,227 | 9.0\% | 9.9\% | 11 | 13.6\% | 16.7\% | \$596 | 5.6\% | 10.8\% |
|  | Middle | 33 | 16.8\% | \$2,944 | 12.1\% | 21.7\% | 18 | 15.5\% | 20.3\% | \$1,549 | 11.4\% | 16.3\% | 15 | 18.5\% | 18.3\% | \$1,395 | 13.0\% | 14.3\% |
|  | Upper | 124 | 62.9\% | \$18,675 | 76.7\% | 45.5\% | 75 | 64.7\% | 42.9\% | \$10,362 | 76.2\% | 53.6\% | 49 | 60.5\% | 42.0\% | \$8,313 | 77.4\% | 53.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.0\% | \$0 | 0.0\% | 16.4\% | 0 | 0.0\% | 16.4\% | \$0 | 0.0\% | 18.5\% |
|  | Total | 197 | 100.0\% | \$24,342 | 100.0\% | 100.0\% | 116 | 100.0\% | 100.0\% | \$13,607 | 100.0\% | 100.0\% | 81 | 100.0\% | 100.0\% | \$10,735 | 100.0\% | 100.0\% |
|  | \$1 Million or LeOver \$1 MillionTotal Rev. availaRev. Not KnowTotal | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 57 | 31.0\% | \$4,830 | 27.0\% | 86.3\% | 27 | 50.0\% | 52.1\% | \$2,022 | 34.4\% | 62.7\% | 30 | 23.1\% | 53.8\% | \$2,808 | 23.3\% | 56.8\% |
|  |  | 39 | 21.2\% | \$10,179 | 56.8\% | 7.2\% | 12 | 22.2\% |  |  |  |  | 27 | 20.8\% |  |  |  |  |
|  |  | 96 | 52.2\% | \$15,009 | 83.8\% | 93.5\% | 39 | 72.2\% |  |  |  |  | 57 | 43.9\% |  |  |  |  |
|  |  | 88 | 47.8\% | \$2,899 | 16.2\% | 6.5\% | 15 | 27.8\% |  |  |  |  | 73 | 56.2\% |  |  |  |  |
|  |  | 184 | 100.0\% | \$17,908 | 100.0\% | 100.0\% | 54 | 100.0\% |  |  |  |  | 130 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 138 | 75.0\% | \$4,083 | 22.8\% |  | 37 | 68.5\% | 87.4\% | \$1,210 | 20.6\% | 30.9\% | 101 | 77.7\% | 84.3\% | \$2,873 | 23.9\% | 24.6\% |
|  | \$100,001-\$250,000 | 28 | 15.2\% | \$5,137 | 28.7\% |  | 11 | 20.4\% | 7.6\% | \$1,985 | 33.8\% | 23.7\% | 17 | 13.1\% | 9.5\% | \$3,152 | 26.2\% | 26.2\% |
|  | \$250,001 - \$1 <br> Million | 18 | 9.8\% | \$8,688 | 48.5\% |  | 6 | 11.1\% | 5.0\% | \$2,677 | 45.6\% | 45.4\% | 12 | 9.2\% | 6.2\% | \$6,011 | 49.9\% | 49.2\% |
|  | Total | 184 | 100.0\% | \$17,908 | 100.0\% |  | 54 | 100.0\% | 100.0\% | \$5,872 | 100.0\% | 100.0\% | 130 | 100.0\% | 100.0\% | \$12,036 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over $\$ 1$ Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 10 | 90.9\% | \$1,163 | 85.3\% | 95.2\% | 4 | 100.0\% | 87.0\% | \$276 | 100.0\% | 95.1\% | 6 | 85.7\% | 87.9\% | \$887 | 81.6\% | 91.1\% |
|  |  | 1 | 9.1\% | \$200 | 14.7\% | 3.2\% | 0 | 0.0\% |  |  |  |  | 1 | 14.3\% |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 11 | 100.0\% | \$1,363 | 100.0\% | 100.0\% | 4 | 100.0\% |  |  |  |  | 7 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 6 | 54.5\% | \$352 | 25.8\% |  | 4 | 100.0\% | 71.7\% | \$276 | 100.0\% | 23.9\% | 2 | 28.6\% | 72.7\% | \$76 | 7.0\% | 23.8\% |
|  | \$100,001-\$250,000 | 4 | 36.4\% | \$711 | 52.2\% |  | 0 | 0.0\% | 19.6\% | \$0 | 0.0\% | 39.5\% | 4 | 57.1\% | 21.2\% | \$711 | 65.4\% | 52.6\% |
|  | \$250,001-\$500,000 | 1 | 9.1\% | \$300 | 22.0\% |  | 0 | 0.0\% | 8.7\% | \$0 | 0.0\% | 36.6\% | 1 | 14.3\% | 6.1\% | \$300 | 27.6\% | 23.5\% |
|  | Total | 11 | 100.0\% | \$1,363 | 100.0\% |  | 4 | 100.0\% | 100.0\% | \$276 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$1,087 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

| Assessment Area: AR Jonesboro |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 5.0 |  | 3.0 | 415 | 47.4 | 6,292 | 21.3 |
| Moderate-income | 2 | 10.0 |  | 5.6 | 395 | 24.1 | 5,137 | 17.4 |
| Middle-income | 15 | 75.0 |  | 74.7 | 2,715 | 12.3 | 6,408 | 21.7 |
| Upper-income | 2 | 10.0 |  | 16.8 | 316 | 6.4 | 11,639 | 39.5 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 20 | 100.0 |  | 100.0 | 3,841 | 13.0 | 29,476 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 2,193 |  | 16 | 9.8 | 1,663 | 75.8 | 314 | 14.3 |
| Moderate-income | 2,867 |  |  | 46.6 | 1,254 | 43.7 | 277 | 9.7 |
| Middle-income | 34,421 | 20,949 |  | 60.9 | 10,552 | 30.7 | 2,920 | 8.5 |
| Upper-income | 6,703 | 4,850 |  | 72.4 | 1,507 | 22.5 | 346 | 5.2 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 46,184 | 27,351 |  | 59.2 | 14,976 | 32.4 | 3,857 | 8.4 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 124 | 2.4 |  | 2.3 | 12 | 3.9 | 5 | 1.9 |
| Moderate-income | 244 | 4.7 |  | 4.3 | 22 | 7.2 | 22 | 8.4 |
| Middle-income | 3,754 | 72.5 |  | 72.7 | 214 | 69.9 | 191 | 72.9 |
| Upper-income | 1,055 | 20.4 |  | 20.7 | 58 | 19.0 | 44 | 16.8 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 5,177 | 100.0 |  | 100.0 | 306 | 100.0 | 262 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.0 |  | 5.9 | 5.1 |  |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2 | 0.4 |  | 0.4 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 22 | 4.5 |  | 4.0 | 3 | 27.3 | 0 | 0.0 |
| Middle-income | 392 | 79.5 |  | 79.7 | 7 | 63.6 | 3 | 100.0 |
| Upper-income | 77 | 15.6 |  | 15.9 | 1 | 9.1 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 493 | 100.0 |  | 100.0 | 11 | 100.0 | 3 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.2 |  | 2.2 |  | . 6 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: AR Jonesboro

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | B |  | $\begin{aligned} & \text { ank } \\ & \quad \text { Dolla } \\ & \$(000 \mathrm{~s}) \end{aligned}$ | \$ \% | Owner <br> Occupied <br> Units <br> $\%$ |  | Count \% \% | Agg $\%$ | \$(000s) | Dollar k \$ \% | Agg \$ \% | \# | Count nk \% | Agg $\%$ | ( ${ }_{\text {Ba }}$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.5\% |
|  | Moderate | 9 | 5.6\% | \$757 | 4.4\% | 4.9\% | 4 | 4.9\% | 2.6\% | \$332 | 3.8\% | 1.6\% | 5 | 6.2\% | 2.3\% | \$425 | 5.1\% | 1.0\% |
|  | Middle | 109 | 67.3\% | \$10,563 | 61.9\% | 76.6\% | 53 | 65.4\% | 61.6\% | \$5,135 | 58.9\% | 52.8\% | 56 | 69.1\% | 61.0\% | \$5,428 | 65.0\% | 51.4\% |
|  | Upper | 44 | 27.2\% | \$5,756 | 33.7\% | 17.7\% | 24 | 29.6\% | 34.6\% | \$3,256 | 37.3\% | 44.6\% | 20 | 24.7\% | 36.0\% | \$2,500 | 29.9\% | 47.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 162 | 100.0\% | \$17,076 | 100.0\% | 100.0\% | 81 | 100.0\% | 100.0\% | \$8,723 | 100.0\% | 100.0\% | 81 | 100.0\% | 100.0\% | \$8,353 | 100.0\% | 100.0\% |
|  | Low | 1 | 0.6\% | \$89 | 0.5\% | 0.8\% | 1 | 1.1\% | 0.7\% | \$89 | 0.9\% | 0.4\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 4 | 2.5\% | \$254 | 1.5\% | 4.9\% | 2 | 2.1\% | 1.5\% | \$112 | 1.1\% | 0.6\% | 2 | 3.0\% | 2.1\% | \$142 | 2.1\% | 0.9\% |
|  | Middle | 102 | 63.8\% | \$9,328 | 55.5\% | 76.6\% | 63 | 67.0\% | 56.4\% | \$5,989 | 59.6\% | 48.4\% | 39 | 59.1\% | 58.7\% | \$3,339 | 49.4\% | 47.1\% |
|  | Upper | 53 | 33.1\% | \$7,139 | 42.5\% | 17.7\% | 28 | 29.8\% | 41.4\% | \$3,864 | 38.4\% | 50.5\% | 25 | 37.9\% | 38.8\% | \$3,275 | 48.5\% | 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\% |
|  | Total | 160 | 100.0\% | \$16,810 | 100.0\% | 100.0\% | 94 | 100.0\% | 100.0\% | \$10,054 | 100.0\% | 100.0\% | 66 | 100.0\% | 100.0\% | \$6,756 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.6\% |
|  | Moderate | 2 | 6.5\% | \$19 | 7.0\% | 4.9\% | 2 | 22.2\% | 5.5\% | \$19 | 26.0\% | 3.5\% | 0 | 0.0\% | 5.6\% | \$0 | 0.0\% | 2.6\% |
|  | Middle | 25 | 80.6\% | \$187 | 69.3\% | 76.6\% | 7 | 77.8\% | 70.0\% | \$54 | 74.0\% | 64.5\% | 18 | 81.8\% | 71.1\% | \$133 | 67.5\% | 60.0\% |
|  | Upper | 4 | 12.9\% | \$64 | 23.7\% | 17.7\% | 0 | 0.0\% | 23.8\% | \$0 | 0.0\% | 31.1\% | 4 | 18.2\% | 23.0\% | \$64 | 32.5\% | 36.8\% |
|  | 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 | 31 | 100.0\% | \$270 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$73 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$197 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | ily Units |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 23.0\% | 0 | 0.0\% | 11.1\% | \$0 | 0.0\% | 7.7\% | 0 | 0.0\% | 15.4\% | \$0 | 0.0\% | 3.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 4.0\% | 0 | 0.0\% | 5.6\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 62.1\% | 0 | 0.0\% | 55.6\% | \$0 | 0.0\% | 55.6\% | 0 | 0.0\% | 73.1\% | \$0 | 0.0\% | 91.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 10.9\% | 0 | 0.0\% | 27.8\% | \$0 | 0.0\% | 34.9\% | 0 | 0.0\% | 11.5\% | \$0 | 0.0\% | 5.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 1 | 0.3\% | \$89 | 0.3\% | 0.8\% | 1 | 0.5\% | 0.9\% | \$89 | 0.5\% | 0.8\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.5\% |
|  | M oderate | 15 | 4.2\% | \$1,030 | 3.0\% | 4.9\% | 8 | 4.3\% | 2.2\% | \$463 | 2.5\% | 1.1\% | 7 | 4.1\% | 2.4\% | \$567 | 3.7\% | 1.0\% |
|  | Middle | 236 | 66.9\% | \$20,078 | 58.8\% | 76.6\% | 123 | 66.8\% | 59.4\% | \$11,178 | 59.3\% | 50.5\% | 113 | 66.9\% | 60.5\% | \$8,900 | 58.1\% | 51.8\% |
|  | Upper | 101 | 28.6\% | \$12,959 | 37.9\% | 17.7\% | 52 | 28.3\% | 37.4\% | \$7,120 | 37.8\% | 47.6\% | 49 | 29.0\% | 36.5\% | \$5,839 | 38.1\% | 46.7\% |
|  | 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 | 353 | 100.0\% | \$34,156 | 100.0\% | 100.0\% | 184 | 100.0\% | 100.0\% | \$18,850 | 100.0\% | 100.0\% | 169 | 100.0\% | 100.0\% | \$15,306 | 100.0\% | 100.0\% |
|  |  |  |  |  | Small | Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 3 | 0.9\% | \$34 | 0.1\% | 2.3\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.3\% | 3 | 1.3\% | 1.6\% | \$34 | 0.2\% | 1.6\% |
|  | Moderate | 3 | 0.9\% | \$66 | 0.2\% | 4.3\% | 2 | 2.0\% | 2.6\% | \$58 | 0.5\% | 1.2\% | 1 | 0.4\% | 1.5\% | \$8 | 0.0\% | 0.6\% |
|  | Middle | 207 | 63.1\% | \$17,309 | 59.5\% | 72.7\% | 57 | 57.0\% | 68.1\% | \$6,446 | 57.6\% | 67.5\% | 150 | 65.8\% | 69.5\% | \$10,863 | 60.7\% | 69.7\% |
|  | Upper | 115 | 35.1\% | \$11,675 | 40.1\% | 20.7\% | 41 | 41.0\% | 23.0\% | \$4,689 | 41.9\% | 29.7\% | 74 | 32.5\% | 23.1\% | \$6,986 | 39.0\% | 27.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 0.8\% |
|  | Total | 328 | 100.0\% | \$29,084 | 100.0\% | 100.0\% | 100 | 100.0\% | 100.0\% | \$11,193 | 100.0\% | 100.0\% | 228 | 100.0\% | 100.0\% | \$17,891 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | nall Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | 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 | 14 | 5.4\% | \$3,691 | 7.3\% | 4.0\% | 2 | 1.6\% | 1.6\% | \$725 | 2.9\% | 2.1\% | 12 | 9.1\% | 5.0\% | \$2,966 | 11.6\% | 7.8\% |
|  | Middle | 190 | 73.1\% | \$34,061 | 67.6\% | 79.7\% | 93 | 72.7\% | 74.2\% | \$16,423 | 66.0\% | 73.3\% | 97 | 73.5\% | 73.1\% | \$17,638 | 69.1\% | 74.0\% |
|  | Upper | 56 | 21.5\% | \$12,660 | 25.1\% | 15.9\% | 33 | 25.8\% | 21.8\% | \$7,729 | 31.1\% | 24.4\% | 23 | 17.4\% | 19.4\% | \$4,931 | 19.3\% | 18.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 260 | 100.0\% | \$50,412 | 100.0\% | 100.0\% | 128 | 100.0\% | 100.0\% | \$24,877 | 100.0\% | 100.0\% | 132 | 100.0\% | 100.0\% | \$25,535 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: AR Northeast AR


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AR Northeast AR

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | Agg | Bank |  | Agg | Bank |  | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | 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 | 1.3\% | \$188 | 0.5\% | 7.8\% | 3 | 1.8\% | 3.0\% | \$110 | 0.5\% | 1.8\% | 1 | 0.7\% | 3.0\% | \$78 | 0.4\% | 1.8\% |
|  | Middle | 171 | 55.0\% | \$17,693 | 45.7\% | 68.9\% | 90 | 53.9\% | 53.8\% | \$9,484 | 44.7\% | 47.5\% | 81 | 56.3\% | 58.1\% | \$8,209 | 46.9\% | 52.3\% |
|  | Upper | 136 | 43.7\% | \$20,815 | 53.8\% | 23.3\% | 74 | 44.3\% | 42.9\% | \$11,606 | 54.7\% | 50.6\% | 62 | 43.1\% | 38.8\% | \$9,209 | 52.6\% | 45.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 311 | 100.0\% | \$38,696 | 100.0\% | 100.0\% | 167 | 100.0\% | 100.0\% | \$21,200 | 100.0\% | 100.0\% | 144 | 100.0\% | 100.0\% | \$17,496 | 100.0\% | 100.0\% |
|  | 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 | 11 | 2.5\% | \$672 | 1.8\% | 7.8\% | 3 | 1.3\% | 3.9\% | \$156 | 0.7\% | 2.4\% | 8 | 4.1\% | 4.2\% | \$516 | 3.1\% | 2.3\% |
|  | Middle | 279 | 64.4\% | \$20,565 | 53.7\% | 68.9\% | 152 | 63.9\% | 57.2\% | \$11,112 | 51.5\% | 51.3\% | 127 | 65.1\% | 58.2\% | \$9,453 | 56.4\% | 53.0\% |
|  | Upper | 143 | 33.0\% | \$17,067 | 44.6\% | 23.3\% | 83 | 34.9\% | 38.8\% | \$10,288 | 47.7\% | 46.3\% | 60 | 30.8\% | 37.6\% | \$6,779 | 40.5\% | 44.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 433 | 100.0\% | \$38,304 | 100.0\% | 100.0\% | 238 | 100.0\% | 100.0\% | \$21,556 | 100.0\% | 100.0\% | 195 | 100.0\% | 100.0\% | \$16,748 | 100.0\% | 100.0\% |
|  | 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 | 12.0\% | \$42 | 9.8\% | 7.8\% | 4 | 14.8\% | 14.3\% | \$17 | 9.7\% | 5.7\% | 5 | 10.4\% | 8.0\% | \$25 | 9.9\% | 3.8\% |
|  | Middle | 56 | 74.7\% | \$328 | 76.5\% | 68.9\% | 20 | 74.1\% | 60.7\% | \$139 | 79.0\% | 60.4\% | 36 | 75.0\% | 68.9\% | \$189 | 74.7\% | 61.1\% |
|  | Upper | 10 | 13.3\% | \$59 | 13.8\% | 23.3\% | 3 | 11.1\% | 25.0\% | \$20 | 11.4\% | 33.9\% | 7 | 14.6\% | 22.8\% | \$39 | 15.4\% | 34.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 75 | 100.0\% | \$429 | 100.0\% | 100.0\% | 27 | 100.0\% | 100.0\% | \$176 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$253 | 100.0\% | 100.0\% |
|  | 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\% | 12.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.4\% | \$0 | 0.0\% | 8.5\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 59.8\% | 0 | 0.0\% | 43.8\% | \$0 | 0.0\% | 20.7\% | 0 | 0.0\% | 65.6\% | \$0 | 0.0\% | 75.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 27.3\% | 0 | 0.0\% | 56.3\% | \$0 | 0.0\% | 79.3\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 15.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | 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 | 24 | 2.9\% | \$902 | 1.2\% | 7.8\% | 10 | 2.3\% | 4.3\% | \$283 | 0.7\% | 2.2\% | 14 | 3.6\% | 3.9\% | \$619 | 1.8\% | 2.4\% |
|  | Middle | 506 | 61.8\% | \$38,586 | 49.8\% | 68.9\% | 262 | 60.6\% | 56.0\% | \$20,735 | 48.3\% | 49.6\% | 244 | 63.0\% | 58.9\% | \$17,851 | 51.7\% | 53.9\% |
|  | Upper | 289 | 35.3\% | \$37,941 | 49.0\% | 23.3\% | 160 | 37.0\% | 39.5\% | \$21,914 | 51.0\% | 48.2\% | 129 | 33.3\% | 37.1\% | \$16,027 | 46.5\% | 43.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 819 | 100.0\% | \$77,429 | 100.0\% | 100.0\% | 432 | 100.0\% | 100.0\% | \$42,932 | 100.0\% | 100.0\% | 387 | 100.0\% | 100.0\% | \$34,497 | 100.0\% | 100.0\% |
|  | 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 | 29 | 6.7\% | \$2,015 | 6.5\% | 8.2\% | 7 | 5.1\% | 5.7\% | \$896 | 7.3\% | 3.0\% | 22 | 7.5\% | 5.4\% | \$1,119 | 5.9\% | 4.6\% |
|  | Middle | 261 | 60.6\% | \$17,510 | 56.2\% | 63.4\% | 89 | 65.0\% | 54.3\% | \$6,977 | 56.6\% | 52.4\% | 172 | 58.5\% | 54.7\% | \$10,533 | 56.0\% | 51.4\% |
|  | Upper | 133 | 30.9\% | \$10,549 | 33.9\% | 28.4\% | 39 | 28.5\% | 35.5\% | \$3,467 | 28.1\% | 42.0\% | 94 | 32.0\% | 35.5\% | \$7,082 | 37.6\% | 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\% |
|  | Tr Unknown | 8 | 1.9\% | \$1,086 | 3.5\% |  | 2 | 1.5\% | 4.5\% | \$995 | 8.1\% | 2.6\% | 6 | 2.0\% | 4.4\% | \$91 | 0.5\% | 0.9\% |
|  | Total | 431 | 100.0\% | \$31,160 | 100.0\% | 100.0\% | 137 | 100.0\% | 100.0\% | \$12,335 | 100.0\% | 100.0\% | 294 | 100.0\% | 100.0\% | \$18,825 | 100.0\% | 100.0\% |
|  | 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 | 6 | 2.0\% | \$1,862 | 4.1\% | 6.8\% | 2 | 1.2\% | 2.1\% | \$575 | 2.2\% | 1.7\% | 4 | 3.0\% | 1.9\% | \$1,287 | 6.8\% | 3.6\% |
|  | Middle | 278 | 90.8\% | \$42,289 | 93.7\% | 77.0\% | 157 | 91.8\% | 79.5\% | \$25,103 | 95.7\% | 87.8\% | 121 | 89.6\% | 84.5\% | \$17,186 | 90.9\% | 87.7\% |
|  | Upper | 21 | 6.9\% | \$971 | 2.2\% | 16.2\% | 12 | 7.0\% | 15.6\% | \$559 | 2.1\% | 10.0\% | 9 | 6.7\% | 12.1\% | \$412 | 2.2\% | 8.5\% |
|  | 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 | 1 | 0.3\% | \$14 | 0.0\% |  | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 0.4\% | 1 | 0.7\% | 1.5\% | \$14 | 0.1\% | 0.2\% |
|  | Total | 306 | 100.0\% | \$45,136 | 100.0\% | 100.0\% | 171 | 100.0\% | 100.0\% | \$26,237 | 100.0\% | 100.0\% | 135 | 100.0\% | 100.0\% | \$18,899 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: AR Northeast AR

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$\text { 2010, } 2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | ount | $\begin{aligned} & \text { 3ank } \\ & \begin{array}{c} \text { Doll } \\ \$(000 \mathrm{~s}) \end{array} \end{aligned}$ | \$ \% | Families by Family Income <br> \% | \# | Count <br> ank <br> $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \mathrm{Ba} \\ \$(\mathbf{0 0 0} \mathbf{s}) \end{array}$ | Dollar k \$ \% | Agg \$\% | B | Count <br> ank <br> \% | \% | Ba $\$(000 s)$ | Dollar k \$ \% | Agg \$ \% |
|  |  |  | Low | 20 | 6.4\% | \$1,347 | 3.5\% | 19.7\% | 13 | 7.8\% | 6.5\% | \$890 | 4.2\% | 3.7\% | 7 | 4.9\% | 5.3\% | \$457 | 2.6\% | 2.9\% |
|  |  | Moderate | 61 | 19.6\% | \$4,973 | 12.9\% | 17.4\% | 29 | 17.4\% | 17.7\% | \$1,929 | 9.1\% | 12.4\% | 32 | 22.2\% | 19.1\% | \$3,044 | 17.4\% | 14.5\% |
|  |  | Middle | 94 | 30.2\% | \$10,357 | 26.8\% | 21.4\% | 49 | 29.3\% | 24.2\% | \$5,566 | 26.3\% | 23.0\% | 45 | 31.3\% | 22.0\% | \$4,791 | 27.4\% | 20.9\% |
|  |  | Upper | 136 | 43.7\% | \$22,019 | 56.9\% | 41.5\% | 76 | 45.5\% | 40.8\% | \$12,815 | 60.4\% | 50.4\% | 60 | 41.7\% | 39.3\% | \$9,204 | 52.6\% | 48.8\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.7\% | \$0 | 0.0\% | 10.5\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 12.8\% |
|  |  | Total | 311 | 100.0\% | \$38,696 | 100.0\% | 100.0\% | 167 | 100.0\% | 100.0\% | \$21,200 | 100.0\% | 100.0\% | 144 | 100.0\% | 100.0\% | \$17,496 | 100.0\% | 100.0\% |
|  |  | Low | 29 | 6.7\% | \$1,345 | 3.5\% | 19.7\% | 16 | 6.7\% | 4.1\% | \$856 | 4.0\% | 1.7\% | 13 | 6.7\% | 4.5\% | \$489 | 2.9\% | 2.0\% |
|  |  | Moderate | 47 | 10.9\% | \$2,867 | 7.5\% | 17.4\% | 27 | 11.3\% | 11.3\% | \$1,604 | 7.4\% | 7.2\% | 20 | 10.3\% | 11.0\% | \$1,263 | 7.5\% | 6.4\% |
|  |  | Middle | 113 | 26.1\% | \$6,932 | 18.1\% | 21.4\% | 63 | 26.5\% | 18.5\% | \$4,066 | 18.9\% | 13.9\% | 50 | 25.6\% | 16.1\% | \$2,866 | 17.1\% | 11.9\% |
|  |  | Upper | 240 | 55.4\% | \$26,884 | 70.2\% | 41.5\% | 131 | 55.0\% | 51.7\% | \$14,919 | 69.2\% | 60.8\% | 109 | 55.9\% | 53.2\% | \$11,965 | 71.4\% | 62.5\% |
|  |  | Unknown | 4 | 0.9\% | \$276 | 0.7\% | 0.0\% | 1 | 0.4\% | 14.4\% | \$111 | 0.5\% | 16.4\% | 3 | 1.5\% | 15.1\% | \$165 | 1.0\% | 17.2\% |
|  |  | Total | 433 | 100.0\% | \$38,304 | 100.0\% | 100.0\% | 238 | 100.0\% | 100.0\% | \$21,556 | 100.0\% | 100.0\% | 195 | 100.0\% | 100.0\% | \$16,748 | 100.0\% | 100.0\% |
|  |  | Low | 18 | 24.0\% | \$67 | 15.6\% | 19.7\% | 5 | 18.5\% | 12.8\% | \$16 | 9.1\% | 2.9\% | 13 | 27.1\% | 11.8\% | \$51 | 20.2\% | 3.7\% |
|  |  | Moderate | 17 | 22.7\% | \$74 | 17.2\% | 17.4\% | 6 | 22.2\% | 17.0\% | \$27 | 15.3\% | 9.0\% | 11 | 22.9\% | 18.5\% | \$47 | 18.6\% | 9.7\% |
|  |  | Middle | 18 | 24.0\% | \$110 | 25.6\% | 21.4\% | 9 | 33.3\% | 22.3\% | \$63 | 35.8\% | 19.6\% | 9 | 18.8\% | 17.3\% | \$47 | 18.6\% | 14.9\% |
|  |  | Upper | 22 | 29.3\% | \$178 | 41.5\% | 41.5\% | 7 | 25.9\% | 42.4\% | \$70 | 39.8\% | 60.3\% | 15 | 31.3\% | 47.0\% | \$108 | 42.7\% | 65.3\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.5\% | \$0 | 0.0\% | 8.1\% | 0 | 0.0\% | 5.5\% | \$0 | 0.0\% | 6.5\% |
|  |  | Total | 75 | 100.0\% | \$429 | 100.0\% | 100.0\% | 27 | 100.0\% | 100.0\% | \$176 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$253 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 19.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 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\% | 41.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 67 | 8.2\% | \$2,759 | 3.6\% | 19.7\% | 34 | 7.9\% | 5.8\% | \$1,762 | 4.1\% | 2.6\% | 33 | 8.5\% | 5.3\% | \$997 | 2.9\% | 2.4\% |
|  |  | Moderate | 125 | 15.3\% | \$7,914 | 10.2\% | 17.4\% | 62 | 14.4\% | 14.4\% | \$3,560 | 8.3\% | 9.5\% | 63 | 16.3\% | 15.0\% | \$4,354 | 12.6\% | 9.7\% |
|  |  | Middle | 225 | 27.5\% | \$17,399 | 22.5\% | 21.4\% | 121 | 28.0\% | 21.2\% | \$9,695 | 22.6\% | 17.9\% | 104 | 26.9\% | 18.7\% | \$7,704 | 22.3\% | 15.3\% |
|  |  | Upper | 398 | 48.6\% | \$49,081 | 63.4\% | 41.5\% | 214 | 49.5\% | 46.3\% | \$27,804 | 64.8\% | 55.7\% | 184 | 47.5\% | 46.4\% | \$21,277 | 61.7\% | 53.9\% |
|  |  | Unknown | 4 | 0.5\% | \$276 | 0.4\% | 0.0\% | 1 | 0.2\% | 12.4\% | \$111 | 0.3\% | 14.3\% | 3 | 0.8\% | 14.6\% | \$165 | 0.5\% | 18.7\% |
|  |  | Total | 819 | 100.0\% | \$77,429 | 100.0\% | 100.0\% | 432 | 100.0\% | 100.0\% | \$42,932 | 100.0\% | 100.0\% | 387 | 100.0\% | 100.0\% | \$34,497 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known <br> Total |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 151 | 35.0\% | \$14,350 | 46.1\% | 90.8\% | 74 | 54.0\% | 42.5\% | \$6,903 | 56.0\% | 49.2\% | 77 | 26.2\% | 42.6\% | \$7,447 | 39.6\% | 41.9\% |
|  |  |  | 53 | 12.3\% | \$8,164 | 26.2\% | 4.3\% | 19 | 13.9\% |  |  |  |  | 34 | 11.6\% |  |  |  |  |
|  |  |  | 204 | 47.3\% | \$22,514 | 72.3\% | 95.1\% | 93 | 67.9\% |  |  |  |  | 111 | 37.8\% |  |  |  |  |
|  |  |  | 227 | 52.7\% | \$8,646 | 27.7\% | 4.9\% | 44 | 32.1\% |  |  |  |  | 183 | 62.2\% |  |  |  |  |
|  |  |  | 431 | 100.0\% | \$31,160 | 100.0\% | 100.0\% | 137 | 100.0\% |  |  |  |  | 294 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { त్ర } \end{aligned}$ | \$100,000 or Less | 359 | 83.3\% | \$10,007 | 32.1\% |  | 106 | 77.4\% | 92.0\% | \$3,618 | 29.3\% | 39.3\% | 253 | 86.1\% | 92.6\% | \$6,389 | 33.9\% | 38.4\% |
|  |  | \$100,001-\$250,000 | 43 | 10.0\% | \$7,077 | 22.7\% |  | 20 | 14.6\% | 5.0\% | \$3,351 | 27.2\% | 21.5\% | 23 | 7.8\% | 4.1\% | \$3,726 | 19.8\% | 18.2\% |
|  |  | \$250,001-\$1 Million | 29 | 6.7\% | \$14,076 | 45.2\% |  | 11 | 8.0\% | 3.0\% | \$5,366 | 43.5\% | 39.1\% | 18 | 6.1\% | 3.3\% | \$8,710 | 46.3\% | 43.4\% |
|  |  | Total | 431 | 100.0\% | \$31,160 | 100.0\% |  | 137 | 100.0\% | 100.0\% | \$12,335 | 100.0\% | 100.0\% | 294 | 100.0\% | 100.0\% | \$18,825 | 100.0\% | 100.0\% |
| illion |  |  |  |  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 225 | 73.5\% | \$28,808 | 63.8\% | 97.1\% | 135 | 78.9\% | 76.8\% | \$17,058 | 65.0\% | 74.6\% | 90 | 66.7\% | 67.0\% | \$11,750 | 62.2\% | 62.1\% |
|  |  |  | 56 | 18.3\% | \$13,886 | 30.8\% | 2.3\% | 26 | 15.2\% |  |  |  |  | 30 | 22.2\% |  |  |  |  |
|  |  |  | 25 | 8.2\% | \$2,442 | 5.4\% | 0.6\% | 10 | 5.8\% |  |  |  |  | 15 | 11.1\% |  |  |  |  |
|  |  |  | 306 | 100.0\% | \$45,136 | 100.0\% | 100.0\% | 171 | 100.0\% |  |  |  |  | 135 | 100.0\% |  |  |  |  |
| $\begin{array}{ll} \hline \text { N } & \$ 100,000 \text { or Less } \\ \text { N } \end{array} \$ 100,001 \text { - } \$ 250,000$ |  |  | 174 | 56.9\% | \$7,281 | 16.1\% |  | 91 | 53.2\% | 65.5\% | \$3,981 | 15.2\% | 21.0\% | 83 | 61.5\% | 62.7\% | \$3,300 | 17.5\% | 19.5\% |
|  |  |  | 64 | 20.9\% | \$11,117 | 24.6\% |  | 39 | 22.8\% | 21.2\% | \$6,486 | 24.7\% | 33.8\% | 25 | 18.5\% | 23.5\% | \$4,631 | 24.5\% | 35.2\% |
|  |  |  | 68 | 22.2\% | \$26,738 | 59.2\% |  | 41 | 24.0\% | 13.3\% | \$15,770 | 60.1\% | 45.1\% | 27 | 20.0\% | 13.8\% | \$10,968 | 58.0\% | 45.3\% |
|  |  |  | 306 | 100.0\% | \$45,136 | 100.0\% |  | 171 | 100.0\% | 100.0\% | \$26,237 | 100.0\% | 100.0\% | 135 | 100.0\% | 100.0\% | \$18,899 | 100.0\% | 100.0\% |

[^310]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: AR Southern AR


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: AR Southern AR

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  | ount | Dol |  |  |  | ank | Agg | Ba |  | Agg |  | ank | Agg | Ban |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | 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\% |
|  | M oderate | 0 | 0.0\% | \$0 | 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 | 81.8\% | \$804 | 81.0\% | 86.5\% | 5 | 100.0\% | 77.8\% | \$361 | 100.0\% | 74.8\% | 4 | 66.7\% | 77.2\% | \$443 | 70.2\% | 69.2\% |
|  | Upper | 2 | 18.2\% | \$188 | 19.0\% | 13.5\% | 0 | 0.0\% | 19.0\% | \$0 | 0.0\% | 23.8\% | 2 | 33.3\% | 22.6\% | \$188 | 29.8\% | 30.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.2\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 11 | 100.0\% | \$992 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$361 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$631 | 100.0\% | 100.0\% |
|  | 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 | 74 | 79.6\% | \$5,798 | 76.9\% | 86.5\% | 44 | 80.0\% | 77.4\% | \$3,179 | 84.5\% | 74.6\% | 30 | 78.9\% | 79.0\% | \$2,619 | 69.5\% | 74.1\% |
|  | Upper | 19 | 20.4\% | \$1,737 | 23.1\% | 13.5\% | 11 | 20.0\% | 22.5\% | \$585 | 15.5\% | 25.1\% | 8 | 21.1\% | 21.0\% | \$1,152 | 30.5\% | 25.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 93 | 100.0\% | \$7,535 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$3,764 | 100.0\% | 100.0\% | 38 | 100.0\% | 100.0\% | \$3,771 | 100.0\% | 100.0\% |
|  | 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 | 25 | 86.2\% | \$141 | 84.9\% | 86.5\% | 11 | 84.6\% | 76.4\% | \$49 | 83.1\% | 74.3\% | 14 | 87.5\% | 80.2\% | \$92 | 86.0\% | 81.4\% |
|  | Upper | 4 | 13.8\% | \$25 | 15.1\% | 13.5\% | 2 | 15.4\% | 22.5\% | \$10 | 16.9\% | 25.5\% | 2 | 12.5\% | 18.5\% | \$15 | 14.0\% | 18.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 29 | 100.0\% | \$166 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$59 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$107 | 100.0\% | 100.0\% |
|  | 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\% | 52.8\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 33.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 47.2\% | 0 | 0.0\% | 85.7\% | \$0 | 0.0\% | 99.0\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 66.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 108 | 81.2\% | \$6,743 | 77.6\% | 86.5\% | 60 | 82.2\% | 77.1\% | \$3,589 | 85.8\% | 69.9\% | 48 | 80.0\% | 78.2\% | \$3,154 | 69.9\% | 72.1\% |
|  | Upper | 25 | 18.8\% | \$1,950 | 22.4\% | 13.5\% | 13 | 17.8\% | 21.6\% | \$595 | 14.2\% | 29.4\% | 12 | 20.0\% | 21.6\% | \$1,355 | 30.1\% | 27.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 133 | 100.0\% | \$8,693 | 100.0\% | 100.0\% | 73 | 100.0\% | 100.0\% | \$4,184 | 100.0\% | 100.0\% | 60 | 100.0\% | 100.0\% | \$4,509 | 100.0\% | 100.0\% |
|  | 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 | 136 | 83.4\% | \$7,287 | 87.0\% | 84.0\% | 43 | 82.7\% | 71.2\% | \$4,473 | 88.6\% | 75.1\% | 93 | 83.8\% | 71.2\% | \$2,814 | 84.5\% | 70.2\% |
|  | Upper | 24 | 14.7\% | \$1,073 | 12.8\% | 16.0\% | 9 | 17.3\% | 19.8\% | \$576 | 11.4\% | 20.3\% | 15 | 13.5\% | 20.3\% | \$497 | 14.9\% | 27.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 3 | 1.8\% | \$20 | 0.2\% |  | 0 | 0.0\% | 8.9\% | \$0 | 0.0\% | 4.6\% | 3 | 2.7\% | 8.6\% | \$20 | 0.6\% | 2.4\% |
|  | Total | 163 | 100.0\% | \$8,380 | 100.0\% | 100.0\% | 52 | 100.0\% | 100.0\% | \$5,049 | 100.0\% | 100.0\% | 111 | 100.0\% | 100.0\% | \$3,331 | 100.0\% | 100.0\% |
|  | 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\% |
|  | M oderate | 0 | 0.0\% | \$0 | 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 | 97 | 96.0\% | \$9,375 | 99.0\% | 94.6\% | 53 | 98.1\% | 86.2\% | \$5,198 | 99.3\% | 85.3\% | 44 | 93.6\% | 88.9\% | \$4,177 | 98.7\% | 85.9\% |
|  | Upper | 3 | 3.0\% | \$82 | 0.9\% | 5.4\% | 1 | 1.9\% | 13.8\% | \$35 | 0.7\% | 14.7\% | 2 | 4.3\% | 10.2\% | \$47 | 1.1\% | 13.9\% |
|  | 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 | 1 | 1.0\% | \$9 | 0.1\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 1 | 2.1\% | 0.9\% | \$9 | 0.2\% | 0.1\% |
|  | Total | 101 | 100.0\% | \$9,466 | 100.0\% | 100.0\% | 54 | 100.0\% | 100.0\% | \$5,233 | 100.0\% | 100.0\% | 47 | 100.0\% | 100.0\% | \$4,233 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: AR Southern AR


[^312]Originations \& Purchases

## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: AR Union



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count | Dollar |  | Families by Family Income \% | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | $\begin{array}{r} B \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 20.6\% | 0 | 0.0\% | 4.2\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 0.7\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.6\% | 0 | 0.0\% | 14.5\% | \$0 | 0.0\% | 10.1\% | 0 | 0.0\% | 13.9\% | \$0 | 0.0\% | 9.1\% |
|  |  | Middle | 2 | 28.6\% | \$172 | 13.0\% | 19.8\% | 1 | 50.0\% | 24.0\% | \$50 | 19.2\% | 15.6\% | 1 | 20.0\% | 20.1\% | \$122 | 11.5\% | 15.5\% |
|  |  | Upper | 5 | 71.4\% | \$1,153 | 87.0\% | 44.1\% | 1 | 50.0\% | 52.0\% | \$210 | 80.8\% | 69.5\% | 4 | 80.0\% | 53.0\% | \$943 | 88.5\% | 69.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 2.8\% | 0 | 0.0\% | 10.1\% | \$0 | 0.0\% | 5.7\% |
|  |  | Total | 7 | 100.0\% | \$1,325 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$260 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$1,065 | 100.0\% | 100.0\% |
| $\begin{aligned} & \text { 山 } \\ & \text { U } \\ & \text { ¿ } \\ & \underset{\sim}{u} \\ & \underset{\sim}{u} \end{aligned}$ |  | Low | 1 | 5.3\% | \$30 | 1.4\% | 20.6\% | 1 | 8.3\% | 2.3\% | \$30 | 2.2\% | 0.8\% | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 0.6\% |
|  |  | Moderate | 1 | 5.3\% | \$34 | 1.6\% | 15.6\% | 0 | 0.0\% | 8.5\% | \$0 | 0.0\% | 4.4\% | 1 | 14.3\% | 9.6\% | \$34 | 4.2\% | 3.8\% |
|  |  | Middle | 3 | 15.8\% | \$182 | 8.3\% | 19.8\% | 2 | 16.7\% | 16.3\% | \$155 | 11.3\% | 11.1\% | 1 | 14.3\% | 15.4\% | \$27 | 3.3\% | 10.0\% |
|  |  | Upper | 13 | 68.4\% | \$1,847 | 84.6\% | 44.1\% | 9 | 75.0\% | 64.1\% | \$1,192 | 86.6\% | 76.8\% | 4 | 57.1\% | 57.8\% | \$655 | 81.3\% | 68.6\% |
|  |  | Unknown | 1 | 5.3\% | \$90 | 4.1\% | 0.0\% | 0 | 0.0\% | 8.7\% | \$0 | 0.0\% | 6.9\% | 1 | 14.3\% | 14.5\% | \$90 | 11.2\% | 17.0\% |
|  |  | Total | 19 | 100.0\% | \$2,183 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$1,377 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$806 | 100.0\% | 100.0\% |
|  |  | Low | 2 | 18.2\% | \$15 | 18.3\% | 20.6\% | 1 | 25.0\% | 9.8\% | \$3 | 8.6\% | 0.9\% | 1 | 14.3\% | 12.4\% | \$12 | 25.5\% | 2.4\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.6\% | 0 | 0.0\% | 14.1\% | \$0 | 0.0\% | 3.2\% | 0 | 0.0\% | 17.5\% | \$0 | 0.0\% | 11.8\% |
|  |  | Middle | 4 | 36.4\% | \$34 | 41.5\% | 19.8\% | 1 | 25.0\% | 25.0\% | \$8 | 22.9\% | 16.9\% | 3 | 42.9\% | 22.7\% | \$26 | 55.3\% | 8.3\% |
|  |  | Upper | 5 | 45.5\% | \$33 | 40.2\% | 44.1\% | 2 | 50.0\% | 46.7\% | \$24 | 68.6\% | 70.2\% | 3 | 42.9\% | 37.1\% | \$9 | 19.1\% | 67.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 8.9\% | 0 | 0.0\% | 10.3\% | \$0 | 0.0\% | 10.6\% |
|  |  | Total | 11 | 100.0\% | \$82 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$35 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$47 | 100.0\% | 100.0\% |
|  |  | Low | 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\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.6\% | 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\% | 19.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 44.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 3 | 8.1\% | \$45 | 1.3\% | 20.6\% | 2 | 11.1\% | 3.9\% | \$33 | 2.0\% | 1.3\% | 1 | 5.3\% | 3.8\% | \$12 | 0.6\% | 0.7\% |
|  |  | Moderate | 1 | 2.7\% | \$34 | 0.9\% | 15.6\% | 0 | 0.0\% | 11.6\% | \$0 | 0.0\% | 6.6\% | 1 | 5.3\% | 12.3\% | \$34 | 1.8\% | 6.7\% |
|  |  | Middle | 9 | 24.3\% | \$388 | 10.8\% | 19.8\% | 4 | 22.2\% | 20.4\% | \$213 | 12.7\% | 13.2\% | 5 | 26.3\% | 18.2\% | \$175 | 9.1\% | 12.6\% |
|  |  | Upper | 23 | 62.2\% | \$3,033 | 84.5\% | 44.1\% | 12 | 66.7\% | 57.2\% | \$1,426 | 85.3\% | 73.5\% | 11 | 57.9\% | 53.5\% | \$1,607 | 83.8\% | 68.5\% |
|  |  | Unknown | 1 | 2.7\% | \$90 | 2.5\% | 0.0\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 5.5\% | 1 | 5.3\% | 12.2\% | \$90 | 4.7\% | 11.6\% |
|  |  | Total | 37 | 100.0\% | \$3,590 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$1,672 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$1,918 | 100.0\% | 100.0\% |
|  |  <br>  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 15 | 35.7\% | \$1,010 | 59.0\% | 88.3\% | 5 | 62.5\% | 41.4\% | \$262 | 51.7\% | 62.7\% | 10 | 29.4\% | 36.3\% | \$748 | 62.1\% | 54.2\% |
|  |  | Over \$1 Million | 4 | 9.5\% | \$256 | 15.0\% | 6.1\% | 2 | 25.0\% |  |  |  |  | 2 | 5.9\% |  |  |  |  |
|  |  | Total Rev. available | 19 | 45.2\% | \$1,266 | 74.0\% | 94.4\% | 7 | 87.5\% |  |  |  |  | 12 | 35.3\% |  |  |  |  |
|  |  | Rev. Not Known |  | 54.8\% | \$445 | 26.0\% | 5.6\% | 1 | 12.5\% |  |  |  |  | 22 | 64.7\% |  |  |  |  |
|  |  | Total | 42 | 100.0\% | \$1,711 | 100.0\% | 100.0\% | 8 | 100.0\% |  |  |  |  | 34 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 40 | 95.2\% | \$1,236 | 72.2\% |  | 7 | 87.5\% | 94.4\% | \$332 | 65.5\% | 48.7\% | 33 | 97.1\% | 95.1\% | \$904 | 75.1\% | 39.5\% |
|  |  | \$100,001 - \$250,000 | 1 | 2.4\% | \$175 | 10.2\% |  | 1 | 12.5\% | 3.2\% | \$175 | 34.5\% | 15.6\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 13.3\% |
|  |  | \$250,001 - \$1 Million | 1 | 2.4\% | \$300 | 17.5\% |  | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 35.7\% | 1 | 2.9\% | 2.7\% | \$300 | 24.9\% | 47.2\% |
|  |  | Total | 42 | 100.0\% | \$1,711 | 100.0\% |  | 8 | 100.0\% | 100.0\% | \$507 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$1,204 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 94.1\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 35.6\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 50.8\% |
|  |  | Over \$1 Million | 2 | 66.7\% | \$1,000 | 81.4\% | $5.9 \%$ | 1 | 100.0\% |  |  |  |  | 1 | 50.0\% |  |  |  |  |
|  |  | Not Known | 1 | 33.3\% | \$228 | 18.6\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 1 | 50.0\% |  |  |  |  |
|  |  | Total | 3 | 100.0\% | \$1,228 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 2 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 58.3\% | \$0 | 0.0\% | 14.6\% | 0 | 0.0\% | 44.4\% | \$0 | 0.0\% | 10.6\% |
|  |  | \$100,001-\$250,000 | 1 | 33.3\% | \$228 | 18.6\% |  | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 35.2\% | 1 | 50.0\% | 44.4\% | \$228 | 31.3\% | 55.8\% |
|  |  | \$250,001-\$500,000 |  | 66.7\% | \$1,000 | 81.4\% |  | 1 | 100.0\% | 16.7\% | \$500 | 100.0\% | 50.2\% | 1 | 50.0\% | 11.1\% | \$500 | 68.7\% | 33.6\% |
|  |  | Total | 3 | 100.0\% | \$1,228 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$500 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$728 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: FL Citrus

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 8,337 | 16.2 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 10,288 | 20.0 |
| Middle-income | 22 | 78.6 |  | 76.3 | 3,823 | 9.7 | 12,332 | 24.0 |
| Upper-income | 5 | 17.9 |  | 23.7 | 728 | 6.0 | 20,531 | 39.9 |
| Unknown-income | 1 | 3.6 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 28 | 100.0 |  | 100.0 | 4,551 | 8.8 | 51,488 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 68,174 | 48,434 |  | 71.0 | 8,670 | 12.7 | 11,070 | 16.2 |
| Upper-income | 19,225 | 14,574 |  | 75.8 | 1,735 | 9.0 | 2,916 | 15.2 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 87,399 | 63,008 |  | 72.1 | 10,405 | 11.9 | 13,986 | 16.0 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 7,717 | 76.4 |  | 76.4 | 256 | 78.5 | 265 | 74.2 |
| Upper-income | 2,384 | 23.6 |  | 23.6 | 70 | 21.5 | 92 | 25.8 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 10,101 | 100.0 |  | 100.0 | 326 | 100.0 | 357 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 93.2 |  | 3.2 |  | 3.5 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 178 | 88.6 |  | 88.4 | 2 | 100.0 | 1 | 100.0 |
| Upper-income | 23 | 11.4 |  | 11.6 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 201 | 100.0 |  | 100.0 | 2 | 100.0 | 1 | 100.0 |
|  | Percentage of | Total F |  | 98.5 |  | 1.0 |  | . 5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: FL Citrus

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | B |  | ank |  |  | Bank |  | Agg | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  | Units |  |  | Ba |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | 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 | 193 | 81.8\% | \$19,583 | 76.6\% | 76.9\% | 108 | 82.4\% | 73.6\% | \$11,562 | 79.4\% | 70.5\% | 85 | 81.0\% | 83.4\% | \$8,021 | 72.8\% | 83.8\% |
|  | Upper | 43 | 18.2\% | \$5,996 | 23.4\% | 23.1\% | 23 | 17.6\% | 26.4\% | \$3,001 | 20.6\% | 29.5\% | 20 | 19.0\% | 16.6\% | \$2,995 | 27.2\% | 16.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 236 | 100.0\% | \$25,579 | 100.0\% | 100.0\% | 131 | 100.0\% | 100.0\% | \$14,563 | 100.0\% | 100.0\% | 105 | 100.0\% | 100.0\% | \$11,016 | 100.0\% | 100.0\% |
|  | 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 | 126 | 74.6\% | \$16,074 | 70.2\% | 76.9\% | 82 | 74.5\% | 70.5\% | \$10,171 | 67.1\% | 69.5\% | 44 | 74.6\% | 72.2\% | \$5,903 | 76.1\% | 72.4\% |
|  | Upper | 43 | 25.4\% | \$6,834 | 29.8\% | 23.1\% | 28 | 25.5\% | 29.5\% | \$4,976 | 32.9\% | 30.5\% | 15 | 25.4\% | 27.8\% | \$1,858 | 23.9\% | 27.6\% |
|  | 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 | 169 | 100.0\% | \$22,908 | 100.0\% | 100.0\% | 110 | 100.0\% | 100.0\% | \$15,147 | 100.0\% | 100.0\% | 59 | 100.0\% | 100.0\% | \$7,761 | 100.0\% | 100.0\% |
|  | 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 | 22 | 75.9\% | \$221 | 55.5\% | 76.9\% | 8 | 88.9\% | 80.6\% | \$46 | 32.6\% | 72.2\% | 14 | 70.0\% | 77.9\% | \$175 | 68.1\% | 83.8\% |
|  | Upper | 7 | 24.1\% | \$177 | 44.5\% | 23.1\% | 1 | 11.1\% | 19.4\% | \$95 | 67.4\% | 27.8\% | 6 | 30.0\% | 22.1\% | \$82 | 31.9\% | 16.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 29 | 100.0\% | \$398 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$141 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$257 | 100.0\% | 100.0\% |
| 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\% | 72.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 90.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 27.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 9.8\% |
|  | 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\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 341 | 78.6\% | \$35,878 | 73.4\% | 76.9\% | 198 | 79.2\% | 72.0\% | \$21,779 | 73.0\% | 69.9\% | 143 | 77.7\% | 78.4\% | \$14,099 | 74.1\% | 78.9\% |
|  | Upper | 93 | 21.4\% | \$13,007 | 26.6\% | 23.1\% | 52 | 20.8\% | 28.0\% | \$8,072 | 27.0\% | 30.1\% | 41 | 22.3\% | 21.6\% | \$4,935 | 25.9\% | 21.1\% |
|  | 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 | 434 | 100.0\% | \$48,885 | 100.0\% | 100.0\% | 250 | 100.0\% | 100.0\% | \$29,851 | 100.0\% | 100.0\% | 184 | 100.0\% | 100.0\% | \$19,034 | 100.0\% | 100.0\% |
|  | 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 | 431 | 76.8\% | \$25,145 | 75.4\% | 76.4\% | 144 | 76.6\% | 74.2\% | \$12,058 | 71.2\% | 73.6\% | 287 | 76.9\% | 73.2\% | \$13,087 | 79.9\% | 72.5\% |
|  | Upper | 130 | 23.2\% | \$8,183 | 24.6\% | 23.6\% | 44 | 23.4\% | 22.6\% | \$4,886 | 28.8\% | 25.0\% | 86 | 23.1\% | 24.0\% | \$3,297 | 20.1\% | 26.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.2\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 0.9\% |
|  | Total | 561 | 100.0\% | \$33,328 | 100.0\% | 100.0\% | 188 | 100.0\% | 100.0\% | \$16,944 | 100.0\% | 100.0\% | 373 | 100.0\% | 100.0\% | \$16,384 | 100.0\% | 100.0\% |
|  | 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 | 3 | 75.0\% | \$125 | 54.6\% | 88.4\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 87.8\% | 3 | 75.0\% | 88.9\% | \$125 | 54.6\% | 76.6\% |
|  | Upper | 1 | 25.0\% | \$104 | 45.4\% | 11.6\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 12.2\% | 1 | 25.0\% | 11.1\% | \$104 | 45.4\% | 23.4\% |
|  | 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 | 4 | 100.0\% | \$229 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$229 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

## Assessment Area: FL Citrus



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## Appendices

## Combined Demographics Report

Assessment Area: FL Daytona


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: FL Daytona

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  | Agg$\%$ | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 13 | 4.9\% | \$1,290 | 3.3\% | 9.6\% | 3 | 2.2\% | 5.4\% | \$495 | 2.3\% | 4.0\% | 10 | 7.8\% | 4.7\% | \$795 | 4.6\% | 4.0\% |
|  | Middle | 168 | 62.9\% | \$22,892 | 58.9\% | 74.0\% | 81 | 58.7\% | 70.6\% | \$11,353 | 52.2\% | 64.4\% | 87 | 67.4\% | 71.7\% | \$11,539 | 67.4\% | 64.7\% |
|  | Upper | 86 | 32.2\% | \$14,705 | 37.8\% | 15.9\% | 54 | 39.1\% | 23.9\% | \$9,909 | 45.5\% | 31.6\% | 32 | 24.8\% | 23.6\% | \$4,796 | 28.0\% | 31.3\% |
|  | 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 | 267 | 100.0\% | \$38,887 | 100.0\% | 100.0\% | 138 | 100.0\% | 100.0\% | \$21,757 | 100.0\% | 100.0\% | 129 | 100.0\% | 100.0\% | \$17,130 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 6 | 3.5\% | \$322 | 1.3\% | 9.6\% | 2 | 2.1\% | 4.8\% | \$112 | 0.8\% | 3.3\% | 4 | 5.4\% | 4.4\% | \$210 | 2.0\% | 3.3\% |
|  | Middle | 130 | 76.5\% | \$18,536 | 76.2\% | 74.0\% | 71 | 74.0\% | 64.7\% | \$9,669 | 71.2\% | 60.2\% | 59 | 79.7\% | 65.6\% | \$8,867 | 82.6\% | 61.4\% |
|  | Upper | 34 | 20.0\% | \$5,459 | 22.4\% | 15.9\% | 23 | 24.0\% | 30.4\% | \$3,802 | 28.0\% | 36.5\% | 11 | 14.9\% | 29.9\% | \$1,657 | 15.4\% | 35.3\% |
|  | 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 | 170 | 100.0\% | \$24,317 | 100.0\% | 100.0\% | 96 | 100.0\% | 100.0\% | \$13,583 | 100.0\% | 100.0\% | 74 | 100.0\% | 100.0\% | \$10,734 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 4.5\% | \$6 | 1.9\% | 9.6\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 5.8\% | 1 | 6.3\% | 10.0\% | \$6 | 2.4\% | 10.7\% |
|  | Middle | 16 | 72.7\% | \$232 | 74.4\% | 74.0\% | 6 | 100.0\% | 74.3\% | \$66 | 100.0\% | 66.7\% | 10 | 62.5\% | 65.5\% | \$166 | 67.5\% | 55.8\% |
|  | Upper | 5 | 22.7\% | \$74 | 23.7\% | 15.9\% | 0 | 0.0\% | 17.4\% | \$0 | 0.0\% | 27.6\% | 5 | 31.3\% | 24.2\% | \$74 | 30.1\% | 33.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 22 | 100.0\% | \$312 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$66 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$246 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.8\% | 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\% | 26.9\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 10.7\% | 0 | 0.0\% | 38.9\% | \$0 | 0.0\% | 10.9\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 60.8\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 89.3\% | 0 | 0.0\% | 55.6\% | \$0 | 0.0\% | 75.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 10.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.6\% | \$0 | 0.0\% | 13.2\% |
|  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 20 | 4.4\% | \$1,618 | 2.5\% | 9.6\% | 5 | 2.1\% | 5.3\% | \$607 | 1.7\% | 4.1\% | 15 | 6.8\% | 4.8\% | \$1,011 | 3.6\% | 3.9\% |
|  | Middle | 314 | 68.4\% | \$41,660 | 65.6\% | 74.0\% | 158 | 65.8\% | 68.2\% | \$21,088 | 59.6\% | 64.2\% | 156 | 71.2\% | 69.0\% | \$20,572 | 73.2\% | 63.5\% |
|  | Upper | 125 | 27.2\% | \$20,238 | 31.9\% | 15.9\% | 77 | 32.1\% | 26.4\% | \$13,711 | 38.7\% | 31.7\% | 48 | 21.9\% | 26.2\% | \$6,527 | 23.2\% | 32.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 459 | 100.0\% | \$63,516 | 100.0\% | 100.0\% | 240 | 100.0\% | 100.0\% | \$35,406 | 100.0\% | 100.0\% | 219 | 100.0\% | 100.0\% | \$28,110 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 14 | 3.3\% | \$1,061 | 3.7\% | 1.1\% | 5 | 3.9\% | 0.8\% | \$732 | 5.6\% | 0.9\% | 9 | 3.1\% | 1.0\% | \$329 | 2.0\% | 1.0\% |
|  | Moderate | 33 | 7.8\% | \$1,924 | 6.6\% | 14.4\% | 11 | 8.5\% | 13.7\% | \$701 | 5.4\% | 20.0\% | 22 | 7.5\% | 14.2\% | \$1,223 | 7.6\% | 22.7\% |
|  | Middle | 303 | 71.8\% | \$17,502 | 60.3\% | 66.6\% | 88 | 68.2\% | 62.8\% | \$7,498 | 57.9\% | 58.7\% | 215 | 73.4\% | 63.1\% | \$10,004 | 62.2\% | 57.3\% |
|  | Upper | 72 | 17.1\% | \$8,546 | 29.4\% | 17.9\% | 25 | 19.4\% | 20.5\% | \$4,025 | 31.1\% | 19.2\% | 47 | 16.0\% | 20.4\% | \$4,521 | 28.1\% | 18.6\% |
|  | 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\% | 2.2\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 422 | 100.0\% | \$29,033 | 100.0\% | 100.0\% | 129 | 100.0\% | 100.0\% | \$12,956 | 100.0\% | 100.0\% | 293 | 100.0\% | 100.0\% | \$16,077 | 100.0\% | 100.0\% |
|  | 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\% | 2.6\% | 0 | 0.0\% | 7.3\% | \$0 | 0.0\% | 5.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 1 | 50.0\% | \$2 | 8.7\% | 73.6\% | 0 | 0.0\% | 61.0\% | \$0 | 0.0\% | 82.1\% | 1 | 50.0\% | 78.9\% | \$2 | 8.7\% | 86.0\% |
|  | Upper | 1 | 50.0\% | \$21 | 91.3\% | 23.8\% | 0 | 0.0\% | 26.8\% | \$0 | 0.0\% | 10.7\% | 1 | 50.0\% | 21.1\% | \$21 | 91.3\% | 14.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.9\% | \$0 | 0.0\% | 2.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2 | 100.0\% | \$23 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$23 | 100.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size



[^318]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: FL Ft. Lauderdale


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Ft. Lauderdale

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount ${ }^{\text {B }}$ |  | ank |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  | Units |  |  | Ba |  | Agg |  | nk | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 17 | 1.6\% | \$2,130 | 1.0\% | 1.0\% | 11 | 1.9\% | 1.3\% | \$1,645 | 1.3\% | 1.0\% | 6 | 1.2\% | 1.3\% | \$485 | 0.5\% | 1.1\% |
|  | Moderate | 145 | 13.6\% | \$14,409 | 6.6\% | 23.8\% | 69 | 12.0\% | 15.3\% | \$7,176 | 5.8\% | 9.2\% | 76 | 15.4\% | 14.9\% | \$7,233 | 7.5\% | 9.9\% |
|  | Middle | 491 | 46.0\% | \$82,683 | 37.6\% | 45.9\% | 278 | 48.3\% | 45.3\% | \$48,366 | 39.4\% | 36.9\% | 213 | 43.3\% | 43.6\% | \$34,317 | 35.4\% | 35.3\% |
|  | Upper | 414 | 38.8\% | \$120,617 | 54.9\% | 29.2\% | 217 | 37.7\% | 38.1\% | \$65,725 | 53.5\% | 52.9\% | 197 | 40.0\% | 40.1\% | \$54,892 | 56.6\% | 53.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,067 | 100.0\% | \$219,839 | 100.0\% | 100.0\% | 575 | 100.0\% | 100.0\% | \$122,912 | 100.0\% | 100.0\% | 492 | 100.0\% | 100.0\% | \$96,927 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.7\% |
|  | Moderate | 36 | 10.4\% | \$3,502 | 4.4\% | 23.8\% | 15 | 9.1\% | 7.6\% | \$1,530 | 3.7\% | 4.6\% | 21 | 11.5\% | 8.2\% | \$1,972 | 5.2\% | 5.1\% |
|  | Middle | 109 | 31.4\% | \$19,790 | 24.9\% | 45.9\% | 48 | 29.1\% | 32.8\% | \$8,710 | 21.1\% | 26.9\% | 61 | 33.5\% | 33.6\% | \$11,080 | 29.0\% | 27.3\% |
|  | Upper | 202 | 58.2\% | \$56,179 | 70.7\% | 29.2\% | 102 | 61.8\% | 58.9\% | \$31,052 | 75.2\% | 68.0\% | 100 | 54.9\% | 57.5\% | \$25,127 | 65.8\% | 66.9\% |
|  | 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 | 347 | 100.0\% | \$79,471 | 100.0\% | 100.0\% | 165 | 100.0\% | 100.0\% | \$41,292 | 100.0\% | 100.0\% | 182 | 100.0\% | 100.0\% | \$38,179 | 100.0\% | 100.0\% |
|  | Low | 1 | 4.0\% | \$3 | 0.9\% | 1.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.3\% | 1 | 6.3\% | 0.5\% | \$3 | 1.2\% | 0.1\% |
|  | Moderate | 6 | 24.0\% | \$113 | 33.1\% | 23.8\% | 3 | 33.3\% | 15.4\% | \$35 | 36.8\% | 6.7\% | 3 | 18.8\% | 14.2\% | \$78 | 31.7\% | 6.9\% |
|  | Middle | 8 | 32.0\% | \$104 | 30.5\% | 45.9\% | 2 | 22.2\% | 39.9\% | \$30 | 31.6\% | 26.6\% | 6 | 37.5\% | 34.6\% | \$74 | 30.1\% | 24.9\% |
|  | Upper | 10 | 40.0\% | \$121 | 35.5\% | 29.2\% | 4 | 44.4\% | 44.3\% | \$30 | 31.6\% | 66.4\% | 6 | 37.5\% | 50.7\% | \$91 | 37.0\% | 68.2\% |
|  | 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 | 25 | 100.0\% | \$341 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$95 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$246 | 100.0\% | 100.0\% |
|  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.2\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 11.1\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 0.9\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 32.6\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 15.2\% | 0 | 0.0\% | 30.9\% | \$0 | 0.0\% | 27.1\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 48.6\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 56.9\% | 0 | 0.0\% | 38.3\% | \$0 | 0.0\% | 42.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 16.6\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 16.8\% | 0 | 0.0\% | 23.5\% | \$0 | 0.0\% | 29.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 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\% |
|  | Low | 18 | 1.3\% | \$2,133 | 0.7\% | 1.0\% | 11 | 1.5\% | 1.1\% | \$1,645 | 1.0\% | 1.4\% | 7 | 1.0\% | 1.1\% | \$488 | 0.4\% | 0.9\% |
|  | Moderate | 187 | 13.0\% | \$18,024 | 6.0\% | 23.8\% | 87 | 11.6\% | 12.3\% | \$8,741 | 5.3\% | 7.7\% | 100 | 14.5\% | 12.3\% | \$9,283 | 6.9\% | 9.2\% |
|  | Middle | 608 | 42.3\% | \$102,577 | 34.2\% | 45.9\% | 328 | 43.8\% | 40.3\% | \$57,106 | 34.8\% | 33.9\% | 280 | 40.6\% | 39.5\% | \$45,471 | 33.6\% | 32.6\% |
|  | Upper | 626 | 43.5\% | \$176,917 | 59.0\% | 29.2\% | 323 | 43.1\% | 46.3\% | \$96,807 | 58.9\% | 57.0\% | 303 | 43.9\% | 47.2\% | \$80,110 | 59.2\% | 57.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,439 | 100.0\% | \$299,651 | 100.0\% | 100.0\% | 749 | 100.0\% | 100.0\% | \$164,299 | 100.0\% | 100.0\% | 690 | 100.0\% | 100.0\% | \$135,352 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 68 | 4.6\% | \$8,625 | 6.1\% | 3.7\% | 22 | 4.0\% | 3.9\% | \$2,905 | 4.0\% | 5.2\% | 46 | 4.9\% | 3.9\% | \$5,720 | 8.3\% | 5.6\% |
|  | Moderate | 333 | 22.4\% | \$39,006 | 27.6\% | 21.5\% | 129 | 23.2\% | 17.4\% | \$20,798 | 28.7\% | 21.2\% | 204 | 21.8\% | 17.6\% | \$18,208 | 26.5\% | 20.6\% |
|  | Middle | 585 | 39.3\% | \$54,938 | 38.9\% | 41.8\% | 231 | 41.6\% | 39.8\% | \$31,129 | 43.0\% | 41.7\% | 354 | 37.9\% | 39.7\% | \$23,809 | 34.7\% | 41.6\% |
|  | Upper | 503 | 33.8\% | \$38,534 | 27.3\% | 33.0\% | 173 | 31.2\% | 37.9\% | \$17,635 | 24.3\% | 31.1\% | 330 | 35.3\% | 38.2\% | \$20,899 | 30.4\% | 32.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 1,489 | 100.0\% | \$141,103 | 100.0\% | 100.0\% | 555 | 100.0\% | 100.0\% | \$72,467 | 100.0\% | 100.0\% | 934 | 100.0\% | 100.0\% | \$68,636 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.5\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 14.8\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 11.4\% | 0 | 0.0\% | 19.0\% | \$0 | 0.0\% | 4.1\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 1.2\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 37.2\% | 0 | 0.0\% | 41.7\% | \$0 | 0.0\% | 32.4\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 14.0\% |
|  | Upper | 1 | 100.0\% | \$20 | 100.0\% | 48.9\% | 0 | 0.0\% | 38.1\% | \$0 | 0.0\% | 63.3\% | 1 | 100.0\% | 66.7\% | \$20 | 100.0\% | 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\% |
|  | 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 | 1 | 100.0\% | \$20 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$20 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: FL Ft. Lauderdale


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## Appendices

## Combined Demographics Report

Assessment Area: FL Ft. Myers


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Ft. Myers

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | Agg | Bank |  | Agg | Bank |  | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
| HOME PURCHASE | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 11 | 2.4\% | \$1,328 | 1.7\% | 12.4\% | 10 | 4.3\% | 4.5\% | \$1,250 | 3.3\% | 3.0\% | 1 | 0.4\% | 4.3\% | \$78 | 0.2\% | 3.0\% |
|  | Middle | 289 | 63.2\% | \$35,186 | 44.2\% | 63.9\% | 143 | 62.2\% | 71.1\% | \$16,900 | 44.7\% | 58.7\% | 146 | 64.3\% | 66.9\% | \$18,286 | 43.7\% | 53.7\% |
|  | Upper | 157 | 34.4\% | \$43,174 | 54.2\% | 22.8\% | 77 | 33.5\% | 24.3\% | \$19,676 | 52.0\% | 38.3\% | 80 | 35.2\% | 28.6\% | \$23,498 | 56.1\% | 43.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 457 | 100.0\% | \$79,688 | 100.0\% | 100.0\% | 230 | 100.0\% | 100.0\% | \$37,826 | 100.0\% | 100.0\% | 227 | 100.0\% | 100.0\% | \$41,862 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 1.5\% | \$275 | 0.8\% | 12.4\% | 2 | 2.4\% | 3.4\% | \$275 | 1.4\% | 2.7\% | 0 | 0.0\% | 3.3\% | \$0 | 0.0\% | 2.4\% |
|  | Middle | 64 | 47.4\% | \$10,331 | 31.6\% | 63.9\% | 43 | 51.2\% | 49.7\% | \$6,672 | 33.9\% | 38.6\% | 21 | 41.2\% | 52.6\% | \$3,659 | 28.2\% | 40.2\% |
|  | Upper | 69 | 51.1\% | \$22,048 | 67.5\% | 22.8\% | 39 | 46.4\% | 46.9\% | \$12,737 | 64.7\% | 58.6\% | 30 | 58.8\% | 44.1\% | \$9,311 | 71.8\% | 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 | 135 | 100.0\% | \$32,654 | 100.0\% | 100.0\% | 84 | 100.0\% | 100.0\% | \$19,684 | 100.0\% | 100.0\% | 51 | 100.0\% | 100.0\% | \$12,970 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 2 | 11.8\% | \$9 | 3.3\% | 12.4\% | 0 | 0.0\% | 8.1\% | \$0 | 0.0\% | 0.7\% | 2 | 16.7\% | 14.4\% | \$9 | 4.4\% | 7.0\% |
|  | Middle | 11 | 64.7\% | \$216 | 79.4\% | 63.9\% | 4 | 80.0\% | 60.1\% | \$63 | 91.3\% | 44.0\% | 7 | 58.3\% | 61.9\% | \$153 | 75.4\% | 48.4\% |
|  | Upper | 4 | 23.5\% | \$47 | 17.3\% | 22.8\% | 1 | 20.0\% | 31.8\% | \$6 | 8.7\% | 55.3\% | 3 | 25.0\% | 22.0\% | \$41 | 20.2\% | 44.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 17 | 100.0\% | \$272 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$69 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$203 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.5\% | 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\% | 15.3\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 6.0\% | 0 | 0.0\% | 15.8\% | \$0 | 0.0\% | 17.2\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 44.4\% | 0 | 0.0\% | 58.3\% | \$0 | 0.0\% | 87.0\% | 0 | 0.0\% | 47.4\% | \$0 | 0.0\% | 70.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.9\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 6.9\% | 0 | 0.0\% | 36.8\% | \$0 | 0.0\% | 12.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 15 | 2.5\% | \$1,612 | 1.4\% | 12.4\% | 12 | 3.8\% | 4.2\% | \$1,525 | 2.6\% | 2.9\% | 3 | 1.0\% | 4.1\% | \$87 | 0.2\% | 2.8\% |
|  | Middle | 364 | 59.8\% | \$45,733 | 40.6\% | 63.9\% | 190 | 59.6\% | 63.7\% | \$23,635 | 41.0\% | 50.1\% | 174 | 60.0\% | 61.6\% | \$22,098 | 40.2\% | 47.8\% |
|  | Upper | 230 | 37.8\% | \$65,269 | 58.0\% | 22.8\% | 117 | 36.7\% | 32.0\% | \$32,419 | 56.3\% | 47.0\% | 113 | 39.0\% | 34.2\% | \$32,850 | 59.7\% | 49.3\% |
|  | 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 | 609 | 100.0\% | \$112,614 | 100.0\% | 100.0\% | 319 | 100.0\% | 100.0\% | \$57,579 | 100.0\% | 100.0\% | 290 | 100.0\% | 100.0\% | \$55,035 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 1 | 0.1\% | \$725 | 1.3\% | 0.9\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.7\% | 1 | 0.2\% | 0.7\% | \$725 | 2.3\% | 1.3\% |
|  | Moderate | 92 | 9.8\% | \$6,596 | 11.6\% | 11.0\% | 32 | 9.6\% | 9.5\% | \$2,288 | 8.8\% | 11.0\% | 60 | 9.9\% | 9.5\% | \$4,308 | 13.9\% | 12.4\% |
|  | Middle | 584 | 62.2\% | \$34,600 | 60.7\% | 63.5\% | 210 | 63.3\% | 57.2\% | \$16,395 | 63.2\% | 55.3\% | 374 | 61.6\% | 58.2\% | \$18,205 | 58.5\% | 53.5\% |
|  | Upper | 262 | 27.9\% | \$15,114 | 26.5\% | 24.6\% | 90 | 27.1\% | 30.4\% | \$7,255 | 28.0\% | 32.0\% | 172 | 28.3\% | 29.9\% | \$7,859 | 25.3\% | 32.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 1.8\% | \$0 | 0.0\% | 0.5\% |
|  | Total | 939 | 100.0\% | \$57,035 | 100.0\% | 100.0\% | 332 | 100.0\% | 100.0\% | \$25,938 | 100.0\% | 100.0\% | 607 | 100.0\% | 100.0\% | \$31,097 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 8.0\% | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 4.2\% | \$0 | 0.0\% | 28.5\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 69.1\% | 0 | 0.0\% | 60.0\% | \$0 | 0.0\% | 76.8\% | 0 | 0.0\% | 70.8\% | \$0 | 0.0\% | 37.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 22.9\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 22.5\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 34.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 7.5\% | \$0 | 0.0\% | 0.5\% | 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\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: FL Ft. Myers

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | sank | \$ \% | Families <br> by Family <br> Income <br> \% |  | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( $\begin{array}{r}\text { Bank } \\ \text { \$(000s) }\end{array}$ | Dollar k \$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( $\begin{array}{r}\text { Bank } \\ \text { \$(000s) }\end{array}$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 43 | 9.4\% | \$2,766 | 3.5\% | 17.1\% | 25 | 10.9\% | 12.7\% | \$1,705 | 4.5\% | 6.3\% | 18 | 7.9\% | 8.6\% | \$1,061 | 2.5\% | 4.1\% |
|  | Moderate | 60 | 13.1\% | \$5,024 | 6.3\% | 19.9\% | 37 | 16.1\% | 20.3\% | \$2,980 | 7.9\% | 13.9\% | 23 | 10.1\% | 15.0\% | \$2,044 | 4.9\% | 9.3\% |
|  | Middle | 73 | 16.0\% | \$8,865 | 11.1\% | 23.3\% | 39 | 17.0\% | 16.4\% | \$4,847 | 12.8\% | 14.3\% | 34 | 15.0\% | 15.7\% | \$4,018 | 9.6\% | 12.4\% |
|  | Upper | 276 | 60.4\% | \$61,094 | 76.7\% | 39.6\% | 128 | 55.7\% | 38.9\% | \$28,126 | 74.4\% | 54.6\% | 148 | 65.2\% | 45.8\% | \$32,968 | 78.8\% | 60.8\% |
|  | Unknown | 5 | 1.1\% | \$1,939 | 2.4\% | 0.0\% | 1 | 0.4\% | 11.7\% | \$168 | 0.4\% | 10.8\% | 4 | 1.8\% | 14.9\% | \$1,771 | 4.2\% | 13.5\% |
|  | Total | 457 | 100.0\% | \$79,688 | 100.0\% | 100.0\% | 230 | 100.0\% | 100.0\% | \$37,826 | 100.0\% | 100.0\% | 227 | 100.0\% | 100.0\% | \$41,862 | 100.0\% | 100.0\% |
|  | Low | 12 | 8.9\% | \$924 | 2.8\% | 17.1\% | 10 | 11.9\% | 4.4\% | \$695 | 3.5\% | 2.7\% | 2 | 3.9\% | 3.8\% | \$229 | 1.8\% | 1.8\% |
|  | Moderate | 12 | 8.9\% | \$1,160 | 3.6\% | 19.9\% | 11 | 13.1\% | 11.3\% | \$1,060 | 5.4\% | 6.4\% | 1 | 2.0\% | 8.3\% | \$100 | 0.8\% | 4.3\% |
|  | Middle | 17 | 12.6\% | \$2,239 | 6.9\% | 23.3\% | 11 | 13.1\% | 16.4\% | \$1,528 | 7.8\% | 11.6\% | 6 | 11.8\% | 14.6\% | \$711 | 5.5\% | 9.2\% |
|  | Upper | 92 | 68.1\% | \$27,946 | 85.6\% | 39.6\% | 52 | 61.9\% | 51.4\% | \$16,401 | 83.3\% | 64.4\% | 40 | 78.4\% | 53.6\% | \$11,545 | 89.0\% | 66.9\% |
|  | Unknown | 2 | 1.5\% | \$385 | 1.2\% | 0.0\% | 0 | 0.0\% | 16.5\% | \$0 | 0.0\% | 14.8\% | 2 | 3.9\% | 19.8\% | \$385 | 3.0\% | 17.8\% |
|  | Total | 135 | 100.0\% | \$32,654 | 100.0\% | 100.0\% | 84 | 100.0\% | 100.0\% | \$19,684 | 100.0\% | 100.0\% | 51 | 100.0\% | 100.0\% | \$12,970 | 100.0\% | 100.0\% |
|  | Low | 2 | 11.8\% | \$6 | 2.2\% | 17.1\% | 1 | 20.0\% | 17.6\% | \$3 | 4.3\% | 3.0\% | 1 | 8.3\% | 11.0\% | \$3 | 1.5\% | 2.8\% |
|  | Moderate | 1 | 5.9\% | \$7 | 2.6\% | 19.9\% | 0 | 0.0\% | 21.6\% | \$0 | 0.0\% | 9.1\% | 1 | 8.3\% | 23.3\% | \$7 | 3.4\% | 11.2\% |
|  | Middle | 7 | 41.2\% | \$118 | 43.4\% | 23.3\% | 1 | 20.0\% | 16.9\% | \$15 | 21.7\% | 13.1\% | 6 | 50.0\% | 24.2\% | \$103 | 50.7\% | 16.5\% |
|  | Upper | 7 | 41.2\% | \$141 | 51.8\% | 39.6\% | 3 | 60.0\% | 36.5\% | \$51 | 73.9\% | 63.0\% | 4 | 33.3\% | 36.9\% | \$90 | 44.3\% | 62.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 11.9\% | 0 | 0.0\% | 4.7\% | \$0 | 0.0\% | 6.8\% |
|  | Total | 17 | 100.0\% | \$272 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$69 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$203 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | Moderate | 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\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 23.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 39.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 57 | 9.4\% | \$3,696 | 3.3\% | 17.1\% | 36 | 11.3\% | 9.9\% | \$2,403 | 4.2\% | 4.7\% | 21 | 7.2\% | 6.9\% | \$1,293 | 2.3\% | 3.1\% |
|  | Moderate | 73 | 12.0\% | \$6,191 | 5.5\% | 19.9\% | 48 | 15.0\% | 17.2\% | \$4,040 | 7.0\% | 10.6\% | 25 | 8.6\% | 12.7\% | \$2,151 | 3.9\% | 7.0\% |
|  | Middle | 97 | 15.9\% | \$11,222 | 10.0\% | 23.3\% | 51 | 16.0\% | 16.4\% | \$6,390 | 11.1\% | 13.1\% | 46 | 15.9\% | 15.4\% | \$4,832 | 8.8\% | 10.9\% |
|  | Upper | 375 | 61.6\% | \$89,181 | 79.2\% | 39.6\% | 183 | 57.4\% | 43.1\% | \$44,578 | 77.4\% | 58.6\% | 192 | 66.2\% | 48.4\% | \$44,603 | 81.0\% | 63.2\% |
|  | Unknown | 7 | 1.1\% | \$2,324 | 2.1\% | 0.0\% | 1 | 0.3\% | 13.3\% | \$168 | 0.3\% | 12.9\% | 6 | 2.1\% | 16.6\% | \$2,156 | 3.9\% | 15.7\% |
|  | Total | 609 | 100.0\% | \$112,614 | 100.0\% | 100.0\% | 319 | 100.0\% | 100.0\% | \$57,579 | 100.0\% | 100.0\% | 290 | 100.0\% | 100.0\% | \$55,035 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over $\$ 1$ M illion <br> Total Rev. available <br> Rev. Not Known <br> Total | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 292 | 31.1\% | \$19,416 | 34.0\% | 91.5\% | 156 | 47.0\% | 31.3\% | \$9,375 | 36.1\% | 41.5\% | 136 | 22.4\% | 43.8\% | \$10,041 | 32.3\% | 38.3\% |
|  |  | 175 | 18.6\% | \$24,730 | 43.4\% | 4.4\% | 91 | 27.4\% |  |  |  |  | 84 | 13.8\% |  |  |  |  |
|  |  | 467 | 49.7\% | \$44,146 | 77.4\% | 95.9\% | 247 | 74.4\% |  |  |  |  | 220 | 36.2\% |  |  |  |  |
|  |  | 472 | 50.3\% | \$12,889 | 22.6\% | 4.1\% |  | 25.6\% |  |  |  |  | 387 | 63.8\% |  |  |  |  |
|  |  | 939 | 100.0\% | \$57,035 | 100.0\% | 100.0\% | 332 | 100.0\% |  |  |  |  | 607 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 845 | 90.0\% | \$29,523 | 51.8\% |  | 295 | 88.9\% | 93.8\% | \$13,799 | 53.2\% | 31.8\% | 550 | 90.6\% | 95.1\% | \$15,724 | 50.6\% | 38.3\% |
|  | \$100,001-\$250,000 | 58 | 6.2\% | \$10,214 | 17.9\% |  | 20 | 6.0\% | 2.8\% | \$3,638 | 14.0\% | 14.3\% | 38 | 6.3\% | 2.3\% | \$6,576 | 21.1\% | 13.6\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ | 36 | 3.8\% | \$17,298 | 30.3\% |  | 17 | 5.1\% | 3.5\% | \$8,501 | 32.8\% | 53.9\% | 19 | 3.1\% | 2.6\% | \$8,797 | 28.3\% | 48.1\% |
|  | Total | 939 | 100.0\% | \$57,035 | 100.0\% |  | 332 | 100.0\% | 100.0\% | \$25,938 | 100.0\% | 100.0\% | 607 | 100.0\% | 100.0\% | \$31,097 | 100.0\% | 100.0\% |
| Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less <br> Over \$1 M illion <br> Not Known <br> Total | 0 | 0.0\% | \$0 | 0.0\% | 96.0\% | 0 | 0.0\% | 60.0\% | \$0 | 0.0\% | 70.4\% | 0 | 0.0\% | 54.2\% | \$0 | 0.0\% | 56.6\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 3.7\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 87.5\% | \$0 | 0.0\% | 28.2\% | 0 | 0.0\% | 83.3\% | \$0 | 0.0\% | 19.9\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 52.6\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 24.9\% |
|  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 19.2\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 55.2\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

[^322]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: FL Ft. Walton

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% | \# | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 7,958 | 17.0 |
| Moderate-income | 4 | 12.1 | 4,773 | 10.2 | 561 | 11.8 | 9,342 | 19.9 |
| Middle-income | 24 | 72.7 | 33,682 | 71.9 | 2,305 | 6.8 | 11,382 | 24.3 |
| Upper-income | 5 | 15.2 | 8,403 | 17.9 | 233 | 2.8 | 18,176 | 38.8 |
| Unknown-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 33 | 100.0 | 46,858 | 100.0 | 3,099 | 6.6 | 46,858 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# \% | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 6,801 |  | 35 5.5 | 35.8 | 3,893 | 57.2 | 473 | 7.0 |
| Middle-income | 58,684 |  | 21 74.2 | 55.6 | 16,179 | 27.6 | 9,884 | 16.8 |
| Upper-income | 13,108 |  | 1620.3 | 68.0 | 2,225 | 17.0 | 1,967 | 15.0 |
| Unknown-income | 0 |  | 0 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 78,593 | 43,972 | 720.010 | 55.9 |  | 22,297 28.4 | 12,324 | 15.7 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% | \# | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 1,027 | 9.2 | 905 | 8.9 | 59 | 11.6 | 63 | 14.0 |
| Middle-income | 7,561 | 67.9 | 6,932 | 68.1 | 347 | 68.0 | 282 | 62.7 |
| Upper-income | 2,553 | 22.9 | 2,344 | 23.0 | 104 | 20.4 | 105 | 23.3 |
| Unknown-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 11,141 | 100.0 | 10,181 | 100.0 | 510 | 100.0 | 450 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 91.4 |  | 4.6 |  | 4.0 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{aligned} & \text { Less Than or = } \\ & \$ 1 \text { Million } \end{aligned}$ |  | Over \$1 Million |  | Revenue NotReported |  |
|  | \# | \% | \# | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 17 | 23.3 | 16 | 22.9 | 1 | 33.3 | 0 | 0.0 |
| Middle-income | 44 | 60.3 | 42 | 60.0 | 2 | 66.7 | 0 | 0.0 |
| Upper-income | 12 | 16.4 | 12 | 17.1 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 73 | 100.0 | 70 | 100.0 | 3 | 100.0 | 0 | . 0 |
|  | Percentage of Total Farms: |  |  | 95.9 |  | 4.1 |  | . 0 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: FL Ft. Walton



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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

## Assessment Area: FL Ft. Walton

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount ${ }^{\text {Ba }}$ |  | Bank |  |  | Count |  | Agg$\%$ | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  | ome |  |  | Ban |  | Agg |  | nk | Agg | Ban |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 12 | 4.2\% | \$956 | 1.5\% | 17.0\% | 6 | 5.3\% |  | 6.2\% | \$438 | 1.6\% | 2.8\% | 6 | 3.4\% | 5.6\% | \$518 | 1.5\% | 2.5\% |
|  | Moderate | 33 | 11.4\% | \$4,142 | 6.6\% | 19.9\% | 12 | 10.5\% | 19.2\% | \$1,727 | 6.3\% | 13.3\% | 21 | 12.0\% | 18.1\% | \$2,415 | 6.8\% | 12.9\% |
|  | Middle | 36 | 12.5\% | \$5,251 | 8.3\% | 24.3\% | 14 | 12.3\% | 22.4\% | \$2,148 | 7.8\% | 20.4\% | 22 | 12.6\% | 27.6\% | \$3,103 | 8.8\% | 26.4\% |
|  | Upper | 198 | 68.5\% | \$50,128 | 79.6\% | 38.8\% | 82 | 71.9\% | 35.2\% | \$23,315 | 84.4\% | 46.9\% | 116 | 66.3\% | 34.3\% | \$26,813 | 75.8\% | 44.2\% |
|  | Unknown | 10 | 3.5\% | \$2,502 | 4.0\% | 0.0\% | 0 | 0.0\% | 17.0\% | \$0 | 0.0\% | 16.6\% | 10 | 5.7\% | 14.4\% | \$2,502 | 7.1\% | 14.0\% |
|  | Total | 289 | 100.0\% | \$62,979 | 100.0\% | 100.0\% | 114 | 100.0\% | 100.0\% | \$27,628 | 100.0\% | 100.0\% | 175 | 100.0\% | 100.0\% | \$35,351 | 100.0\% | 100.0\% |
|  | Low | 12 | 7.4\% | \$1,120 | 2.5\% | 17.0\% | 5 | 5.0\% | 4.4\% | \$385 | 1.3\% | 2.3\% | 7 | 11.3\% | 5.2\% | \$735 | 4.8\% | 2.4\% |
|  | Moderate | 22 | 13.6\% | \$2,618 | 5.9\% | 19.9\% | 14 | 14.0\% | 10.3\% | \$1,763 | 6.1\% | 6.5\% | 8 | 12.9\% | 9.1\% | \$855 | 5.6\% | 5.0\% |
|  | Middle | 33 | 20.4\% | \$4,800 | 10.8\% | 24.3\% | 17 | 17.0\% | 15.0\% | \$2,616 | 9.0\% | 11.2\% | 16 | 25.8\% | 14.0\% | \$2,184 | 14.4\% | 10.8\% |
|  | Upper | 92 | 56.8\% | \$35,001 | 79.1\% | 38.8\% | 61 | 61.0\% | 37.8\% | \$23,559 | 81.1\% | 46.1\% | 31 | 50.0\% | 35.3\% | \$11,442 | 75.2\% | 43.9\% |
|  | Unknown | 3 | 1.9\% | \$710 | 1.6\% | 0.0\% | 3 | 3.0\% | 32.4\% | \$710 | 2.4\% | 33.8\% | 0 | 0.0\% | 36.4\% | \$0 | 0.0\% | 37.9\% |
|  | Total | 162 | 100.0\% | \$44,249 | 100.0\% | 100.0\% | 100 | 100.0\% | 100.0\% | \$29,033 | 100.0\% | 100.0\% | 62 | 100.0\% | 100.0\% | \$15,216 | 100.0\% | 100.0\% |
|  | Low | 4 | 30.8\% | \$18 | 20.7\% | 17.0\% | 1 | 20.0\% | 17.3\% | \$4 | 9.1\% | 6.5\% | 3 | 37.5\% | 13.0\% | \$14 | 32.6\% | 3.2\% |
|  | M oderate | 3 | 23.1\% | \$10 | 11.5\% | 19.9\% | 1 | 20.0\% | 20.2\% | \$3 | 6.8\% | 18.0\% | 2 | 25.0\% | 14.5\% | \$7 | 16.3\% | 9.5\% |
|  | Middle | 2 | 15.4\% | \$18 | 20.7\% | 24.3\% | 1 | 20.0\% | 26.9\% | \$15 | 34.1\% | 20.7\% | 1 | 12.5\% | 22.9\% | \$3 | 7.0\% | 20.9\% |
|  | Upper | 4 | 30.8\% | \$41 | 47.1\% | 38.8\% | 2 | 40.0\% | 31.7\% | \$22 | 50.0\% | 52.8\% | 2 | 25.0\% | 42.7\% | \$19 | 44.2\% | 59.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 2.0\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 7.1\% |
|  | Total | 13 | 100.0\% | \$87 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$44 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | M oderate | 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\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 24.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 28 | 6.0\% | \$2,094 | 2.0\% | 17.0\% | 12 | 5.5\% | 5.5\% | \$827 | 1.5\% | 2.6\% | 16 | 6.5\% | 5.6\% | \$1,267 | 2.5\% | 2.4\% |
|  | M oderate | 58 | 12.5\% | \$6,770 | 6.3\% | 19.9\% | 27 | 12.3\% | 14.7\% | \$3,493 | 6.2\% | 9.9\% | 31 | 12.7\% | 14.1\% | \$3,277 | 6.5\% | 9.4\% |
|  | Middle | 71 | 15.3\% | \$10,069 | 9.4\% | 24.3\% | 32 | 14.6\% | 18.8\% | \$4,779 | 8.4\% | 15.8\% | 39 | 15.9\% | 21.7\% | \$5,290 | 10.5\% | 19.4\% |
|  | Upper | 294 | 63.4\% | \$85,170 | 79.4\% | 38.8\% | 145 | 66.2\% | 36.4\% | \$46,896 | 82.7\% | 46.5\% | 149 | 60.8\% | 34.8\% | \$38,274 | 75.6\% | 43.5\% |
|  | Unknown | 13 | 2.8\% | \$3,212 | 3.0\% | 0.0\% | 3 | 1.4\% | 24.5\% | \$710 | 1.3\% | 25.3\% | 10 | 4.1\% | 23.7\% | \$2,502 | 4.9\% | 25.4\% |
|  | Total | 464 | 100.0\% | \$107,315 | 100.0\% | 100.0\% | 219 | 100.0\% | 100.0\% | \$56,705 | 100.0\% | 100.0\% | 245 | 100.0\% | 100.0\% | \$50,610 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available Rev. Not Known Total | Total Businesses |  |  |  |  | 133 $48.9 \%$ <br> 58 $21.3 \%$ <br> 191 $70.2 \%$ <br> 81 $29.8 \%$ |  | 34.9\% | \$10,296 | 40.6\% | 47.1\% | 97 $17.0 \%$ <br> 43 $7.6 \%$ <br> 140 $24.6 \%$ <br> 429 $75.4 \%$ |  | 41.3\% | \$7,434 27.5\% |  | 44.9\% |
|  |  | 230 | 27.3\% | \$17,730 | 33.8\% | 91.4\% |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 101 | 12.0\% | \$18,667 | 35.6\% | 4.6\% |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 331 | 39.3\% | \$36,397 | 69.4\% | 96.0\% |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 510 | 60.6\% | \$16,052 | 30.6\% | 4.0\% |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 841 | 100.0\% | \$52,449 | 100.0\% | 100.0\% | 272 | 100.0\% |  |  |  |  | 569 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \hline \$ 100,000 \text { or Less } \\ & \$ 100,001-\$ 250,000 \\ & \$ 250,001-\$ 1 \\ & \text { Million } \\ & \text { Total } \end{aligned}$ | 750 | 89.2\% | \$22,418 | 42.7\% |  | 218 | 80.1\% | 90.7\% | \$9,261 | 36.5\% | 32.3\% | 532 | 93.5\% | 93.0\% | \$13,157 | 48.6\% | 33.2\% |
|  |  | 48 | 5.7\% | \$8,696 | 16.6\% |  | 32 | 11.8\% | 5.3\% | \$5,537 | 21.8\% | 20.3\% | 16 | 2.8\% | 3.1\% | \$3,159 | 11.7\% | 14.1\% |
|  |  | 43 | 5.1\% | \$21,335 | 40.7\% |  | 22 | 8.1\% | 4.1\% | \$10,589 | 41.7\% | 47.4\% | 21 | 3.7\% | 3.9\% | \$10,746 | 39.7\% | 52.7\% |
|  |  | 841 | 100.0\% | \$52,449 | 100.0\% |  | 272 | 100.0\% | 100.0\% | \$25,387 | 100.0\% | 100.0\% | 569 | 100.0\% | 100.0\% | \$27,062 | 100.0\% | 100.0\% |
|  | \$1 Million or LessOver \$1 MillionNot KnownTotal | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 95.9\% | 0 | 0.0\% | 72.7\% | \$0 | 0.0\% | 85.6\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 55.6\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 4.1\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 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\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 90.9\% | \$0 | 0.0\% | 35.6\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 64.4\% | 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\% |

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## Appendices

## Combined Demographics Report

Assessment Area: FL Gainesville


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: FL Gainesville



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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: FL Gainesville


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## Appendices

## Combined Demographics Report

Assessment Area: FL Lakeland

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 0.9 |  | 0.3 | 192 | 43.8 | 24,281 | 18.3 |
| Moderate-income | 28 | 25.5 |  | 17.8 | 4,663 | 19.7 | 25,887 | 19.5 |
| Middle-income | 63 | 57.3 |  | 59.3 | 6,728 | 8.5 | 30,058 | 22.6 |
| Upper-income | 18 | 16.4 |  | 22.6 | 894 | 3.0 | 52,722 | 39.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 110 | 100.0 |  | 100.0 | 12,477 | 9.4 | 132,948 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 1,086 | 188 |  | 17.3 | 787 | 72.5 | 111 | 10.2 |
| Moderate-income | 44,383 | 21,167 |  | 47.7 | 14,149 | 31.9 | 9,067 | 20.4 |
| Middle-income | 136,850 | 83,455 |  | 61.0 | 27,149 | 19.8 | 26,246 | 19.2 |
| Upper-income | 44,057 | 32,563 |  | 73.9 | 7,775 | 17.6 | 3,719 | 8.4 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 226,376 | 137,373 |  | 60.7 | 49,860 | 22.0 | 39,143 | 17.3 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 94 | 0.4 |  | 0.4 | 7 | 0.6 | 4 | 0.4 |
| Moderate-income | 4,952 | 20.2 |  | 19.3 | 353 | 29.9 | 283 | 29.1 |
| Middle-income | 14,007 | 57.2 |  | 57.4 | 672 | 56.9 | 528 | 54.3 |
| Upper-income | 5,422 | 22.2 |  | 22.9 | 148 | 12.5 | 157 | 16.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 24,475 | 100.0 |  | 100.0 | 1,180 | 100.0 | 972 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 91.2 |  | 4.8 |  | 4.0 |
|  | Total Farms by $\quad$ Farms by Tract \& Revenue Size |  |  |  |  |  |  |  |
|  |  |  | $\begin{aligned} & \text { Less Than or = } \\ & \$ 1 \text { Million } \end{aligned}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 81 | 15.6 |  | 15.5 | 8 | 19.0 | 0 | 0.0 |
| Middle-income | 357 | 68.8 |  | 68.5 | 28 | 66.7 | 7 | 100.0 |
| Upper-income | 81 | 15.6 |  | 16.0 | 6 | 14.3 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 519 | 100.0 |  | 100.0 | 42 | 100.0 | 7 | 100.0 |
|  | Percentage of | otal Fa | ms: | 90.6 |  | 8.1 |  | 1.3 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: FL Lakeland



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## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: FL Lakeland

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Families <br> by Family <br> Income <br> \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol |  |  |  | ank | Agg | Ban |  | Agg |  | nk | Agg | Ban |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 27 | 10.0\% | \$1,714 | 5.4\% | 18.3\% | 15 | 9.3\% | 7.9\% | \$996 | 5.0\% | 4.6\% | 12 | 11.0\% | 8.1\% | \$718 | 6.1\% | 4.7\% |
|  | Moderate | 67 | 24.8\% | \$5,776 | 18.2\% | 19.5\% | 44 | 27.3\% | 26.5\% | \$3,882 | 19.5\% | 21.6\% | 23 | 21.1\% | 24.4\% | \$1,894 | 16.0\% | 20.1\% |
|  | Middle | 71 | 26.3\% | \$8,041 | 25.3\% | 22.6\% | 37 | 23.0\% | 24.6\% | \$4,609 | 23.1\% | 24.7\% | 34 | 31.2\% | 20.4\% | \$3,432 | 29.0\% | 20.0\% |
|  | Upper | 103 | 38.1\% | \$15,959 | 50.2\% | 39.7\% | 65 | 40.4\% | 31.2\% | \$10,455 | 52.4\% | 39.8\% | 38 | 34.9\% | 29.0\% | \$5,504 | 46.4\% | 37.2\% |
|  | Unknown | 2 | 0.7\% | \$305 | 1.0\% | 0.0\% | 0 | 0.0\% | 9.9\% | \$0 | 0.0\% | 9.4\% | 2 | 1.8\% | 18.0\% | \$305 | 2.6\% | 18.0\% |
|  | Total | 270 | 100.0\% | \$31,795 | 100.0\% | 100.0\% | 161 | 100.0\% | 100.0\% | \$19,942 | 100.0\% | 100.0\% | 109 | 100.0\% | 100.0\% | \$11,853 | 100.0\% | 100.0\% |
|  | Low | 1 | 1.5\% | \$155 | 1.4\% | 18.3\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 2.0\% | 1 | 3.3\% | 3.8\% | \$155 | 3.2\% | 1.9\% |
|  | M oderate | 5 | 7.4\% | \$298 | 2.8\% | 19.5\% | 3 | 7.9\% | 12.6\% | \$127 | 2.1\% | 8.3\% | 2 | 6.7\% | 12.7\% | \$171 | 3.5\% | 8.0\% |
|  | Middle | 12 | 17.6\% | \$1,313 | 12.1\% | 22.6\% | 9 | 23.7\% | 18.9\% | \$965 | 16.3\% | 15.5\% | 3 | 10.0\% | 17.0\% | \$348 | 7.1\% | 13.8\% |
|  | Upper | 45 | 66.2\% | \$8,333 | 76.9\% | 39.7\% | 24 | 63.2\% | 42.7\% | \$4,469 | 75.3\% | 50.8\% | 21 | 70.0\% | 41.0\% | \$3,864 | 78.9\% | 50.0\% |
|  | Unknown | 5 | 7.4\% | \$734 | 6.8\% | 0.0\% | 2 | 5.3\% | 22.1\% | \$377 | 6.3\% | 23.3\% | 3 | 10.0\% | 25.4\% | \$357 | 7.3\% | 26.3\% |
|  | Total | 68 | 100.0\% | \$10,833 | 100.0\% | 100.0\% | 38 | 100.0\% | 100.0\% | \$5,938 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$4,895 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.3\% | 0 | 0.0\% | 15.3\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 14.1\% | \$0 | 0.0\% | 4.9\% |
|  | Moderate | 5 | 50.0\% | \$78 | 43.3\% | 19.5\% | 1 | 50.0\% | 24.5\% | \$9 | 42.9\% | 14.8\% | 4 | 50.0\% | 31.5\% | \$69 | 43.4\% | 15.7\% |
|  | Middle | 2 | 20.0\% | \$37 | 20.6\% | 22.6\% | 1 | 50.0\% | 22.9\% | \$12 | 57.1\% | 21.5\% | 1 | 12.5\% | 19.5\% | \$25 | 15.7\% | 17.0\% |
|  | Upper | 3 | 30.0\% | \$65 | 36.1\% | 39.7\% | 0 | 0.0\% | 34.3\% | \$0 | 0.0\% | 58.2\% | 3 | 37.5\% | 30.7\% | \$65 | 40.9\% | 51.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 2.8\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 10.8\% |
|  | Total | 10 | 100.0\% | \$180 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$21 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$159 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | Moderate | 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\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 39.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 28 | 8.0\% | \$1,869 | 4.4\% | 18.3\% | 15 | 7.5\% | 6.7\% | \$996 | 3.8\% | 3.4\% | 13 | 8.8\% | 6.9\% | \$873 | 5.2\% | 3.7\% |
|  | Moderate | 77 | 22.1\% | \$6,152 | 14.4\% | 19.5\% | 48 | 23.9\% | 21.6\% | \$4,018 | 15.5\% | 15.7\% | 29 | 19.7\% | 20.7\% | \$2,134 | 12.6\% | 15.4\% |
|  | Middle | 85 | 24.4\% | \$9,391 | 21.9\% | 22.6\% | 47 | 23.4\% | 22.5\% | \$5,586 | 21.6\% | 20.3\% | 38 | 25.9\% | 19.2\% | \$3,805 | 22.5\% | 17.6\% |
|  | Upper | 151 | 43.4\% | \$24,357 | 56.9\% | 39.7\% | 89 | 44.3\% | 35.2\% | \$14,924 | 57.6\% | 42.8\% | 62 | 42.2\% | 33.1\% | \$9,433 | 55.8\% | 42.0\% |
|  | Unknown | 7 | 2.0\% | \$1,039 | 2.4\% | 0.0\% | 2 | 1.0\% | 13.9\% | \$377 | 1.5\% | 17.8\% | 5 | 3.4\% | 20.0\% | \$662 | 3.9\% | 21.3\% |
|  |  | 348 | 100.0\% | \$42,808 | 100.0\% | 100.0\% | 201 | 100.0\% | 100.0\% | \$25,901 | 100.0\% | 100.0\% | 147 | 100.0\% | 100.0\% | \$16,907 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over $\$ 1$ Million <br> Total Rev. available <br> Rev. Not Known <br> Total | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 186 | 42.3\% | \$12,867 | 43.5\% | 91.2\% | 109 | 65.7\% | 31.4\% | \$7,214 | 52.3\% | 35.5\% | 77 | 28.1\% | 40.1\% | \$5,653 | 35.7\% | 30.6\% |
|  |  | 76 | 17.3\% | \$12,628 | 42.7\% | 4.8\% | 42 | 25.3\% |  |  |  |  | 34 | 12.4\% |  |  |  |  |
|  |  | 262 | 59.6\% | \$25,495 | 86.2\% | 96.0\% | 151 | 91.0\% |  |  |  |  | 111 | 40.5\% |  |  |  |  |
|  |  | 178 | 40.5\% | \$4,108 | 13.9\% | 4.0\% | 15 | 9.0\% |  |  |  |  | 163 | 59.5\% |  |  |  |  |
|  |  | 440 | 100.0\% | \$29,603 | 100.0\% | 100.0\% | 166 | 100.0\% |  |  |  |  | 274 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 390 | 88.6\% | \$13,984 | 47.2\% |  | 140 | 84.3\% | 95.7\% | \$6,617 | 48.0\% | 41.3\% | 250 | 91.2\% | 96.4\% | \$7,367 | 46.6\% | 47.3\% |
|  | \$100,001-\$250,000 | 31 | 7.0\% | \$6,013 | 20.3\% |  | 18 | 10.8\% | 2.3\% | \$3,427 | 24.9\% | 15.5\% | 13 | 4.7\% | 1.9\% | \$2,586 | 16.4\% | 13.7\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ |  | 4.3\% |  | 32.4\% |  |  | 4.8\% | 2.1\% | \$3,745 | 27.2\% | 43.2\% | 11 | 4.0\% | 1.7\% | \$5,861 | 37.1\% | 39.0\% |
|  | Total | 440 | 100.0\% | \$29,603 | 100.0\% |  | 166 | 100.0\% | 100.0\% | \$13,789 | 100.0\% | 100.0\% | 274 | 100.0\% | 100.0\% | \$15,814 | 100.0\% | 100.0\% |
|  | \$1 Million or LessOver \$1 MillionNot Known | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 3 | 75.0\% | \$1,096 | 98.2\% | 90.6\% | 1 | 100.0\% | 86.4\% | \$296 | 100.0\% | 96.4\% | 2 | 66.7\% | 62.2\% | \$800 | 97.6\% | 59.7\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 8.1\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  |  | $25.0 \%$ | \$20 | 1.8\% | 1.3\% |  |  |  |  |  |  |  | 33.3\% |  |  |  |  |
|  |  | 4 | 100.0\% | \$1,116 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 3 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 1 | 25.0\% | \$20 | 1.8\% |  | 0 | 0.0\% | 90.9\% | \$0 | 0.0\% | 46.9\% | 1 | 33.3\% | 73.0\% | \$20 | 2.4\% | 20.5\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 6.8\% | \$0 | 0.0\% | 30.6\% | 0 | 0.0\% | 16.2\% | \$0 | 0.0\% | 33.1\% |
|  | \$250,001-\$500,000 | 3 | 75.0\% | \$1,096 | 98.2\% |  | 1 | 100.0\% | 2.3\% | \$296 | 100.0\% | 22.5\% | 2 | 66.7\% | 10.8\% | \$800 | 97.6\% | 46.4\% |
|  | Total | 4 | 100.0\% | \$1,116 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$296 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$820 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: FL Miami

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 27 | 7.8 |  | 4.3 | 10,095 | 42.4 | 127,088 | 23.0 |
| Moderate-income | 99 | 28.5 |  | 27.4 | 35,406 | 23.4 | 93,806 | 17.0 |
| Middle-income | 114 | 32.9 |  | 35.9 | 24,453 | 12.3 | 102,360 | 18.5 |
| Upper-income | 104 | 30.0 |  | 32.3 | 10,154 | 5.7 | 229,230 | 41.5 |
| Unknown-income | 3 | 0.9 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 347 | 100.0 |  | 100.0 | 80,108 | 14.5 | 552,484 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 44,415 |  | 86 | 17.1 | 30,530 | 68.7 | 6,299 | 14.2 |
| Moderate-income | 243,755 |  |  | 36.5 | 136,133 | 55.8 | 18,578 | 7.6 |
| Middle-income | 287,834 |  |  | 57.7 | 101,379 | 35.2 | 20,262 | 7.0 |
| Upper-income | 276,253 |  |  | 67.5 | 59,399 | 21.5 | 30,344 | 11.0 |
| Unknown-income | 21 |  | 0 | 0.0 | 0 | 0.0 | 21 | 100.0 |
| Total Assessment Area | 852,278 | 449,333 |  | 52.7 | 327,441 | 38.4 | 75,504 | 8.9 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 7,270 | 4.7 |  | 4.5 | 573 | 6.1 | 456 | 6.4 |
| Moderate-income | 32,745 | 21.3 |  | 21.1 | 1,890 | 20.2 | 1,825 | 25.6 |
| Middle-income | 49,558 | 32.2 |  | 32.4 | 2,825 | 30.2 | 2,232 | 31.3 |
| Upper-income | 63,427 | 41.2 |  | 41.4 | 3,914 | 41.9 | 2,561 | 35.9 |
| Unknown-income | 902 | 0.6 |  | 0.5 | 141 | 1.5 | 63 | 0.9 |
| Total Assessment Area | 153,902 | 100.0 |  | 100.0 | 9,343 | 100.0 | 7,137 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.3 |  | 6.1 |  | 4.6 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 13 | 1.9 |  | 1.8 | 2 | 3.1 | 0 | 0.0 |
| Moderate-income | 88 | 13.0 |  | 13.3 | 7 | 10.9 | 1 | 11.1 |
| Middle-income | 148 | 21.9 |  | 22.4 | 11 | 17.2 | 2 | 22.2 |
| Upper-income | 424 | 62.8 |  | 62.1 | 44 | 68.8 | 6 | 66.7 |
| Unknown-income | 2 | 0.3 |  | 0.3 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 675 | 100.0 |  | 100.0 | 64 | 100.0 | 9 | 100.0 |
|  | Percentage of Total Farms: |  |  | 89.2 |  | 9.5 |  | 1.3 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: FL Miami



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: FL Miami


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## Appendices

## Combined Demographics Report

Assessment Area: FL Naples


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: FL Naples

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  | Agg$\%$ | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.3\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 24 | 11.9\% | \$5,078 | 7.1\% | 13.1\% | 13 | 11.6\% | 15.1\% | \$2,579 | 5.8\% | 9.3\% | 11 | 12.4\% | 13.7\% | \$2,499 | 9.2\% | 8.5\% |
|  | Middle | 82 | 40.8\% | \$21,694 | 30.5\% | 48.0\% | 46 | 41.1\% | 52.5\% | \$13,159 | 29.8\% | 42.6\% | 36 | 40.4\% | 51.7\% | \$8,535 | 31.6\% | 40.2\% |
|  | Upper | 95 | 47.3\% | \$44,441 | 62.4\% | 36.6\% | 53 | 47.3\% | 31.7\% | \$28,428 | 64.4\% | 47.8\% | 42 | 47.2\% | 34.2\% | \$16,013 | 59.2\% | 51.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 201 | 100.0\% | \$71,213 | 100.0\% | 100.0\% | 112 | 100.0\% | 100.0\% | \$44,166 | 100.0\% | 100.0\% | 89 | 100.0\% | 100.0\% | \$27,047 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.3\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 9 | 4.5\% | \$1,827 | 2.7\% | 13.1\% | 9 | 7.4\% | 7.9\% | \$1,827 | 4.5\% | 5.6\% | 0 | 0.0\% | 7.3\% | \$0 | 0.0\% | 4.6\% |
|  | Middle | 69 | 34.7\% | \$15,359 | 22.5\% | 48.0\% | 42 | 34.7\% | 40.3\% | \$8,669 | 21.2\% | 30.4\% | 27 | 34.6\% | 43.1\% | \$6,690 | 24.4\% | 32.4\% |
|  | Upper | 121 | 60.8\% | \$51,108 | 74.8\% | 36.6\% | 70 | 57.9\% | 51.5\% | \$30,332 | 74.3\% | 63.8\% | 51 | 65.4\% | 49.2\% | \$20,776 | 75.6\% | 62.7\% |
|  | 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 | 199 | 100.0\% | \$68,294 | 100.0\% | 100.0\% | 121 | 100.0\% | 100.0\% | \$40,828 | 100.0\% | 100.0\% | 78 | 100.0\% | 100.0\% | \$27,466 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.3\% | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 1 | 25.0\% | \$36 | 39.6\% | 13.1\% | 0 | 0.0\% | 3.6\% | \$0 | 0.0\% | 1.7\% | 1 | 50.0\% | 13.3\% | \$36 | 59.0\% | 4.5\% |
|  | Middle | 3 | 75.0\% | \$55 | 60.4\% | 48.0\% | 2 | 100.0\% | 53.6\% | \$30 | 100.0\% | 26.7\% | 1 | 50.0\% | 51.0\% | \$25 | 41.0\% | 53.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 36.6\% | 0 | 0.0\% | 40.5\% | \$0 | 0.0\% | 71.4\% | 0 | 0.0\% | 34.7\% | \$0 | 0.0\% | 42.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 4 | 100.0\% | \$91 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$30 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$61 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 3.4\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 7.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 18.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 35.1\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 7.3\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 77.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 55.8\% | 0 | 0.0\% | 70.0\% | \$0 | 0.0\% | 92.7\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 0.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.3\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 34 | 8.4\% | \$6,941 | 5.0\% | 13.1\% | 22 | 9.4\% | 11.8\% | \$4,406 | 5.2\% | 7.3\% | 12 | 7.1\% | 10.9\% | \$2,535 | 4.6\% | 6.7\% |
|  | Middle | 154 | 38.1\% | \$37,108 | 26.6\% | 48.0\% | 90 | 38.3\% | 47.1\% | \$21,858 | 25.7\% | 35.9\% | 64 | 37.9\% | 48.0\% | \$15,250 | 27.9\% | 37.1\% |
|  | Upper | 216 | 53.5\% | \$95,549 | 68.4\% | 36.6\% | 123 | 52.3\% | 40.6\% | \$58,760 | 69.1\% | 56.6\% | 93 | 55.0\% | 40.7\% | \$36,789 | 67.4\% | 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 | 404 | 100.0\% | \$139,598 | 100.0\% | 100.0\% | 235 | 100.0\% | 100.0\% | \$85,024 | 100.0\% | 100.0\% | 169 | 100.0\% | 100.0\% | \$54,574 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 5 | 0.5\% | \$230 | 0.4\% | 1.9\% | 2 | 0.5\% | 1.2\% | \$110 | 0.4\% | 3.0\% | 3 | 0.5\% | 0.8\% | \$120 | 0.4\% | 1.4\% |
|  | Moderate | 67 | 6.5\% | \$3,066 | 5.1\% | 11.3\% | 21 | 5.3\% | 7.1\% | \$1,648 | 5.4\% | 6.2\% | 46 | 7.2\% | 8.0\% | \$1,418 | 4.7\% | 6.9\% |
|  | Middle | 449 | 43.3\% | \$24,942 | 41.3\% | 45.8\% | 167 | 41.9\% | 43.6\% | \$11,323 | 37.4\% | 40.1\% | 282 | 44.3\% | 43.3\% | \$13,619 | 45.3\% | 40.4\% |
|  | Upper | 515 | 49.7\% | \$32,111 | 53.2\% | 41.0\% | 209 | 52.4\% | 46.6\% | \$17,215 | 56.8\% | 49.8\% | 306 | 48.0\% | 47.2\% | \$14,896 | 49.6\% | 51.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 1,036 | 100.0\% | \$60,349 | 100.0\% | 100.0\% | 399 | 100.0\% | 100.0\% | \$30,296 | 100.0\% | 100.0\% | 637 | 100.0\% | 100.0\% | \$30,053 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 11.1\% | 0 | 0.0\% | 19.0\% | \$0 | 0.0\% | 30.4\% | 0 | 0.0\% | 17.6\% | \$0 | 0.0\% | 54.3\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 22.8\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 14.8\% | 0 | 0.0\% | 29.4\% | \$0 | 0.0\% | 5.9\% |
|  | Middle | 1 | 100.0\% | \$40 | 100.0\% | 41.5\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 17.0\% | 1 | 100.0\% | 23.5\% | \$40 | 100.0\% | 30.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 24.6\% | 0 | 0.0\% | 38.1\% | \$0 | 0.0\% | 37.8\% | 0 | 0.0\% | 29.4\% | \$0 | 0.0\% | 9.2\% |
|  | 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\% |
|  | Total | 1 | 100.0\% | \$40 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$40 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | come | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | Agg | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$(000s) | \$ \% | \$ \% | \# | \% |  | \$(000s) | \$ \% | \$ \% |
|  | Low | 13 | 6.5\% | \$1,131 | 1.6\% | 18.9\% | 7 | 6.3\% | 13.9\% | \$656 | 1.5\% | 6.1\% | 6 | 6.7\% | 11.5\% | \$475 | 1.8\% | 4.8\% |
|  | Moderate | 29 | 14.4\% | \$3,816 | 5.4\% | 19.2\% | 17 | 15.2\% | 16.5\% | \$2,118 | 4.8\% | 9.7\% | 12 | 13.5\% | 15.3\% | \$1,698 | 6.3\% | 8.3\% |
|  | Middle | 30 | 14.9\% | \$5,920 | 8.3\% | 20.7\% | 17 | 15.2\% | 15.5\% | \$3,800 | 8.6\% | 11.3\% | 13 | 14.6\% | 12.9\% | \$2,120 | 7.8\% | 8.9\% |
|  | Upper | 127 | 63.2\% | \$60,006 | 84.3\% | 41.2\% | 71 | 63.4\% | 44.7\% | \$37,592 | 85.1\% | 62.3\% | 56 | 62.9\% | 48.8\% | \$22,414 | 82.9\% | 67.5\% |
|  | Unknown | 2 | 1.0\% | \$340 | 0.5\% | 0.0\% | 0 | 0.0\% | 9.4\% | \$0 | 0.0\% | 10.5\% | 2 | 2.2\% | 11.5\% | \$340 | 1.3\% | 10.4\% |
|  | Total | 201 | 100.0\% | \$71,213 | 100.0\% | 100.0\% | 112 | 100.0\% | 100.0\% | \$44,166 | 100.0\% | 100.0\% | 89 | 100.0\% | 100.0\% | \$27,047 | 100.0\% | 100.0\% |
|  | Low | 12 | 6.0\% | \$1,506 | 2.2\% | 18.9\% | 8 | 6.6\% | 4.1\% | \$997 | 2.4\% | 1.6\% | 4 | 5.1\% | 4.6\% | \$509 | 1.9\% | 1.9\% |
|  | Moderate | 12 | 6.0\% | \$1,746 | 2.6\% | 19.2\% | 7 | 5.8\% | 10.7\% | \$1,268 | 3.1\% | 5.2\% | 5 | 6.4\% | 10.3\% | \$478 | 1.7\% | 4.7\% |
|  | Middle | 34 | 17.1\% | \$5,856 | 8.6\% | 20.7\% | 23 | 19.0\% | 15.8\% | \$3,882 | 9.5\% | 9.8\% | 11 | 14.1\% | 15.9\% | \$1,974 | 7.2\% | 9.6\% |
|  | Upper | 139 | 69.8\% | \$58,446 | 85.6\% | 41.2\% | 83 | 68.6\% | 56.8\% | \$34,681 | 84.9\% | 72.2\% | 56 | 71.8\% | 54.0\% | \$23,765 | 86.5\% | 70.2\% |
|  | Unknown | 2 | 1.0\% | \$740 | 1.1\% | 0.0\% | 0 | 0.0\% | 12.7\% | \$0 | 0.0\% | 11.2\% | 2 | 2.6\% | 15.2\% | \$740 | 2.7\% | 13.5\% |
|  | Total | 199 | 100.0\% | \$68,294 | 100.0\% | 100.0\% | 121 | 100.0\% | 100.0\% | \$40,828 | 100.0\% | 100.0\% | 78 | 100.0\% | 100.0\% | \$27,466 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.9\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 2.9\% | 0 | 0.0\% | 8.2\% | \$0 | 0.0\% | 0.6\% |
|  | Moderate | 1 | 25.0\% | \$5 | 5.5\% | 19.2\% | 1 | 50.0\% | 23.8\% | \$5 | 16.7\% | 6.9\% | 0 | 0.0\% | 17.3\% | \$0 | 0.0\% | 6.1\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 20.7\% | 0 | 0.0\% | 19.0\% | \$0 | 0.0\% | 13.4\% | 0 | 0.0\% | 25.5\% | \$0 | 0.0\% | 13.9\% |
|  | Upper | 3 | 75.0\% | \$86 | 94.5\% | 41.2\% | 1 | 50.0\% | 41.7\% | \$25 | 83.3\% | 70.1\% | 2 | 100.0\% | 40.8\% | \$61 | 100.0\% | 61.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.0\% | \$0 | 0.0\% | 6.7\% | 0 | 0.0\% | 8.2\% | \$0 | 0.0\% | 18.3\% |
|  | Total | 4 | 100.0\% | \$91 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$30 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$61 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{\stackrel{\rightharpoonup}{\perp}}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 20.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 41.2\% | 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\% |
|  | Low | 25 | 6.2\% | \$2,637 | 1.9\% | 18.9\% | 15 | 6.4\% | 9.5\% | \$1,653 | 1.9\% | 3.7\% | 10 | 5.9\% | 8.4\% | \$984 | 1.8\% | 3.3\% |
|  | Moderate | 42 | 10.4\% | \$5,567 | 4.0\% | 19.2\% | 25 | 10.6\% | 14.0\% | \$3,391 | 4.0\% | 7.3\% | 17 | 10.1\% | 13.2\% | \$2,176 | 4.0\% | 6.4\% |
|  | Middle | 64 | 15.8\% | \$11,776 | 8.4\% | 20.7\% | 40 | 17.0\% | 15.6\% | \$7,682 | 9.0\% | 10.4\% | 24 | 14.2\% | 14.3\% | \$4,094 | 7.5\% | 9.1\% |
|  | Upper | 269 | 66.6\% | \$118,538 | 84.9\% | 41.2\% | 155 | 66.0\% | 50.0\% | \$72,298 | 85.0\% | 66.8\% | 114 | 67.5\% | 51.0\% | \$46,240 | 84.7\% | 67.6\% |
|  | Unknown | 4 | 1.0\% | \$1,080 | 0.8\% | 0.0\% | 0 | 0.0\% | 10.9\% | \$0 | 0.0\% | 11.8\% | 4 | 2.4\% | 13.1\% | \$1,080 | 2.0\% | 13.5\% |
|  | Total | 404 | 100.0\% | \$139,598 | 100.0\% | 100.0\% | 235 | 100.0\% | 100.0\% | \$85,024 | 100.0\% | 100.0\% | 169 | 100.0\% | 100.0\% | \$54,574 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 329 | 31.8\% | \$22,358 | 37.0\% | 91.5\% | 203 | 50.9\% | 30.1\% | \$14,019 | 46.3\% | 42.0\% | 126 | 19.8\% | 39.6\% | \$8,339 | 27.7\% | 39.3\% |
|  | Over \$1 Million | 129 | 12.5\% | \$19,836 | 32.9\% | 4.9\% | 74 | 18.5\% |  |  |  |  | 55 | 8.6\% |  |  |  |  |
|  | Total Rev. available | 458 | 44.3\% | \$42,194 | 69.9\% | 96.4\% | 277 | 69.4\% |  |  |  |  | 181 | 28.4\% |  |  |  |  |
|  | Rev. Not Known | 578 | 55.8\% | \$18,155 | 30.1\% | 3.6\% | 122 | 30.6\% |  |  |  |  | 456 | 71.6\% |  |  |  |  |
|  | Total | 1,036 | 100.0\% | \$60,349 | 100.0\% | 100.0\% | 399 | 100.0\% |  |  |  |  | 637 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 958 | 92.5\% | \$34,605 | 57.3\% |  | 357 | 89.5\% | 93.0\% | \$17,075 | 56.4\% | 33.0\% | 601 | 94.3\% | 95.0\% | \$17,530 | 58.3\% | 40.2\% |
|  | \$100,001-\$250,000 | 45 | 4.3\% | \$7,920 | 13.1\% |  | 23 | 5.8\% | 3.4\% | \$4,204 | 13.9\% | 15.9\% | 22 | 3.5\% | 2.5\% | \$3,716 | 12.4\% | 14.7\% |
|  | \$250,001 - \$1 <br> Million | 33 | 3.2\% | \$17,824 | 29.5\% |  | 19 | 4.8\% | 3.6\% | \$9,017 | 29.8\% | 51.1\% | 14 | 2.2\% | 2.5\% | \$8,807 | 29.3\% | 45.1\% |
|  | Total | 1,036 | 100.0\% | \$60,349 | 100.0\% |  | 399 | 100.0\% | 100.0\% | \$30,296 | 100.0\% | 100.0\% | 637 | 100.0\% | 100.0\% | \$30,053 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 88.1\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 58.1\% | 0 | 0.0\% | 58.8\% | \$0 | 0.0\% | 31.9\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 7.7\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 1 | 100.0\% | \$40 | 100.0\% | 4.1\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | 1 | 100.0\% | \$40 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 1 | 100.0\% | \$40 | 100.0\% |  | 0 | 0.0\% | 76.2\% | \$0 | 0.0\% | 8.6\% | 1 | 100.0\% | 88.2\% | \$40 | 100.0\% | 25.8\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 32.8\% | 0 | 0.0\% | 5.9\% | \$0 | 0.0\% | 22.5\% |
|  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 58.6\% | 0 | 0.0\% | 5.9\% | \$0 | 0.0\% | 51.7\% |
|  | Total | 1 | 100.0\% | \$40 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$40 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

## Assessment Area: FL Northern FL

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 7,711 | 20.9 |
| Moderate-income | 1 | 3.7 |  | 3.7 | 247 | 18.1 | 6,780 | 18.4 |
| Middle-income | 24 | 88.9 |  | 85.3 | 4,472 | 14.2 | 7,850 | 21.3 |
| Upper-income | 2 | 7.4 |  | 11.0 | 198 | 4.9 | 14,479 | 39.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 27 | 100.0 | 36,820 | 100.0 | 4,917 | 13.4 | 36,820 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 2,452 | 1,389 |  | 56.6 | 725 | 29.6 | 338 | 13.8 |
| Middle-income | 52,443 | 35,596 |  | 67.9 | 8,711 | 16.6 | 8,136 | 15.5 |
| Upper-income | 16,429 | 4,751 |  | 28.9 | 1,316 | 8.0 | 10,362 | 63.1 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 71,324 | 41,736 |  | 58.5 | 10,752 | 15.1 | 18,836 | 26.4 |
|  | Total Businesses by <br> Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 422 | 5.1 |  | 4.9 | 20 | 6.6 | 29 | 7.9 |
| Middle-income | 5,356 | 65.0 |  | 65.5 | 181 | 60.1 | 215 | 58.4 |
| Upper-income | 2,466 | 29.9 |  | 29.6 | 100 | 33.2 | 124 | 33.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 8,244 | 100.0 |  | 100.0 | 301 | 100.0 | 368 | 100.0 |
|  | Percentage of | otal B | ess | 91.9 |  | 3.7 |  | 4.5 |
|  | Total Farm |  |  | Farm | by Tract \& R | evenue |  |  |
|  | Tract |  |  |  | Over \$1 Million |  | Revenue Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 13 | 2.4 |  | 2.5 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 507 | 94.8 |  | 94.6 | 9 | 100.0 | 4 | 100.0 |
| Upper-income | 15 | 2.8 |  | 2.9 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 535 | 100.0 |  | 100.0 | 9 | 100.0 | 4 | 100.0 |
|  | Percentage of | otal Fa |  | 97.6 |  | 1.7 |  | . 7 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Northern FL


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: FL Northern FL


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## Appendices

## Combined Demographics Report

Assessment Area: FL Ocala


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: FL Ocala



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: FL Ocala

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparis on 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Families <br> by Family <br> Income <br> \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol | lar |  |  | ank | Agg | Ban |  | Agg |  | nk | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 29 | 11.2\% | \$1,779 | 5.3\% | 17.1\% | 16 | 10.9\% | 8.7\% | \$1,064 | 5.9\% | 5.0\% | 13 | 11.6\% | 8.3\% | \$715 | 4.6\% | 4.8\% |
|  | M oderate | 59 | 22.8\% | \$4,563 | 13.6\% | 19.9\% | 37 | 25.2\% | 26.0\% | \$2,905 | 16.2\% | 19.4\% | 22 | 19.6\% | 23.9\% | \$1,658 | 10.7\% | 17.5\% |
|  | Middle | 68 | 26.3\% | \$6,670 | 19.9\% | 23.5\% | 43 | 29.3\% | 22.8\% | \$4,549 | 25.3\% | 21.6\% | 25 | 22.3\% | 21.5\% | \$2,121 | 13.6\% | 19.5\% |
|  | Upper | 99 | 38.2\% | \$19,817 | 59.1\% | 39.5\% | 51 | 34.7\% | 31.1\% | \$9,454 | 52.6\% | 42.5\% | 48 | 42.9\% | 28.5\% | \$10,363 | 66.7\% | 39.9\% |
|  | Unknown | 4 | 1.5\% | \$682 | 2.0\% | 0.0\% | 0 | 0.0\% | 11.3\% | \$0 | 0.0\% | 11.5\% | 4 | 3.6\% | 17.9\% | \$682 | 4.4\% | 18.2\% |
|  | Total | 259 | 100.0\% | \$33,511 | 100.0\% | 100.0\% | 147 | 100.0\% | 100.0\% | \$17,972 | 100.0\% | 100.0\% | 112 | 100.0\% | 100.0\% | \$15,539 | 100.0\% | 100.0\% |
|  | Low | 18 | 7.6\% | \$1,448 | 3.0\% | 17.1\% | 10 | 6.8\% | 4.8\% | \$1,018 | 3.4\% | 2.7\% | 8 | 8.8\% | 4.4\% | \$430 | 2.3\% | 2.3\% |
|  | M oderate | 34 | 14.3\% | \$3,008 | 6.2\% | 19.9\% | 16 | 11.0\% | 13.8\% | \$1,478 | 5.0\% | 9.2\% | 18 | 19.8\% | 11.8\% | \$1,530 | 8.1\% | 7.4\% |
|  | Middle | 54 | 22.8\% | \$6,186 | 12.7\% | 23.5\% | 42 | 28.8\% | 21.9\% | \$5,030 | 17.0\% | 18.1\% | 12 | 13.2\% | 18.7\% | \$1,156 | 6.1\% | 15.3\% |
|  | Upper | 129 | 54.4\% | \$37,370 | 77.0\% | 39.5\% | 78 | 53.4\% | 38.2\% | \$22,131 | 74.6\% | 47.8\% | 51 | 56.0\% | 38.9\% | \$15,239 | 80.7\% | 48.7\% |
|  | Unknown | 2 | 0.8\% | \$534 | 1.1\% | 0.0\% | 0 | 0.0\% | 21.2\% | \$0 | 0.0\% | 22.2\% | 2 | 2.2\% | 26.2\% | \$534 | 2.8\% | 26.3\% |
|  | Total | 237 | 100.0\% | \$48,546 | 100.0\% | 100.0\% | 146 | 100.0\% | 100.0\% | \$29,657 | 100.0\% | 100.0\% | 91 | 100.0\% | 100.0\% | \$18,889 | 100.0\% | 100.0\% |
|  | Low | 7 | 13.2\% | \$36 | 9.1\% | 17.1\% | 2 | 9.1\% | 13.9\% | \$19 | 10.7\% | 6.4\% | 5 | 16.1\% | 22.0\% | \$17 | 7.8\% | 5.1\% |
|  | M oderate | 15 | 28.3\% | \$70 | 17.7\% | 19.9\% | 4 | 18.2\% | 24.2\% | \$17 | 9.6\% | 14.1\% | 11 | 35.5\% | 20.3\% | \$53 | 24.2\% | 5.3\% |
|  | Middle | 17 | 32.1\% | \$125 | 31.6\% | 23.5\% | 10 | 45.5\% | 27.3\% | \$64 | 36.2\% | 24.9\% | 7 | 22.6\% | 17.0\% | \$61 | 27.9\% | 15.3\% |
|  | Upper | 14 | 26.4\% | \$165 | 41.7\% | 39.5\% | 6 | 27.3\% | 33.3\% | \$77 | 43.5\% | 51.8\% | 8 | 25.8\% | 36.8\% | \$88 | 40.2\% | 58.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 2.9\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 15.6\% |
|  | Total | 53 | 100.0\% | \$396 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$177 | 100.0\% | 100.0\% | 31 | 100.0\% | 100.0\% | \$219 | 100.0\% | 100.0\% |
| $\stackrel{\grave{C}}{\stackrel{\rightharpoonup}{\sum}}$ | Low | 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\% |
|  | M oderate | 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\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 23.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 39.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 54 | 9.8\% | \$3,263 | 4.0\% | 17.1\% | 28 | 8.9\% | 7.1\% | \$2,101 | 4.4\% | 3.9\% | 26 | 11.1\% | 7.1\% | \$1,162 | 3.4\% | 3.6\% |
|  | M oderate | 108 | 19.7\% | \$7,641 | 9.3\% | 19.9\% | 57 | 18.1\% | 20.5\% | \$4,400 | 9.2\% | 14.1\% | 51 | 21.8\% | 18.8\% | \$3,241 | 9.4\% | 12.5\% |
|  | Middle | 139 | 25.3\% | \$12,981 | 15.7\% | 23.5\% | 95 | 30.2\% | 22.5\% | \$9,643 | 20.2\% | 19.8\% | 44 | 18.8\% | 20.2\% | \$3,338 | 9.6\% | 17.4\% |
|  | Upper | 242 | 44.1\% | \$57,352 | 69.6\% | 39.5\% | 135 | 42.9\% | 34.3\% | \$31,662 | 66.2\% | 45.2\% | 107 | 45.7\% | 33.0\% | \$25,690 | 74.1\% | 43.9\% |
|  | Unknown | 6 | 1.1\% | \$1,216 | 1.5\% | 0.0\% | 0 | 0.0\% | 15.5\% | \$0 | 0.0\% | 17.1\% | 6 | 2.6\% | 20.9\% | \$1,216 | 3.5\% | 22.6\% |
|  | Total | 549 | 100.0\% | \$82,453 | 100.0\% | 100.0\% | 315 | 100.0\% | 100.0\% | \$47,806 | 100.0\% | 100.0\% | 234 | 100.0\% | 100.0\% | \$34,647 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 320 | 27.5\% | \$25,687 | 37.0\% | 92.7\% | 187 | 47.8\% | 31.6\% | \$16,058 | 47.5\% | 40.5\% | 133 | 17.2\% | 40.0\% | \$9,629 | 27.0\% | 33.0\% |
|  |  | 197 | 16.9\% | \$27,470 | 39.6\% | 4.0\% | 107 | 27.4\% |  |  |  |  | 90 | 11.6\% |  |  |  |  |
|  |  | 517 | 44.4\% | \$53,157 | 76.6\% | 96.7\% | 294 | 75.2\% |  |  |  |  | 223 | 28.8\% |  |  |  |  |
|  |  | 648 | 55.6\% | \$16,251 | 23.4\% | 3.3\% | 97 | 24.8\% |  |  |  |  | 551 | 71.2\% |  |  |  |  |
|  |  | 1,165 | 100.0\% | \$69,408 | 100.0\% | 100.0\% | 391 | 100.0\% |  |  |  |  | 774 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 1,023 | 87.8\% | \$31,250 | 45.0\% |  | 319 | 81.6\% | 93.5\% | \$13,900 | 41.2\% | 37.6\% | 704 | 91.0\% | 94.9\% | \$17,350 | 48.7\% | 41.2\% |
|  | \$100,001-\$250,000 | 94 | 8.1\% | \$16,819 | 24.2\% |  | 44 | 11.3\% | 3.5\% | \$7,565 | 22.4\% | 18.1\% | 50 | 6.5\% | 2.9\% | \$9,254 | 26.0\% | 17.7\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ | 48 | 4.1\% | \$21,339 | 30.7\% |  | 28 | 7.2\% | 2.9\% | \$12,307 | 36.4\% | 44.3\% | 20 | 2.6\% | 2.2\% | \$9,032 | 25.3\% | 41.1\% |
|  | Total | 1,165 | 100.0\% | \$69,408 | 100.0\% |  | 391 | 100.0\% | 100.0\% | \$33,772 | 100.0\% | 100.0\% | 774 | 100.0\% | 100.0\% | \$35,636 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 8 | 72.7\% | \$664 | 54.4\% | 97.7\% | 0 | 0.0\% | 61.8\% | \$0 | 0.0\% | 67.0\% | 8 | 80.0\% | 69.1\% | \$664 | 92.1\% | 71.3\% |
|  |  | 1 | 9.1\% | \$500 | 41.0\% | 2.0\% | 1 | 100.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 2 | 18.2\% | \$57 | 4.7\% | 0.3\% | 0 | 0.0\% |  |  |  |  | 2 | 20.0\% |  |  |  |  |
|  |  | 11 | 100.0\% | \$1,221 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 10 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 7 | 63.6\% | \$233 | 19.1\% |  | 0 | 0.0\% | 83.6\% | \$0 | 0.0\% | 21.2\% | 7 | 70.0\% | 87.3\% | \$233 | 32.3\% | 39.2\% |
|  | \$100,001-\$250,000 | 3 | 27.3\% | \$488 | 40.0\% |  | 0 | 0.0\% | 5.5\% | \$0 | 0.0\% | 16.0\% | 3 | 30.0\% | 10.9\% | \$488 | 67.7\% | 41.3\% |
|  | \$250,001-\$500,000 | 1 | 9.1\% | \$500 | 41.0\% |  | 1 | 100.0\% | 10.9\% | \$500 | 100.0\% | 62.8\% | 0 | 0.0\% | 1.8\% | \$0 | 0.0\% | 19.5\% |
|  | Total | 11 | 100.0\% | \$1,221 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$500 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$721 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: FL Okeechobee


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Okeechobee


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: FL Okeechobee

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$\text { 2010, } 2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | ount | ank <br> Dol <br> \$(000s) | lar \$ \% | Families by Family Income <br> \% | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> k <br> \$ \% | Agg \$\% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  |  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 19.6\% | 0 | 0.0\% | 7.2\% | \$0 | 0.0\% | 4.1\% | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 2.3\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.6\% | 0 | 0.0\% | 26.3\% | \$0 | 0.0\% | 20.4\% | 0 | 0.0\% | 13.3\% | \$0 | 0.0\% | 8.3\% |
|  |  | Middle | 2 | 66.7\% | \$194 | 59.3\% | 22.4\% | 1 | 50.0\% | 20.1\% | \$99 | 42.7\% | 18.0\% | 1 | 100.0\% | 23.5\% | \$95 | 100.0\% | 21.1\% |
|  |  | Upper | 1 | 33.3\% | \$133 | 40.7\% | 38.5\% | 1 | 50.0\% | 37.6\% | \$133 | 57.3\% | 48.8\% | 0 | 0.0\% | 40.8\% | \$0 | 0.0\% | 51.6\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 8.8\% | \$0 | 0.0\% | 8.7\% | 0 | 0.0\% | 18.4\% | \$0 | 0.0\% | 16.7\% |
|  |  | Total | 3 | 100.0\% | \$327 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$232 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$95 | 100.0\% | 100.0\% |
|  |  | Low | 2 | 16.7\% | \$51 | 4.7\% | 19.6\% | 1 | 25.0\% | 4.1\% | \$26 | 6.6\% | 1.7\% | 1 | 12.5\% | 2.9\% | \$25 | 3.6\% | 3.1\% |
|  |  | Moderate | 3 | 25.0\% | \$367 | 33.9\% | 19.6\% | 3 | 75.0\% | 14.4\% | \$367 | 93.4\% | 10.9\% | 0 | 0.0\% | 14.9\% | \$0 | 0.0\% | 10.0\% |
|  |  | Middle | 3 | 25.0\% | \$217 | 20.0\% | 22.4\% | 0 | 0.0\% | 17.8\% | \$0 | 0.0\% | 17.3\% | 3 | 37.5\% | 12.6\% | \$217 | 31.4\% | 10.7\% |
|  |  | Upper | 4 | 33.3\% | \$448 | 41.4\% | 38.5\% | 0 | 0.0\% | 34.9\% | \$0 | 0.0\% | 40.3\% | 4 | 50.0\% | 42.9\% | \$448 | 64.9\% | 49.2\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 28.8\% | \$0 | 0.0\% | 29.8\% | 0 | 0.0\% | 26.9\% | \$0 | 0.0\% | 26.9\% |
|  |  | Total | 12 | 100.0\% | \$1,083 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$393 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$690 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 19.6\% | 0 | 0.0\% | 11.8\% | \$0 | 0.0\% | 24.4\% | 0 | 0.0\% | 14.8\% | \$0 | 0.0\% | 5.7\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.6\% | 0 | 0.0\% | 29.4\% | \$0 | 0.0\% | 34.0\% | 0 | 0.0\% | 18.5\% | \$0 | 0.0\% | 4.0\% |
|  |  | Middle | 1 | 50.0\% | \$3 | 23.1\% | 22.4\% | 1 | 100.0\% | 23.5\% | \$3 | 100.0\% | 3.3\% | 0 | 0.0\% | 37.0\% | \$0 | 0.0\% | 56.6\% |
|  |  | Upper | 1 | 50.0\% | \$10 | 76.9\% | 38.5\% | 0 | 0.0\% | 35.3\% | \$0 | 0.0\% | 38.3\% | 1 | 100.0\% | 25.9\% | \$10 | 100.0\% | 29.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.7\% | \$0 | 0.0\% | 4.7\% |
|  |  | Total | 2 | 100.0\% | \$13 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$3 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% |
|  |  | 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\% | 19.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 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\% |
|  |  | Low | 2 | 11.8\% | \$51 | 3.6\% | 19.6\% | 1 | 14.3\% | 6.2\% | \$26 | 4.1\% | 3.2\% | 1 | 10.0\% | 4.3\% | \$25 | 3.1\% | 2.7\% |
|  |  | Moderate | 3 | 17.6\% | \$367 | 25.8\% | 19.6\% | 3 | 42.9\% | 21.6\% | \$367 | 58.4\% | 16.2\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 9.0\% |
|  |  | Middle | 6 | 35.3\% | \$414 | 29.1\% | 22.4\% | 2 | 28.6\% | 19.3\% | \$102 | 16.2\% | 17.5\% | 4 | 40.0\% | 19.6\% | \$312 | 39.2\% | 16.9\% |
|  |  | Upper | 6 | 35.3\% | \$591 | 41.5\% | 38.5\% | 1 | 14.3\% | 36.4\% | \$133 | 21.2\% | 44.8\% | 5 | 50.0\% | 40.7\% | \$458 | 57.6\% | 50.2\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 16.5\% | \$0 | 0.0\% | 18.3\% | 0 | 0.0\% | 21.1\% | \$0 | 0.0\% | 21.2\% |
|  |  | Total | 17 | 100.0\% | \$1,423 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$628 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$795 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 10 | 62.5\% | \$597 | 61.2\% | 92.9\% | 6 | 75.0\% | 30.4\% | \$447 | 74.9\% | 29.8\% | 4 | 50.0\% | 44.3\% | \$150 | 39.7\% | 44.0\% |
|  |  | Over \$1 Million | 4 | 25.0\% | \$350 | 35.9\% | 3.7\% | 2 | 25.0\% |  |  |  |  | 2 | 25.0\% |  |  |  |  |
|  |  | Total Rev. available | 14 | 87.5\% | \$947 | 97.1\% | 96.6\% | 8 | 100.0\% |  |  |  |  | 6 | 75.0\% |  |  |  |  |
|  |  | Rev. Not Known | 2 | 12.5\% | \$28 | 2.9\% | 3.4\% | 0 | 0.0\% |  |  |  |  | 2 | 25.0\% |  |  |  |  |
|  |  | Total | 16 | 100.0\% | \$975 | 100.0\% | 100.0\% | 8 | 100.0\% |  |  |  |  | 8 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 14 | 87.5\% | \$588 | 60.3\% |  | 7 | 87.5\% | 94.5\% | \$360 | 60.3\% | 37.2\% | 7 | 87.5\% | 94.7\% | \$228 | 60.3\% | 38.1\% |
|  |  | \$100,001 - \$250,000 | 2 | 12.5\% | \$387 | 39.7\% |  | 1 | 12.5\% | 3.1\% | \$237 | 39.7\% | 17.6\% | 1 | 12.5\% | 3.1\% | \$150 | 39.7\% | 17.4\% |
|  |  | \$250,001-\$1 Million | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 45.2\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 44.5\% |
|  |  | Total | 16 | 100.0\% | \$975 | 100.0\% |  | 8 | 100.0\% | 100.0\% | \$597 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$378 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 5 | 83.3\% | \$974 | 90.7\% | 87.7\% | 2 | 100.0\% | 53.8\% | \$600 | 100.0\% | 44.9\% | 3 | 75.0\% | 37.5\% | \$374 | 78.9\% | 34.8\% |
|  |  | Over \$1 Million | 1 | 16.7\% | \$100 | 9.3\% | 9.6\% | 0 | 0.0\% |  |  |  |  | 1 | 25.0\% |  |  |  |  |
|  |  | Not Known | 0 | 0.0\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Total | 6 | 100.0\% | \$1,074 | 100.0\% | 100.0\% | 2 | 100.0\% |  |  |  |  | 4 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 2 | 33.3\% | \$150 | 14.0\% |  | 0 | 0.0\% | 73.1\% | \$0 | 0.0\% | 15.2\% | 2 | 50.0\% | 75.0\% | \$150 | 31.6\% | 31.3\% |
|  |  | \$100,001-\$250,000 | 3 | 50.0\% | \$474 | 44.1\% |  | 1 | 50.0\% | 7.7\% | \$150 | 25.0\% | 14.7\% | 2 | 50.0\% | 25.0\% | \$324 | 68.4\% | 68.7\% |
|  |  | \$250,001 - \$500,000 | 1 | 16.7\% | \$450 | 41.9\% |  | 1 | 50.0\% | 19.2\% | \$450 | 75.0\% | 70.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Total | 6 | 100.0\% | \$1,074 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$600 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$474 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: FL Palm Bay


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Palm Bay


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: FL Palm Bay


[^340]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: FL Panama City


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Panama City

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  |  | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 8 | 2.4\% | \$664 | 1.2\% | 19.7\% | 7 | 4.9\% | 10.1\% | \$489 | 2.1\% | 6.8\% | 1 | 0.5\% | 8.2\% | \$175 | 0.5\% | 5.3\% |
|  | Middle | 300 | 89.6\% | \$51,309 | 90.0\% | 56.3\% | 128 | 88.9\% | 72.1\% | \$21,786 | 91.6\% | 75.4\% | 172 | 90.1\% | 75.6\% | \$29,523 | 88.8\% | 77.7\% |
|  | Upper | 27 | 8.1\% | \$5,060 | 8.9\% | 23.0\% | 9 | 6.3\% | 17.6\% | \$1,521 | 6.4\% | 17.7\% | 18 | 9.4\% | 16.0\% | \$3,539 | 10.6\% | 16.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 335 | 100.0\% | \$57,033 | 100.0\% | 100.0\% | 144 | 100.0\% | 100.0\% | \$23,796 | 100.0\% | 100.0\% | 191 | 100.0\% | 100.0\% | \$33,237 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 9 | 4.3\% | \$894 | 2.2\% | 19.7\% | 4 | 3.4\% | 8.3\% | \$471 | 2.2\% | 5.7\% | 5 | 5.6\% | 8.3\% | \$423 | 2.2\% | 6.0\% |
|  | Middle | 144 | 69.6\% | \$30,702 | 74.3\% | 56.3\% | 85 | 72.0\% | 63.8\% | \$15,938 | 73.5\% | 65.7\% | 59 | 66.3\% | 66.6\% | \$14,764 | 75.2\% | 70.3\% |
|  | Upper | 54 | 26.1\% | \$9,731 | 23.5\% | 23.0\% | 29 | 24.6\% | 27.5\% | \$5,273 | 24.3\% | 28.4\% | 25 | 28.1\% | 24.7\% | \$4,458 | 22.7\% | 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\% |
|  | Total | 207 | 100.0\% | \$41,327 | 100.0\% | 100.0\% | 118 | 100.0\% | 100.0\% | \$21,682 | 100.0\% | 100.0\% | 89 | 100.0\% | 100.0\% | \$19,645 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 6 | 42.9\% | \$113 | 46.7\% | 19.7\% | 4 | 44.4\% | 12.4\% | \$96 | 56.8\% | 5.9\% | 2 | 40.0\% | 14.4\% | \$17 | 23.3\% | 11.1\% |
|  | Middle | 3 | 21.4\% | \$52 | 21.5\% | 56.3\% | 1 | 11.1\% | 57.9\% | \$5 | 3.0\% | 58.7\% | 2 | 40.0\% | 60.0\% | \$47 | 64.4\% | 60.3\% |
|  | Upper | 5 | 35.7\% | \$77 | 31.8\% | 23.0\% | 4 | 44.4\% | 28.7\% | \$68 | 40.2\% | 34.5\% | 1 | 20.0\% | 25.6\% | \$9 | 12.3\% | 28.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 14 | 100.0\% | \$242 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$169 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$73 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | 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\% | 15.4\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 12.0\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 97.5\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 75.6\% | 0 | 0.0\% | 83.3\% | \$0 | 0.0\% | 88.0\% | 0 | 0.0\% | 60.0\% | \$0 | 0.0\% | 2.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 8.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 23 | 4.1\% | \$1,671 | 1.7\% | 19.7\% | 15 | 5.5\% | 9.3\% | \$1,056 | 2.3\% | 6.4\% | 8 | 2.8\% | 8.5\% | \$615 | 1.2\% | 10.4\% |
|  | Middle | 447 | 80.4\% | \$82,063 | 83.2\% | 56.3\% | 214 | 79.0\% | 67.6\% | \$37,729 | 82.7\% | 70.8\% | 233 | 81.8\% | 71.2\% | \$44,334 | 83.7\% | 70.4\% |
|  | Upper | 86 | 15.5\% | \$14,868 | 15.1\% | 23.0\% | 42 | 15.5\% | 22.8\% | \$6,862 | 15.0\% | 22.6\% | 44 | 15.4\% | 20.0\% | \$8,006 | 15.1\% | 19.1\% |
|  | 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 | 556 | 100.0\% | \$98,602 | 100.0\% | 100.0\% | 271 | 100.0\% | 100.0\% | \$45,647 | 100.0\% | 100.0\% | 285 | 100.0\% | 100.0\% | \$52,955 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 6 | 0.7\% | \$150 | 0.3\% | 0.9\% | 3 | 1.0\% | 0.3\% | \$72 | 0.2\% | 0.2\% | 3 | 0.5\% | 0.4\% | \$78 | 0.3\% | 1.4\% |
|  | Moderate | 190 | 21.7\% | \$11,575 | 19.6\% | 24.5\% | 61 | 21.0\% | 20.2\% | \$5,841 | 19.8\% | 18.8\% | 129 | 22.1\% | 22.4\% | \$5,734 | 19.3\% | 19.4\% |
|  | Middle | 448 | 51.3\% | \$26,528 | 44.9\% | 53.2\% | 144 | 49.5\% | 54.0\% | \$13,579 | 46.1\% | 55.6\% | 304 | 52.1\% | 52.9\% | \$12,949 | 43.6\% | 50.5\% |
|  | Upper | 230 | 26.3\% | \$20,883 | 35.3\% | 21.4\% | 83 | 28.5\% | 22.4\% | \$9,965 | 33.8\% | 24.3\% | 147 | 25.2\% | 22.2\% | \$10,918 | 36.8\% | 28.4\% |
|  | 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\% | 3.1\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 874 | 100.0\% | \$59,136 | 100.0\% | 100.0\% | 291 | 100.0\% | 100.0\% | \$29,457 | 100.0\% | 100.0\% | 583 | 100.0\% | 100.0\% | \$29,679 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 27.4\% | 0 | 0.0\% | 42.9\% | \$0 | 0.0\% | 92.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 54.8\% | 0 | 0.0\% | 57.1\% | \$0 | 0.0\% | 8.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 17.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: FL Panama City

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  |  |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  | lar |  |  | nk | Agg | Ban |  | Agg |  | nk | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 13 | 3.9\% | \$1,003 | 1.8\% | 19.7\% | 7 | 4.9\% | 5.1\% | \$532 | 2.2\% | 2.5\% | 6 | 3.1\% | 5.3\% | \$471 | 1.4\% | 2.7\% |
|  | Moderate | 32 | 9.6\% | \$3,644 | 6.4\% | 18.2\% | 17 | 11.8\% | 16.5\% | \$1,894 | 8.0\% | 11.4\% | 15 | 7.9\% | 16.6\% | \$1,750 | 5.3\% | 11.1\% |
|  | Middle | 51 | 15.2\% | \$6,769 | 11.9\% | 22.1\% | 20 | 13.9\% | 22.3\% | \$2,764 | 11.6\% | 20.0\% | 31 | 16.2\% | 18.6\% | \$4,005 | 12.0\% | 16.8\% |
|  | Upper | 234 | 69.9\% | \$44,102 | 77.3\% | 40.0\% | 100 | 69.4\% | 41.1\% | \$18,606 | 78.2\% | 51.1\% | 134 | 70.2\% | 43.0\% | \$25,496 | 76.7\% | 53.0\% |
|  | Unknown | 5 | 1.5\% | \$1,515 | 2.7\% | 0.0\% | 0 | 0.0\% | 15.1\% | \$0 | 0.0\% | 15.1\% | 5 | 2.6\% | 16.5\% | \$1,515 | 4.6\% | 16.4\% |
|  | Total | 335 | 100.0\% | \$57,033 | 100.0\% | 100.0\% | 144 | 100.0\% | 100.0\% | \$23,796 | 100.0\% | 100.0\% | 191 | 100.0\% | 100.0\% | \$33,237 | 100.0\% | 100.0\% |
|  | Low | 8 | 3.9\% | \$734 | 1.8\% | 19.7\% | 4 | 3.4\% | 4.3\% | \$365 | 1.7\% | 2.1\% | 4 | 4.5\% | 3.6\% | \$369 | 1.9\% | 1.8\% |
|  | Moderate | 18 | 8.7\% | \$2,096 | 5.1\% | 18.2\% | 12 | 10.2\% | 10.2\% | \$1,454 | 6.7\% | 6.2\% | 6 | 6.7\% | 9.4\% | \$642 | 3.3\% | 5.2\% |
|  | Middle | 43 | 20.8\% | \$5,895 | 14.3\% | 22.1\% | 27 | 22.9\% | 16.2\% | \$3,578 | 16.5\% | 11.9\% | 16 | 18.0\% | 14.8\% | \$2,317 | 11.8\% | 10.7\% |
|  | Upper | 132 | 63.8\% | \$31,241 | 75.6\% | 40.0\% | 72 | 61.0\% | 46.6\% | \$15,696 | 72.4\% | 53.8\% | 60 | 67.4\% | 39.9\% | \$15,545 | 79.1\% | 47.0\% |
|  | Unknown | 6 | 2.9\% | \$1,361 | 3.3\% | 0.0\% | 3 | 2.5\% | 22.8\% | \$589 | 2.7\% | 25.9\% | 3 | 3.4\% | 32.3\% | \$772 | 3.9\% | 35.2\% |
|  | Total | 207 | 100.0\% | \$41,327 | 100.0\% | 100.0\% | 118 | 100.0\% | 100.0\% | \$21,682 | 100.0\% | 100.0\% | 89 | 100.0\% | 100.0\% | \$19,645 | 100.0\% | 100.0\% |
|  | Low | 1 | 7.1\% | \$40 | 16.5\% | 19.7\% | 0 | 0.0\% | 7.9\% | \$0 | 0.0\% | 4.7\% | 1 | 20.0\% | 15.0\% | \$40 | 54.8\% | 5.7\% |
|  | Moderate | 4 | 28.6\% | \$53 | 21.9\% | 18.2\% | 3 | 33.3\% | 16.9\% | \$43 | 25.4\% | 15.1\% | 1 | 20.0\% | 19.4\% | \$10 | 13.7\% | 15.7\% |
|  | Middle | 4 | 28.6\% | \$52 | 21.5\% | 22.1\% | 2 | 22.2\% | 28.7\% | \$36 | 21.3\% | 25.4\% | 2 | 40.0\% | 25.6\% | \$16 | 21.9\% | 19.2\% |
|  | Upper | 5 | 35.7\% | \$97 | 40.1\% | 40.0\% | 4 | 44.4\% | 45.5\% | \$90 | 53.3\% | 54.6\% | 1 | 20.0\% | 36.7\% | \$7 | 9.6\% | 53.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 3.3\% | \$0 | 0.0\% | 5.7\% |
|  | Total | 14 | 100.0\% | \$242 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$169 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$73 | 100.0\% | 100.0\% |
| $\begin{aligned} & \stackrel{\searrow}{\stackrel{\rightharpoonup}{\Sigma}} \\ & \stackrel{\rightharpoonup}{U} \\ & \stackrel{\rightharpoonup}{\rightleftarrows} \\ & \stackrel{\rightharpoonup}{\Sigma} \end{aligned}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 19.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 22 | 4.0\% | \$1,777 | 1.8\% | 19.7\% | 11 | 4.1\% | 4.8\% | \$897 | 2.0\% | 2.2\% | 11 | 3.9\% | 4.9\% | \$880 | 1.7\% | 2.2\% |
|  | Moderate | 54 | 9.7\% | \$5,793 | 5.9\% | 18.2\% | 32 | 11.8\% | 13.4\% | \$3,391 | 7.4\% | 8.5\% | 22 | 7.7\% | 13.7\% | \$2,402 | 4.5\% | 8.1\% |
|  | Middle | 98 | 17.6\% | \$12,716 | 12.9\% | 22.1\% | 49 | 18.1\% | 19.5\% | \$6,378 | 14.0\% | 15.4\% | 49 | 17.2\% | 17.2\% | \$6,338 | 12.0\% | 13.4\% |
|  | Upper | 371 | 66.7\% | \$75,440 | 76.5\% | 40.0\% | 176 | 64.9\% | 43.9\% | \$34,392 | 75.3\% | 50.7\% | 195 | 68.4\% | 41.4\% | \$41,048 | 77.5\% | 47.7\% |
|  | Unknown | 11 | 2.0\% | \$2,876 | 2.9\% | 0.0\% | 3 | 1.1\% | 18.4\% | \$589 | 1.3\% | 23.1\% | 8 | 2.8\% | 22.8\% | \$2,287 | 4.3\% | 28.6\% |
|  | Total | 556 | 100.0\% | \$98,602 | 100.0\% | 100.0\% | 271 | 100.0\% | 100.0\% | \$45,647 | 100.0\% | 100.0\% | 285 | 100.0\% | 100.0\% | \$52,955 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known <br> Total | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 270 | 30.9\% | \$23,907 | 40.4\% | 90.8\% | 150 | 51.5\% | 32.5\% | \$12,160 | 41.3\% | 45.9\% | 120 | 20.6\% | 39.2\% | \$11,747 | 39.6\% | 44.5\% |
|  |  | 121 | 13.8\% | \$23,352 | 39.5\% | 5.2\% | 72 | 24.7\% |  |  |  |  | 49 | 8.4\% |  |  |  |  |
|  |  | 391 | 44.7\% | \$47,259 | 79.9\% | 96.0\% | 222 | 76.2\% |  |  |  |  | 169 | 29.0\% |  |  |  |  |
|  |  | 483 | 55.3\% | \$11,877 | 20.1\% | 4.0\% | 69 | 23.7\% |  |  |  |  | 414 | 71.0\% |  |  |  |  |
|  |  | 874 | 100.0\% | \$59,136 | 100.0\% | 100.0\% | 291 | 100.0\% |  |  |  |  | 583 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 763 | 87.3\% | \$23,161 | 39.2\% |  | 232 | 79.7\% | 89.9\% | \$10,116 | 34.3\% | 29.2\% | 531 | 91.1\% | 92.2\% | \$13,045 | 44.0\% | 32.7\% |
|  | \$100,001-\$250,000 | 63 | 7.2\% | \$11,906 | 20.1\% |  | 32 | 11.0\% | 5.1\% | \$6,256 | 21.2\% | 19.5\% | 31 | 5.3\% | 3.8\% | \$5,650 | 19.0\% | 16.5\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ | 48 | 5.5\% | \$24,069 | 40.7\% |  | 27 | 9.3\% | 5.0\% | \$13,085 | 44.4\% | 51.3\% | 21 | 3.6\% | 4.0\% | \$10,984 | 37.0\% | 50.8\% |
|  | Total | 874 | 100.0\% | \$59,136 | 100.0\% |  | 291 | 100.0\% | 100.0\% | \$29,457 | 100.0\% | 100.0\% | 583 | 100.0\% | 100.0\% | \$29,679 | 100.0\% | 100.0\% |
|  | \$1 Million or LessOver \$1 MillionNot KnownTotal | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 57.1\% | \$0 | 0.0\% | 6.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 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\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 85.7\% | \$0 | 0.0\% | 10.7\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 3.2\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 89.3\% | 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\% | 50.0\% | \$0 | 0.0\% | 96.8\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: FL Punta Gorda


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Punta Gorda

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  | Agg$\%$ | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 5 | 3.8\% | \$245 | 1.6\% | 5.1\% | 1 | 1.6\% | 2.2\% | \$32 | 0.4\% | 0.9\% | 4 | 5.6\% | 1.5\% | \$213 | 2.8\% | 0.6\% |
|  | Middle | 118 | 88.7\% | \$12,666 | 84.8\% | 83.0\% | 55 | 88.7\% | 86.2\% | \$6,103 | 84.8\% | 77.9\% | 63 | 88.7\% | 86.1\% | \$6,563 | 84.8\% | 77.2\% |
|  | Upper | 10 | 7.5\% | \$2,022 | 13.5\% | 11.9\% | 6 | 9.7\% | 11.6\% | \$1,063 | 14.8\% | 21.2\% | 4 | 5.6\% | 12.4\% | \$959 | 12.4\% | 22.2\% |
|  | 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 | 133 | 100.0\% | \$14,933 | 100.0\% | 100.0\% | 62 | 100.0\% | 100.0\% | \$7,198 | 100.0\% | 100.0\% | 71 | 100.0\% | 100.0\% | \$7,735 | 100.0\% | 100.0\% |
|  | 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\% | 5.1\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 0.5\% |
|  | Middle | 45 | 73.8\% | \$6,398 | 58.5\% | 83.0\% | 27 | 75.0\% | 76.3\% | \$3,171 | 55.6\% | 66.2\% | 18 | 72.0\% | 78.7\% | \$3,227 | 61.7\% | 69.8\% |
|  | Upper | 16 | 26.2\% | \$4,536 | 41.5\% | 11.9\% | 9 | 25.0\% | 22.9\% | \$2,533 | 44.4\% | 33.5\% | 7 | 28.0\% | 20.4\% | \$2,003 | 38.3\% | 29.7\% |
|  | 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 | 61 | 100.0\% | \$10,934 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$5,704 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$5,230 | 100.0\% | 100.0\% |
|  | 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\% | 5.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 3.2\% |
|  | Middle | 8 | 100.0\% | \$159 | 100.0\% | 83.0\% | 3 | 100.0\% | 90.3\% | \$117 | 100.0\% | 66.1\% | 5 | 100.0\% | 91.3\% | \$42 | 100.0\% | 83.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 11.9\% | 0 | 0.0\% | 9.7\% | \$0 | 0.0\% | 33.9\% | 0 | 0.0\% | 5.8\% | \$0 | 0.0\% | 13.6\% |
|  | 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 | 8 | 100.0\% | \$159 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$117 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$42 | 100.0\% | 100.0\% |
| 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\% | 16.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 43.9\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 66.1\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 18.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 56.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 5 | 2.5\% | \$245 | 0.9\% | 5.1\% | 1 | 1.0\% | 1.5\% | \$32 | 0.2\% | 0.6\% | 4 | 4.0\% | 1.3\% | \$213 | 1.6\% | 0.6\% |
|  | Middle | 171 | 84.7\% | \$19,223 | 73.9\% | 83.0\% | 85 | 84.2\% | 81.5\% | \$9,391 | 72.1\% | 71.5\% | 86 | 85.1\% | 82.8\% | \$9,832 | 75.6\% | 73.5\% |
|  | Upper | 26 | 12.9\% | \$6,558 | 25.2\% | 11.9\% | 15 | 14.9\% | 17.0\% | \$3,596 | 27.6\% | 27.9\% | 11 | 10.9\% | 15.9\% | \$2,962 | 22.8\% | 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\% |
|  | Total | 202 | 100.0\% | \$26,026 | 100.0\% | 100.0\% | 101 | 100.0\% | 100.0\% | \$13,019 | 100.0\% | 100.0\% | 101 | 100.0\% | 100.0\% | \$13,007 | 100.0\% | 100.0\% |
|  | 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 | 50 | 7.8\% | \$3,195 | 9.5\% | 5.2\% | 19 | 8.2\% | 4.8\% | \$1,382 | 9.0\% | 14.1\% | 31 | 7.6\% | 4.5\% | \$1,813 | 9.9\% | 9.1\% |
|  | Middle | 528 | 82.4\% | \$26,820 | 79.9\% | 86.0\% | 193 | 83.5\% | 82.3\% | \$12,696 | 82.7\% | 72.6\% | 335 | 81.7\% | 84.3\% | \$14,124 | 77.5\% | 79.4\% |
|  | Upper | 63 | 9.8\% | \$3,563 | 10.6\% | 8.8\% | 19 | 8.2\% | 10.5\% | \$1,275 | 8.3\% | 11.6\% | 44 | 10.7\% | 9.9\% | \$2,288 | 12.6\% | 10.9\% |
|  | 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\% | 2.4\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.5\% |
|  | Total | 641 | 100.0\% | \$33,578 | 100.0\% | 100.0\% | 231 | 100.0\% | 100.0\% | \$15,353 | 100.0\% | 100.0\% | 410 | 100.0\% | 100.0\% | \$18,225 | 100.0\% | 100.0\% |
|  | 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\% | 2.9\% | 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\% | 92.6\% | 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\% | 4.4\% | 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\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: FL Punta Gorda

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank | Families | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count | Dollar |  | Income | Bank |  | Agg <br> \% | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# |  | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  |  |  | Low | 17 | 12.8\% | \$943 | 6.3\% | 15.5\% | 8 | 12.9\% | 7.5\% | \$502 | 7.0\% | 3.7\% | 9 | 12.7\% | 6.7\% | \$441 | 5.7\% | 3.4\% |
|  |  | M oderate | 30 | 22.6\% | \$2,587 | 17.3\% | 20.5\% | 14 | 22.6\% | 19.1\% | \$1,328 | 18.4\% | 12.7\% | 16 | 22.5\% | 16.3\% | \$1,259 | 16.3\% | 10.4\% |
|  |  | Middle | 29 | 21.8\% | \$2,971 | 19.9\% | 25.4\% | 10 | 16.1\% | 20.2\% | \$1,097 | 15.2\% | 17.0\% | 19 | 26.8\% | 19.5\% | \$1,874 | 24.2\% | 16.4\% |
|  |  | Upper | 56 | 42.1\% | \$8,267 | 55.4\% | 38.5\% | 30 | 48.4\% | 44.2\% | \$4,271 | 59.3\% | 56.2\% | 26 | 36.6\% | 46.6\% | \$3,996 | 51.7\% | 57.8\% |
|  |  | Unknown | 1 | 0.8\% | \$165 | 1.1\% | 0.0\% | 0 | 0.0\% | 8.9\% | \$0 | 0.0\% | 10.5\% | 1 | 1.4\% | 10.9\% | \$165 | 2.1\% | 12.0\% |
|  |  | Total | 133 | 100.0\% | \$14,933 | 100.0\% | 100.0\% | 62 | 100.0\% | 100.0\% | \$7,198 | 100.0\% | 100.0\% | 71 | 100.0\% | 100.0\% | \$7,735 | 100.0\% | 100.0\% |
|  |  |  | Low | 4 | 6.6\% | \$280 | 2.6\% | 15.5\% | 4 | 11.1\% | 5.3\% | \$280 | 4.9\% | 2.8\% | 0 | 0.0\% | 5.5\% | \$0 | 0.0\% | 3.2\% |
|  |  | Moderate | 6 | 9.8\% | \$601 | 5.5\% | 20.5\% | 3 | 8.3\% | 12.4\% | \$383 | 6.7\% | 7.9\% | 3 | 12.0\% | 13.4\% | \$218 | 4.2\% | 9.0\% |
|  |  | Middle | 22 | 36.1\% | \$2,763 | 25.3\% | 25.4\% | 13 | 36.1\% | 20.4\% | \$1,665 | 29.2\% | 15.7\% | 9 | 36.0\% | 18.2\% | \$1,098 | 21.0\% | 14.8\% |
|  |  | Upper | 29 | 47.5\% | \$7,290 | 66.7\% | 38.5\% | 16 | 44.4\% | 44.8\% | \$3,376 | 59.2\% | 56.8\% | 13 | 52.0\% | 39.9\% | \$3,914 | 74.8\% | 51.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 17.2\% | \$0 | 0.0\% | 16.7\% | 0 | 0.0\% | 23.0\% | \$0 | 0.0\% | 22.1\% |
|  |  | Total | 61 | 100.0\% | \$10,934 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$5,704 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$5,230 | 100.0\% | 100.0\% |
|  |  |  | Low | 1 | 12.5\% | \$5 | 3.1\% | 15.5\% | 0 | 0.0\% | 8.1\% | \$0 | 0.0\% | 2.1\% | 1 | 20.0\% | 18.8\% | \$5 | 11.9\% | 11.7\% |
|  |  | Moderate | 1 | 12.5\% | \$7 | 4.4\% | 20.5\% | 1 | 33.3\% | 27.4\% | \$7 | 6.0\% | 12.1\% | 0 | 0.0\% | 15.9\% | \$0 | 0.0\% | 10.3\% |
|  |  | Middle | 2 | 25.0\% | \$63 | 39.6\% | 25.4\% | 1 | 33.3\% | 25.8\% | \$60 | 51.3\% | 20.4\% | 1 | 20.0\% | 33.3\% | \$3 | 7.1\% | 38.9\% |
|  |  | Upper | 4 | 50.0\% | \$84 | 52.8\% | 38.5\% | 1 | 33.3\% | 33.9\% | \$50 | 42.7\% | 60.9\% | 3 | 60.0\% | 30.4\% | \$34 | 81.0\% | 38.9\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 4.5\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.2\% |
|  |  | Total | 8 | 100.0\% | \$159 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$117 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$42 | 100.0\% | 100.0\% |
|  |  | Low | 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\% |
|  |  | 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\% | 25.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 22 | 10.9\% | \$1,228 | 4.7\% | 15.5\% | 12 | 11.9\% | 6.5\% | \$782 | 6.0\% | 3.2\% | 10 | 9.9\% | 6.4\% | \$446 | 3.4\% | 3.3\% |
|  |  | Moderate | 37 | 18.3\% | \$3,195 | 12.3\% | 20.5\% | 18 | 17.8\% | 16.0\% | \$1,718 | 13.2\% | 10.1\% | 19 | 18.8\% | 15.0\% | \$1,477 | 11.4\% | 9.7\% |
|  |  | Middle | 53 | 26.2\% | \$5,797 | 22.3\% | 25.4\% | 24 | 23.8\% | 20.4\% | \$2,822 | 21.7\% | 16.3\% | 29 | 28.7\% | 19.2\% | \$2,975 | 22.9\% | 15.7\% |
|  |  | Upper | 89 | 44.1\% | \$15,641 | 60.1\% | 38.5\% | 47 | 46.5\% | 44.3\% | \$7,697 | 59.1\% | 56.5\% | 42 | 41.6\% | 43.3\% | \$7,944 | 61.1\% | 54.3\% |
|  |  | Unknown | 1 | 0.5\% | \$165 | 0.6\% | 0.0\% | 0 | 0.0\% | 12.8\% | \$0 | 0.0\% | 13.9\% | 1 | 1.0\% | 16.2\% | \$165 | 1.3\% | 16.9\% |
|  |  | Total | 202 | 100.0\% | \$26,026 | 100.0\% | 100.0\% | 101 | 100.0\% | 100.0\% | \$13,019 | 100.0\% | 100.0\% | 101 | 100.0\% | 100.0\% | \$13,007 | 100.0\% | 100.0\% |
|  | $\stackrel{\otimes}{\stackrel{Q}{ \pm}}$ | \$1 Million or Less <br> Over $\$ 1$ Million <br> Total Rev. available <br> Rev. Not Known <br> Total | Total Businesses |  |  |  |  | 147 $63.6 \%$ <br> 62 $26.8 \%$ <br> 209 $90.4 \%$ <br> 22 $9.5 \%$ |  | 37.2\% | \$6,616 | 43.1\% | 37.8\% | 99 $24.1 \%$ <br> 50 $12.2 \%$ <br> 149 $36.3 \%$ <br> 261 $63.7 \%$ |  | 42.2\% | \$5,679 | 31.2\% | 35.5\% |
|  |  |  | 246 | 38.4\% | \$12,295 | 36.6\% | 92.9\% |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 112 | 17.5\% | \$15,206 | 45.3\% | 3.7\% |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 358 | 55.9\% | \$27,501 | 81.9\% | 96.6\% |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 283 | 44.1\% | \$6,077 | 18.1\% | 3.4\% |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 641 | 100.0\% | \$33,578 | 100.0\% | 100.0\% | 231 | 100.0\% |  |  |  |  | 410 | 100.0\% |  |  |  |  |
|  |  | $\$ 100,000$ or Less$\$ 100,001-\$ 250,000$$\$ 250,001-\$ 1$MillionTotal | 601 | 93.8\% | \$20,414 | 60.8\% |  | 210 | 90.9\% | 96.0\% | \$9,303 | 60.6\% | 47.6\% | 391 | 95.4\% | 97.2\% | \$11,111 | 61.0\% | 57.4\% |
|  |  |  | 23 | 3.6\% | \$4,404 | 13.1\% |  | 16 | 6.9\% | 2.0\% | \$3,160 | 20.6\% | 14.4\% | 7 | 1.7\% | 1.3\% | \$1,244 | 6.8\% | 10.6\% |
|  |  |  | 17 | 2.7\% | \$8,760 | 26.1\% |  | 5 | 2.2\% | 2.0\% | \$2,890 | 18.8\% | 38.0\% | 12 | 2.9\% | 1.4\% | \$5,870 | 32.2\% | 32.0\% |
|  |  |  | 641 | 100.0\% | \$33,578 | 100.0\% |  | 231 | 100.0\% | 100.0\% | \$15,353 | 100.0\% | 100.0\% | 410 | 100.0\% | 100.0\% | \$18,225 | 100.0\% | 100.0\% |
| $\begin{aligned} & \underset{N}{E} \\ & \stackrel{\sim}{\sim} \\ & \overline{\bar{\sigma}} \\ & \underset{\sim}{6} \end{aligned}$ |  | \$1 Million or LessOver \$1 MillionNot KnownTotal | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% | 98.6\% | 0 | 0.0\% | 57.1\% | \$0 | 0.0\% | 85.6\% | 0 | 0.0\% | 80.0\% | \$0 | 0.0\% | 97.0\% |
|  | $\stackrel{\grave{\Sigma}}{\mathrm{J}}$ |  | 0 | 0.0\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  | $\underset{\sim}{\underset{\sim}{\sim}}$ |  | 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\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  | $\begin{aligned} & \stackrel{N}{N} \\ & \stackrel{\sim}{x} \\ & \stackrel{\Gamma}{0} \end{aligned}$ | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## 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 | 1 | 0.7 |  | 0.5 | 291 | 32.4 | 29,853 | 17.6 |
| Moderate-income | 31 | 21.7 |  | 22.2 | 4,826 | 12.9 | 33,150 | 19.6 |
| Middle-income | 77 | 53.8 |  | 52.9 | 3,830 | 4.3 | 39,877 | 23.6 |
| Upper-income | 34 | 23.8 |  | 24.3 | 1,130 | 2.7 | 66,368 | 39.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 143 | 100.0 |  | 100.0 | 10,077 | 6.0 | 169,248 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 1,621 |  | 01 | 37.1 | 853 | 52.6 | 167 | 10.3 |
| Moderate-income | 77,332 | 41,213 |  | 53.3 | 22,650 | 29.3 | 13,469 | 17.4 |
| Middle-income | 164,234 | 110,169 |  | 67.1 | 28,128 | 17.1 | 25,937 | 15.8 |
| Upper-income | 77,408 | 49,491 |  | 63.9 | 9,292 | 12.0 | 18,625 | 24.1 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 320,595 | 201,474 |  | 62.8 | 60,923 | 19.0 | 58,198 | 18.2 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 193 | 0.4 |  | 0.4 | 16 | 0.7 | 6 | 0.4 |
| Moderate-income | 7,900 | 18.2 |  | 18.0 | 406 | 18.9 | 344 | 21.4 |
| Middle-income | 23,095 | 53.2 |  | 53.2 | 1,135 | 53.0 | 843 | 52.6 |
| Upper-income | 12,230 | 28.2 |  | 28.3 | 586 | 27.3 | 411 | 25.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 43,418 | 100.0 |  | 100.0 | 2,143 | 100.0 | 1,604 | 100.0 |
|  | Percentage of | otal B | ness | 91.4 |  | 4.9 |  | 3.7 |
|  | Total Farm |  |  | Farm | by Tract \& R | evenue |  |  |
|  | Tract |  |  |  | Over \$1 Million |  | Revenue Reporte |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 37 | 9.2 |  | 9.8 | 1 | 3.8 | 0 | 0.0 |
| Middle-income | 239 | 59.2 |  | 57.6 | 19 | 73.1 | 8 | 80.0 |
| Upper-income | 128 | 31.7 |  | 32.6 | 6 | 23.1 | 2 | 20.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 404 | 100.0 |  | 100.0 | 26 | 100.0 | 10 | 100.0 |
|  | Percentage of Total Farms: |  |  | 91.1 |  | 6.4 |  | 2.5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Sarasota

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | Agg | Bank |  | Agg | Bank |  | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 88 | 15.7\% | \$7,197 | 8.0\% | 20.5\% | 57 | 18.7\% | 9.6\% | \$4,383 | 8.9\% | 6.0\% | 31 | 12.1\% | 9.5\% | \$2,814 | 7.0\% | 6.2\% |
|  | Middle | 345 | 61.5\% | \$50,021 | 55.8\% | 54.7\% | 179 | 58.7\% | 56.4\% | \$26,693 | 54.3\% | 47.1\% | 166 | 64.8\% | 56.5\% | \$23,328 | 57.7\% | 46.3\% |
|  | Upper | 128 | 22.8\% | \$32,372 | 36.1\% | 24.6\% | 69 | 22.6\% | 33.9\% | \$18,110 | 36.8\% | 46.8\% | 59 | 23.0\% | 33.9\% | \$14,262 | 35.3\% | 47.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 561 | 100.0\% | \$89,590 | 100.0\% | 100.0\% | 305 | 100.0\% | 100.0\% | \$49,186 | 100.0\% | 100.0\% | 256 | 100.0\% | 100.0\% | \$40,404 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 21 | 9.3\% | \$2,156 | 5.0\% | 20.5\% | 13 | 8.6\% | 6.1\% | \$1,237 | 4.6\% | 4.0\% | 8 | 10.5\% | 6.4\% | \$919 | 5.6\% | 4.2\% |
|  | Middle | 108 | 47.6\% | \$16,451 | 38.1\% | 54.7\% | 71 | 47.0\% | 48.8\% | \$10,556 | 39.2\% | 40.6\% | 37 | 48.7\% | 50.6\% | \$5,895 | 36.2\% | 41.9\% |
|  | Upper | 98 | 43.2\% | \$24,611 | 56.9\% | 24.6\% | 67 | 44.4\% | 44.9\% | \$15,135 | 56.2\% | 55.3\% | 31 | 40.8\% | 42.9\% | \$9,476 | 58.2\% | 53.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 227 | 100.0\% | \$43,218 | 100.0\% | 100.0\% | 151 | 100.0\% | 100.0\% | \$26,928 | 100.0\% | 100.0\% | 76 | 100.0\% | 100.0\% | \$16,290 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 5 | 21.7\% | \$19 | 4.5\% | 20.5\% | 2 | 14.3\% | 19.1\% | \$8 | 3.5\% | 8.7\% | 3 | 33.3\% | 17.5\% | \$11 | 5.7\% | 8.3\% |
|  | Middle | 16 | 69.6\% | \$266 | 62.9\% | 54.7\% | 12 | 85.7\% | 54.1\% | \$222 | 96.5\% | 43.8\% | 4 | 44.4\% | 55.3\% | \$44 | 22.8\% | 42.1\% |
|  | Upper | 2 | 8.7\% | \$138 | 32.6\% | 24.6\% | 0 | 0.0\% | 26.4\% | \$0 | 0.0\% | 47.3\% | 2 | 22.2\% | 27.2\% | \$138 | 71.5\% | 49.6\% |
|  | 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 | 23 | 100.0\% | \$423 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$230 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$193 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 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\% | 20.9\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 9.4\% | 0 | 0.0\% | 23.5\% | \$0 | 0.0\% | 1.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 43.0\% | 0 | 0.0\% | 44.4\% | \$0 | 0.0\% | 86.8\% | 0 | 0.0\% | 52.9\% | \$0 | 0.0\% | 54.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 35.5\% | 0 | 0.0\% | 22.2\% | \$0 | 0.0\% | 3.8\% | 0 | 0.0\% | 23.5\% | \$0 | 0.0\% | 44.8\% |
|  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 114 | 14.1\% | \$9,372 | 7.0\% | 20.5\% | 72 | 15.3\% | 8.2\% | \$5,628 | 7.4\% | 5.1\% | 42 | 12.3\% | 8.3\% | \$3,744 | 6.6\% | 5.2\% |
|  | Middle | 469 | 57.8\% | \$66,738 | 50.1\% | 54.7\% | 262 | 55.7\% | 52.9\% | \$37,471 | 49.1\% | 44.6\% | 207 | 60.7\% | 53.9\% | \$29,267 | 51.4\% | 44.3\% |
|  | Upper | 228 | 28.1\% | \$57,121 | 42.9\% | 24.6\% | 136 | 28.9\% | 38.8\% | \$33,245 | 43.5\% | 50.2\% | 92 | 27.0\% | 37.8\% | \$23,876 | 42.0\% | 50.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 811 | 100.0\% | \$133,231 | 100.0\% | 100.0\% | 470 | 100.0\% | 100.0\% | \$76,344 | 100.0\% | 100.0\% | 341 | 100.0\% | 100.0\% | \$56,887 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 3 | 0.2\% | \$111 | 0.1\% | 0.4\% | 1 | 0.2\% | 0.2\% | \$50 | 0.1\% | 0.3\% | 2 | 0.2\% | 0.2\% | \$61 | 0.1\% | 0.3\% |
|  | Moderate | 252 | 15.2\% | \$17,032 | 14.2\% | 18.0\% | 95 | 15.4\% | 13.9\% | \$7,949 | 12.7\% | 14.9\% | 157 | 15.0\% | 14.4\% | \$9,083 | 15.9\% | 15.7\% |
|  | Middle | 848 | 51.1\% | \$65,311 | 54.4\% | 53.2\% | 315 | 51.1\% | 49.2\% | \$33,864 | 54.0\% | 50.6\% | 533 | 51.1\% | 49.9\% | \$31,447 | 54.9\% | 50.4\% |
|  | Upper | 558 | 33.6\% | \$37,554 | 31.3\% | 28.3\% | 206 | 33.4\% | 35.0\% | \$20,844 | 33.2\% | 33.3\% | 352 | 33.7\% | 34.4\% | \$16,710 | 29.2\% | 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\% | 1.8\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 1,661 | 100.0\% | \$120,008 | 100.0\% | 100.0\% | 617 | 100.0\% | 100.0\% | \$62,707 | 100.0\% | 100.0\% | 1,044 | 100.0\% | 100.0\% | \$57,301 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 50.0\% | \$47 | 28.1\% | 9.8\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 8.0\% | 2 | 50.0\% | 17.6\% | \$47 | 28.1\% | 22.6\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 57.6\% | 0 | 0.0\% | 45.5\% | \$0 | 0.0\% | 50.1\% | 0 | 0.0\% | 32.4\% | \$0 | 0.0\% | 44.2\% |
|  | Upper | 2 | 50.0\% | \$120 | 71.9\% | 32.6\% | 0 | 0.0\% | 36.4\% | \$0 | 0.0\% | 41.8\% | 2 | 50.0\% | 44.1\% | \$120 | 71.9\% | 30.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 5.9\% | \$0 | 0.0\% | 2.7\% |
|  | Total | 4 | 100.0\% | \$167 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$167 | 100.0\% | 100.0\% |

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## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

## Assessment Area: FL Sarasota

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | come | Bank |  | Agg | Bank |  | Agg | Bank |  | gg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 115 | 20.5\% | \$8,877 | 9.9\% | 17.6\% | 66 | 21.6\% | 8.6\% | \$5,123 | 10.4\% | 4.0\% | 49 | 19.1\% | 6.6\% | \$3,754 | 9.3\% | 2.8\% |
|  | Moderate | 134 | 23.9\% | \$13,926 | 15.5\% | 19.6\% | 74 | 24.3\% | 18.2\% | \$8,088 | 16.4\% | 11.7\% | 60 | 23.4\% | 15.8\% | \$5,838 | 14.4\% | 9.6\% |
|  | Middle | 94 | 16.8\% | \$11,828 | 13.2\% | 23.6\% | 60 | 19.7\% | 20.0\% | \$7,444 | 15.1\% | 16.4\% | 34 | 13.3\% | 18.0\% | \$4,384 | 10.9\% | 14.0\% |
|  | Upper | 210 | 37.4\% | \$53,855 | 60.1\% | 39.2\% | 105 | 34.4\% | 42.3\% | \$28,531 | 58.0\% | 57.9\% | 105 | 41.0\% | 46.6\% | \$25,324 | 62.7\% | 61.7\% |
|  | Unknown | 8 | 1.4\% | \$1,104 | 1.2\% | 0.0\% | 0 | 0.0\% | 10.9\% | \$0 | 0.0\% | 10.0\% | 8 | 3.1\% | 13.0\% | \$1,104 | 2.7\% | 11.9\% |
|  | Total | 561 | 100.0\% | \$89,590 | 100.0\% | 100.0\% | 305 | 100.0\% | 100.0\% | \$49,186 | 100.0\% | 100.0\% | 256 | 100.0\% | 100.0\% | \$40,404 | 100.0\% | 100.0\% |
| $\begin{aligned} & \text { 山 } \\ & \underset{\sim}{u} \\ & \vdots \\ & \vdots \\ & \underset{\sim}{U} \\ & \underset{\sim}{u} \end{aligned}$ | Low | 16 | 7.0\% | \$1,224 | 2.8\% | 17.6\% | 12 | 7.9\% | 5.6\% | \$987 | 3.7\% | 2.9\% | 4 | 5.3\% | 3.8\% | \$237 | 1.5\% | 1.8\% |
|  | M oderate | 44 | 19.4\% | \$4,368 | 10.1\% | 19.6\% | 29 | 19.2\% | 11.7\% | \$2,887 | 10.7\% | 6.9\% | 15 | 19.7\% | 10.7\% | \$1,481 | 9.1\% | 6.1\% |
|  | Middle | 49 | 21.6\% | \$7,480 | 17.3\% | 23.6\% | 32 | 21.2\% | 18.8\% | \$5,166 | 19.2\% | 13.8\% | 17 | 22.4\% | 15.9\% | \$2,314 | 14.2\% | 11.0\% |
|  | Upper | 114 | 50.2\% | \$29,230 | 67.6\% | 39.2\% | 75 | 49.7\% | 48.3\% | \$17,052 | 63.3\% | 61.9\% | 39 | 51.3\% | 48.9\% | \$12,178 | 74.8\% | 62.7\% |
|  | Unknown | 4 | 1.8\% | \$916 | 2.1\% | 0.0\% | 3 | 2.0\% | 15.6\% | \$836 | 3.1\% | 14.5\% | 1 | 1.3\% | 20.7\% | \$80 | 0.5\% | 18.4\% |
|  | Total | 227 | 100.0\% | \$43,218 | 100.0\% | 100.0\% | 151 | 100.0\% | 100.0\% | \$26,928 | 100.0\% | 100.0\% | 76 | 100.0\% | 100.0\% | \$16,290 | 100.0\% | 100.0\% |
|  | Low | 5 | 21.7\% | \$19 | 4.5\% | 17.6\% | 4 | 28.6\% | 16.3\% | \$14 | 6.1\% | 4.8\% | 1 | 11.1\% | 14.9\% | \$5 | 2.6\% | 3.2\% |
|  | M oderate | 5 | 21.7\% | \$121 | 28.6\% | 19.6\% | 0 | 0.0\% | 22.8\% | \$0 | 0.0\% | 15.5\% | 5 | 55.6\% | 27.5\% | \$121 | 62.7\% | 12.6\% |
|  | Middle | 6 | 26.1\% | \$108 | 25.5\% | 23.6\% | 5 | 35.7\% | 21.5\% | \$94 | 40.9\% | 16.0\% | 1 | 11.1\% | 17.5\% | \$14 | 7.3\% | 12.6\% |
|  | Upper | 7 | 30.4\% | \$175 | 41.4\% | 39.2\% | 5 | 35.7\% | 33.7\% | \$122 | 53.0\% | 57.6\% | 2 | 22.2\% | 36.2\% | \$53 | 27.5\% | 65.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 5.7\% | \$0 | 0.0\% | 6.1\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 6.3\% |
|  | Total | 23 | 100.0\% | \$423 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$230 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$193 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | M oderate | 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\% |
|  | Middle | 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\% |
|  | 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\% |
|  | 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\% |
|  | Low | 136 | 16.8\% | \$10,120 | 7.6\% | 17.6\% | 82 | 17.4\% | 7.4\% | \$6,124 | 8.0\% | 3.4\% | 54 | 15.8\% | 5.5\% | \$3,996 | 7.0\% | 2.3\% |
|  | Moderate | 183 | 22.6\% | \$18,415 | 13.8\% | 19.6\% | 103 | 21.9\% | 15.3\% | \$10,975 | 14.4\% | 9.2\% | 80 | 23.5\% | 13.7\% | \$7,440 | 13.1\% | 7.8\% |
|  | Middle | 149 | 18.4\% | \$19,416 | 14.6\% | 23.6\% | 97 | 20.6\% | 19.4\% | \$12,704 | 16.6\% | 14.8\% | 52 | 15.2\% | 17.0\% | \$6,712 | 11.8\% | 12.4\% |
|  | Upper | 331 | 40.8\% | \$83,260 | 62.5\% | 39.2\% | 185 | 39.4\% | 44.9\% | \$45,705 | 59.9\% | 58.8\% | 146 | 42.8\% | 47.4\% | \$37,555 | 66.0\% | 61.5\% |
|  | Unknown | 12 | 1.5\% | \$2,020 | 1.5\% | 0.0\% | 3 | 0.6\% | 13.0\% | \$836 | 1.1\% | 13.8\% | 9 | 2.6\% | 16.4\% | \$1,184 | 2.1\% | 16.0\% |
|  | Total | 811 | 100.0\% | \$133,231 | 100.0\% | 100.0\% | 470 | 100.0\% | 100.0\% | \$76,344 | 100.0\% | 100.0\% | 341 | 100.0\% | 100.0\% | \$56,887 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 656 | 39.5\% | \$48,946 | 40.8\% | 91.4\% | 372 | 60.3\% | 34.3\% | \$28,388 | 45.3\% | 37.4\% | 284 | 27.2\% | 44.0\% | \$20,558 | 35.9\% | 35.9\% |
|  | Over \$1 Million | 309 | 18.6\% | \$52,951 | 44.1\% | 4.9\% | 161 | 26.1\% |  |  |  |  | 148 | 14.2\% |  |  |  |  |
|  | Total Rev. available | 965 | 58.1\% | \$101,897 | 84.9\% | 96.3\% | 533 | 86.4\% |  |  |  |  | 432 | 41.4\% |  |  |  |  |
|  | Rev. Not Known | 696 | 41.9\% | \$18,111 | 15.1\% | 3.7\% | 84 | 13.6\% |  |  |  |  | 612 | 58.6\% |  |  |  |  |
|  | Total | 1,661 | 100.0\% | \$120,008 | 100.0\% | 100.0\% | 617 | 100.0\% |  |  |  |  | 1,044 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 1,418 | 85.4\% | \$49,101 | 40.9\% |  | 489 | 79.3\% | 93.5\% | \$22,969 | 36.6\% | 33.7\% | 929 | 89.0\% | 94.5\% | \$26,132 | 45.6\% | 37.0\% |
|  | \$100,001-\$250,000 | 147 | 8.9\% | \$26,338 | 21.9\% |  | 71 | 11.5\% | 3.2\% | \$12,560 | 20.0\% | 16.2\% | 76 | 7.3\% | 2.9\% | \$13,778 | 24.0\% | 16.6\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ | 96 | 5.8\% | \$44,569 | 37.1\% |  | 57 | 9.2\% | 3.3\% | \$27,178 | 43.3\% | 50.0\% | 39 | 3.7\% | 2.6\% | \$17,391 | 30.4\% | 46.5\% |
|  | Total | 1,661 | 100.0\% | \$120,008 | 100.0\% |  | 617 | 100.0\% | 100.0\% | \$62,707 | 100.0\% | 100.0\% | 1,044 | 100.0\% | 100.0\% | \$57,301 | 100.0\% | 100.0\% |
|  | \$1 Million or LessOver \$1 MillionNot KnownTotal | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 91.1\% | 0 | 0.0\% | 60.6\% | \$0 | 0.0\% | 49.4\% | 0 | 0.0\% | 41.2\% | \$0 | 0.0\% | 59.8\% |
|  |  | 1 | 25.0\% | \$100 | 59.9\% | 6.4\% | 0 | 0.0\% |  |  |  |  | 1 | 25.0\% |  |  |  |  |
|  |  | 3 | 75.0\% | \$67 | 40.1\% | 2.5\% | 0 | 0.0\% |  |  |  |  | 3 | 75.0\% |  |  |  |  |
|  |  | 4 | 100.0\% | \$167 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 4 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 4 | 100.0\% | \$167 | 100.0\% |  | 0 | 0.0\% | 90.9\% | \$0 | 0.0\% | 32.3\% | 4 | 100.0\% | 91.2\% | \$167 | 100.0\% | 47.8\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 18.8\% | 0 | 0.0\% | 5.9\% | \$0 | 0.0\% | 22.7\% |
|  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 48.9\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 29.4\% |
|  | Total | 4 | 100.0\% | \$167 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$167 | 100.0\% | 100.0\% |

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## 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 | 9 | 18.8 |  | 9.8 | 1,892 | 35.3 | 10,793 | 19.7 |
| Moderate-income | 10 | 20.8 |  | 12.7 | 1,362 | 19.6 | 7,952 | 14.5 |
| Middle-income | 16 | 33.3 |  | 39.3 | 1,332 | 6.2 | 11,634 | 21.2 |
| Upper-income | 12 | 25.0 |  | 38.2 | 578 | 2.8 | 24,417 | 44.6 |
| Unknown-income | 1 | 2.1 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 48 | 100.0 |  | 100.0 | 5,164 | 9.4 | 54,796 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 19,362 | 3,392 |  | 17.5 | 13,700 | 70.8 | 2,270 | 11.7 |
| Moderate-income | 15,980 | 6,102 |  | 38.2 | 8,427 | 52.7 | 1,451 | 9.1 |
| Middle-income | 39,611 | 22,821 |  | 57.6 | 14,323 | 36.2 | 2,467 | 6.2 |
| Upper-income | 29,021 | 22,699 |  | 78.2 | 5,057 | 17.4 | 1,265 | 4.4 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 103,974 | 55,014 |  | 52.9 | 41,507 | 39.9 | 7,453 | 7.2 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1,411 | 9.4 |  | 9.1 | 92 | 11.2 | 82 | 14.0 |
| Moderate-income | 1,933 | 12.9 |  | 12.6 | 139 | 16.9 | 91 | 15.5 |
| Middle-income | 6,335 | 42.3 |  | 42.1 | 378 | 46.0 | 254 | 43.3 |
| Upper-income | 5,237 | 35.0 |  | 35.9 | 208 | 25.3 | 156 | 26.6 |
| Unknown-income | 49 | 0.3 |  | 0.3 | 4 | 0.5 | 3 | 0.5 |
| Total Assessment Area | 14,965 | 100.0 |  | 100.0 | 821 | 100.0 | 586 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 90.6 |  | 5.5 |  | 3.9 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3 | 3.0 |  | 3.1 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 3 | 3.0 |  | 3.1 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 32 | 32.3 |  | 32.7 | 0 | 0.0 | 0 | 0.0 |
| Upper-income | 61 | 61.6 |  | 61.2 | 1 | 100.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 99 | 100.0 |  | 100.0 | 1 | 100.0 | 0 | . 0 |
|  | Percentage of Total Farms: |  |  | 99.0 |  | 1.0 |  | . 0 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL Tallahassee

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount ${ }^{\text {Ba }}$ |  | nk |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol |  |  |  | ank | Agg | Ba |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
| HOME PURCHASE | Low | 3 | 4.1\% | \$362 | 2.6\% | 6.2\% | 1 | 2.6\% | 3.6\% | \$47 | 0.7\% | 2.0\% | 2 | 5.7\% | 3.1\% | \$315 | 4.4\% | 1.7\% |
|  | Moderate | 3 | 4.1\% | \$276 | 2.0\% | 11.1\% | 1 | 2.6\% | 10.2\% | \$108 | 1.6\% | 6.8\% | 2 | 5.7\% | 9.9\% | \$168 | 2.4\% | 5.8\% |
|  | Middle | 37 | 50.7\% | \$6,437 | 45.9\% | 41.5\% | 22 | 57.9\% | 43.7\% | \$4,245 | 61.6\% | 38.0\% | 15 | 42.9\% | 42.1\% | \$2,192 | 30.7\% | 35.6\% |
|  | Upper | 30 | 41.1\% | \$6,941 | 49.5\% | 41.3\% | 14 | 36.8\% | 42.5\% | \$2,487 | 36.1\% | 53.2\% | 16 | 45.7\% | 44.9\% | \$4,454 | 62.5\% | 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\% |
|  | Total | 73 | 100.0\% | \$14,016 | 100.0\% | 100.0\% | 38 | 100.0\% | 100.0\% | \$6,887 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$7,129 | 100.0\% | 100.0\% |
|  | Low | 1 | 1.2\% | \$329 | 2.1\% | 6.2\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 1.4\% | 1 | 3.6\% | 1.9\% | \$329 | 6.0\% | 1.7\% |
|  | Moderate | 7 | 8.3\% | \$801 | 5.2\% | 11.1\% | 5 | 8.9\% | 3.8\% | \$674 | 6.8\% | 2.5\% | 2 | 7.1\% | 3.8\% | \$127 | 2.3\% | 2.1\% |
|  | Middle | 24 | 28.6\% | \$3,753 | 24.3\% | 41.5\% | 15 | 26.8\% | 33.9\% | \$2,205 | 22.1\% | 28.2\% | 9 | 32.1\% | 35.0\% | \$1,548 | 28.4\% | 30.5\% |
|  | Upper | 52 | 61.9\% | \$10,545 | 68.3\% | 41.3\% | 36 | 64.3\% | 60.2\% | \$7,098 | 71.1\% | 67.9\% | 16 | 57.1\% | 59.4\% | \$3,447 | 63.2\% | 65.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 84 | 100.0\% | \$15,428 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$9,977 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$5,451 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 6.2\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 1.8\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 11.1\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 1.7\% |
|  | Middle | 4 | 80.0\% | \$21 | 67.7\% | 41.5\% | 2 | 66.7\% | 40.9\% | \$11 | 52.4\% | 30.1\% | 2 | 100.0\% | 34.3\% | \$10 | 100.0\% | 22.6\% |
|  | Upper | 1 | 20.0\% | \$10 | 32.3\% | 41.3\% | 1 | 33.3\% | 50.4\% | \$10 | 47.6\% | 67.6\% | 0 | 0.0\% | 55.1\% | \$0 | 0.0\% | 73.9\% |
|  | 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 | 5 | 100.0\% | \$31 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$21 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% |
|  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 46.1\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 44.4\% | 0 | 0.0\% | 43.8\% | \$0 | 0.0\% | 31.5\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 18.8\% | \$0 | 0.0\% | 4.8\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 27.9\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 55.6\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 63.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 10.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 4 | 2.5\% | \$691 | 2.3\% | 6.2\% | 1 | 1.0\% | 2.9\% | \$47 | 0.3\% | 2.7\% | 3 | 4.6\% | 2.6\% | \$644 | 5.1\% | 2.9\% |
|  | Moderate | 10 | 6.2\% | \$1,077 | 3.7\% | 11.1\% | 6 | 6.2\% | 6.6\% | \$782 | 4.6\% | 4.1\% | 4 | 6.2\% | 6.5\% | \$295 | 2.3\% | 3.8\% |
|  | Middle | 65 | 40.1\% | \$10,211 | 34.6\% | 41.5\% | 39 | 40.2\% | 38.2\% | \$6,461 | 38.3\% | 32.8\% | 26 | 40.0\% | 38.1\% | \$3,750 | 29.8\% | 33.9\% |
|  | Upper | 83 | 51.2\% | \$17,496 | 59.4\% | 41.3\% | 51 | 52.6\% | 52.4\% | \$9,595 | 56.8\% | 60.4\% | 32 | 49.2\% | 52.8\% | \$7,901 | 62.8\% | 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\% |
|  | Total | 162 | 100.0\% | \$29,475 | 100.0\% | 100.0\% | 97 | 100.0\% | 100.0\% | \$16,885 | 100.0\% | 100.0\% | 65 | 100.0\% | 100.0\% | \$12,590 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 22 | 4.0\% | \$1,082 | 3.0\% | 9.1\% | 6 | 2.8\% | 6.8\% | \$385 | 2.1\% | 6.6\% | 16 | 4.7\% | 7.0\% | \$697 | 4.1\% | 5.5\% |
|  | Moderate | 58 | 10.6\% | \$4,032 | 11.3\% | 12.6\% | 22 | 10.4\% | 12.2\% | \$2,095 | 11.3\% | 14.3\% | 36 | 10.7\% | 13.0\% | \$1,937 | 11.3\% | 14.1\% |
|  | Middle | 207 | 37.7\% | \$12,589 | 35.3\% | 42.1\% | 78 | 37.0\% | 39.9\% | \$7,028 | 37.8\% | 44.3\% | 129 | 38.2\% | 39.6\% | \$5,561 | 32.5\% | 46.2\% |
|  | Upper | 261 | 47.5\% | \$17,656 | 49.4\% | 35.9\% | 104 | 49.3\% | 39.3\% | \$8,723 | 46.9\% | 34.1\% | 157 | 46.4\% | 38.8\% | \$8,933 | 52.2\% | 33.9\% |
|  | Unknown | 1 | 0.2\% | \$350 | 1.0\% | 0.3\% | 1 | 0.5\% | 0.2\% | \$350 | 1.9\% | 0.3\% | 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\% | 0.4\% | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 549 | 100.0\% | \$35,709 | 100.0\% | 100.0\% | 211 | 100.0\% | 100.0\% | \$18,581 | 100.0\% | 100.0\% | 338 | 100.0\% | 100.0\% | \$17,128 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 3.1\% | 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\% | 3.1\% | 0 | 0.0\% | 23.1\% | \$0 | 0.0\% | 2.4\% | 0 | 0.0\% | 28.6\% | \$0 | 0.0\% | 0.6\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 32.7\% | 0 | 0.0\% | 38.5\% | \$0 | 0.0\% | 15.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 1 | 100.0\% | \$481 | 100.0\% | 61.2\% | 0 | 0.0\% | 30.8\% | \$0 | 0.0\% | 81.2\% | 1 | 100.0\% | 71.4\% | \$481 | 100.0\% | 99.4\% |
|  | 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\% | 7.7\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$481 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$481 | 100.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: FL Tallahassee


[^348] Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: FL West Palm Beach

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 15 | 5.7 |  | 3.5 | 3,615 | 33.9 | 60,890 | 19.9 |
| Moderate-income | 70 | 26.4 |  | 26.2 | 9,991 | 12.5 | 56,890 | 18.6 |
| Middle-income | 89 | 33.6 |  | 34.6 | 4,713 | 4.4 | 63,037 | 20.6 |
| Upper-income | 89 | 33.6 |  | 35.7 | 2,726 | 2.5 | 125,185 | 40.9 |
| Unknown-income | 2 | 0.8 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 265 | 100.0 |  | 100.0 | 21,045 | 6.9 | 306,002 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 18,418 | 5,400 |  | 29.3 | 10,677 | 58.0 | 2,341 | 12.7 |
| Moderate-income | 156,639 | 87,199 |  | 55.7 | 47,038 | 30.0 | 22,402 | 14.3 |
| Middle-income | 191,411 | 128,672 |  | 67.2 | 39,964 | 20.9 | 22,775 | 11.9 |
| Upper-income | 189,960 | 132,753 |  | 69.9 | 22,472 | 11.8 | 34,735 | 18.3 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 556,428 | 354,024 |  | 63.6 | 120,151 | 21.6 | 82,253 | 14.8 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3,106 | 3.3 |  | 3.1 | 269 | 5.8 | 206 | 5.3 |
| Moderate-income | 19,948 | 21.2 |  | 20.9 | 1,224 | 26.6 | 879 | 22.6 |
| Middle-income | 31,867 | 33.9 |  | 34.2 | 1,401 | 30.4 | 1,240 | 31.9 |
| Upper-income | 39,003 | 41.5 |  | 41.8 | 1,686 | 36.6 | 1,548 | 39.8 |
| Unknown-income | 116 | 0.1 |  | 0.1 | 23 | 0.5 | 17 | 0.4 |
| Total Assessment Area | 94,040 | 100.0 |  | 100.0 | 4,603 | 100.0 | 3,890 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 91.0 |  | 4.9 |  | 4.1 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 37 | 5.8 |  | 4.7 | 9 | 22.0 | 1 | 6.3 |
| Moderate-income | 87 | 13.7 |  | 13.7 | 4 | 9.8 | 4 | 25.0 |
| Middle-income | 199 | 31.4 |  | 32.2 | 9 | 22.0 | 4 | 25.0 |
| Upper-income | 311 | 49.1 |  | 49.4 | 19 | 46.3 | 7 | 43.8 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 634 | 100.0 |  | 100.0 | 41 | 100.0 | 16 | 100.0 |
|  | Percentage of Total Farms: |  |  | 91.0 |  | 6.5 |  | 2.5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: FL West Palm Beach

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  |  | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 3 | 0.8\% | \$383 | 0.4\% | 1.5\% | 1 | 0.4\% | 1.5\% | \$156 | 0.3\% | 0.8\% | 2 | 1.2\% | 1.1\% | \$227 | 0.6\% | 0.7\% |
|  | Moderate | 90 | 23.1\% | \$10,377 | 10.9\% | 24.6\% | 55 | 24.2\% | 17.1\% | \$6,041 | 11.1\% | 10.6\% | 35 | 21.5\% | 14.5\% | \$4,336 | 10.8\% | 8.8\% |
|  | Middle | 156 | 40.0\% | \$28,080 | 29.6\% | 36.3\% | 93 | 41.0\% | 37.3\% | \$17,456 | 31.9\% | 30.2\% | 63 | 38.7\% | 36.6\% | \$10,624 | 26.4\% | 29.1\% |
|  | Upper | 141 | 36.2\% | \$56,111 | 59.1\% | 37.5\% | 78 | 34.4\% | 44.1\% | \$30,986 | 56.7\% | 58.4\% | 63 | 38.7\% | 47.8\% | \$25,125 | 62.3\% | 61.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 390 | 100.0\% | \$94,951 | 100.0\% | 100.0\% | 227 | 100.0\% | 100.0\% | \$54,639 | 100.0\% | 100.0\% | 163 | 100.0\% | 100.0\% | \$40,312 | 100.0\% | 100.0\% |
|  | Low | 1 | 0.6\% | \$96 | 0.2\% | 1.5\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% | 1 | 1.2\% | 0.6\% | \$96 | 0.5\% | 0.4\% |
|  | Moderate | 10 | 5.9\% | \$1,134 | 2.6\% | 24.6\% | 2 | 2.4\% | 8.2\% | \$142 | 0.6\% | 5.2\% | 8 | 9.3\% | 7.5\% | \$992 | 4.9\% | 5.2\% |
|  | Middle | 58 | 34.3\% | \$10,306 | 24.1\% | 36.3\% | 23 | 27.7\% | 30.6\% | \$4,382 | 19.3\% | 23.7\% | 35 | 40.7\% | 29.9\% | \$5,924 | 29.5\% | 23.0\% |
|  | Upper | 100 | 59.2\% | \$31,313 | 73.1\% | 37.5\% | 58 | 69.9\% | 60.8\% | \$18,232 | 80.1\% | 70.9\% | 42 | 48.8\% | 62.0\% | \$13,081 | 65.1\% | 71.3\% |
|  | 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 | 169 | 100.0\% | \$42,849 | 100.0\% | 100.0\% | 83 | 100.0\% | 100.0\% | \$22,756 | 100.0\% | 100.0\% | 86 | 100.0\% | 100.0\% | \$20,093 | 100.0\% | 100.0\% |
|  | Low | 1 | 5.0\% | \$3 | 0.8\% | 1.5\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 1.2\% | 1 | 6.7\% | 3.1\% | \$3 | 1.0\% | 1.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 24.6\% | 0 | 0.0\% | 17.5\% | \$0 | 0.0\% | 8.1\% | 0 | 0.0\% | 14.9\% | \$0 | 0.0\% | 4.5\% |
|  | Middle | 4 | 20.0\% | \$69 | 18.2\% | 36.3\% | 2 | 40.0\% | 27.7\% | \$40 | 46.5\% | 20.3\% | 2 | 13.3\% | 28.4\% | \$29 | 9.9\% | 20.6\% |
|  | Upper | 15 | 75.0\% | \$308 | 81.1\% | 37.5\% | 3 | 60.0\% | 50.9\% | \$46 | 53.5\% | 70.4\% | 12 | 80.0\% | 53.7\% | \$262 | 89.1\% | 74.0\% |
|  | 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 | 20 | 100.0\% | \$380 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$86 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$294 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 3.1\% | 0 | 0.0\% | 6.5\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 9.4\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 32.8\% | 0 | 0.0\% | 35.5\% | \$0 | 0.0\% | 35.1\% | 0 | 0.0\% | 31.3\% | \$0 | 0.0\% | 7.3\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 31.5\% | 0 | 0.0\% | 25.8\% | \$0 | 0.0\% | 38.6\% | 0 | 0.0\% | 21.9\% | \$0 | 0.0\% | 35.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 32.6\% | 0 | 0.0\% | 32.3\% | \$0 | 0.0\% | 26.1\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 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\% |
|  | 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\% |
|  | Low | 5 | 0.9\% | \$482 | 0.3\% | 1.5\% | 1 | 0.3\% | 1.0\% | \$156 | 0.2\% | 0.5\% | 4 | 1.5\% | 0.9\% | \$326 | 0.5\% | 0.6\% |
|  | Moderate | 100 | 17.3\% | \$11,511 | 8.3\% | 24.6\% | 57 | 18.1\% | 12.9\% | \$6,183 | 8.0\% | 8.3\% | 43 | 16.3\% | 11.4\% | \$5,328 | 8.8\% | 7.0\% |
|  | Middle | 218 | 37.7\% | \$38,455 | 27.8\% | 36.3\% | 118 | 37.5\% | 33.9\% | \$21,878 | 28.2\% | 27.0\% | 100 | 37.9\% | 33.4\% | \$16,577 | 27.3\% | 26.3\% |
|  | Upper | 256 | 44.2\% | \$87,732 | 63.5\% | 37.5\% | 139 | 44.1\% | 52.1\% | \$49,264 | 63.6\% | 64.2\% | 117 | 44.3\% | 54.2\% | \$38,468 | 63.4\% | 66.1\% |
|  | 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 | 579 | 100.0\% | \$138,180 | 100.0\% | 100.0\% | 315 | 100.0\% | 100.0\% | \$77,481 | 100.0\% | 100.0\% | 264 | 100.0\% | 100.0\% | \$60,699 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 43 | 5.1\% | \$5,150 | 6.4\% | 3.1\% | 18 | 5.5\% | 2.8\% | \$2,348 | 6.2\% | 5.1\% | 25 | 4.9\% | 2.7\% | \$2,802 | 6.7\% | 4.2\% |
|  | Moderate | 159 | 19.0\% | \$15,098 | 18.9\% | 20.9\% | 61 | 18.8\% | 16.0\% | \$7,240 | 19.0\% | 17.9\% | 98 | 19.1\% | 16.6\% | \$7,858 | 18.8\% | 20.0\% |
|  | Middle | 281 | 33.5\% | \$24,859 | 31.1\% | 34.2\% | 110 | 33.8\% | 31.4\% | \$14,217 | 37.3\% | 33.1\% | 171 | 33.3\% | 32.7\% | \$10,642 | 25.4\% | 32.4\% |
|  | Upper | 355 | 42.3\% | \$34,873 | 43.6\% | 41.8\% | 136 | 41.8\% | 48.5\% | \$14,341 | 37.6\% | 43.1\% | 219 | 42.6\% | 47.1\% | \$20,532 | 49.1\% | 43.0\% |
|  | Unknown | 1 | 0.1\% | \$15 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 1 | 0.2\% | 0.2\% | \$15 | 0.0\% | 0.1\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 839 | 100.0\% | \$79,995 | 100.0\% | 100.0\% | 325 | 100.0\% | 100.0\% | \$38,146 | 100.0\% | 100.0\% | 514 | 100.0\% | 100.0\% | \$41,849 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 4.7\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 9.5\% | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 5.9\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 13.7\% | 0 | 0.0\% | 9.9\% | \$0 | 0.0\% | 1.8\% | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 0.6\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 32.2\% | 0 | 0.0\% | 30.7\% | \$0 | 0.0\% | 8.9\% | 0 | 0.0\% | 34.8\% | \$0 | 0.0\% | 17.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 49.4\% | 0 | 0.0\% | 47.5\% | \$0 | 0.0\% | 66.1\% | 0 | 0.0\% | 54.5\% | \$0 | 0.0\% | 75.4\% |
|  | 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\% | 7.9\% | \$0 | 0.0\% | 13.7\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: FL West Palm Beach


[^350]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: GA Albany


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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: GA Albany



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Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: GA Albany


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## Appendices

## Combined Demographics Report

Assessment Area: GA Athens


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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: GA Athens



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Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size


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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: GA Dalton



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | nk |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol | lar |  |  | ank | Agg | Ban |  | Agg |  | nk | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 85 | 27.7\% | \$5,868 | 19.4\% | 18.6\% | 51 | 29.3\% | 21.5\% | \$3,741 | 20.4\% | 14.9\% | 34 | 25.6\% | 14.4\% | \$2,127 | 17.8\% | 9.6\% |
|  | Moderate | 119 | 38.8\% | \$9,865 | 32.6\% | 18.9\% | 68 | 39.1\% | 32.8\% | \$6,173 | 33.7\% | 27.1\% | 51 | 38.3\% | 31.4\% | \$3,692 | 30.9\% | 26.0\% |
|  | Middle | 58 | 18.9\% | \$6,587 | 21.8\% | 24.0\% | 31 | 17.8\% | 19.2\% | \$3,613 | 19.7\% | 20.8\% | 27 | 20.3\% | 19.3\% | \$2,974 | 24.9\% | 21.1\% |
|  | Upper | 41 | 13.4\% | \$7,547 | 24.9\% | 38.5\% | 24 | 13.8\% | 17.8\% | \$4,795 | 26.2\% | 27.5\% | 17 | 12.8\% | 16.3\% | \$2,752 | 23.0\% | 22.9\% |
|  | Unknown | 4 | 1.3\% | \$400 | 1.3\% | 0.0\% | 0 | 0.0\% | 8.7\% | \$0 | 0.0\% | 9.6\% | 4 | 3.0\% | 18.7\% | \$400 | 3.3\% | 20.3\% |
|  | Total | 307 | 100.0\% | \$30,267 | 100.0\% | 100.0\% | 174 | 100.0\% | 100.0\% | \$18,322 | 100.0\% | 100.0\% | 133 | 100.0\% | 100.0\% | \$11,945 | 100.0\% | 100.0\% |
|  | Low | 24 | 7.7\% | \$1,432 | 3.1\% | 18.6\% | 15 | 8.4\% | 7.6\% | \$834 | 3.0\% | 4.3\% | 9 | 6.7\% | 5.7\% | \$598 | 3.1\% | 3.2\% |
|  | Moderate | 69 | 22.0\% | \$6,682 | 14.3\% | 18.9\% | 45 | 25.3\% | 15.0\% | \$4,167 | 15.2\% | 9.9\% | 24 | 17.8\% | 14.9\% | \$2,515 | 13.0\% | 10.8\% |
|  | Middle | 65 | 20.8\% | \$7,557 | 16.2\% | 24.0\% | 31 | 17.4\% | 19.9\% | \$4,011 | 14.6\% | 17.8\% | 34 | 25.2\% | 19.1\% | \$3,546 | 18.4\% | 14.9\% |
|  | Upper | 152 | 48.6\% | \$30,613 | 65.5\% | 38.5\% | 86 | 48.3\% | 37.8\% | \$18,284 | 66.6\% | 45.8\% | 66 | 48.9\% | 38.6\% | \$12,329 | 63.9\% | 47.0\% |
|  | Unknown | 3 | 1.0\% | \$475 | 1.0\% | 0.0\% | 1 | 0.6\% | 19.7\% | \$157 | 0.6\% | 22.3\% | 2 | 1.5\% | 21.7\% | \$318 | 1.6\% | 24.0\% |
|  | Total | 313 | 100.0\% | \$46,759 | 100.0\% | 100.0\% | 178 | 100.0\% | 100.0\% | \$27,453 | 100.0\% | 100.0\% | 135 | 100.0\% | 100.0\% | \$19,306 | 100.0\% | 100.0\% |
|  | Low | 4 | 12.1\% | \$19 | 10.6\% | 18.6\% | 2 | 20.0\% | 21.9\% | \$10 | 22.2\% | 9.3\% | 2 | 8.7\% | 12.4\% | \$9 | 6.7\% | 4.8\% |
|  | Moderate | 11 | 33.3\% | \$51 | 28.3\% | 18.9\% | 2 | 20.0\% | 28.9\% | \$7 | 15.6\% | 25.4\% | 9 | 39.1\% | 24.0\% | \$44 | 32.6\% | 7.2\% |
|  | Middle | 9 | 27.3\% | \$40 | 22.2\% | 24.0\% | 4 | 40.0\% | 22.8\% | \$20 | 44.4\% | 25.3\% | 5 | 21.7\% | 26.4\% | \$20 | 14.8\% | 17.6\% |
|  | Upper | 9 | 27.3\% | \$70 | 38.9\% | 38.5\% | 2 | 20.0\% | 23.7\% | \$8 | 17.8\% | 34.7\% | 7 | 30.4\% | 36.4\% | \$62 | 45.9\% | 66.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 5.3\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 3.7\% |
|  | Total | 33 | 100.0\% | \$180 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$45 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$135 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | Moderate | 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\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 24.0\% | 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\% | 38.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 113 | 17.3\% | \$7,319 | 9.5\% | 18.6\% | 68 | 18.8\% | 14.0\% | \$4,585 | 10.0\% | 8.1\% | 45 | 15.5\% | 9.6\% | \$2,734 | 8.7\% | 5.5\% |
|  | Moderate | 199 | 30.5\% | \$16,598 | 21.5\% | 18.9\% | 115 | 31.8\% | 22.9\% | \$10,347 | 22.6\% | 16.1\% | 84 | 28.9\% | 22.1\% | \$6,251 | 19.9\% | 16.0\% |
|  | Middle | 132 | 20.2\% | \$14,184 | 18.4\% | 24.0\% | 66 | 18.2\% | 19.6\% | \$7,644 | 16.7\% | 18.4\% | 66 | 22.7\% | 19.4\% | \$6,540 | 20.8\% | 16.9\% |
|  | Upper | 202 | 30.9\% | \$38,230 | 49.5\% | 38.5\% | 112 | 30.9\% | 28.6\% | \$23,087 | 50.4\% | 37.7\% | 90 | 30.9\% | 29.0\% | \$15,143 | 48.2\% | 37.5\% |
|  | Unknown | 7 | 1.1\% | \$875 | 1.1\% | 0.0\% | 1 | 0.3\% | 14.9\% | \$157 | 0.3\% | 19.8\% | 6 | 2.1\% | 19.9\% | \$718 | 2.3\% | 24.1\% |
|  | Total | 653 | 100.0\% | \$77,206 | 100.0\% | 100.0\% | 362 | 100.0\% | 100.0\% | \$45,820 | 100.0\% | 100.0\% | 291 | 100.0\% | 100.0\% | \$31,386 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 48 | 21.1\% | \$6,320 | 19.9\% | 87.3\% | 23 | 39.0\% | 37.6\% | \$2,073 | 16.1\% | 45.8\% | 25 | 14.8\% | 42.6\% | \$4,247 | 22.6\% | 44.6\% |
|  | Over \$1 Million | 55 | 24.1\% | \$21,321 | 67.2\% | 8.1\% | 27 | 45.8\% |  |  |  |  | 28 | 16.6\% |  |  |  |  |
|  | Total Rev. available | 103 | 45.2\% | \$27,641 | 87.1\% | 95.4\% |  | 84.8\% |  |  |  |  |  | 31.4\% |  |  |  |  |
|  | Rev. Not Known | 125 | 54.8\% | \$4,082 | 12.9\% | 4.6\% |  | 15.3\% |  |  |  |  | 116 | 68.6\% |  |  |  |  |
|  | Total | 228 | 100.0\% | \$31,723 | 100.0\% | 100.0\% | 59 | 100.0\% |  |  |  |  | 169 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 171 | 75.0\% | \$5,093 | 16.1\% |  | 38 | 64.4\% | 83.8\% | \$1,931 | 15.0\% | 18.5\% | 133 | 78.7\% | 86.1\% | \$3,162 | 16.8\% | 20.4\% |
|  | \$100,001-\$250,000 | 14 | 6.1\% | \$2,663 | 8.4\% |  | 4 | 6.8\% | 7.0\% | \$651 | 5.0\% | 16.2\% | 10 | 5.9\% | 5.7\% | \$2,012 | 10.7\% | 15.1\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ | 43 | 18.9\% | \$23,967 | 75.6\% |  | 17 | 28.8\% | 9.2\% | \$10,311 | 80.0\% | 65.4\% | 26 | 15.4\% | 8.2\% | \$13,656 | 72.5\% | 64.4\% |
|  | Total | 228 | 100.0\% | \$31,723 | 100.0\% |  | 59 | 100.0\% | 100.0\% | \$12,893 | 100.0\% | 100.0\% | 169 | 100.0\% | 100.0\% | \$18,830 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over $\$ 1$ Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 1 | 100.0\% | \$183 | 100.0\% | 98.9\% | 0 | 0.0\% | 89.5\% | \$0 | 0.0\% | 68.0\% | 1 | 100.0\% | 70.0\% | \$183 | 100.0\% | 90.1\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 1 | 100.0\% | \$183 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 84.2\% | \$0 | 0.0\% | 30.6\% | 0 | 0.0\% | 80.0\% | \$0 | 0.0\% | 30.0\% |
|  | \$100,001-\$250,000 | 1 | 100.0\% | \$183 | 100.0\% |  | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 11.4\% | 1 | 100.0\% | 20.0\% | \$183 | 100.0\% | 70.0\% |
|  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 10.5\% | \$0 | 0.0\% | 58.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$183 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$183 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: GA Gainesville


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: GA Gainesville


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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

## Assessment Area: GA Gainesville



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## Appendices

## Combined Demographics Report

Assessment Area: GA Jefferson-Jenkins

| Income Categories | Tract Distribution |  | Families by Tract Income |  |  | $\begin{gathered} \hline \text { Families < Poverty } \\ \text { Level as \% of } \\ \text { Families by Tract } \end{gathered}$ |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 2,047 | 30.0 |
| Moderate-income | 3 | 50.0 |  | 4,060 | 59.4 | 893 | 22.0 | 1,295 | 19.0 |
| Middle-income | 3 | 50.0 |  | 2,771 | 40.6 | 493 | 17.8 | 1,214 | 17.8 |
| Upper-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 2,275 | 33.3 |
| Unknown-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 6 | 100.0 |  | 6,831 | 100.0 | 1,386 | 20.3 | 6,831 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 6,776 |  | 4,132 | 59.6 | 61.0 | 1,673 | 24.7 | 971 | 14.3 |
| Middle-income | 4,352 |  | 2,801 | 40.4 | 64.4 | 947 | 21.8 | 604 | 13.9 |
| Upper-income | 0 |  | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 |  | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 11,128 |  | 6,933 | 100.0 | 62.3 | 2,620 | 23.5 | 1,575 | 14.2 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 528 | 57.5 |  | 467 | 56.5 | 34 | 72.3 | 27 | 61.4 |
| Middle-income | 390 | 42.5 |  | 360 | 43.5 | 13 | 27.7 | 17 | 38.6 |
| Upper-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 918 | 100.0 |  | 827 | 100.0 | 47 | 100.0 | 44 | 100.0 |
|  | Percentage of Total Businesses: |  |  |  | 90.1 |  | 5.1 |  | 4.8 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |  |
|  |  |  | Less Than or =\$1 Million |  |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 56 | 58.3 |  | 55 | 58.5 | 1 | 50.0 | 0 | 0.0 |
| Middle-income | 40 | 41.7 |  | 39 | 41.5 | 1 | 50.0 | 0 | 0.0 |
| Upper-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 96 | 100.0 |  | 94 | 100.0 | 2 | 100.0 | 0 | . 0 |
|  | Percentage of Total Farms: |  |  |  | 97.9 |  | 2.1 |  | . 0 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: GA Jefferson-Jenkins

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison  <br> 2010  <br> 201  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  |  | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | 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 | 54.5\% | \$1,146 | 50.7\% | 59.6\% | 4 | 44.4\% | 67.7\% | \$388 | 41.5\% | 65.0\% | 8 | 61.5\% | 52.5\% | \$758 | 57.2\% | 51.7\% |
|  | Middle | 10 | 45.5\% | \$1,113 | 49.3\% | 40.4\% | 5 | 55.6\% | 30.1\% | \$546 | 58.5\% | 34.4\% | 5 | 38.5\% | 47.5\% | \$567 | 42.8\% | 48.3\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 22 | 100.0\% | \$2,259 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$934 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$1,325 | 100.0\% | 100.0\% |
|  | 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 | 44 | 58.7\% | \$4,045 | 56.4\% | 59.6\% | 29 | 56.9\% | 57.3\% | \$2,489 | 55.6\% | 46.2\% | 15 | 62.5\% | 61.3\% | \$1,556 | 57.8\% | 56.4\% |
|  | Middle | 31 | 41.3\% | \$3,126 | 43.6\% | 40.4\% | 22 | 43.1\% | 42.7\% | \$1,991 | 44.4\% | 53.8\% | 9 | 37.5\% | 38.7\% | \$1,135 | 42.2\% | 43.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 75 | 100.0\% | \$7,171 | 100.0\% | 100.0\% | 51 | 100.0\% | 100.0\% | \$4,480 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$2,691 | 100.0\% | 100.0\% |
|  | 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 | 64.7\% | \$192 | 77.4\% | 59.6\% | 9 | 60.0\% | 73.6\% | \$67 | 68.4\% | 92.0\% | 13 | 68.4\% | 60.5\% | \$125 | 83.3\% | 47.9\% |
|  | Middle | 12 | 35.3\% | \$56 | 22.6\% | 40.4\% | 6 | 40.0\% | 26.4\% | \$31 | 31.6\% | 8.0\% | 6 | 31.6\% | 39.5\% | \$25 | 16.7\% | 52.1\% |
|  | 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 | 34 | 100.0\% | \$248 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$98 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$150 | 100.0\% | 100.0\% |
| 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\% | 85.8\% | 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\% | 14.2\% | 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\% | 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\% |
|  | 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 | 78 | 59.5\% | \$5,383 | 55.6\% | 59.6\% | 42 | 56.0\% | 63.4\% | \$2,944 | 53.4\% | 53.9\% | 36 | 64.3\% | 57.6\% | \$2,439 | 58.5\% | 54.4\% |
|  | Middle | 53 | 40.5\% | \$4,295 | 44.4\% | 40.4\% | 33 | 44.0\% | 36.0\% | \$2,568 | 46.6\% | 45.9\% | 20 | 35.7\% | 42.4\% | \$1,727 | 41.5\% | 45.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 131 | 100.0\% | \$9,678 | 100.0\% | 100.0\% | 75 | 100.0\% | 100.0\% | \$5,512 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$4,166 | 100.0\% | 100.0\% |
|  | 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\% |
|  | M oderate | 37 | 60.7\% | \$3,040 | 77.0\% | 56.5\% | 13 | 68.4\% | 57.8\% | \$1,979 | 83.2\% | 55.4\% | 24 | 57.1\% | 51.0\% | \$1,061 | 67.5\% | 41.4\% |
|  | Middle | 21 | 34.4\% | \$858 | 21.7\% | 43.5\% | 6 | 31.6\% | 35.5\% | \$399 | 16.8\% | 43.4\% | 15 | 35.7\% | 39.9\% | \$459 | 29.2\% | 57.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 3 | 4.9\% | \$52 | 1.3\% |  | 0 | 0.0\% | 6.8\% | \$0 | 0.0\% | 1.2\% | 3 | 7.1\% | 9.1\% | \$52 | 3.3\% | 1.2\% |
|  | Total | 61 | 100.0\% | \$3,950 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$2,378 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$1,572 | 100.0\% | 100.0\% |
|  | 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\% |
|  | M oderate | 6 | 50.0\% | \$1,074 | 57.6\% | 58.5\% | 2 | 40.0\% | 39.3\% | \$625 | 66.1\% | 51.1\% | 4 | 57.1\% | 41.3\% | \$449 | 48.9\% | 40.6\% |
|  | Middle | 6 | 50.0\% | \$790 | 42.4\% | 41.5\% | 3 | 60.0\% | 60.0\% | \$320 | 33.9\% | 48.9\% | 3 | 42.9\% | 56.7\% | \$470 | 51.1\% | 59.0\% |
|  | 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\% | 0.7\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 0.5\% |
|  | Total | 12 | 100.0\% | \$1,864 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$945 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$919 | 100.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: GA Jefferson-Jenkins

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | $\begin{array}{\|c\|\|} \text { Families } \\ \text { by Family } \\ \text { Income } \\ \% \end{array}$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  | ount |  | lar |  |  | ank | Agg | Ban |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 3 | 13.6\% | \$242 | 10.7\% | 30.0\% | 2 | 22.2\% | 6.5\% | \$160 | 17.1\% | 3.1\% | 1 | 7.7\% | 10.9\% | \$82 | 6.2\% | 6.7\% |
|  | Moderate | 6 | 27.3\% | \$350 | 15.5\% | 19.0\% | 2 | 22.2\% | 28.0\% | \$128 | 13.7\% | 22.9\% | 4 | 30.8\% | 23.8\% | \$222 | 16.8\% | 19.5\% |
|  | Middle | 4 | 18.2\% | \$375 | 16.6\% | 17.8\% | 2 | 22.2\% | 28.0\% | \$180 | 19.3\% | 26.2\% | 2 | 15.4\% | 21.8\% | \$195 | 14.7\% | 20.9\% |
|  | Upper | 9 | 40.9\% | \$1,292 | 57.2\% | 33.3\% | 3 | 33.3\% | 30.1\% | \$466 | 49.9\% | 40.2\% | 6 | 46.2\% | 23.8\% | \$826 | 62.3\% | 33.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 7.5\% | \$0 | 0.0\% | 7.7\% | 0 | 0.0\% | 19.8\% | \$0 | 0.0\% | 19.3\% |
|  | Total | 22 | 100.0\% | \$2,259 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$934 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$1,325 | 100.0\% | 100.0\% |
|  | Low | 3 | 4.0\% | \$104 | 1.5\% | 30.0\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 1.5\% | 3 | 12.5\% | 4.5\% | \$104 | 3.9\% | 1.4\% |
|  | Moderate | 15 | 20.0\% | \$851 | 11.9\% | 19.0\% | 10 | 19.6\% | 12.4\% | \$542 | 12.1\% | 6.6\% | 5 | 20.8\% | 14.4\% | \$309 | 11.5\% | 7.7\% |
|  | Middle | 16 | 21.3\% | \$1,261 | 17.6\% | 17.8\% | 14 | 27.5\% | 23.8\% | \$1,118 | 25.0\% | 21.3\% | 2 | 8.3\% | 8.1\% | \$143 | 5.3\% | 6.2\% |
|  | Upper | 39 | 52.0\% | \$4,778 | 66.6\% | 33.3\% | 26 | 51.0\% | 44.9\% | \$2,715 | 60.6\% | 42.6\% | 13 | 54.2\% | 50.5\% | \$2,063 | 76.7\% | 61.3\% |
|  | Unknown | 2 | 2.7\% | \$177 | 2.5\% | 0.0\% | 1 | 2.0\% | 16.2\% | \$105 | 2.3\% | 28.0\% | 1 | 4.2\% | 22.5\% | \$72 | 2.7\% | 23.4\% |
|  | Total | 75 | 100.0\% | \$7,171 | 100.0\% | 100.0\% | 51 | 100.0\% | 100.0\% | \$4,480 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$2,691 | 100.0\% | 100.0\% |
|  | Low | 4 | 11.8\% | \$17 | 6.9\% | 30.0\% | 1 | 6.7\% | 18.1\% | \$6 | 6.1\% | 3.6\% | 3 | 15.8\% | 16.3\% | \$11 | 7.3\% | 8.1\% |
|  | M oderate | 9 | 26.5\% | \$41 | 16.5\% | 19.0\% | 5 | 33.3\% | 29.2\% | \$26 | 26.5\% | 11.2\% | 4 | 21.1\% | 25.6\% | \$15 | 10.0\% | 29.7\% |
|  | Middle | 5 | 14.7\% | \$20 | 8.1\% | 17.8\% | 1 | 6.7\% | 16.7\% | \$4 | 4.1\% | 10.3\% | 4 | 21.1\% | 16.3\% | \$16 | 10.7\% | 13.5\% |
|  | Upper | 15 | 44.1\% | \$159 | 64.1\% | 33.3\% | 8 | 53.3\% | 29.2\% | \$62 | 63.3\% | 60.5\% | 7 | 36.8\% | 34.9\% | \$97 | 64.7\% | 41.7\% |
|  | Unknown | 1 | 2.9\% | \$11 | 4.4\% | 0.0\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 14.4\% | 1 | 5.3\% | 7.0\% | \$11 | 7.3\% | 7.1\% |
|  | Total | 34 | 100.0\% | \$248 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$98 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$150 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{\stackrel{\rightharpoonup}{\sum}}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 30.0\% | 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\% | 17.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 33.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Low | 10 | 7.6\% | \$363 | 3.8\% | 30.0\% | 3 | 4.0\% | 6.9\% | \$166 | 3.0\% | 2.0\% | 7 | 12.5\% | 9.0\% | \$197 | 4.7\% | 3.6\% |
|  | Moderate | 30 | 22.9\% | \$1,242 | 12.8\% | 19.0\% | 17 | 22.7\% | 20.0\% | \$696 | 12.6\% | 11.2\% | 13 | 23.2\% | 20.0\% | \$546 | 13.1\% | 12.7\% |
|  | Middle | 25 | 19.1\% | \$1,656 | 17.1\% | 17.8\% | 17 | 22.7\% | 23.4\% | \$1,302 | 23.6\% | 21.9\% | 8 | 14.3\% | 14.9\% | \$354 | 8.5\% | 12.0\% |
|  | Upper | 63 | 48.1\% | \$6,229 | 64.4\% | 33.3\% | 37 | 49.3\% | 37.7\% | \$3,243 | 58.8\% | 43.1\% | 26 | 46.4\% | 37.3\% | \$2,986 | 71.7\% | 50.2\% |
|  | Unknown | 3 | 2.3\% | \$188 | 1.9\% | 0.0\% | 1 | 1.3\% | 12.0\% | \$105 | 1.9\% | 21.8\% | 2 | 3.6\% | 18.8\% | \$83 | 2.0\% | 21.5\% |
|  | Total | 131 | 100.0\% | \$9,678 | 100.0\% | 100.0\% | 75 | 100.0\% | 100.0\% | \$5,512 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$4,166 | 100.0\% | 100.0\% |
| Small Business |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 19 | 31.1\% | \$630 | 15.9\% | 90.1\% | 9 | 47.4\% | 60.2\% | \$238 | 10.0\% | 58.0\% | 10 | 23.8\% | 41.2\% | \$392 | 24.9\% | 55.7\% |
|  | Over \$1 Million | 6 | 9.8\% | \$1,548 | 39.2\% | 5.1\% | 3 | 15.8\% |  |  |  |  | 3 | 7.1\% |  |  |  |  |
|  | Total Rev. available | 25 | 40.9\% | \$2,178 | 55.1\% | 95.2\% | 12 | 63.2\% |  |  |  |  | 13 | 30.9\% |  |  |  |  |
|  | Rev. Not Known | 36 | 59.0\% | \$1,772 | 44.9\% | 4.8\% | 7 | 36.8\% |  |  |  |  | 29 | 69.0\% |  |  |  |  |
|  | Total | 61 | 100.0\% | \$3,950 | 100.0\% | 100.0\% | 19 | 100.0\% |  |  |  |  | 42 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 51 | 83.6\% | \$1,090 | 27.6\% |  | 14 | 73.7\% | 89.6\% | \$291 | 12.2\% | 32.1\% | 37 | 88.1\% | 88.1\% | \$799 | 50.8\% | 29.6\% |
|  | \$100,001-\$250,000 | 7 | 11.5\% | \$1,069 | 27.1\% |  | 2 | 10.5\% | 5.6\% | \$296 | 12.4\% | 18.4\% | 5 | 11.9\% | 7.0\% | \$773 | 49.2\% | 24.7\% |
|  | \$250,001 - \$1 <br> Million | 3 | 4.9\% | \$1,791 | 45.3\% |  | 3 | 15.8\% | 4.8\% | \$1,791 | 75.3\% | 49.5\% | 0 | 0.0\% | 4.9\% | \$0 | 0.0\% | 45.7\% |
|  | Total | 61 | 100.0\% | \$3,950 | 100.0\% |  | 19 | 100.0\% | 100.0\% | \$2,378 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$1,572 | 100.0\% | 100.0\% |
|  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 9 | 75.0\% | \$1,306 | 70.1\% | 97.9\% | 4 | 80.0\% | 82.2\% | \$620 | 65.6\% | 77.2\% | 5 | 71.4\% | 77.9\% | \$686 | 74.6\% | 77.5\% |
|  | Over \$1 Million | 2 | 16.7\% | \$538 | 28.9\% | 2.1\% | 1 | 20.0\% |  |  |  |  | 1 | 14.3\% |  |  |  |  |
|  | Not Known | 1 | 8.3\% | \$20 | 1.1\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 1 | 14.3\% |  |  |  |  |
|  | Total | 12 | 100.0\% | \$1,864 | 100.0\% | 100.0\% | 5 | 100.0\% |  |  |  |  | 7 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 6 | 50.0\% | \$262 | 14.1\% |  | 2 | 40.0\% | 75.6\% | \$156 | 16.5\% | 33.1\% | 4 | 57.1\% | 67.3\% | \$106 | 11.5\% | 21.9\% |
|  | \$100,001-\$250,000 | 3 | 25.0\% | \$627 | 33.6\% |  | 1 | 20.0\% | 14.8\% | \$164 | 17.4\% | 28.8\% | 2 | 28.6\% | 21.2\% | \$463 | 50.4\% | 38.5\% |
|  | \$250,001-\$500,000 | 3 | 25.0\% | \$975 | 52.3\% |  | 2 | 40.0\% | 9.6\% | \$625 | 66.1\% | 38.1\% | 1 | 14.3\% | 11.5\% | \$350 | 38.1\% | 39.6\% |
|  | Total | 12 | 100.0\% | \$1,864 | 100.0\% |  | 5 | 100.0\% | 100.0\% | \$945 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$919 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: GA Morgan-Elbert-Wilkes

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 2,807 | 21.3 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 2,121 | 16.1 |
| Middle-income | 9 | 75.0 |  | 83.1 | 1,461 | 13.4 | 2,783 | 21.2 |
| Upper-income | 3 | 25.0 |  | 16.9 | 162 | 7.3 | 5,446 | 41.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 12 | 100.0 |  | 100.0 | 1,623 | 12.3 | 13,157 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 17,215 | 11,365 |  | 66.0 | 3,752 | 21.8 | 2,098 | 12.2 |
| Upper-income | 3,071 | 2,284 |  | 74.4 | 475 | 15.5 | 312 | 10.2 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 20,286 | 13,649 |  | 67.3 | 4,227 | 20.8 | 2,410 | 11.9 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 2,359 | 86.2 |  | 85.5 | 114 | 92.7 | 120 | 93.0 |
| Upper-income | 379 | 13.8 |  | 14.5 | 9 | 7.3 | 9 | 7.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 2,738 | 100.0 |  | 100.0 | 123 | 100.0 | 129 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 90.8 |  | 4.5 |  | 4.7 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 137 | 77.4 |  | 76.7 | 4 | 100.0 | 1 | 100.0 |
| Upper-income | 40 | 22.6 |  | 23.3 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 177 | 100.0 |  | 100.0 | 4 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.2 |  | 2.3 |  | . 6 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: GA Morgan-Elbert-Wilkes


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## Appendices

## Combined Demographics Report

Assessment Area: GA Northwest GA


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: GA Northwest GA


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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: GA Rome



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Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | nk |  | Families <br> by Family <br> Income <br> \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol | lar |  |  | ank | Agg |  |  | Agg |  | nk | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 1 | 4.5\% | \$59 | 1.9\% | 19.9\% | 1 | 6.3\% | 11.7\% | \$59 | 2.4\% | 6.4\% | 0 | 0.0\% | 9.0\% | \$0 | 0.0\% | 4.8\% |
|  | Moderate | 4 | 18.2\% | \$469 | 15.2\% | 18.9\% | 4 | 25.0\% | 21.3\% | \$469 | 19.4\% | 15.6\% | 0 | 0.0\% | 18.9\% | \$0 | 0.0\% | 12.8\% |
|  | Middle | 3 | 13.6\% | \$251 | 8.1\% | 21.3\% | 2 | 12.5\% | 22.3\% | \$143 | 5.9\% | 20.3\% | 1 | 16.7\% | 17.8\% | \$108 | 16.2\% | 17.5\% |
|  | Upper | 14 | 63.6\% | \$2,308 | 74.8\% | 39.8\% | 9 | 56.3\% | 29.2\% | \$1,751 | 72.3\% | 41.0\% | 5 | 83.3\% | 30.8\% | \$557 | 83.8\% | 43.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 15.5\% | \$0 | 0.0\% | 16.7\% | 0 | 0.0\% | 23.5\% | \$0 | 0.0\% | 21.7\% |
|  | Total | 22 | 100.0\% | \$3,087 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$2,422 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$665 | 100.0\% | 100.0\% |
|  | Low | 5 | 6.5\% | \$307 | 2.6\% | 19.9\% | 2 | 5.1\% | 4.9\% | \$91 | 1.9\% | 2.3\% | 3 | 7.9\% | 5.7\% | \$216 | 3.2\% | 3.0\% |
|  | Moderate | 12 | 15.6\% | \$976 | 8.4\% | 18.9\% | 3 | 7.7\% | 13.0\% | \$259 | 5.3\% | 8.1\% | 9 | 23.7\% | 10.9\% | \$717 | 10.6\% | 6.8\% |
|  | Middle | 19 | 24.7\% | \$2,627 | 22.6\% | 21.3\% | 14 | 35.9\% | 18.5\% | \$1,837 | 37.8\% | 15.1\% | 5 | 13.2\% | 15.8\% | \$790 | 11.7\% | 12.8\% |
|  | Upper | 40 | 51.9\% | \$7,622 | 65.6\% | 39.8\% | 20 | 51.3\% | 41.9\% | \$2,671 | 55.0\% | 50.8\% | 20 | 52.6\% | 42.8\% | \$4,951 | 73.1\% | 54.0\% |
|  | Unknown | 1 | 1.3\% | \$95 | 0.8\% | 0.0\% | 0 | 0.0\% | 21.7\% | \$0 | 0.0\% | 23.7\% | 1 | 2.6\% | 24.7\% | \$95 | 1.4\% | 23.4\% |
|  | Total | 77 | 100.0\% | \$11,627 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$4,858 | 100.0\% | 100.0\% | 38 | 100.0\% | 100.0\% | \$6,769 | 100.0\% | 100.0\% |
|  | Low | 2 | 18.2\% | \$8 | 11.1\% | 19.9\% | 0 | 0.0\% | 15.6\% | \$0 | 0.0\% | 2.4\% | 2 | 22.2\% | 23.6\% | \$8 | 12.9\% | 10.9\% |
|  | Moderate | 3 | 27.3\% | \$16 | 22.2\% | 18.9\% | 1 | 50.0\% | 16.9\% | \$5 | 50.0\% | 5.5\% | 2 | 22.2\% | 9.7\% | \$11 | 17.7\% | 2.8\% |
|  | Middle | 1 | 9.1\% | \$5 | 6.9\% | 21.3\% | 1 | 50.0\% | 27.3\% | \$5 | 50.0\% | 19.5\% | 0 | 0.0\% | 27.8\% | \$0 | 0.0\% | 25.4\% |
|  | Upper | 5 | 45.5\% | \$43 | 59.7\% | 39.8\% | 0 | 0.0\% | 36.4\% | \$0 | 0.0\% | 70.5\% | 5 | 55.6\% | 33.3\% | \$43 | 69.4\% | 51.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 5.6\% | \$0 | 0.0\% | 9.2\% |
|  | Total | 11 | 100.0\% | \$72 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$62 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 19.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.9\% | 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\% | 21.3\% | 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\% | 39.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 8 | 7.3\% | \$374 | 2.5\% | 19.9\% | 3 | 5.3\% | 7.6\% | \$150 | 2.1\% | 3.5\% | 5 | 9.4\% | 7.5\% | \$224 | 3.0\% | 3.6\% |
|  | Moderate | 19 | 17.3\% | \$1,461 | 9.9\% | 18.9\% | 8 | 14.0\% | 16.0\% | \$733 | 10.1\% | 10.0\% | 11 | 20.8\% | 13.8\% | \$728 | 9.7\% | 8.7\% |
|  | Middle | 23 | 20.9\% | \$2,883 | 19.5\% | 21.3\% | 17 | 29.8\% | 20.1\% | \$1,985 | 27.2\% | 16.0\% | 6 | 11.3\% | 16.9\% | \$898 | 12.0\% | 14.3\% |
|  | Upper | 59 | 53.6\% | \$9,973 | 67.4\% | 39.8\% | 29 | 50.9\% | 37.0\% | \$4,422 | 60.7\% | 45.1\% | 30 | 56.6\% | 38.0\% | \$5,551 | 74.1\% | 49.3\% |
|  | Unknown | 1 | 0.9\% | \$95 | 0.6\% | 0.0\% | 0 | 0.0\% | 19.3\% | \$0 | 0.0\% | 25.3\% | 1 | 1.9\% | 23.8\% | \$95 | 1.3\% | 24.0\% |
|  | Total | 110 | 100.0\% | \$14,786 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$7,290 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$7,496 | 100.0\% | 100.0\% |
| Small Business | \$1 Million or LessOver \$1 MillionTotal Rev. availabRev. Not KnownTotal | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 52 | 24.2\% | \$5,648 | 41.1\% | 90.1\% | 27 | 50.9\% | 42.5\% | \$2,414 | 46.5\% | 55.2\% | 25 | 15.4\% | 45.1\% | \$3,234 | 37.9\% | 46.2\% |
|  |  | 25 | 11.6\% | \$4,930 | 35.9\% | 5.6\% | 12 | 22.6\% |  |  |  |  | 13 | 8.0\% |  |  |  |  |
|  |  | 77 | 35.8\% | \$10,578 | 77.0\% | 95.7\% | 39 | 73.5\% |  |  |  |  | 38 | 23.4\% |  |  |  |  |
|  |  | 138 | 64.2\% | \$3,152 | 23.0\% | 4.4\% | 14 | 26.4\% |  |  |  |  | 124 | 76.5\% |  |  |  |  |
|  |  | 215 | 100.0\% | \$13,730 | 100.0\% | 100.0\% | 53 | 100.0\% |  |  |  |  | 162 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 190 | 88.4\% | \$5,048 | 36.8\% |  | 44 | 83.0\% | 87.7\% | \$1,922 | 37.0\% | 25.4\% | 146 | 90.1\% | 91.3\% | \$3,126 | 36.6\% | 30.1\% |
|  | \$100,001-\$250,000 | 9 | 4.2\% | \$1,441 | 10.5\% |  | 2 | 3.8\% | 5.2\% | \$256 | 4.9\% | 14.8\% | 7 | 4.3\% | 3.8\% | \$1,185 | 13.9\% | 13.1\% |
|  | \$250,001 - \$1 <br> Million | 16 | 7.4\% | \$7,241 | 52.7\% |  | 7 | 13.2\% | 7.1\% | \$3,013 | 58.0\% | 59.8\% | 9 | 5.6\% | 5.0\% | \$4,228 | 49.5\% | 56.7\% |
|  | Total | 215 | 100.0\% | \$13,730 | 100.0\% |  | 53 | 100.0\% | 100.0\% | \$5,191 | 100.0\% | 100.0\% | 162 | 100.0\% | 100.0\% | \$8,539 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over $\$ 1$ Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 7 | 87.5\% | \$464 | 99.8\% | 100.0\% | 2 | 100.0\% | 77.8\% | \$315 | 100.0\% | 50.5\% | 5 | 83.3\% | 92.3\% | \$149 | 99.3\% | 99.8\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 1 | 12.5\% | \$1 | 0.2\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 1 | 16.7\% |  |  |  |  |
|  |  | 8 | 100.0\% | \$465 | 100.0\% | 100.0\% | 2 | 100.0\% |  |  |  |  | 6 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 7 | 87.5\% | \$177 | 38.1\% |  | 1 | 50.0\% | 77.8\% | \$27 | 8.6\% | 26.3\% | 6 | 100.0\% | 92.3\% | \$150 | 100.0\% | 68.8\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 31.2\% |
|  | \$250,001-\$500,000 | 1 | 12.5\% | \$288 | 61.9\% |  | 1 | 50.0\% | 22.2\% | \$288 | 91.4\% | 73.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 8 | 100.0\% | \$465 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$315 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$150 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: GA Savannah


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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: GA Savannah

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  |  | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 5 | 4.3\% | \$1,044 | 4.1\% | 5.2\% | 3 | 4.8\% | 3.7\% | \$750 | 5.1\% | 3.6\% | 2 | 3.7\% | 3.2\% | \$294 | 2.7\% | 2.6\% |
|  | Moderate | 8 | 6.8\% | \$944 | 3.7\% | 22.2\% | 5 | 7.9\% | 8.7\% | \$749 | 5.1\% | 6.0\% | 3 | 5.6\% | 8.4\% | \$195 | 1.8\% | 5.8\% |
|  | Middle | 53 | 45.3\% | \$10,082 | 39.4\% | 40.7\% | 24 | 38.1\% | 60.4\% | \$5,143 | 34.7\% | 55.3\% | 29 | 53.7\% | 60.9\% | \$4,939 | 45.7\% | 56.2\% |
|  | Upper | 51 | 43.6\% | \$13,547 | 52.9\% | 32.0\% | 31 | 49.2\% | 27.2\% | \$8,162 | 55.1\% | 35.0\% | 20 | 37.0\% | 27.5\% | \$5,385 | 49.8\% | 35.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 117 | 100.0\% | \$25,617 | 100.0\% | 100.0\% | 63 | 100.0\% | 100.0\% | \$14,804 | 100.0\% | 100.0\% | 54 | 100.0\% | 100.0\% | \$10,813 | 100.0\% | 100.0\% |
|  | Low | 5 | 5.7\% | \$745 | 6.1\% | 5.2\% | 3 | 6.0\% | 3.3\% | \$405 | 4.6\% | 3.1\% | 2 | 5.4\% | 3.2\% | \$340 | 9.9\% | 3.0\% |
|  | Moderate | 7 | 8.0\% | \$448 | 3.7\% | 22.2\% | 2 | 4.0\% | 10.6\% | \$55 | 0.6\% | 7.1\% | 5 | 13.5\% | 9.2\% | \$393 | 11.5\% | 7.2\% |
|  | Middle | 34 | 39.1\% | \$4,142 | 34.0\% | 40.7\% | 22 | 44.0\% | 45.0\% | \$3,116 | 35.6\% | 38.1\% | 12 | 32.4\% | 45.6\% | \$1,026 | 29.9\% | 37.8\% |
|  | Upper | 41 | 47.1\% | \$6,860 | 56.3\% | 32.0\% | 23 | 46.0\% | 40.9\% | \$5,188 | 59.2\% | 51.4\% | 18 | 48.6\% | 41.9\% | \$1,672 | 48.7\% | 51.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 87 | 100.0\% | \$12,195 | 100.0\% | 100.0\% | 50 | 100.0\% | 100.0\% | \$8,764 | 100.0\% | 100.0\% | 37 | 100.0\% | 100.0\% | \$3,431 | 100.0\% | 100.0\% |
|  | Low | 1 | 100.0\% | \$4 | 100.0\% | 5.2\% | 0 | 0.0\% | 5.8\% | \$0 | 0.0\% | 12.4\% | 1 | 100.0\% | 6.7\% | \$4 | 100.0\% | 5.2\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 22.2\% | 0 | 0.0\% | 25.4\% | \$0 | 0.0\% | 15.3\% | 0 | 0.0\% | 18.0\% | \$0 | 0.0\% | 8.7\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 40.7\% | 0 | 0.0\% | 44.2\% | \$0 | 0.0\% | 29.1\% | 0 | 0.0\% | 46.0\% | \$0 | 0.0\% | 33.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 32.0\% | 0 | 0.0\% | 24.6\% | \$0 | 0.0\% | 43.2\% | 0 | 0.0\% | 29.3\% | \$0 | 0.0\% | 52.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$4 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$4 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 9.3\% | 0 | 0.0\% | 11.4\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 20.7\% | \$0 | 0.0\% | 4.8\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 30.8\% | 0 | 0.0\% | 22.9\% | \$0 | 0.0\% | 9.7\% | 0 | 0.0\% | 27.6\% | \$0 | 0.0\% | 29.3\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 33.5\% | 0 | 0.0\% | 42.9\% | \$0 | 0.0\% | 64.0\% | 0 | 0.0\% | 31.0\% | \$0 | 0.0\% | 36.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 26.5\% | 0 | 0.0\% | 22.9\% | \$0 | 0.0\% | 24.4\% | 0 | 0.0\% | 20.7\% | \$0 | 0.0\% | 29.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 11 | 5.4\% | \$1,793 | 4.7\% | 5.2\% | 6 | 5.3\% | 3.5\% | \$1,155 | 4.9\% | 3.3\% | 5 | 5.4\% | 3.3\% | \$638 | 4.5\% | 2.9\% |
|  | Moderate | 15 | 7.3\% | \$1,392 | 3.7\% | 22.2\% | 7 | 6.2\% | 10.1\% | \$804 | 3.4\% | 6.8\% | 8 | 8.7\% | 9.1\% | \$588 | 4.1\% | 7.4\% |
|  | Middle | 87 | 42.4\% | \$14,224 | 37.6\% | 40.7\% | 46 | 40.7\% | 51.8\% | \$8,259 | 35.0\% | 45.8\% | 41 | 44.6\% | 52.5\% | \$5,965 | 41.9\% | 45.3\% |
|  | Upper | 92 | 44.9\% | \$20,407 | 54.0\% | 32.0\% | 54 | 47.8\% | 34.6\% | \$13,350 | 56.6\% | 43.9\% | 38 | 41.3\% | 35.0\% | \$7,057 | 49.5\% | 44.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 205 | 100.0\% | \$37,816 | 100.0\% | 100.0\% | 113 | 100.0\% | 100.0\% | \$23,568 | 100.0\% | 100.0\% | 92 | 100.0\% | 100.0\% | \$14,248 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 8 | 14.0\% | \$2,049 | 25.7\% | 7.3\% | 1 | 5.9\% | 5.7\% | \$250 | 6.6\% | 5.0\% | 7 | 17.5\% | 6.3\% | \$1,799 | 42.8\% | 7.3\% |
|  | Moderate | 6 | 10.5\% | \$1,056 | 13.3\% | 19.8\% | 3 | 17.6\% | 16.6\% | \$997 | 26.5\% | 19.1\% | 3 | 7.5\% | 18.7\% | \$59 | 1.4\% | 20.9\% |
|  | Middle | 22 | 38.6\% | \$2,511 | 31.5\% | 45.4\% | 6 | 35.3\% | 42.9\% | \$1,122 | 29.8\% | 49.1\% | 16 | 40.0\% | 42.4\% | \$1,389 | 33.1\% | 48.7\% |
|  | Upper | 21 | 36.8\% | \$2,352 | 29.5\% | 27.3\% | 7 | 41.2\% | 31.4\% | \$1,397 | 37.1\% | 25.2\% | 14 | 35.0\% | 30.3\% | \$955 | 22.7\% | 21.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 1.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 57 | 100.0\% | \$7,968 | 100.0\% | 100.0\% | 17 | 100.0\% | 100.0\% | \$3,766 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$4,202 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 4.8\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 23.1\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 22.1\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 1.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 50.0\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 5.9\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 91.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 25.0\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 72.0\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 1.9\% |
|  | 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\% |
|  | 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\% |

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## Appendices

## Combined Demographics Report

Assessment Area: GA Southwest GA


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: GA Southwest GA

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  | Agg$\%$ | Bank |  | Agg | Bank |  |  | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 8 | 40.0\% | \$971 | 41.8\% | 40.9\% | 7 | 46.7\% | 30.1\% | \$872 | 49.2\% | 25.4\% | 1 | 20.0\% | 35.3\% | \$99 | 17.9\% | 31.2\% |
|  | Middle | 12 | 60.0\% | \$1,353 | 58.2\% | 59.1\% | 8 | 53.3\% | 66.3\% | \$900 | 50.8\% | 73.0\% | 4 | 80.0\% | 64.7\% | \$453 | 82.1\% | 68.8\% |
|  | 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\% | 3.6\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 20 | 100.0\% | \$2,324 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$1,772 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$552 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 28 | 38.9\% | \$2,481 | 32.3\% | 40.9\% | 14 | 33.3\% | 31.8\% | \$1,017 | 24.9\% | 26.4\% | 14 | 46.7\% | 27.3\% | \$1,464 | 40.7\% | 25.9\% |
|  | Middle | 44 | 61.1\% | \$5,204 | 67.7\% | 59.1\% | 28 | 66.7\% | 68.2\% | \$3,075 | 75.1\% | 73.6\% | 16 | 53.3\% | 72.7\% | \$2,129 | 59.3\% | 74.1\% |
|  | 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 | 72 | 100.0\% | \$7,685 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$4,092 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$3,593 | 100.0\% | 100.0\% |
|  | 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 | 46.7\% | \$91 | 46.9\% | 40.9\% | 6 | 40.0\% | 37.2\% | \$35 | 37.2\% | 44.6\% | 8 | 53.3\% | 35.1\% | \$56 | 56.0\% | 28.8\% |
|  | Middle | 16 | 53.3\% | \$103 | 53.1\% | 59.1\% | 9 | 60.0\% | 62.8\% | \$59 | 62.8\% | 55.4\% | 7 | 46.7\% | 64.9\% | \$44 | 44.0\% | 71.2\% |
|  | 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 | 30 | 100.0\% | \$194 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$94 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$100 | 100.0\% | 100.0\% |
| 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\% | 43.5\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 32.8\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 56.5\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 67.2\% | 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\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 50 | 41.0\% | \$3,543 | 34.7\% | 40.9\% | 27 | 37.5\% | 31.8\% | \$1,924 | 32.3\% | 26.7\% | 23 | 46.0\% | 30.2\% | \$1,619 | 38.1\% | 27.8\% |
|  | Middle | 72 | 59.0\% | \$6,660 | 65.3\% | 59.1\% | 45 | 62.5\% | 67.2\% | \$4,034 | 67.7\% | 72.8\% | 27 | 54.0\% | 69.8\% | \$2,626 | 61.9\% | 72.2\% |
|  | 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\% | 1.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 122 | 100.0\% | \$10,203 | 100.0\% | 100.0\% | 72 | 100.0\% | 100.0\% | \$5,958 | 100.0\% | 100.0\% | 50 | 100.0\% | 100.0\% | \$4,245 | 100.0\% | 100.0\% |
|  | 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 | 69 | 44.2\% | \$3,445 | 32.0\% | 45.0\% | 12 | 35.3\% | 28.2\% | \$723 | 16.8\% | 28.4\% | 57 | 46.7\% | 32.5\% | \$2,722 | 42.1\% | 31.4\% |
|  | Middle | 75 | 48.1\% | \$6,924 | 64.3\% | 55.0\% | 21 | 61.8\% | 65.7\% | \$3,563 | 82.8\% | 69.9\% | 54 | 44.3\% | 61.7\% | \$3,361 | 52.0\% | 66.7\% |
|  | 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\% |
|  | Tr Unknown | 12 | 7.7\% | \$396 | 3.7\% |  | 1 | 2.9\% | 6.1\% | \$15 | 0.3\% | 1.7\% | 11 | 9.0\% | 5.8\% | \$381 | 5.9\% | 1.9\% |
|  | Total | 156 | 100.0\% | \$10,765 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$4,301 | 100.0\% | 100.0\% | 122 | 100.0\% | 100.0\% | \$6,464 | 100.0\% | 100.0\% |
|  | 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 | 40.9\% | \$4,350 | 57.9\% | 27.6\% | 10 | 52.6\% | 27.6\% | \$2,550 | 64.5\% | 45.9\% | 8 | 32.0\% | 16.8\% | \$1,800 | 50.6\% | 31.6\% |
|  | Middle | 23 | 52.3\% | \$3,100 | 41.3\% | 72.4\% | 9 | 47.4\% | 68.6\% | \$1,403 | 35.5\% | 54.0\% | 14 | 56.0\% | 77.6\% | \$1,697 | 47.7\% | 67.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 3 | 6.8\% | \$62 | 0.8\% |  | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 0.1\% | 3 | 12.0\% | 5.6\% | \$62 | 1.7\% | 1.0\% |
|  | Total | 44 | 100.0\% | \$7,512 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$3,953 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$3,559 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size


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## Appendices

## Combined Demographics Report

Assessment Area: GA Valdosta


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: GA Valdosta

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison  <br> 2010  <br> 201  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  |  | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 8.5\% | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 3.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 6.8\% | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 0.9\% |
|  | Middle | 25 | 44.6\% | \$4,025 | 42.7\% | 49.6\% | 15 | 45.5\% | 51.3\% | \$2,463 | 44.7\% | 47.5\% | 10 | 43.5\% | 54.4\% | \$1,562 | 40.0\% | 51.7\% |
|  | Upper | 31 | 55.4\% | \$5,391 | 57.3\% | 35.0\% | 18 | 54.5\% | 42.6\% | \$3,048 | 55.3\% | 48.4\% | 13 | 56.5\% | 39.9\% | \$2,343 | 60.0\% | 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\% |
|  | Total | 56 | 100.0\% | \$9,416 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$5,511 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$3,905 | 100.0\% | 100.0\% |
|  | Low | 2 | 2.4\% | \$182 | 1.3\% | 8.5\% | 1 | 2.0\% | 3.3\% | \$128 | 1.5\% | 1.8\% | 1 | 2.9\% | 2.9\% | \$54 | 1.0\% | 1.5\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 6.8\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 2.8\% | 0 | 0.0\% | 3.7\% | \$0 | 0.0\% | 3.2\% |
|  | Middle | 29 | 34.9\% | \$3,367 | 23.8\% | 49.6\% | 18 | 36.7\% | 47.6\% | \$1,940 | 22.9\% | 42.2\% | 11 | 32.4\% | 48.5\% | \$1,427 | 25.1\% | 43.0\% |
|  | Upper | 52 | 62.7\% | \$10,619 | 75.0\% | 35.0\% | 30 | 61.2\% | 45.1\% | \$6,421 | 75.6\% | 53.2\% | 22 | 64.7\% | 44.8\% | \$4,198 | 73.9\% | 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\% |
|  | Total | 83 | 100.0\% | \$14,168 | 100.0\% | 100.0\% | 49 | 100.0\% | 100.0\% | \$8,489 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$5,679 | 100.0\% | 100.0\% |
|  | Low | 1 | 12.5\% | \$3 | 7.9\% | 8.5\% | 1 | 25.0\% | 5.4\% | \$3 | 12.5\% | 1.5\% | 0 | 0.0\% | 11.8\% | \$0 | 0.0\% | 12.3\% |
|  | Moderate | 2 | 25.0\% | \$10 | 26.3\% | 6.8\% | 1 | 25.0\% | 3.6\% | \$8 | 33.3\% | 2.5\% | 1 | 25.0\% | 7.5\% | \$2 | 14.3\% | 6.2\% |
|  | Middle | 2 | 25.0\% | \$7 | 18.4\% | 49.6\% | 0 | 0.0\% | 53.0\% | \$0 | 0.0\% | 39.9\% | 2 | 50.0\% | 46.6\% | \$7 | 50.0\% | 41.2\% |
|  | Upper | 3 | 37.5\% | \$18 | 47.4\% | 35.0\% | 2 | 50.0\% | 38.0\% | \$13 | 54.2\% | 56.1\% | 1 | 25.0\% | 34.2\% | \$5 | 35.7\% | 40.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 8 | 100.0\% | \$38 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$24 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$14 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 11.3\% | 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\% | 31.0\% | 0 | 0.0\% | 55.0\% | \$0 | 0.0\% | 7.8\% | 0 | 0.0\% | 73.1\% | \$0 | 0.0\% | 53.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 33.6\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 90.3\% | 0 | 0.0\% | 11.5\% | \$0 | 0.0\% | 16.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 24.1\% | 0 | 0.0\% | 15.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 15.4\% | \$0 | 0.0\% | 29.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 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\% |
|  | Low | 3 | 2.0\% | \$185 | 0.8\% | 8.5\% | 2 | 2.3\% | 3.3\% | \$131 | 0.9\% | 1.7\% | 1 | 1.6\% | 3.6\% | \$54 | 0.6\% | 2.1\% |
|  | Moderate | 2 | 1.4\% | \$10 | 0.0\% | 6.8\% | 1 | 1.2\% | 3.9\% | \$8 | 0.1\% | 3.1\% | 1 | 1.6\% | 3.8\% | \$2 | 0.0\% | 4.8\% |
|  | Middle | 56 | 38.1\% | \$7,399 | 31.3\% | 49.6\% | 33 | 38.4\% | 49.1\% | \$4,403 | 31.4\% | 50.2\% | 23 | 37.7\% | 50.0\% | \$2,996 | 31.2\% | 44.4\% |
|  | Upper | 86 | 58.5\% | \$16,028 | 67.9\% | 35.0\% | 50 | 58.1\% | 43.7\% | \$9,482 | 67.6\% | 44.9\% | 36 | 59.0\% | 42.6\% | \$6,546 | 68.2\% | 48.8\% |
|  | 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 | 147 | 100.0\% | \$23,622 | 100.0\% | 100.0\% | 86 | 100.0\% | 100.0\% | \$14,024 | 100.0\% | 100.0\% | 61 | 100.0\% | 100.0\% | \$9,598 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 6 | 6.9\% | \$486 | 5.7\% | 11.5\% | 2 | 13.3\% | 9.4\% | \$442 | 13.4\% | 10.8\% | 4 | 5.6\% | 9.1\% | \$44 | 0.8\% | 9.7\% |
|  | Moderate | 22 | 25.3\% | \$1,466 | 17.1\% | 15.5\% | 2 | 13.3\% | 18.2\% | \$617 | 18.7\% | 22.7\% | 20 | 27.8\% | 15.4\% | \$849 | 16.1\% | 18.8\% |
|  | Middle | 24 | 27.6\% | \$3,750 | 43.7\% | 39.0\% | 7 | 46.7\% | 32.7\% | \$2,135 | 64.8\% | 29.0\% | 17 | 23.6\% | 35.1\% | \$1,615 | 30.6\% | 37.6\% |
|  | Upper | 35 | 40.2\% | \$2,872 | 33.5\% | 34.0\% | 4 | 26.7\% | 38.0\% | \$103 | 3.1\% | 37.2\% | 31 | 43.1\% | 38.4\% | \$2,769 | 52.5\% | 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\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 87 | 100.0\% | \$8,574 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$3,297 | 100.0\% | 100.0\% | 72 | 100.0\% | 100.0\% | \$5,277 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 3.8\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 16.9\% | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 0.4\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 2.9\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 59.6\% | 0 | 0.0\% | 51.7\% | \$0 | 0.0\% | 58.4\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 32.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 33.7\% | 0 | 0.0\% | 34.5\% | \$0 | 0.0\% | 24.4\% | 0 | 0.0\% | 45.0\% | \$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\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: IL Bloomington


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

| $\underset{\downarrow}{\underset{\sim}{\sim}}$ | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | nk Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( ${ }_{\text {Ba }}$ | Dollar k \$ \% | Agg \$ \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba $\$(000 s)$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 9 | 22.0\% | \$856 | 14.1\% | 21.2\% | 5 | 26.3\% | 20.0\% | \$473 | 18.5\% | 15.6\% | 4 | 18.2\% | 18.1\% | \$383 | 10.9\% | 14.9\% |
|  | Middle | 18 | 43.9\% | \$2,195 | 36.1\% | 55.3\% | 8 | 42.1\% | 47.2\% | \$976 | 38.2\% | 41.4\% | 10 | 45.5\% | 46.0\% | \$1,219 | 34.6\% | 40.2\% |
|  | Upper | 14 | 34.1\% | \$3,025 | 49.8\% | 23.5\% | 6 | 31.6\% | 32.8\% | \$1,103 | 43.2\% | 43.0\% | 8 | 36.4\% | 35.8\% | \$1,922 | 54.5\% | 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\% |
|  | Total | 41 | 100.0\% | \$6,076 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$2,552 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$3,524 | 100.0\% | 100.0\% |
|  | 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 | 20 | 20.0\% | \$2,200 | 16.7\% | 21.2\% | 15 | 25.9\% | 15.3\% | \$1,656 | 23.5\% | 12.6\% | 5 | 11.9\% | 15.5\% | \$544 | 8.9\% | 12.6\% |
|  | Middle | 44 | 44.0\% | \$5,111 | 38.8\% | 55.3\% | 25 | 43.1\% | 41.3\% | \$2,490 | 35.4\% | 36.2\% | 19 | 45.2\% | 43.5\% | \$2,621 | 42.8\% | 38.3\% |
|  | Upper | 36 | 36.0\% | \$5,847 | 44.4\% | 23.5\% | 18 | 31.0\% | 43.4\% | \$2,894 | 41.1\% | 51.2\% | 18 | 42.9\% | 41.0\% | \$2,953 | 48.3\% | 49.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 100 | 100.0\% | \$13,158 | 100.0\% | 100.0\% | 58 | 100.0\% | 100.0\% | \$7,040 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$6,118 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 21.2\% | 0 | 0.0\% | 17.3\% | \$0 | 0.0\% | 11.3\% | 0 | 0.0\% | 10.7\% | \$0 | 0.0\% | 5.9\% |
|  | Middle | 1 | 100.0\% | \$3 | 100.0\% | 55.3\% | 1 | 100.0\% | 49.5\% | \$3 | 100.0\% | 40.8\% | 0 | 0.0\% | 51.2\% | \$0 | 0.0\% | 49.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 23.5\% | 0 | 0.0\% | 33.2\% | \$0 | 0.0\% | 47.9\% | 0 | 0.0\% | 37.7\% | \$0 | 0.0\% | 44.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$3 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$3 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 2.4\% | 0 | 0.0\% | 6.3\% | \$0 | 0.0\% | 3.3\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 36.5\% | 0 | 0.0\% | 33.7\% | \$0 | 0.0\% | 14.8\% | 0 | 0.0\% | 27.0\% | \$0 | 0.0\% | 11.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 54.3\% | 0 | 0.0\% | 54.5\% | \$0 | 0.0\% | 50.9\% | 0 | 0.0\% | 55.6\% | \$0 | 0.0\% | 60.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 7.1\% | 0 | 0.0\% | 8.9\% | \$0 | 0.0\% | 31.9\% | 0 | 0.0\% | 11.1\% | \$0 | 0.0\% | 24.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 29 | 20.4\% | \$3,056 | 15.9\% | 21.2\% | 20 | 25.6\% | 16.8\% | \$2,129 | 22.2\% | 13.4\% | 9 | 14.1\% | 16.2\% | \$927 | 9.6\% | 13.1\% |
|  | Middle | 63 | 44.4\% | \$7,309 | 38.0\% | 55.3\% | 34 | 43.6\% | 43.2\% | \$3,469 | 36.2\% | 38.3\% | 29 | 45.3\% | 44.6\% | \$3,840 | 39.8\% | 41.0\% |
|  | Upper | 50 | 35.2\% | \$8,872 | 46.1\% | 23.5\% | 24 | 30.8\% | 39.9\% | \$3,997 | 41.7\% | 48.1\% | 26 | 40.6\% | 39.0\% | \$4,875 | 50.6\% | 45.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 142 | 100.0\% | \$19,237 | 100.0\% | 100.0\% | 78 | 100.0\% | 100.0\% | \$9,595 | 100.0\% | 100.0\% | 64 | 100.0\% | 100.0\% | \$9,642 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.8\% |
|  | Moderate | 15 | 23.4\% | \$2,523 | 37.7\% | 22.4\% | 4 | 19.0\% | 18.0\% | \$1,086 | 27.4\% | 20.8\% | 11 | 25.6\% | 19.2\% | \$1,437 | 52.5\% | 25.1\% |
|  | Middle | 35 | 54.7\% | \$3,776 | 56.4\% | 58.3\% | 14 | 66.7\% | 53.6\% | \$2,760 | 69.7\% | 54.4\% | 21 | 48.8\% | 52.5\% | \$1,016 | 37.1\% | 48.5\% |
|  | Upper | 14 | 21.9\% | \$398 | 5.9\% | 18.6\% | 3 | 14.3\% | 25.1\% | \$113 | 2.9\% | 24.1\% | 11 | 25.6\% | 25.9\% | \$285 | 10.4\% | 25.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 64 | 100.0\% | \$6,697 | 100.0\% | 100.0\% | 21 | 100.0\% | 100.0\% | \$3,959 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$2,738 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 3.0\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 2.1\% |
|  | Middle | 12 | 100.0\% | \$1,626 | 100.0\% | 75.8\% | 5 | 100.0\% | 79.5\% | \$686 | 100.0\% | 83.7\% | 7 | 100.0\% | 79.6\% | \$940 | 100.0\% | 82.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 21.2\% | 0 | 0.0\% | 16.9\% | \$0 | 0.0\% | 15.2\% | 0 | 0.0\% | 17.0\% | \$0 | 0.0\% | 15.0\% |
|  | 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\% | 0.8\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 12 | 100.0\% | \$1,626 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$686 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$940 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IL Bloomington


[^373]Originations \& Purchases

## Appendices

## Combined Demographics Report

## Assessment Area: IL Central IL

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 3,223 | 14.8 |
| Moderate-income | 1 | 4.3 |  | 3.1 | 55 | 8.1 | 3,839 | 17.6 |
| Middle-income | 19 | 82.6 |  | 86.1 | 1,234 | 6.6 | 5,447 | 25.0 |
| Upper-income | 3 | 13.0 |  | 10.8 | 76 | 3.2 | 9,308 | 42.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 23 | 100.0 |  | 100.0 | 1,365 | 6.3 | 21,817 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \% |  | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 1,203 | 653 |  | 54.3 | 423 | 35.2 | 127 | 10.6 |
| Middle-income | 29,576 | 20,434 |  | 69.1 | 7,175 | 24.3 | 1,967 | 6.7 |
| Upper-income | 3,367 | 2,518 |  | 74.8 | 601 | 17.8 | 248 | 7.4 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 34,146 | 23,605 |  | 69.1 | 8,199 | 24.0 | 2,342 | 6.9 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 109 | 3.3 |  | 3.3 | 3 | 2.1 | 7 | 3.4 |
| Middle-income | 2,934 | 88.3 |  | 88.3 | 131 | 90.3 | 181 | 87.4 |
| Upper-income | 280 | 8.4 |  | 8.4 | 11 | 7.6 | 19 | 9.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 3,323 | 100.0 |  | 100.0 | 145 | 100.0 | 207 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.4 |  | 4.4 |  | 6.2 |
|  | Total Farms by $\quad$ Farms by Tract \& Revenue Size |  |  |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | $\begin{aligned} & \text { Revenue Not } \\ & \text { Reported } \end{aligned}$ |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 2 | 0.3 |  | 0.3 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 607 | 78.9 |  | 78.9 | 1 | 100.0 | 0 | 0.0 |
| Upper-income | 160 | 20.8 |  | 20.8 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 769 | 100.0 |  | 100.0 | 1 | 100.0 | 0 | . 0 |
|  | Percentage of | otal F |  | 99.9 |  | . 1 |  | . 0 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | $\begin{aligned} & \text { 3ank } \\ & \quad \text { Do } \\ & \text { \$(000s) } \end{aligned}$ | lar <br> \$ \% | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count <br> Bank <br> $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar \$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$ (000s) | Dollar <br> k <br> \$ \% | Agg \$ \% |
|  | 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\% | 2.8\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 2.2\% |
|  | Middle | 26 | 96.3\% | \$2,037 | 98.1\% | 86.6\% | 13 | 92.9\% | 87.3\% | \$1,227 | 96.8\% | 85.5\% | 13 | 100.0\% | 88.9\% | \$810 | 100.0\% | 87.0\% |
|  | Upper | 1 | 3.7\% | \$40 | 1.9\% | 10.7\% | 1 | 7.1\% | 10.6\% | \$40 | 3.2\% | 12.9\% | 0 | 0.0\% | 8.4\% | \$0 | 0.0\% | 9.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 1.0\% |
|  | Total | 27 | 100.0\% | \$2,077 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$1,267 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$810 | 100.0\% | 100.0\% |
|  | 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 | 2.0\% | \$153 | 1.7\% | 2.8\% | 2 | 3.4\% | 2.2\% | \$153 | 2.6\% | 2.3\% | 0 | 0.0\% | 3.3\% | \$0 | 0.0\% | 3.1\% |
|  | Middle | 83 | 84.7\% | \$7,598 | 82.6\% | 86.6\% | 50 | 84.7\% | 86.5\% | \$4,832 | 81.5\% | 84.1\% | 33 | 84.6\% | 82.3\% | \$2,766 | 84.7\% | 80.7\% |
|  | Upper | 13 | 13.3\% | \$1,443 | 15.7\% | 10.7\% | 7 | 11.9\% | 11.3\% | \$945 | 15.9\% | 13.6\% | 6 | 15.4\% | 14.3\% | \$498 | 15.3\% | 15.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 98 | 100.0\% | \$9,194 | 100.0\% | 100.0\% | 59 | 100.0\% | 100.0\% | \$5,930 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$3,264 | 100.0\% | 100.0\% |
|  | 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\% | 2.8\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 1.4\% |
|  | Middle | 15 | 93.8\% | \$121 | 97.6\% | 86.6\% | 6 | 85.7\% | 87.5\% | \$43 | 93.5\% | 92.2\% | 9 | 100.0\% | 90.0\% | \$78 | 100.0\% | 89.9\% |
|  | Upper | 1 | 6.3\% | \$3 | 2.4\% | 10.7\% | 1 | 14.3\% | 11.6\% | \$3 | 6.5\% | 5.9\% | 0 | 0.0\% | 7.8\% | \$0 | 0.0\% | 8.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 16 | 100.0\% | \$124 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$46 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$78 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | iily 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\% | 8.7\% | 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\% | 89.4\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 94.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 6.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 1.4\% | \$153 | 1.3\% | 2.8\% | 2 | 2.5\% | 2.1\% | \$153 | 2.1\% | 2.0\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 2.7\% |
|  | Middle | 124 | 87.9\% | \$9,756 | 85.6\% | 86.6\% | 69 | 86.3\% | 86.8\% | \$6,102 | 84.2\% | 84.9\% | 55 | 90.2\% | 85.5\% | \$3,654 | 88.0\% | 83.4\% |
|  | Upper | 15 | 10.6\% | \$1,486 | 13.0\% | 10.7\% | 9 | 11.3\% | 11.1\% | \$988 | 13.6\% | 13.1\% | 6 | 9.8\% | 11.4\% | \$498 | 12.0\% | 13.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.6\% |
|  |  | 141 | 100.0\% | \$11,395 | 100.0\% | 100.0\% | 80 | 100.0\% | 100.0\% | \$7,243 | 100.0\% | 100.0\% | 61 | 100.0\% | 100.0\% | \$4,152 | 100.0\% | 100.0\% |
|  |  |  |  |  | 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 | 2 | 3.9\% | \$20 | 1.6\% | 3.3\% | 0 | 0.0\% | 3.5\% | \$0 | 0.0\% | 1.8\% | 2 | 5.6\% | 3.4\% | \$20 | 2.8\% | 2.2\% |
|  | Middle | 47 | 92.2\% | \$1,190 | 96.0\% | 88.3\% | 14 | 93.3\% | 75.0\% | \$500 | 97.1\% | 74.9\% | 33 | 91.7\% | 79.6\% | \$690 | 95.2\% | 78.6\% |
|  | Upper | 2 | 3.9\% | \$30 | 2.4\% | 8.4\% | 1 | 6.7\% | 14.3\% | \$15 | 2.9\% | 17.2\% | 1 | 2.8\% | 11.1\% | \$15 | 2.1\% | 17.4\% |
|  | 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\% | 7.2\% | \$0 | 0.0\% | 6.1\% | 0 | 0.0\% | 5.9\% | \$0 | 0.0\% | 1.8\% |
|  | Total | 51 | 100.0\% | \$1,240 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$515 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$725 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | 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\% | 0.3\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.5\% |
|  | Middle | 15 | 75.0\% | \$2,280 | 68.2\% | 78.9\% | 7 | 70.0\% | 61.9\% | \$1,119 | 64.5\% | 66.1\% | 8 | 80.0\% | 66.1\% | \$1,161 | 72.1\% | 71.1\% |
|  | Upper | 5 | 25.0\% | \$1,065 | 31.8\% | 20.8\% | 3 | 30.0\% | 36.6\% | \$615 | 35.5\% | 33.3\% | 2 | 20.0\% | 32.8\% | \$450 | 27.9\% | 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\% | 1.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 20 | 100.0\% | \$3,345 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,734 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,611 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IL Central IL


[^375]Originations \& Purchases

## Appendices

## Combined Demographics Report

## Assessment Area: IL Champaign



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

| $\underset{\downarrow}{\underset{\sim}{\sim}}$ | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Owner Occupied Units \% | \# | Count Bank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba $\$(000 s)$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.6\% |
|  | Moderate | 1 | 5.9\% | \$92 | 3.5\% | 18.6\% | 1 | 9.1\% | 15.7\% | \$92 | 6.5\% | 11.0\% | 0 | 0.0\% | 13.8\% | \$0 | 0.0\% | 9.6\% |
|  | Middle | 10 | 58.8\% | \$1,695 | 64.8\% | 52.4\% | 5 | 45.5\% | 54.5\% | \$616 | 43.8\% | 53.5\% | 5 | 83.3\% | 57.2\% | \$1,079 | 89.0\% | 55.1\% |
|  | Upper | 6 | 35.3\% | \$830 | 31.7\% | 28.1\% | 5 | 45.5\% | 29.3\% | \$697 | 49.6\% | 35.3\% | 1 | 16.7\% | 28.7\% | \$133 | 11.0\% | 34.7\% |
|  | 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 | 17 | 100.0\% | \$2,617 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$1,405 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$1,212 | 100.0\% | 100.0\% |
| $\begin{aligned} & 山 \\ & \underset{\sim}{u} \\ & \underset{Z}{Z} \\ & \underset{\sim}{\underset{\sim}{u}} \end{aligned}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 4 | 9.5\% | \$386 | 6.7\% | 18.6\% | 4 | 16.0\% | 9.6\% | \$386 | 11.7\% | 7.0\% | 0 | 0.0\% | 9.8\% | \$0 | 0.0\% | 8.1\% |
|  | Middle | 28 | 66.7\% | \$4,029 | 70.4\% | 52.4\% | 14 | 56.0\% | 54.9\% | \$2,096 | 63.5\% | 56.7\% | 14 | 82.4\% | 53.7\% | \$1,933 | 79.6\% | 49.8\% |
|  | Upper | 10 | 23.8\% | \$1,311 | 22.9\% | 28.1\% | 7 | 28.0\% | 35.1\% | \$817 | 24.8\% | 36.1\% | 3 | 17.6\% | 36.1\% | \$494 | 20.4\% | 41.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 42 | 100.0\% | \$5,726 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$3,299 | 100.0\% | 100.0\% | 17 | 100.0\% | 100.0\% | \$2,427 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 2 | 33.3\% | \$9 | 15.8\% | 18.6\% | 1 | 50.0\% | 13.7\% | \$4 | 19.0\% | 7.8\% | 1 | 25.0\% | 13.7\% | \$5 | 13.9\% | 9.1\% |
|  | Middle | 4 | 66.7\% | \$48 | 84.2\% | 52.4\% | 1 | 50.0\% | 61.1\% | \$17 | 81.0\% | 58.1\% | 3 | 75.0\% | 62.9\% | \$31 | 86.1\% | 60.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 28.1\% | 0 | 0.0\% | 24.3\% | \$0 | 0.0\% | 33.5\% | 0 | 0.0\% | 22.3\% | \$0 | 0.0\% | 30.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 6 | 100.0\% | \$57 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$21 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$36 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 17.6\% | 0 | 0.0\% | 24.3\% | \$0 | 0.0\% | 13.0\% | 0 | 0.0\% | 30.2\% | \$0 | 0.0\% | 24.1\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 45.1\% | 0 | 0.0\% | 48.6\% | \$0 | 0.0\% | 34.7\% | 0 | 0.0\% | 37.7\% | \$0 | 0.0\% | 42.3\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 21.6\% | 0 | 0.0\% | 15.0\% | \$0 | 0.0\% | 18.7\% | 0 | 0.0\% | 17.0\% | \$0 | 0.0\% | 6.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 15.5\% | 0 | 0.0\% | 12.1\% | \$0 | 0.0\% | 33.6\% | 0 | 0.0\% | 14.2\% | \$0 | 0.0\% | 27.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 4.1\% |
|  | Moderate | 7 | 10.8\% | \$487 | 5.8\% | 18.6\% | 6 | 15.8\% | 12.0\% | \$482 | 10.2\% | 11.1\% | 1 | 3.7\% | 11.6\% | \$5 | 0.1\% | 14.0\% |
|  | Middle | 42 | 64.6\% | \$5,772 | 68.7\% | 52.4\% | 20 | 52.6\% | 54.4\% | \$2,729 | 57.8\% | 51.7\% | 22 | 81.5\% | 54.4\% | \$3,043 | 82.8\% | 44.3\% |
|  | Upper | 16 | 24.6\% | \$2,141 | 25.5\% | 28.1\% | 12 | 31.6\% | 32.9\% | \$1,514 | 32.0\% | 35.6\% | 4 | 14.8\% | 33.0\% | \$627 | 17.1\% | 37.6\% |
|  | 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 | 65 | 100.0\% | \$8,400 | 100.0\% | 100.0\% | 38 | 100.0\% | 100.0\% | \$4,725 | 100.0\% | 100.0\% | 27 | 100.0\% | 100.0\% | \$3,675 | 100.0\% | 100.0\% |
|  |  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 4.5\% | 0 | 0.0\% | 4.2\% | \$0 | 0.0\% | 6.6\% | 0 | 0.0\% | 4.9\% | \$0 | 0.0\% | 7.1\% |
|  | Moderate | 6 | 23.1\% | \$324 | 17.9\% | 25.5\% | 1 | 16.7\% | 20.0\% | \$50 | 10.8\% | 21.3\% | 5 | 25.0\% | 20.8\% | \$274 | 20.2\% | 22.9\% |
|  | Middle | 8 | 30.8\% | \$1,124 | 61.9\% | 45.0\% | 2 | 33.3\% | 44.9\% | \$255 | 55.3\% | 45.3\% | 6 | 30.0\% | 43.1\% | \$869 | 64.2\% | 44.7\% |
|  | Upper | 12 | 46.2\% | \$367 | 20.2\% | 23.3\% | 3 | 50.0\% | 25.5\% | \$156 | 33.8\% | 24.5\% | 9 | 45.0\% | 26.6\% | \$211 | 15.6\% | 23.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 1.8\% | \$0 | 0.0\% | 1.4\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.2\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 0.6\% |
|  |  | 26 | 100.0\% | \$1,815 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$461 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$1,354 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 4.8\% | 0 | 0.0\% | 6.6\% | \$0 | 0.0\% | 5.8\% |
|  | Middle | 2 | 100.0\% | \$190 | 100.0\% | 89.3\% | 1 | 100.0\% | 88.5\% | \$90 | 100.0\% | 87.8\% | 1 | 100.0\% | 84.4\% | \$100 | 100.0\% | 80.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 7.7\% | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 7.1\% | 0 | 0.0\% | 8.2\% | \$0 | 0.0\% | 13.4\% |
|  | 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\% | 2.3\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 2 | 100.0\% | \$190 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$90 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$100 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IL Champaign


[^377]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: IL Livingston


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count Bank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \mathrm{Ba} \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | (000s) | Dollar k \$ \% | 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 | 1 | 50.0\% | \$96 | 36.4\% | 84.8\% | 0 | 0.0\% | 80.6\% | \$0 | 0.0\% | 77.4\% | 1 | 100.0\% | 74.0\% | \$96 | 100.0\% | 69.4\% |
|  | Upper | 1 | 50.0\% | \$168 | 63.6\% | 15.2\% | 1 | 100.0\% | 19.4\% | \$168 | 100.0\% | 22.6\% | 0 | 0.0\% | 26.0\% | \$0 | 0.0\% | 30.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2 | 100.0\% | \$264 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$168 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$96 | 100.0\% | 100.0\% |
|  | 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 | 18 | 94.7\% | \$1,862 | 89.8\% | 84.8\% | 9 | 100.0\% | 77.8\% | \$888 | 100.0\% | 76.8\% | 9 | 90.0\% | 79.9\% | \$974 | 82.2\% | 77.8\% |
|  | Upper | 1 | 5.3\% | \$211 | 10.2\% | 15.2\% | 0 | 0.0\% | 22.2\% | \$0 | 0.0\% | 23.2\% | 1 | 10.0\% | 20.1\% | \$211 | 17.8\% | 22.2\% |
|  | 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 | 19 | 100.0\% | \$2,073 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$888 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,185 | 100.0\% | 100.0\% |
|  | 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 | 1 | 100.0\% | \$4 | 100.0\% | 84.8\% | 1 | 100.0\% | 85.4\% | \$4 | 100.0\% | 83.2\% | 0 | 0.0\% | 77.1\% | \$0 | 0.0\% | 80.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 15.2\% | 0 | 0.0\% | 14.6\% | \$0 | 0.0\% | 16.8\% | 0 | 0.0\% | 22.9\% | \$0 | 0.0\% | 19.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$4 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$4 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  |  |  |  | Multi-F | amily 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\% | 84.5\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 69.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 15.5\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 31.0\% | 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\% |
|  |  | 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\% |
|  | 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 | 20 | 90.9\% | \$1,962 | 83.8\% | 84.8\% | 10 | 90.9\% | 78.8\% | \$892 | 84.2\% | 77.0\% | 10 | 90.9\% | 78.1\% | \$1,070 | 83.5\% | 76.9\% |
|  | Upper | 2 | 9.1\% | \$379 | 16.2\% | 15.2\% | 1 | 9.1\% | 21.2\% | \$168 | 15.8\% | 23.0\% | 1 | 9.1\% | 21.9\% | \$211 | 16.5\% | 23.1\% |
|  | 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\% |
|  |  | 22 | 100.0\% | \$2,341 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$1,060 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$1,281 | 100.0\% | 100.0\% |
|  |  |  |  |  | Small | I 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 | 2 | 100.0\% | \$83 | 100.0\% | 81.0\% | 1 | 100.0\% | 71.4\% | \$50 | 100.0\% | 75.5\% | 1 | 100.0\% | 64.0\% | \$33 | 100.0\% | 70.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 19.0\% | 0 | 0.0\% | 21.8\% | \$0 | 0.0\% | 22.8\% | 0 | 0.0\% | 31.1\% | \$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\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 6.8\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 4.9\% | \$0 | 0.0\% | 0.5\% |
|  |  | 2 | 100.0\% | \$83 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$50 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$33 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 79.3\% | 0 | 0.0\% | 85.6\% | \$0 | 0.0\% | 95.7\% | 0 | 0.0\% | 84.7\% | \$0 | 0.0\% | 90.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 20.7\% | 0 | 0.0\% | 12.8\% | \$0 | 0.0\% | 4.0\% | 0 | 0.0\% | 14.6\% | \$0 | 0.0\% | 9.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IL Livingston


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## Appendices

## Combined Demographics Report

Assessment Area: IL Southeast IL


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount ${ }^{\text {B }}$ |  | Dollar |  | Owner Occupied Units \% | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(\mathbf{0 0 0} \mathbf{s}) \end{array}$ | Dollar k $\%$ \$ | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar \$ \% | Agg \$ \% |
|  | 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 | 22.2\% | \$82 | 14.9\% | 12.1\% | 1 | 16.7\% | 10.2\% | \$35 | 8.3\% | 6.2\% | 1 | 33.3\% | 10.6\% | \$47 | 36.4\% | 9.2\% |
|  | Middle | 5 | 55.6\% | \$276 | 50.0\% | 81.8\% | 3 | 50.0\% | 79.7\% | \$194 | 45.9\% | 80.0\% | 2 | 66.7\% | 82.0\% | \$82 | 63.6\% | 81.6\% |
|  | Upper | 2 | 22.2\% | \$194 | 35.1\% | 6.1\% | 2 | 33.3\% | 10.2\% | \$194 | 45.9\% | 13.8\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 8.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.6\% |
|  | Total | 9 | 100.0\% | \$552 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$423 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$129 | 100.0\% | 100.0\% |
|  | 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 | 8.3\% | \$219 | 12.1\% | 12.1\% | 2 | 12.5\% | 6.3\% | \$219 | 18.8\% | 5.4\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 7.4\% |
|  | Middle | 20 | 83.3\% | \$1,305 | 72.2\% | 81.8\% | 12 | 75.0\% | 84.6\% | \$659 | 56.7\% | 81.8\% | 8 | 100.0\% | 83.8\% | \$646 | 100.0\% | 85.3\% |
|  | Upper | 2 | 8.3\% | \$284 | 15.7\% | 6.1\% | 2 | 12.5\% | 9.1\% | \$284 | 24.4\% | 12.8\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 7.3\% |
|  | 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 | 24 | 100.0\% | \$1,808 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$1,162 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$646 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 20.0\% | \$11 | 29.7\% | 12.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 1 | 25.0\% | 10.3\% | \$11 | 40.7\% | 8.9\% |
|  | Middle | 4 | 80.0\% | \$26 | 70.3\% | 81.8\% | 1 | 100.0\% | 97.9\% | \$10 | 100.0\% | 99.7\% | 3 | 75.0\% | 86.8\% | \$16 | 59.3\% | 82.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 6.1\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 8.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 5 | 100.0\% | \$37 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$27 | 100.0\% | 100.0\% |
|  | 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\% | 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\% | 51.7\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 30.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 5 | 13.2\% | \$312 | 13.0\% | 12.1\% | 3 | 13.0\% | 7.3\% | \$254 | 15.9\% | 5.5\% | 2 | 13.3\% | 10.0\% | \$58 | 7.2\% | 8.2\% |
|  | Middle | 29 | 76.3\% | \$1,607 | 67.0\% | 81.8\% | 16 | 69.6\% | 83.8\% | \$863 | 54.1\% | 81.8\% | 13 | 86.7\% | 83.5\% | \$744 | 92.8\% | 83.7\% |
|  | Upper | 4 | 10.5\% | \$478 | 19.9\% | 6.1\% | 4 | 17.4\% | 9.0\% | \$478 | 30.0\% | 12.7\% | 0 | 0.0\% | 6.4\% | \$0 | 0.0\% | 7.9\% |
|  | 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\% | 0.2\% |
|  | Total | 38 | 100.0\% | \$2,397 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$1,595 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$802 | 100.0\% | 100.0\% |
|  | 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 | 7.3\% | \$62 | 2.6\% | 12.8\% | 1 | 5.6\% | 13.1\% | \$20 | 2.7\% | 12.9\% | 3 | 8.1\% | 13.9\% | \$42 | 2.5\% | 18.3\% |
|  | Middle | 48 | 87.3\% | \$2,236 | 93.9\% | 81.8\% | 16 | 88.9\% | 76.1\% | \$651 | 89.1\% | 77.1\% | 32 | 86.5\% | 76.8\% | \$1,585 | 96.1\% | 74.5\% |
|  | Upper | 1 | 1.8\% | \$18 | 0.8\% | 5.4\% | 0 | 0.0\% | 5.8\% | \$0 | 0.0\% | 8.3\% | 1 | 2.7\% | 3.8\% | \$18 | 1.1\% | 6.0\% |
|  | 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 | 2 | 3.6\% | \$65 | 2.7\% |  | 1 | 5.6\% | 5.1\% | \$60 | 8.2\% | 1.7\% | 1 | 2.7\% | 5.5\% | \$5 | 0.3\% | 1.2\% |
|  | Total | 55 | 100.0\% | \$2,381 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$731 | 100.0\% | 100.0\% | 37 | 100.0\% | 100.0\% | \$1,650 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{x}}^{\substack{4}} \\ & \underset{\sim}{\underset{\sim}{x}} \end{aligned}$ | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.4\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 3.3\% | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 1.3\% |
|  |  | 125 | 100.0\% | \$16,525 | 100.0\% | 95.5\% | 61 | 100.0\% | 94.7\% | \$8,618 | 100.0\% | 96.2\% | 64 | 100.0\% | 96.0\% | \$7,907 | 100.0\% | 98.2\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 0.5\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 125 | 100.0\% | \$16,525 | 100.0\% | 100.0\% | 61 | 100.0\% | 100.0\% | \$8,618 | 100.0\% | 100.0\% | 64 | 100.0\% | 100.0\% | \$7,907 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IL Southeast IL


[^381]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: IL Southern IL


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IL Southern IL


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Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IL Southern IL

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  |  | \$ \% | Families by Family Income <br> \% | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { BaI } \\ \$(\mathbf{0 0 0} \mathbf{s}) \end{array}$ | Dollar k \$ \% | Agg \$ \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | Agg \$\% |
|  | Low | 21 | 12.2\% | \$1,117 | 7.0\% | 21.3\% | 8 | 10.0\% | 9.9\% | \$444 | 6.9\% | 5.6\% | 13 | 14.1\% | 8.6\% | \$673 | 7.1\% | 4.9\% |
|  | Moderate | 46 | 26.7\% | \$3,145 | 19.7\% | 19.2\% | 24 | 30.0\% | 23.6\% | \$1,606 | 25.1\% | 17.9\% | 22 | 23.9\% | 20.6\% | \$1,539 | 16.1\% | 15.6\% |
|  | Middle | 54 | 31.4\% | \$4,591 | 28.8\% | 24.3\% | 28 | 35.0\% | 26.7\% | \$1,997 | 31.2\% | 26.1\% | 26 | 28.3\% | 29.8\% | \$2,594 | 27.2\% | 28.2\% |
|  | Upper | 49 | 28.5\% | \$6,865 | 43.1\% | 35.2\% | 20 | 25.0\% | 33.2\% | \$2,353 | 36.8\% | 43.1\% | 29 | 31.5\% | 28.9\% | \$4,512 | 47.3\% | 40.3\% |
|  | Unknown | 2 | 1.2\% | \$228 | 1.4\% | 0.0\% | 0 | 0.0\% | 6.6\% | \$0 | 0.0\% | 7.3\% | 2 | 2.2\% | 12.1\% | \$228 | 2.4\% | 11.0\% |
|  | Total | 172 | 100.0\% | \$15,946 | 100.0\% | 100.0\% | 80 | 100.0\% | 100.0\% | \$6,400 | 100.0\% | 100.0\% | 92 | 100.0\% | 100.0\% | \$9,546 | 100.0\% | 100.0\% |
|  | Low | 27 | 8.8\% | \$1,331 | 4.4\% | 21.3\% | 15 | 10.4\% | 4.6\% | \$686 | 4.7\% | 2.3\% | 12 | 7.4\% | 4.3\% | \$645 | 4.0\% | 2.1\% |
|  | Moderate | 61 | 19.9\% | \$4,383 | 14.3\% | 19.2\% | 28 | 19.4\% | 12.9\% | \$2,021 | 13.9\% | 8.4\% | 33 | 20.4\% | 12.1\% | \$2,362 | 14.8\% | 7.6\% |
|  | Middle | 88 | 28.8\% | \$7,905 | 25.9\% | 24.3\% | 40 | 27.8\% | 23.5\% | \$3,883 | 26.6\% | 19.4\% | 48 | 29.6\% | 23.5\% | \$4,022 | 25.2\% | 19.9\% |
|  | Upper | 124 | 40.5\% | \$16,275 | 53.3\% | 35.2\% | 60 | 41.7\% | 47.3\% | \$7,828 | 53.7\% | 56.6\% | 64 | 39.5\% | 45.0\% | \$8,447 | 52.9\% | 54.1\% |
|  | Unknown | 6 | 2.0\% | \$663 | 2.2\% | 0.0\% | 1 | 0.7\% | 11.6\% | \$161 | 1.1\% | 13.3\% | 5 | 3.1\% | 15.1\% | \$502 | 3.1\% | 16.3\% |
|  | Total | 306 | 100.0\% | \$30,557 | 100.0\% | 100.0\% | 144 | 100.0\% | 100.0\% | \$14,579 | 100.0\% | 100.0\% | 162 | 100.0\% | 100.0\% | \$15,978 | 100.0\% | 100.0\% |
|  | Low | 8 | 14.8\% | \$41 | 9.0\% | 21.3\% | 4 | 16.7\% | 7.9\% | \$15 | 5.8\% | 2.9\% | 4 | 13.3\% | 9.6\% | \$26 | 13.3\% | 4.9\% |
|  | Moderate | 10 | 18.5\% | \$43 | 9.5\% | 19.2\% | 3 | 12.5\% | 20.0\% | \$16 | 6.2\% | 15.3\% | 7 | 23.3\% | 14.8\% | \$27 | 13.8\% | 8.5\% |
|  | Middle | 14 | 25.9\% | \$132 | 29.0\% | 24.3\% | 7 | 29.2\% | 26.8\% | \$67 | 25.9\% | 20.9\% | 7 | 23.3\% | 27.3\% | \$65 | 33.2\% | 26.3\% |
|  | Upper | 22 | 40.7\% | \$239 | 52.5\% | 35.2\% | 10 | 41.7\% | 41.2\% | \$161 | 62.2\% | 54.1\% | 12 | 40.0\% | 40.2\% | \$78 | 39.8\% | 52.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 6.8\% | 0 | 0.0\% | 8.1\% | \$0 | 0.0\% | 7.9\% |
|  | Total | 54 | 100.0\% | \$455 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$259 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$196 | 100.0\% | 100.0\% |
|  | 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\% | 19.2\% | 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\% | 24.3\% | 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\% | 35.2\% | 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\% |
|  | Low | 56 | 10.5\% | \$2,489 | 5.3\% | 21.3\% | 27 | 10.9\% | 6.5\% | \$1,145 | 5.4\% | 3.3\% | 29 | 10.2\% | 6.2\% | \$1,344 | 5.2\% | 3.0\% |
|  | Moderate | 117 | 22.0\% | \$7,571 | 16.1\% | 19.2\% | 55 | 22.2\% | 16.7\% | \$3,643 | 17.2\% | 11.3\% | 62 | 21.8\% | 15.1\% | \$3,928 | 15.3\% | 9.8\% |
|  | Middle | 156 | 29.3\% | \$12,628 | 26.9\% | 24.3\% | 75 | 30.2\% | 24.6\% | \$5,947 | 28.0\% | 21.2\% | 81 | 28.5\% | 25.8\% | \$6,681 | 26.0\% | 22.1\% |
|  | Upper | 195 | 36.7\% | \$23,379 | 49.8\% | 35.2\% | 90 | 36.3\% | 42.3\% | \$10,342 | 48.7\% | 51.9\% | 105 | 37.0\% | 39.2\% | \$13,037 | 50.7\% | 47.9\% |
|  | Unknown | 8 | 1.5\% | \$891 | 1.9\% | 0.0\% | 1 | 0.4\% | 9.9\% | \$161 | 0.8\% | 12.4\% | 7 | 2.5\% | 13.7\% | \$730 | 2.8\% | 17.1\% |
|  | Total | 532 | 100.0\% | \$46,958 | 100.0\% | 100.0\% | 248 | 100.0\% | 100.0\% | \$21,238 | 100.0\% | 100.0\% | 284 | 100.0\% | 100.0\% | \$25,720 | 100.0\% | 100.0\% |
|  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 89 | 33.2\% | \$5,146 | 22.9\% | 89.8\% | 46 | 53.5\% | 37.9\% | \$2,834 | 34.9\% | 45.7\% | 43 | 23.6\% | 38.6\% | \$2,312 | 16.1\% | 38.6\% |
|  | Over \$1 Million | 59 | 22.0\% | \$14,318 | 63.6\% | 4.7\% | 27 | 31.4\% |  |  |  |  | 32 | 17.6\% |  |  |  |  |
|  | Total Rev. available | 148 | 55.2\% | \$19,464 | 86.5\% | 94.5\% | 73 | 84.9\% |  |  |  |  | 75 | 41.2\% |  |  |  |  |
|  | Rev. Not Known | 120 | 44.8\% | \$3,031 | 13.5\% | 5.4\% | 13 | 15.1\% |  |  |  |  | 107 | 58.8\% |  |  |  |  |
|  | Total | 268 | 100.0\% | \$22,495 | 100.0\% | 100.0\% | 86 | 100.0\% |  |  |  |  | 182 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 223 | 83.2\% | \$6,780 | 30.1\% |  | 68 | 79.1\% | 90.3\% | \$2,758 | 33.9\% | 29.1\% | 155 | 85.2\% | 91.7\% | \$4,022 | 28.0\% | 30.8\% |
|  | \$100,001-\$250,000 | 22 | 8.2\% | \$3,929 | 17.5\% |  | 11 | 12.8\% | 5.0\% | \$1,880 | 23.1\% | 18.3\% | 11 | 6.0\% | 4.2\% | \$2,049 | 14.3\% | 17.2\% |
|  | \$250,001-\$1 Million | 23 | 8.6\% | \$11,786 | 52.4\% |  | 7 | 8.1\% | 4.7\% | \$3,490 | 42.9\% | 52.6\% | 16 | 8.8\% | 4.2\% | \$8,296 | 57.7\% | 51.9\% |
|  | Total | 268 | 100.0\% | \$22,495 | 100.0\% |  | 86 | 100.0\% | 100.0\% | \$8,128 | 100.0\% | 100.0\% | 182 | 100.0\% | 100.0\% | \$14,367 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 63 | 74.1\% | \$5,483 | 62.0\% | 99.3\% | 37 | 80.4\% | 83.1\% | \$3,539 | 73.1\% | 69.9\% | 26 | 66.7\% | 79.5\% | \$1,944 | 48.6\% | 66.7\% |
|  |  | 15 | 17.6\% | \$3,257 | 36.8\% | 0.6\% | 8 | 17.4\% |  |  |  |  | 7 | 17.9\% |  |  |  |  |
|  |  | 7 | 8.2\% | \$101 | 1.1\% | 0.2\% | 1 | 2.2\% |  |  |  |  | 6 | 15.4\% |  |  |  |  |
|  |  | 85 | 100.0\% | \$8,841 | 100.0\% | 100.0\% | 46 | 100.0\% |  |  |  |  | 39 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 58 | 68.2\% | \$2,678 | 30.3\% |  | 31 | 67.4\% | 80.8\% | \$1,542 | 31.9\% | 37.4\% | 27 | 69.2\% | 78.2\% | \$1,136 | 28.4\% | 36.3\% |
|  | \$100,001-\$250,000 | 16 | 18.8\% | \$2,591 | 29.3\% |  | 9 | 19.6\% | 12.1\% | \$1,450 | 30.0\% | 28.3\% | 7 | 17.9\% | 15.1\% | \$1,141 | 28.5\% | 32.3\% |
|  | \$250,001-\$500,000 | 11 | 12.9\% | \$3,572 | 40.4\% |  | 6 | 13.0\% | 7.2\% | \$1,848 | 38.2\% | 34.3\% | 5 | 12.8\% | 6.7\% | \$1,724 | 43.1\% | 31.4\% |
|  | Total | 85 | 100.0\% | \$8,841 | 100.0\% |  | 46 | 100.0\% | 100.0\% | \$4,840 | 100.0\% | 100.0\% | 39 | 100.0\% | 100.0\% | \$4,001 | 100.0\% | 100.0\% |

[^383]Originations \& Purchases

## Appendices

## Combined Demographics Report

## Assessment Area: IL Springfield



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: IL Springfield

| $\stackrel{山}{\stackrel{\rightharpoonup}{\unrhd}}$ | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison   <br> 2010 2011  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{aligned} & \text { F } \\ & \text { B } \\ & \text { O} \\ & \text { 몸 } \end{aligned}$ |  | ount |  | Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count ank \% | Agg $\%$ | ( ${ }_{\text {Ba }}$ | Dollar k \$ \% | Agg \$ \% | \# | Count nk \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \% $\begin{array}{r}\text { Bank } \\ \text { \$ (000s) }\end{array}$ | Dollar | Agg \$ \% |
|  | Low | 2 | 5.4\% | \$317 | 6.9\% | 2.6\% | 1 | 6.7\% | 1.1\% | \$251 | 13.9\% | 0.5\% | 1 | 4.5\% | 1.2\% | \$66 | 2.4\% | 0.6\% |
|  | Moderate | 5 | 13.5\% | \$286 | 6.2\% | 20.5\% | 3 | 20.0\% | 12.9\% | \$192 | 10.6\% | 6.6\% | 2 | 9.1\% | 14.5\% | \$94 | 3.3\% | 7.7\% |
|  | Middle | 17 | 45.9\% | \$1,858 | 40.3\% | 40.9\% | 6 | 40.0\% | 40.1\% | \$670 | 37.1\% | 34.7\% | 11 | 50.0\% | 40.6\% | \$1,188 | 42.3\% | 35.3\% |
|  | Upper | 13 | 35.1\% | \$2,151 | 46.6\% | 36.0\% | 5 | 33.3\% | 45.9\% | \$692 | 38.3\% | 58.2\% | 8 | 36.4\% | 43.8\% | \$1,459 | 52.0\% | 56.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 37 | 100.0\% | \$4,612 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$1,805 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$2,807 | 100.0\% | 100.0\% |
|  | Low | 1 | 1.9\% | \$8 | 0.1\% | 2.6\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.4\% | 1 | 5.6\% | 0.6\% | \$8 | 0.4\% | 0.2\% |
|  | Moderate | 5 | 9.6\% | \$296 | 5.1\% | 20.5\% | 4 | 11.8\% | 6.7\% | \$214 | 5.4\% | 3.2\% | 1 | 5.6\% | 8.2\% | \$82 | 4.4\% | 3.8\% |
|  | Middle | 13 | 25.0\% | \$1,316 | 22.7\% | 40.9\% | 8 | 23.5\% | 33.8\% | \$918 | 23.4\% | 27.4\% | 5 | 27.8\% | 35.9\% | \$398 | 21.4\% | 29.0\% |
|  | Upper | 33 | 63.5\% | \$4,172 | 72.0\% | 36.0\% | 22 | 64.7\% | 58.9\% | \$2,798 | 71.2\% | 69.0\% | 11 | 61.1\% | 55.4\% | \$1,374 | 73.8\% | 66.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 52 | 100.0\% | \$5,792 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$3,930 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$1,862 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.6\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 1 | 20.0\% | \$10 | 29.4\% | 20.5\% | 1 | 33.3\% | 12.4\% | \$10 | 41.7\% | 5.9\% | 0 | 0.0\% | 9.2\% | \$0 | 0.0\% | 4.4\% |
|  | Middle | 1 | 20.0\% | \$5 | 14.7\% | 40.9\% | 0 | 0.0\% | 42.8\% | \$0 | 0.0\% | 36.6\% | 1 | 50.0\% | 40.4\% | \$5 | 50.0\% | 35.7\% |
|  | Upper | 3 | 60.0\% | \$19 | 55.9\% | 36.0\% | 2 | 66.7\% | 43.5\% | \$14 | 58.3\% | 57.0\% | 1 | 50.0\% | 49.2\% | \$5 | 50.0\% | 59.6\% |
|  | 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 | 5 | 100.0\% | \$34 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$24 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% |
|  |  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 12.1\% | 0 | 0.0\% | 7.1\% | \$0 | 0.0\% | 18.2\% | 0 | 0.0\% | 11.8\% | \$0 | 0.0\% | 30.9\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 41.8\% | 0 | 0.0\% | 39.3\% | \$0 | 0.0\% | 21.6\% | 0 | 0.0\% | 41.2\% | \$0 | 0.0\% | 38.8\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.1\% | 0 | 0.0\% | 28.6\% | \$0 | 0.0\% | 39.0\% | 0 | 0.0\% | 23.5\% | \$0 | 0.0\% | 9.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 24.0\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 21.2\% | 0 | 0.0\% | 23.5\% | \$0 | 0.0\% | 21.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 3 | 3.2\% | \$325 | 3.1\% | 2.6\% | 1 | 1.9\% | 0.8\% | \$251 | 4.4\% | 0.9\% | 2 | 4.8\% | 0.8\% | \$74 | 1.6\% | 1.3\% |
|  | Moderate | 11 | 11.7\% | \$592 | 5.7\% | 20.5\% | 8 | 15.4\% | 8.7\% | \$416 | 7.2\% | 4.5\% | 3 | 7.1\% | 10.4\% | \$176 | 3.8\% | 6.2\% |
|  | Middle | 31 | 33.0\% | \$3,179 | 30.5\% | 40.9\% | 14 | 26.9\% | 36.0\% | \$1,588 | 27.6\% | 29.7\% | 17 | 40.5\% | 37.6\% | \$1,591 | 34.0\% | 30.5\% |
|  | Upper | 49 | 52.1\% | \$6,342 | 60.8\% | 36.0\% | 29 | 55.8\% | 54.5\% | \$3,504 | 60.8\% | 65.0\% | 20 | 47.6\% | 51.2\% | \$2,838 | 60.7\% | 62.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 94 | 100.0\% | \$10,438 | 100.0\% | 100.0\% | 52 | 100.0\% | 100.0\% | \$5,759 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$4,679 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 2 | 5.9\% | \$423 | 17.1\% | 6.6\% | 0 | 0.0\% | 5.6\% | \$0 | 0.0\% | 5.2\% | 2 | 9.5\% | 5.8\% | \$423 | 27.7\% | 6.2\% |
|  | Moderate | 6 | 17.6\% | \$62 | 2.5\% | 23.1\% | 2 | 15.4\% | 25.0\% | \$25 | 2.6\% | 35.6\% | 4 | 19.0\% | 22.2\% | \$37 | 2.4\% | 31.2\% |
|  | Middle | 14 | 41.2\% | \$1,204 | 48.6\% | 33.3\% | 6 | 46.2\% | 29.2\% | \$667 | 70.3\% | 22.6\% | 8 | 38.1\% | 29.6\% | \$537 | 35.2\% | 25.9\% |
|  | Upper | 12 | 35.3\% | \$786 | 31.8\% | 37.0\% | 5 | 38.5\% | 38.9\% | \$257 | 27.1\% | 36.3\% | 7 | 33.3\% | 40.5\% | \$529 | 34.7\% | 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\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 34 | 100.0\% | \$2,475 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$949 | 100.0\% | 100.0\% | 21 | 100.0\% | 100.0\% | \$1,526 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 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\% | 3.0\% | 0 | 0.0\% | 4.9\% | \$0 | 0.0\% | 3.1\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 2.8\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 63.6\% | 0 | 0.0\% | 67.2\% | \$0 | 0.0\% | 65.0\% | 0 | 0.0\% | 66.0\% | \$0 | 0.0\% | 58.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 32.9\% | 0 | 0.0\% | 26.2\% | \$0 | 0.0\% | 31.6\% | 0 | 0.0\% | 32.0\% | \$0 | 0.0\% | 38.4\% |
|  | 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\% | 1.6\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: IN Bloomington


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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IN Bloomington


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IN Bloomington


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## Appendices

## Combined Demographics Report

Assessment Area: IN Clinton-Grant


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: IN Clinton-Grant



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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size



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## Appendices

## Combined Demographics Report

Assessment Area: IN Evansville


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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IN Evansville


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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IN Gary

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner Occupied Units \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  | A | Bank |  | A | Bank |  | gg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | 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\% | 5.7\% | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 5.0\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 3.2\% |
|  | Middle | 3 | 100.0\% | \$351 | 100.0\% | 94.3\% | 0 | 0.0\% | 95.0\% | \$0 | 0.0\% | 95.0\% | 3 | 100.0\% | 96.1\% | \$351 | 100.0\% | 96.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 3 | 100.0\% | \$351 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$351 | 100.0\% | 100.0\% |
|  | 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\% | 5.7\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 2.9\% |
|  | Middle | 2 | 100.0\% | \$124 | 100.0\% | 94.3\% | 1 | 100.0\% | 97.9\% | \$29 | 100.0\% | 98.3\% | 1 | 100.0\% | 97.1\% | \$95 | 100.0\% | 97.1\% |
|  | 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 | 2 | 100.0\% | \$124 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$29 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$95 | 100.0\% | 100.0\% |
|  | 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\% | 5.7\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 3.3\% | \$0 | 0.0\% | 5.7\% |
|  | Middle | 1 | 100.0\% | \$3 | 100.0\% | 94.3\% | 0 | 0.0\% | 98.1\% | \$0 | 0.0\% | 99.8\% | 1 | 100.0\% | 96.7\% | \$3 | 100.0\% | 94.3\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$3 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$3 | 100.0\% | 100.0\% |
| 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\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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\% | 5.7\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 2.6\% | 0 | 0.0\% | 3.2\% | \$0 | 0.0\% | 2.9\% |
|  | Middle | 6 | 100.0\% | \$478 | 100.0\% | 94.3\% | 1 | 100.0\% | 97.1\% | \$29 | 100.0\% | 97.4\% | 5 | 100.0\% | 96.8\% | \$449 | 100.0\% | 97.1\% |
|  | 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 | 6 | 100.0\% | \$478 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$29 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$449 | 100.0\% | 100.0\% |
| Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 8 | 100.0\% | \$3,032 | 100.0\% | 98.1\% | 3 | 100.0\% | 91.4\% | \$1,993 | 100.0\% | 97.8\% | 5 | 100.0\% | 90.4\% | \$1,039 | 100.0\% | 97.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 7.9\% | \$0 | 0.0\% | 2.1\% | 0 | 0.0\% | 9.2\% | \$0 | 0.0\% | 2.6\% |
|  | Total | 8 | 100.0\% | \$3,032 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$1,993 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$1,039 | 100.0\% | 100.0\% |
| Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 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\% |
|  |  | 1 | 100.0\% | \$500 | 100.0\% | 99.3\% | 1 | 100.0\% | 100.0\% | \$500 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 1 | 100.0\% | \$500 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$500 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: IN Knox-Lawrence

| Income Categories | Tract Distribution |  | Families by Tract Income |  | $\begin{gathered} \hline \text { Families < Poverty } \\ \text { Level as \% of } \\ \text { Families by Tract } \end{gathered}$ |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 4,850 | 20.9 |
| Moderate-income | 7 | 35.0 |  | 24.1 | 846 | 15.1 | 4,679 | 20.2 |
| Middle-income | 13 | 65.0 |  | 75.9 | 1,284 | 7.3 | 5,629 | 24.3 |
| Upper-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 8,028 | 34.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 20 | 100.0 |  | 100.0 | 2,130 | 9.2 | 23,186 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 10,849 | 5,776 |  | 53.2 | 3,776 | 34.8 | 1,297 | 12.0 |
| Middle-income | 27,016 | 19,580 |  | 72.5 | 4,955 | 18.3 | 2,481 | 9.2 |
| Upper-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 37,865 | 25,356 |  | 67.0 | 8,731 | 23.1 | 3,778 | 10.0 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 1,109 | 31.1 |  | 30.7 | 65 | 35.1 | 53 | 34.2 |
| Middle-income | 2,455 | 68.9 |  | 69.3 | 120 | 64.9 | 102 | 65.8 |
| Upper-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 3,564 | 100.0 |  | 100.0 | 185 | 100.0 | 155 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 90.5 |  | 5.2 |  | 4.3 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 26 | 6.8 |  | 6.7 | 1 | 14.3 | 0 | 0.0 |
| Middle-income | 354 | 93.2 |  | 93.3 | 6 | 85.7 | 0 | 0.0 |
| Upper-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 380 | 100.0 |  | 100.0 | 7 | 100.0 | 0 | . 0 |
|  | Percentage of Total Farms: |  |  | 98.2 |  | 1.8 |  | . 0 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IN Knox-Lawrence

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | B |  | nk |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol |  | Units |  | ank | Agg | Ba |  | Agg |  | ank | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | 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 | 31.6\% | \$1,743 | 18.7\% | 22.8\% | 21 | 38.2\% | 22.8\% | \$1,105 | 22.3\% | 16.4\% | 10 | 23.3\% | 23.3\% | \$638 | 14.7\% | 13.6\% |
|  | Middle | 67 | 68.4\% | \$7,558 | 81.3\% | 77.2\% | 34 | 61.8\% | 77.2\% | \$3,856 | 77.7\% | 83.6\% | 33 | 76.7\% | 76.7\% | \$3,702 | 85.3\% | 86.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 98 | 100.0\% | \$9,301 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$4,961 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$4,340 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 17 | 14.0\% | \$946 | 6.3\% | 22.8\% | 10 | 17.9\% | 14.0\% | \$585 | 8.1\% | 9.6\% | 7 | 10.8\% | 18.3\% | \$361 | 4.6\% | 11.3\% |
|  | Middle | 104 | 86.0\% | \$14,137 | 93.7\% | 77.2\% | 46 | 82.1\% | 86.0\% | \$6,648 | 91.9\% | 90.4\% | 58 | 89.2\% | 81.7\% | \$7,489 | 95.4\% | 88.7\% |
|  | 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 | 121 | 100.0\% | \$15,083 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$7,233 | 100.0\% | 100.0\% | 65 | 100.0\% | 100.0\% | \$7,850 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 8 | 53.3\% | \$47 | 31.1\% | 22.8\% | 4 | 44.4\% | 25.8\% | \$23 | 21.5\% | 20.1\% | 4 | 66.7\% | 24.2\% | \$24 | 54.5\% | 12.9\% |
|  | Middle | 7 | 46.7\% | \$104 | 68.9\% | 77.2\% | 5 | 55.6\% | 74.2\% | \$84 | 78.5\% | 79.9\% | 2 | 33.3\% | 75.8\% | \$20 | 45.5\% | 87.1\% |
|  | 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 | 15 | 100.0\% | \$151 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$107 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$44 | 100.0\% | 100.0\% |
| 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\% | 46.9\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 38.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 53.1\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 61.8\% | 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\% |
|  | 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\% |
|  | 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 | 56 | 23.9\% | \$2,736 | 11.2\% | 22.8\% | 35 | 29.2\% | 18.3\% | \$1,713 | 13.9\% | 12.4\% | 21 | 18.4\% | 20.8\% | \$1,023 | 8.4\% | 12.3\% |
|  | Middle | 178 | 76.1\% | \$21,799 | 88.8\% | 77.2\% | 85 | 70.8\% | 81.7\% | \$10,588 | 86.1\% | 87.6\% | 93 | 81.6\% | 79.2\% | \$11,211 | 91.6\% | 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 | 234 | 100.0\% | \$24,535 | 100.0\% | 100.0\% | 120 | 100.0\% | 100.0\% | \$12,301 | 100.0\% | 100.0\% | 114 | 100.0\% | 100.0\% | \$12,234 | 100.0\% | 100.0\% |
|  | 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 | 63 | 38.7\% | \$6,296 | 40.9\% | 30.7\% | 22 | 38.6\% | 27.0\% | \$2,570 | 35.8\% | 26.2\% | 41 | 38.7\% | 29.9\% | \$3,726 | 45.4\% | 31.2\% |
|  | Middle | 100 | 61.3\% | \$9,088 | 59.1\% | 69.3\% | 35 | 61.4\% | 68.0\% | \$4,607 | 64.2\% | 71.6\% | 65 | 61.3\% | 66.0\% | \$4,481 | 54.6\% | 68.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 5.1\% | \$0 | 0.0\% | 2.2\% | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 163 | 100.0\% | \$15,384 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$7,177 | 100.0\% | 100.0\% | 106 | 100.0\% | 100.0\% | \$8,207 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\underset{\sim}{c}}^{\substack{4}} \\ & \underset{\sim}{\underset{N}{\gtrless}} \end{aligned}$ | 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\% | 6.7\% | 0 | 0.0\% | 1.8\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 2.9\% |
|  | Middle | 66 | 100.0\% | \$8,702 | 100.0\% | 93.3\% | 28 | 100.0\% | 95.6\% | \$4,091 | 100.0\% | 98.2\% | 38 | 100.0\% | 98.0\% | \$4,611 | 100.0\% | 97.1\% |
|  | 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\% | 2.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 66 | 100.0\% | \$8,702 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$4,091 | 100.0\% | 100.0\% | 38 | 100.0\% | 100.0\% | \$4,611 | 100.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 20 | 20.4\% | \$1,083 | 11.6\% | 20.9\% | 12 | 21.8\% | 16.2\% | \$653 | 13.2\% | 10.1\% | 8 | 18.6\% | 11.2\% | \$430 | 9.9\% | 7.8\% |
|  | Moderate |  | 31.6\% | \$2,662 | 28.6\% | 20.2\% | 16 | 29.1\% | 29.8\% | \$1,371 | 27.6\% | 24.4\% | 15 | 34.9\% | 21.0\% | \$1,291 | 29.7\% | 17.1\% |
|  | Middle | 20 | 20.4\% | \$1,982 | 21.3\% | 24.3\% | 14 | 25.5\% | 23.3\% | \$1,360 | 27.4\% | 24.9\% | 6 | 14.0\% | 21.7\% | \$622 | 14.3\% | 23.5\% |
|  | Upper | 27 | 27.6\% | \$3,574 | 38.4\% | 34.6\% | 13 | 23.6\% | 20.3\% | \$1,577 | 31.8\% | 29.8\% | 14 | 32.6\% | 24.8\% | \$1,997 | 46.0\% | 36.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.3\% | \$0 | 0.0\% | 10.8\% | 0 | 0.0\% | 21.3\% | \$0 | 0.0\% | 14.7\% |
|  | Total | 98 | 100.0\% | \$9,301 | 100.0\% | 100.0\% | 55 | 100.0\% | 100.0\% | \$4,961 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$4,340 | 100.0\% | 100.0\% |
|  | Low | 12 | 9.9\% | \$736 | 4.9\% | 20.9\% | 6 | 10.7\% | 6.7\% | \$390 | 5.4\% | 4.0\% | 6 | 9.2\% | 6.7\% | \$346 | 4.4\% | 3.4\% |
|  | Moderate | 16 | 13.2\% | \$1,123 | 7.4\% | 20.2\% | 6 | 10.7\% | 15.5\% | \$423 | 5.8\% | 10.4\% | 10 | 15.4\% | 12.2\% | \$700 | 8.9\% | 8.6\% |
|  | Middle | 27 | 22.3\% | \$2,770 | 18.4\% | 24.3\% | 15 | 26.8\% | 19.2\% | \$1,565 | 21.6\% | 16.9\% | 12 | 18.5\% | 15.4\% | \$1,205 | 15.4\% | 14.0\% |
|  | Upper | 64 | 52.9\% | \$10,285 | 68.2\% | 34.6\% | 28 | 50.0\% | 35.0\% | \$4,765 | 65.9\% | 42.5\% | 36 | 55.4\% | 38.6\% | \$5,520 | 70.3\% | 49.0\% |
|  | Unknown | 2 | 1.7\% | \$169 | 1.1\% | 0.0\% | 1 | 1.8\% | 23.6\% | \$90 | 1.2\% | 26.2\% | 1 | 1.5\% | 27.1\% | \$79 | 1.0\% | 25.0\% |
|  | Total | 121 | 100.0\% | \$15,083 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$7,233 | 100.0\% | 100.0\% | 65 | 100.0\% | 100.0\% | \$7,850 | 100.0\% | 100.0\% |
|  | Low | 3 | 20.0\% | \$13 | 8.6\% | 20.9\% | 1 | 11.1\% | 11.3\% | \$4 | 3.7\% | 5.1\% | 2 | 33.3\% | 12.4\% | \$9 | 20.5\% | 6.5\% |
|  | Moderate | 2 | 13.3\% | \$14 | 9.3\% | 20.2\% | 2 | 22.2\% | 20.2\% | \$14 | 13.1\% | 11.1\% | 0 | 0.0\% | 15.5\% | \$0 | 0.0\% | 12.8\% |
|  | Middle | 3 | 20.0\% | \$27 | 17.9\% | 24.3\% | 3 | 33.3\% | 28.2\% | \$27 | 25.2\% | 26.2\% | 0 | 0.0\% | 16.5\% | \$0 | 0.0\% | 13.9\% |
|  | Upper | 7 | 46.7\% | \$97 | 64.2\% | 34.6\% | 3 | 33.3\% | 36.3\% | \$62 | 57.9\% | 54.1\% | 4 | 66.7\% | 32.5\% | \$35 | 79.5\% | 56.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 3.5\% | 0 | 0.0\% | 23.2\% | \$0 | 0.0\% | 10.1\% |
|  | Total | 15 | 100.0\% | \$151 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$107 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$44 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 20.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 24.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 34.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 35 | 15.0\% | \$1,832 | 7.5\% | 20.9\% | 19 | 15.8\% | 10.6\% | \$1,047 | 8.5\% | 6.3\% | 16 | 14.0\% | 9.0\% | \$785 | 6.4\% | 5.3\% |
|  | Moderate | 49 | 20.9\% | \$3,799 | 15.5\% | 20.2\% | 24 | 20.0\% | 21.1\% | \$1,808 | 14.7\% | 15.5\% | 25 | 21.9\% | 15.9\% | \$1,991 | 16.3\% | 12.1\% |
|  | Middle | 50 | 21.4\% | \$4,779 | 19.5\% | 24.3\% | 32 | 26.7\% | 21.4\% | \$2,952 | 24.0\% | 20.0\% | 18 | 15.8\% | 17.9\% | \$1,827 | 14.9\% | 17.7\% |
|  | Upper | 98 | 41.9\% | \$13,956 | 56.9\% | 34.6\% | 44 | 36.7\% | 29.6\% | \$6,404 | 52.1\% | 38.0\% | 54 | 47.4\% | 32.7\% | \$7,552 | 61.7\% | 44.2\% |
|  | Unknown | 2 | 0.9\% | \$169 | 0.7\% | 0.0\% | 1 | 0.8\% | 17.3\% | \$90 | 0.7\% | 20.2\% | 1 | 0.9\% | 24.6\% | \$79 | 0.6\% | 20.7\% |
|  | Total | 234 | 100.0\% | \$24,535 | 100.0\% | 100.0\% | 120 | 100.0\% | 100.0\% | \$12,301 | 100.0\% | 100.0\% | 114 | 100.0\% | 100.0\% | \$12,234 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 57 | 35.0\% | \$3,483 | 22.6\% | 90.5\% | 29 | 50.9\% | 45.2\% | \$1,461 | 20.4\% | 41.6\% | 28 | 26.4\% | 49.1\% | \$2,022 | 24.6\% | 47.9\% |
|  | Over \$1 Million | 44 | 27.0\% | \$10,052 | 65.3\% | 5.2\% |  | 38.6\% |  |  |  |  | 22 | 20.8\% |  |  |  |  |
|  | Total Rev. available | 101 | 62.0\% | \$13,535 | 87.9\% | 95.7\% |  | 89.5\% |  |  |  |  | 50 | 47.2\% |  |  |  |  |
|  | Rev. Not Known | 62 | 38.0\% | \$1,849 | 12.0\% | 4.3\% | 6 | 10.5\% |  |  |  |  | 56 | 52.8\% |  |  |  |  |
|  | Total | 163 | 100.0\% | \$15,384 | 100.0\% | 100.0\% |  | 100.0\% |  |  |  |  | 106 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 128 | 78.5\% | \$4,322 | 28.1\% |  | 37 | 64.9\% | 85.6\% | \$1,309 | 18.2\% | 29.4\% | 91 | 85.8\% | 85.6\% | \$3,013 | 36.7\% | 31.8\% |
|  | \$100,001-\$250,000 | 20 | 12.3\% | \$3,410 | 22.2\% |  | 12 | 21.1\% | 8.4\% | \$2,050 | 28.6\% | 23.3\% | 8 | 7.5\% | 9.7\% | \$1,360 | 16.6\% | 26.9\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ | 15 | 9.2\% | \$7,652 | 49.7\% |  | 8 | 14.0\% | 6.0\% | \$3,818 | 53.2\% | 47.3\% | 7 | 6.6\% | 4.8\% | \$3,834 | 46.7\% | 41.4\% |
|  | Total | 163 | 100.0\% | \$15,384 | 100.0\% |  | 57 | 100.0\% | 100.0\% | \$7,177 | 100.0\% | 100.0\% | 106 | 100.0\% | 100.0\% | \$8,207 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 42 | 63.6\% | \$4,759 | 54.7\% | 98.2\% | 19 | 67.9\% | 75.3\% | \$1,939 | 47.4\% | 65.7\% | 23 | 60.5\% | 72.9\% | \$2,820 | 61.2\% | 62.2\% |
|  |  | 18 | 27.3\% | \$3,849 | 44.2\% | 1.8\% | 9 | 32.1\% |  |  |  |  | 9 | 23.7\% |  |  |  |  |
|  |  | 6 | 9.1\% | \$94 | 1.1\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 6 | 15.8\% |  |  |  |  |
|  |  | 66 | 100.0\% | \$8,702 | 100.0\% | 100.0\% | 28 | 100.0\% |  |  |  |  | 38 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 40 | 60.6\% | \$2,191 | 25.2\% |  | 16 | 57.1\% | 66.2\% | \$970 | 23.7\% | 27.0\% | 24 | 63.2\% | 64.7\% | \$1,221 | 26.5\% | 26.0\% |
|  | \$100,001-\$250,000 | 14 | 21.2\% | \$1,930 | 22.2\% |  | 6 | 21.4\% | 22.9\% | \$860 | 21.0\% | 36.3\% | 8 | 21.1\% | 23.9\% | \$1,070 | 23.2\% | 36.0\% |
|  | \$250,001-\$500,000 | 12 | 18.2\% | \$4,581 | 52.6\% |  | 6 | 21.4\% | 10.9\% | \$2,261 | 55.3\% | 36.7\% | 6 | 15.8\% | 11.4\% | \$2,320 | 50.3\% | 38.1\% |
|  | Total | 66 | 100.0\% | \$8,702 | 100.0\% |  | 28 | 100.0\% | 100.0\% | \$4,091 | 100.0\% | 100.0\% | 38 | 100.0\% | 100.0\% | \$4,611 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IN Kokomo

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparis on 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Families by Family Income \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  |  | lar |  |  | ank | Agg | Ba |  | Agg |  | nk | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 3 | 10.0\% | \$167 | 6.6\% | 19.6\% | 3 | 18.8\% | 21.3\% | \$167 | 17.1\% | 14.2\% | 0 | 0.0\% | 17.3\% | \$0 | 0.0\% | 11.5\% |
|  | M oderate | 11 | 36.7\% | \$765 | 30.4\% | 18.7\% | 3 | 18.8\% | 23.5\% | \$149 | 15.2\% | 20.7\% | 8 | 57.1\% | 24.9\% | \$616 | 40.1\% | 20.9\% |
|  | Middle | 8 | 26.7\% | \$908 | 36.1\% | 22.9\% | 5 | 31.3\% | 27.3\% | \$524 | 53.5\% | 29.9\% | 3 | 21.4\% | 22.9\% | \$384 | 25.0\% | 26.3\% |
|  | Upper | 8 | 26.7\% | \$674 | 26.8\% | 38.8\% | 5 | 31.3\% | 18.9\% | \$139 | 14.2\% | 26.4\% | 3 | 21.4\% | 21.0\% | \$535 | 34.9\% | 28.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.0\% | \$0 | 0.0\% | 8.8\% | 0 | 0.0\% | 13.8\% | \$0 | 0.0\% | 13.1\% |
|  | Total | 30 | 100.0\% | \$2,514 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$979 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$1,535 | 100.0\% | 100.0\% |
|  | Low | 3 | 10.0\% | \$130 | 4.7\% | 19.6\% | 1 | 5.0\% | 8.4\% | \$44 | 2.1\% | 5.0\% | 2 | 20.0\% | 5.9\% | \$86 | 13.6\% | 3.5\% |
|  | M oderate | 8 | 26.7\% | \$599 | 21.6\% | 18.7\% | 6 | 30.0\% | 19.4\% | \$489 | 22.9\% | 14.3\% | 2 | 20.0\% | 18.9\% | \$110 | 17.4\% | 14.3\% |
|  | Middle | 8 | 26.7\% | \$837 | 30.2\% | 22.9\% | 5 | 25.0\% | 26.5\% | \$584 | 27.4\% | 25.5\% | 3 | 30.0\% | 21.8\% | \$253 | 40.0\% | 19.6\% |
|  | Upper | 11 | 36.7\% | \$1,201 | 43.4\% | 38.8\% | 8 | 40.0\% | 30.9\% | \$1,017 | 47.7\% | 40.1\% | 3 | 30.0\% | 36.0\% | \$184 | 29.1\% | 44.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.7\% | \$0 | 0.0\% | 15.1\% | 0 | 0.0\% | 17.4\% | \$0 | 0.0\% | 18.1\% |
|  | Total | 30 | 100.0\% | \$2,767 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$2,134 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$633 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 19.6\% | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 2.9\% | 0 | 0.0\% | 7.0\% | \$0 | 0.0\% | 4.3\% |
|  | M oderate | 0 | 0.0\% | \$0 | 0.0\% | 18.7\% | 0 | 0.0\% | 34.3\% | \$0 | 0.0\% | 33.5\% | 0 | 0.0\% | 23.9\% | \$0 | 0.0\% | 14.8\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.9\% | 0 | 0.0\% | 19.4\% | \$0 | 0.0\% | 17.1\% | 0 | 0.0\% | 25.4\% | \$0 | 0.0\% | 24.4\% |
|  | Upper | 1 | 100.0\% | \$3 | 100.0\% | 38.8\% | 1 | 100.0\% | 32.8\% | \$3 | 100.0\% | 45.5\% | 0 | 0.0\% | 35.2\% | \$0 | 0.0\% | 44.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 8.5\% | \$0 | 0.0\% | 12.2\% |
|  | Total | 1 | 100.0\% | \$3 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$3 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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\% |
|  | M oderate | 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\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 38.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 6 | 9.8\% | \$297 | 5.6\% | 19.6\% | 4 | 10.8\% | 13.8\% | \$211 | 6.8\% | 8.2\% | 2 | 8.3\% | 10.7\% | \$86 | 4.0\% | 6.0\% |
|  | M oderate | 19 | 31.1\% | \$1,364 | 25.8\% | 18.7\% | 9 | 24.3\% | 21.6\% | \$638 | 20.5\% | 16.3\% | 10 | 41.7\% | 21.6\% | \$726 | 33.5\% | 15.2\% |
|  | Middle | 16 | 26.2\% | \$1,745 | 33.0\% | 22.9\% | 10 | 27.0\% | 26.6\% | \$1,108 | 35.6\% | 25.8\% | 6 | 25.0\% | 22.3\% | \$637 | 29.4\% | 20.0\% |
|  | Upper | 20 | 32.8\% | \$1,878 | 35.5\% | 38.8\% | 14 | 37.8\% | 25.7\% | \$1,159 | 37.2\% | 33.0\% | 6 | 25.0\% | 29.5\% | \$719 | 33.2\% | 34.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.4\% | \$0 | 0.0\% | 16.8\% | 0 | 0.0\% | 15.8\% | \$0 | 0.0\% | 24.9\% |
|  | Total | 61 | 100.0\% | \$5,284 | 100.0\% | 100.0\% | 37 | 100.0\% | 100.0\% | \$3,116 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$2,168 | 100.0\% | 100.0\% |
|  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 8 | 47.1\% | \$452 | 63.0\% | 90.5\% | 4 | 66.7\% | 39.4\% | \$261 | 60.6\% | 45.4\% | 4 | 36.4\% | 42.0\% | \$191 | 66.8\% | 44.6\% |
|  | Over \$1 Million | 3 | 17.6\% | \$190 | 26.5\% | 4.6\% | 2 | 33.3\% |  |  |  |  | 1 | 9.1\% |  |  |  |  |
|  | Total Rev. available | 11 | 64.7\% | \$642 | 89.5\% | 95.1\% | 6 | 100.0\% |  |  |  |  | 5 | 45.5\% |  |  |  |  |
|  | Rev. Not Known | 6 | 35.3\% | \$75 | 10.5\% | 4.9\% | 0 | 0.0\% |  |  |  |  | 6 | 54.5\% |  |  |  |  |
|  | Total | 17 | 100.0\% | \$717 | 100.0\% | 100.0\% | 6 | 100.0\% |  |  |  |  | 11 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 16 | 94.1\% | \$567 | 79.1\% |  | 5 | 83.3\% | 92.2\% | \$281 | 65.2\% | 32.7\% | 11 | 100.0\% | 94.2\% | \$286 | 100.0\% | 45.0\% |
|  | \$100,001-\$250,000 | 1 | 5.9\% | \$150 | 20.9\% |  | 1 | 16.7\% | 3.8\% | \$150 | 34.8\% | 17.1\% | 0 | 0.0\% | 3.6\% | \$0 | 0.0\% | 18.8\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ |  | 0.0\% |  | 0.0\% |  | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 50.2\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 36.1\% |
|  | Total | 17 | 100.0\% | \$717 | 100.0\% |  | 6 | 100.0\% | 100.0\% | \$431 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$286 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 12 | 85.7\% | \$1,746 | 91.3\% | 99.5\% | 5 | 83.3\% | 57.1\% | \$790 | 84.0\% | 73.6\% | 7 | 87.5\% | 80.0\% | \$956 | 98.4\% | 98.2\% |
|  |  | 1 | 7.1\% | \$150 | 7.8\% | 0.5\% | 1 | 16.7\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 1 | 7.1\% | \$16 | 0.8\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 1 | 12.5\% |  |  |  |  |
|  |  | 14 | 100.0\% | \$1,912 | 100.0\% | 100.0\% | 6 | 100.0\% |  |  |  |  | 8 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 4 | 28.6\% | \$122 | 6.4\% |  | 1 | 16.7\% | 60.0\% | \$45 | 4.8\% | 21.1\% | 3 | 37.5\% | 70.0\% | \$77 | 7.9\% | 26.9\% |
|  | \$100,001-\$250,000 | 8 | 57.1\% | \$1,240 | 64.9\% |  | 4 | 66.7\% | 34.3\% | \$620 | 66.0\% | 60.8\% | 4 | 50.0\% | 25.0\% | \$620 | 63.8\% | 53.3\% |
|  | \$250,001-\$500,000 | 2 | 14.3\% | \$550 | 28.8\% |  | 1 | 16.7\% | 5.7\% | \$275 | 29.3\% | 18.1\% | 1 | 12.5\% | 5.0\% | \$275 | 28.3\% | 19.8\% |
|  | Total | 14 | 100.0\% | \$1,912 | 100.0\% |  | 6 | 100.0\% | 100.0\% | \$940 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$972 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: IN Lafayette

| Income Categories | Tract Distribution |  | Families by Tract Income |  | $\begin{aligned} & \text { Families < Poverty } \\ & \text { Level as \% of } \\ & \text { Families by Tract } \end{aligned}$ |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 4 | 9.1 |  | 2.6 | 352 | 35.0 | 6,907 | 18.0 |
| Moderate-income | 6 | 13.6 |  | 11.3 | 677 | 15.7 | 7,189 | 18.8 |
| Middle-income | 23 | 52.3 |  | 58.2 | 1,204 | 5.4 | 9,439 | 24.7 |
| Upper-income | 10 | 22.7 |  | 27.9 | 409 | 3.8 | 14,757 | 38.5 |
| Unknown-income | 1 | 2.3 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 44 | 100.0 |  | 100.0 | 2,642 | 6.9 | 38,292 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 4,978 |  | 76 | 1.5 | 4,703 | 94.5 | 199 | 4.0 |
| Moderate-income | 9,912 |  |  | 29.5 | 6,183 | 62.4 | 803 | 8.1 |
| Middle-income | 34,660 |  |  | 66.4 | 9,263 | 26.7 | 2,397 | 6.9 |
| Upper-income | 17,468 |  |  | 63.2 | 5,761 | 33.0 | 675 | 3.9 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 67,018 | 37,034 |  | 55.3 | 25,910 | 38.7 | 4,074 | 6.1 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 262 | 4.2 |  | 3.8 | 21 | 5.7 | 28 | 8.6 |
| Moderate-income | 1,374 | 22.0 |  | 20.2 | 151 | 41.3 | 98 | 30.1 |
| Middle-income | 2,932 | 46.9 |  | 48.2 | 126 | 34.4 | 126 | 38.7 |
| Upper-income | 1,682 | 26.9 |  | 27.7 | 68 | 18.6 | 74 | 22.7 |
| Unknown-income | 6 | 0.1 |  | 0.1 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 6,256 | 100.0 |  | 100.0 | 366 | 100.0 | 326 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 88.9 |  | 5.9 |  | 5.2 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 0.2 |  | 0.2 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 7 | 1.2 |  | 1.1 | 1 | 8.3 | 0 | 0.0 |
| Middle-income | 446 | 79.4 |  | 79.2 | 10 | 83.3 | 1 | 100.0 |
| Upper-income | 108 | 19.2 |  | 19.5 | 1 | 8.3 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 562 | 100.0 |  | 100.0 | 12 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.7 |  | 2.1 |  | . 2 |

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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: IN Lafayette

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  | Owner <br> Occupied <br> Units <br> $\%$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  |  | Bank |  | Agg$\%$ | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 8 | 4.6\% | \$623 | 2.6\% | 7.9\% | 5 | 5.2\% | 6.2\% | \$344 | 2.5\% | 4.0\% | 3 | 3.8\% | 4.9\% | \$279 | 2.7\% | 3.2\% |
|  | Middle | 85 | 48.9\% | \$10,461 | 43.9\% | 62.1\% | 47 | 49.0\% | 48.7\% | \$6,180 | 45.6\% | 43.9\% | 38 | 48.7\% | 49.0\% | \$4,281 | 41.6\% | 43.8\% |
|  | Upper | 81 | 46.6\% | \$12,750 | 53.5\% | 29.8\% | 44 | 45.8\% | 44.8\% | \$7,031 | 51.9\% | 51.7\% | 37 | 47.4\% | 46.0\% | \$5,719 | 55.6\% | 52.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 174 | 100.0\% | \$23,834 | 100.0\% | 100.0\% | 96 | 100.0\% | 100.0\% | \$13,555 | 100.0\% | 100.0\% | 78 | 100.0\% | 100.0\% | \$10,279 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 12 | 3.6\% | \$1,142 | 2.4\% | 7.9\% | 8 | 4.1\% | 4.1\% | \$947 | 3.3\% | 2.8\% | 4 | 2.9\% | 3.8\% | \$195 | 1.0\% | 2.6\% |
|  | Middle | 176 | 53.0\% | \$23,209 | 48.7\% | 62.1\% | 96 | 49.0\% | 49.9\% | \$12,867 | 44.8\% | 46.5\% | 80 | 58.8\% | 52.2\% | \$10,342 | 54.6\% | 48.6\% |
|  | Upper | 144 | 43.4\% | \$23,336 | 48.9\% | 29.8\% | 92 | 46.9\% | 46.0\% | \$14,917 | 51.9\% | 50.6\% | 52 | 38.2\% | 43.8\% | \$8,419 | 44.4\% | 48.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 332 | 100.0\% | \$47,687 | 100.0\% | 100.0\% | 196 | 100.0\% | 100.0\% | \$28,731 | 100.0\% | 100.0\% | 136 | 100.0\% | 100.0\% | \$18,956 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | Moderate | 2 | 16.7\% | \$12 | 17.6\% | 7.9\% | 0 | 0.0\% | 7.6\% | \$0 | 0.0\% | 2.1\% | 2 | 18.2\% | 7.4\% | \$12 | 18.8\% | 5.9\% |
|  | Middle | 9 | 75.0\% | \$46 | 67.6\% | 62.1\% | 1 | 100.0\% | 61.8\% | \$4 | 100.0\% | 55.1\% | 8 | 72.7\% | 62.8\% | \$42 | 65.6\% | 52.5\% |
|  | Upper | 1 | 8.3\% | \$10 | 14.7\% | 29.8\% | 0 | 0.0\% | 30.6\% | \$0 | 0.0\% | 42.8\% | 1 | 9.1\% | 29.8\% | \$10 | 15.6\% | 41.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 12 | 100.0\% | \$68 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$4 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$64 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 27.8\% | 0 | 0.0\% | 17.8\% | \$0 | 0.0\% | 22.7\% | 0 | 0.0\% | 31.9\% | \$0 | 0.0\% | 46.5\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 23.7\% | 0 | 0.0\% | 60.0\% | \$0 | 0.0\% | 46.6\% | 0 | 0.0\% | 25.5\% | \$0 | 0.0\% | 13.5\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 21.0\% | 0 | 0.0\% | 15.6\% | \$0 | 0.0\% | 28.4\% | 0 | 0.0\% | 23.4\% | \$0 | 0.0\% | 26.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 27.5\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 2.2\% | 0 | 0.0\% | 19.1\% | \$0 | 0.0\% | 13.2\% |
|  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 3.2\% |
|  | Moderate | 22 | 4.2\% | \$1,777 | 2.5\% | 7.9\% | 13 | 4.4\% | 5.3\% | \$1,291 | 3.1\% | 5.8\% | 9 | 4.0\% | 4.5\% | \$486 | 1.7\% | 3.6\% |
|  | Middle | 270 | 52.1\% | \$33,716 | 47.1\% | 62.1\% | 144 | 49.1\% | 49.5\% | \$19,051 | 45.0\% | 44.7\% | 126 | 56.0\% | 51.0\% | \$14,665 | 50.1\% | 45.4\% |
|  | Upper | 226 | 43.6\% | \$36,096 | 50.4\% | 29.8\% | 136 | 46.4\% | 44.9\% | \$21,948 | 51.9\% | 48.0\% | 90 | 40.0\% | 44.0\% | \$14,148 | 48.3\% | 47.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 518 | 100.0\% | \$71,589 | 100.0\% | 100.0\% | 293 | 100.0\% | 100.0\% | \$42,290 | 100.0\% | 100.0\% | 225 | 100.0\% | 100.0\% | \$29,299 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 7 | 2.3\% | \$106 | 0.3\% | 3.8\% | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 1.2\% | 7 | 3.5\% | 3.3\% | \$106 | 0.7\% | 6.3\% |
|  | Moderate | 95 | 30.9\% | \$11,000 | 36.2\% | 20.2\% | 42 | 39.6\% | 22.4\% | \$6,088 | 40.0\% | 33.4\% | 53 | 26.4\% | 23.4\% | \$4,912 | 32.4\% | 30.6\% |
|  | Middle | 122 | 39.7\% | \$11,610 | 38.2\% | 48.2\% | 36 | 34.0\% | 43.2\% | \$4,876 | 32.1\% | 32.7\% | 86 | 42.8\% | 41.8\% | \$6,734 | 44.4\% | 39.9\% |
|  | Upper | 82 | 26.7\% | \$7,661 | 25.2\% | 27.7\% | 28 | 26.4\% | 27.2\% | \$4,248 | 27.9\% | 29.2\% | 54 | 26.9\% | 27.8\% | \$3,413 | 22.5\% | 21.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 1 | 0.3\% | \$3 | 0.0\% |  | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 3.5\% | 1 | 0.5\% | 3.8\% | \$3 | 0.0\% | 2.1\% |
|  | Total | 307 | 100.0\% | \$30,380 | 100.0\% | 100.0\% | 106 | 100.0\% | 100.0\% | \$15,212 | 100.0\% | 100.0\% | 201 | 100.0\% | 100.0\% | \$15,168 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 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\% |
|  | Moderate | 2 | 1.9\% | \$250 | 1.5\% | 1.1\% | 1 | 2.0\% | 0.4\% | \$125 | 1.5\% | 0.3\% | 1 | 1.9\% | 0.9\% | \$125 | 1.5\% | 1.0\% |
|  | Middle | 99 | 96.1\% | \$16,390 | 97.0\% | 79.2\% | 46 | 93.9\% | 90.0\% | \$8,198 | 95.6\% | 91.1\% | 53 | 98.1\% | 91.2\% | \$8,192 | 98.5\% | 95.3\% |
|  | Upper | 2 | 1.9\% | \$250 | 1.5\% | 19.5\% | 2 | 4.1\% | 9.3\% | \$250 | 2.9\% | 8.6\% | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 3.6\% |
|  | 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\% | 0.4\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 103 | 100.0\% | \$16,890 | 100.0\% | 100.0\% | 49 | 100.0\% | 100.0\% | \$8,573 | 100.0\% | 100.0\% | 54 | 100.0\% | 100.0\% | \$8,317 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IN Lafayette

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | nk |  | $\begin{array}{\|c\|\|} \text { Families } \\ \text { by Family } \\ \text { Income } \\ \% \\ \hline \end{array}$ | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dol | ar |  |  | ank | Agg | Ban |  | Agg |  | nk | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 27 | 15.5\% | \$1,890 | 7.9\% | 18.0\% | 14 | 14.6\% | 14.2\% | \$1,115 | 8.2\% | 9.2\% | 13 | 16.7\% | 14.7\% | \$775 | 7.5\% | 9.1\% |
|  | Moderate | 39 | 22.4\% | \$4,271 | 17.9\% | 18.8\% | 23 | 24.0\% | 23.9\% | \$2,601 | 19.2\% | 19.7\% | 16 | 20.5\% | 19.9\% | \$1,670 | 16.2\% | 15.9\% |
|  | Middle | 46 | 26.4\% | \$5,700 | 23.9\% | 24.7\% | 21 | 21.9\% | 21.4\% | \$2,523 | 18.6\% | 21.4\% | 25 | 32.1\% | 21.0\% | \$3,177 | 30.9\% | 21.2\% |
|  | Upper | 62 | 35.6\% | \$11,973 | 50.2\% | 38.5\% | 38 | 39.6\% | 26.9\% | \$7,316 | 54.0\% | 36.5\% | 24 | 30.8\% | 26.4\% | \$4,657 | 45.3\% | 36.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 13.7\% | \$0 | 0.0\% | 13.3\% | 0 | 0.0\% | 18.0\% | \$0 | 0.0\% | 17.6\% |
|  | Total | 174 | 100.0\% | \$23,834 | 100.0\% | 100.0\% | 96 | 100.0\% | 100.0\% | \$13,555 | 100.0\% | 100.0\% | 78 | 100.0\% | 100.0\% | \$10,279 | 100.0\% | 100.0\% |
|  | Low | 26 | 7.8\% | \$2,105 | 4.4\% | 18.0\% | 11 | 5.6\% | 6.0\% | \$1,035 | 3.6\% | 3.2\% | 15 | 11.0\% | 7.2\% | \$1,070 | 5.6\% | 4.1\% |
|  | Moderate | 56 | 16.9\% | \$4,637 | 9.7\% | 18.8\% | 35 | 17.9\% | 15.0\% | \$2,846 | 9.9\% | 10.5\% | 21 | 15.4\% | 14.0\% | \$1,791 | 9.4\% | 9.6\% |
|  | Middle | 70 | 21.1\% | \$8,415 | 17.6\% | 24.7\% | 39 | 19.9\% | 21.2\% | \$4,748 | 16.5\% | 18.2\% | 31 | 22.8\% | 20.8\% | \$3,667 | 19.3\% | 18.1\% |
|  | Upper | 171 | 51.5\% | \$31,310 | 65.7\% | 38.5\% | 105 | 53.6\% | 38.7\% | \$19,252 | 67.0\% | 48.2\% | 66 | 48.5\% | 37.0\% | \$12,058 | 63.6\% | 46.6\% |
|  | Unknown | 9 | 2.7\% | \$1,220 | 2.6\% | 0.0\% | 6 | 3.1\% | 19.2\% | \$850 | 3.0\% | 19.9\% | 3 | 2.2\% | 20.9\% | \$370 | 2.0\% | 21.6\% |
|  | Total | 332 | 100.0\% | \$47,687 | 100.0\% | 100.0\% | 196 | 100.0\% | 100.0\% | \$28,731 | 100.0\% | 100.0\% | 136 | 100.0\% | 100.0\% | \$18,956 | 100.0\% | 100.0\% |
|  | Low | 1 | 8.3\% | \$5 | 7.4\% | 18.0\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 3.2\% | 1 | 9.1\% | 11.6\% | \$5 | 7.8\% | 3.0\% |
|  | Moderate | 6 | 50.0\% | \$28 | 41.2\% | 18.8\% | 0 | 0.0\% | 15.9\% | \$0 | 0.0\% | 2.9\% | 6 | 54.5\% | 19.1\% | \$28 | 43.8\% | 7.7\% |
|  | Middle | 3 | 25.0\% | \$22 | 32.4\% | 24.7\% | 1 | 100.0\% | 20.6\% | \$4 | 100.0\% | 12.6\% | 2 | 18.2\% | 29.8\% | \$18 | 28.1\% | 20.1\% |
|  | Upper | 2 | 16.7\% | \$13 | 19.1\% | 38.5\% | 0 | 0.0\% | 47.1\% | \$0 | 0.0\% | 79.4\% | 2 | 18.2\% | 34.4\% | \$13 | 20.3\% | 60.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.5\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 5.1\% | \$0 | 0.0\% | 8.4\% |
|  | Total | 12 | 100.0\% | \$68 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$4 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$64 | 100.0\% | 100.0\% |
|  | Low | 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\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.8\% | 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\% | 24.7\% | 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\% | 38.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 54 | 10.4\% | \$4,000 | 5.6\% | 18.0\% | 25 | 8.5\% | 9.1\% | \$2,150 | 5.1\% | 5.0\% | 29 | 12.9\% | 10.4\% | \$1,850 | 6.3\% | 5.7\% |
|  | Moderate | 101 | 19.5\% | \$8,936 | 12.5\% | 18.8\% | 58 | 19.8\% | 18.2\% | \$5,447 | 12.9\% | 12.9\% | 43 | 19.1\% | 16.5\% | \$3,489 | 11.9\% | 11.3\% |
|  | Middle | 119 | 23.0\% | \$14,137 | 19.7\% | 24.7\% | 61 | 20.8\% | 21.1\% | \$7,275 | 17.2\% | 18.1\% | 58 | 25.8\% | 21.0\% | \$6,862 | 23.4\% | 18.2\% |
|  | Upper | 235 | 45.4\% | \$43,296 | 60.5\% | 38.5\% | 143 | 48.8\% | 34.2\% | \$26,568 | 62.8\% | 41.7\% | 92 | 40.9\% | 32.3\% | \$16,728 | 57.1\% | 39.7\% |
|  | Unknown | 9 | 1.7\% | \$1,220 | 1.7\% | 0.0\% | 6 | 2.0\% | 17.3\% | \$850 | 2.0\% | 22.2\% | 3 | 1.3\% | 19.8\% | \$370 | 1.3\% | 25.1\% |
|  | Total | 518 | 100.0\% | \$71,589 | 100.0\% | 100.0\% | 293 | 100.0\% | 100.0\% | \$42,290 | 100.0\% | 100.0\% | 225 | 100.0\% | 100.0\% | \$29,299 | 100.0\% | 100.0\% |
| ssəu!!sng ॥ems |  |  |  |  | Total | Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 73 | 23.8\% | \$6,186 | 20.4\% | 88.9\% | 42 | 39.6\% | 36.9\% | \$4,046 | 26.6\% | 40.8\% | 31 | 15.4\% | 33.6\% | \$2,140 | 14.1\% | 34.6\% |
|  | Over \$1 Million | 88 | 28.7\% | \$20,058 | 66.0\% | 5.9\% |  | 48.1\% |  |  |  |  | 37 | 18.4\% |  |  |  |  |
|  | Total Rev. available | 161 | 52.5\% | \$26,244 | 86.4\% | 94.8\% | 93 | 87.7\% |  |  |  |  | 68 | 33.8\% |  |  |  |  |
|  | Rev. Not Known | 146 | 47.6\% | \$4,136 | 13.6\% | 5.2\% |  | 12.3\% |  |  |  |  | 133 | 66.2\% |  |  |  |  |
|  | Total | 307 | 100.0\% | \$30,380 | 100.0\% | 100.0\% | 106 | 100.0\% |  |  |  |  | 201 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 237 | 77.2\% | \$7,294 | 24.0\% |  | 72 | 67.9\% | 88.1\% | \$3,504 | 23.0\% | 28.6\% | 165 | 82.1\% | 92.8\% | \$3,790 | 25.0\% | 33.4\% |
|  | \$100,001-\$250,000 | 36 | 11.7\% | \$6,428 | 21.2\% |  | 14 | 13.2\% | 5.9\% | \$2,534 | 16.7\% | 18.4\% | 22 | 10.9\% | 3.8\% | \$3,894 | 25.7\% | 17.9\% |
|  | $\begin{aligned} & \text { \$250,001 - \$1 } \\ & \text { Million } \end{aligned}$ |  | 11.1\% | \$16,658 | 54.8\% |  | 20 | 18.9\% | 5.9\% | \$9,174 | 60.3\% | 52.9\% | 14 | 7.0\% | 3.4\% | \$7,484 | 49.3\% | 48.7\% |
|  | Total | 307 | 100.0\% | \$30,380 | 100.0\% |  | 106 | 100.0\% | 100.0\% | \$15,212 | 100.0\% | 100.0\% | 201 | 100.0\% | 100.0\% | \$15,168 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 71 | 68.9\% | \$11,496 | 68.1\% | 97.7\% | 37 | 75.5\% | 72.2\% | \$6,003 | 70.0\% | 65.1\% | 34 | 63.0\% | 51.3\% | \$5,493 | 66.0\% | 69.9\% |
|  |  | 21 | 20.4\% | \$5,222 | 30.9\% | 2.1\% | 11 | 22.4\% |  |  |  |  | 10 | 18.5\% |  |  |  |  |
|  |  | 11 | 10.7\% | \$172 | 1.0\% | 0.2\% | 1 | 2.0\% |  |  |  |  | 10 | 18.5\% |  |  |  |  |
|  |  | 103 | 100.0\% | \$16,890 | 100.0\% | 100.0\% | 49 | 100.0\% |  |  |  |  | 54 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 43 | 41.7\% | \$1,893 | 11.2\% |  | 20 | 40.8\% | 54.4\% | \$1,158 | 13.5\% | 15.9\% | 23 | 42.6\% | 63.7\% | \$735 | 8.8\% | 15.5\% |
|  | \$100,001-\$250,000 | 40 | 38.8\% | \$7,581 | 44.9\% |  | 19 | 38.8\% | 26.3\% | \$3,530 | 41.2\% | 34.1\% | 21 | 38.9\% | 22.1\% | \$4,051 | 48.7\% | 38.9\% |
|  | \$250,001-\$500,000 | 20 | 19.4\% | \$7,416 | 43.9\% |  | 10 | 20.4\% | 19.3\% | \$3,885 | 45.3\% | 49.9\% | 10 | 18.5\% | 14.2\% | \$3,531 | 42.5\% | 45.6\% |
|  | Total | 103 | 100.0\% | \$16,890 | 100.0\% |  | 49 | 100.0\% | 100.0\% | \$8,573 | 100.0\% | 100.0\% | 54 | 100.0\% | 100.0\% | \$8,317 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: IN Louisville


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IN Louisville

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  | Agg$\%$ | Bank |  | Agg | Bank |  |  | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 2.4\% | \$162 | 3.2\% | 9.0\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 5.1\% | 1 | 3.4\% | 5.7\% | \$162 | 4.7\% | 3.8\% |
|  | Middle | 36 | 85.7\% | \$4,193 | 83.6\% | 82.2\% | 12 | 92.3\% | 80.3\% | \$1,398 | 90.1\% | 81.6\% | 24 | 82.8\% | 82.1\% | \$2,795 | 80.6\% | 82.7\% |
|  | Upper | 5 | 11.9\% | \$663 | 13.2\% | 8.8\% | 1 | 7.7\% | 13.0\% | \$154 | 9.9\% | 13.3\% | 4 | 13.8\% | 12.2\% | \$509 | 14.7\% | 13.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 42 | 100.0\% | \$5,018 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$1,552 | 100.0\% | 100.0\% | 29 | 100.0\% | 100.0\% | \$3,466 | 100.0\% | 100.0\% |
|  | 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 | 2.4\% | \$250 | 1.9\% | 9.0\% | 2 | 2.9\% | 5.1\% | \$192 | 2.5\% | 3.4\% | 1 | 1.8\% | 4.1\% | \$58 | 1.0\% | 2.7\% |
|  | Middle | 121 | 96.8\% | \$12,902 | 97.4\% | 82.2\% | 65 | 95.6\% | 81.5\% | \$7,348 | 96.2\% | 81.3\% | 56 | 98.2\% | 83.1\% | \$5,554 | 99.0\% | 84.0\% |
|  | Upper | 1 | 0.8\% | \$96 | 0.7\% | 8.8\% | 1 | 1.5\% | 13.4\% | \$96 | 1.3\% | 15.2\% | 0 | 0.0\% | 12.8\% | \$0 | 0.0\% | 13.3\% |
|  | 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 | 125 | 100.0\% | \$13,248 | 100.0\% | 100.0\% | 68 | 100.0\% | 100.0\% | \$7,636 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$5,612 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 28.6\% | \$11 | 18.6\% | 9.0\% | 1 | 25.0\% | 3.4\% | \$3 | 18.8\% | 2.5\% | 1 | 33.3\% | 6.2\% | \$8 | 18.6\% | 2.7\% |
|  | Middle | 4 | 57.1\% | \$23 | 39.0\% | 82.2\% | 3 | 75.0\% | 83.9\% | \$13 | 81.3\% | 85.2\% | 1 | 33.3\% | 85.4\% | \$10 | 23.3\% | 89.2\% |
|  | Upper | 1 | 14.3\% | \$25 | 42.4\% | 8.8\% | 0 | 0.0\% | 12.7\% | \$0 | 0.0\% | 12.3\% | 1 | 33.3\% | 8.4\% | \$25 | 58.1\% | 8.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 7 | 100.0\% | \$59 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$16 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$43 | 100.0\% | 100.0\% |
| 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\% | 27.7\% | 0 | 0.0\% | 30.8\% | \$0 | 0.0\% | 24.9\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 5.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 70.2\% | 0 | 0.0\% | 61.5\% | \$0 | 0.0\% | 74.0\% | 0 | 0.0\% | 60.0\% | \$0 | 0.0\% | 94.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 2.2\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | 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 | 3.4\% | \$423 | 2.3\% | 9.0\% | 3 | 3.5\% | 5.6\% | \$195 | 2.1\% | 4.3\% | 3 | 3.4\% | 4.8\% | \$228 | 2.5\% | 3.1\% |
|  | Middle | 161 | 92.5\% | \$17,118 | 93.4\% | 82.2\% | 80 | 94.1\% | 81.1\% | \$8,759 | 95.2\% | 81.4\% | 81 | 91.0\% | 82.8\% | \$8,359 | 91.6\% | 83.7\% |
|  | Upper | 7 | 4.0\% | \$784 | 4.3\% | 8.8\% | 2 | 2.4\% | 13.2\% | \$250 | 2.7\% | 14.3\% | 5 | 5.6\% | 12.4\% | \$534 | 5.9\% | 13.1\% |
|  | 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 | 174 | 100.0\% | \$18,325 | 100.0\% | 100.0\% | 85 | 100.0\% | 100.0\% | \$9,204 | 100.0\% | 100.0\% | 89 | 100.0\% | 100.0\% | \$9,121 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 15 | 14.2\% | \$2,341 | 26.2\% | 16.8\% | 6 | 18.2\% | 18.3\% | \$2,053 | 39.5\% | 23.1\% | 9 | 12.3\% | 17.7\% | \$288 | 7.7\% | 21.9\% |
|  | Middle | 87 | 82.1\% | \$4,692 | 52.5\% | 75.7\% | 26 | 78.8\% | 64.9\% | \$2,575 | 49.6\% | 52.3\% | 61 | 83.6\% | 66.2\% | \$2,117 | 56.6\% | 50.7\% |
|  | Upper | 4 | 3.8\% | \$1,900 | 21.3\% | 7.6\% | 1 | 3.0\% | 12.0\% | \$568 | 10.9\% | 21.8\% | 3 | 4.1\% | 12.1\% | \$1,332 | 35.6\% | 25.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.9\% | \$0 | 0.0\% | 2.8\% | 0 | 0.0\% | 4.0\% | \$0 | 0.0\% | 2.1\% |
|  | Total | 106 | 100.0\% | \$8,933 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$5,196 | 100.0\% | 100.0\% | 73 | 100.0\% | 100.0\% | \$3,737 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 2.0\% | \$50 | 0.7\% | 2.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 1 | 4.0\% | 1.3\% | \$50 | 1.4\% | 0.7\% |
|  | Middle | 50 | 98.0\% | \$7,303 | 99.3\% | 96.3\% | 26 | 100.0\% | 97.5\% | \$3,727 | 100.0\% | 96.7\% | 24 | 96.0\% | 97.4\% | \$3,576 | 98.6\% | 99.3\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 3.3\% | 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\% | 1.3\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 51 | 100.0\% | \$7,353 | 100.0\% | 100.0\% | 26 | 100.0\% | 100.0\% | \$3,727 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$3,626 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: IN Terre Haute


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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: IN Terre Haute


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## Appendices

## Combined Demographics Report

Assessment Area: IA Cedar Rapids


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IA Cedar Rapids

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | count ${ }^{\text {B }}$ |  | ank |  | Owner | Count |  | Agg$\%$ | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Dollar |  | Units |  |  | Ba |  | Agg |  | ank | Agg | Ban |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% |  | 0.4\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.6\% |
|  | M oderate | 1 | 14.3\% | \$80 | 9.6\% | 9.7\% | 0 | 0.0\% | 5.9\% | \$0 | 0.0\% | 3.6\% | 1 | 50.0\% | 6.1\% | \$80 | 26.6\% | 3.9\% |
|  | Middle | 5 | 71.4\% | \$612 | 73.6\% | 67.6\% | 4 | 80.0\% | 61.3\% | \$391 | 73.6\% | 56.0\% | 1 | 50.0\% | 61.5\% | \$221 | 73.4\% | 56.3\% |
|  | Upper | 1 | 14.3\% | \$140 | 16.8\% | 22.2\% | 1 | 20.0\% | 32.4\% | \$140 | 26.4\% | 40.1\% | 0 | 0.0\% | 31.3\% | \$0 | 0.0\% | 38.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 7 | 100.0\% | \$832 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$531 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$301 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 8 | 29.6\% | \$643 | 20.7\% | 9.7\% | 4 | 22.2\% | 3.4\% | \$441 | 19.5\% | 2.3\% | 4 | 44.4\% | 4.1\% | \$202 | 23.7\% | 2.7\% |
|  | Middle | 14 | 51.9\% | \$1,771 | 56.9\% | 67.6\% | 11 | 61.1\% | 59.1\% | \$1,428 | 63.2\% | 53.2\% | 3 | 33.3\% | 59.0\% | \$343 | 40.3\% | 52.5\% |
|  | Upper | 5 | 18.5\% | \$696 | 22.4\% | 22.2\% | 3 | 16.7\% | 37.3\% | \$389 | 17.2\% | 44.5\% | 2 | 22.2\% | 36.6\% | \$307 | 36.0\% | 44.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 27 | 100.0\% | \$3,110 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$2,258 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$852 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 9.7\% | 0 | 0.0\% | 7.9\% | \$0 | 0.0\% | 5.8\% | 0 | 0.0\% | 7.3\% | \$0 | 0.0\% | 5.2\% |
|  | Middle | 2 | 100.0\% | \$15 | 100.0\% | 67.6\% | 0 | 0.0\% | 67.3\% | \$0 | 0.0\% | 61.5\% | 2 | 100.0\% | 67.2\% | \$15 | 100.0\% | 58.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 22.2\% | 0 | 0.0\% | 24.7\% | \$0 | 0.0\% | 32.6\% | 0 | 0.0\% | 25.3\% | \$0 | 0.0\% | 35.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2 | 100.0\% | \$15 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$15 | 100.0\% | 100.0\% |
|  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 3.3\% | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.9\% | 0 | 0.0\% | 21.3\% | \$0 | 0.0\% | 4.8\% | 0 | 0.0\% | 23.8\% | \$0 | 0.0\% | 7.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 65.2\% | 0 | 0.0\% | 68.9\% | \$0 | 0.0\% | 92.4\% | 0 | 0.0\% | 69.0\% | \$0 | 0.0\% | 81.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 15.6\% | 0 | 0.0\% | 8.2\% | \$0 | 0.0\% | 2.6\% | 0 | 0.0\% | 7.1\% | \$0 | 0.0\% | 11.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.3\% |
|  | M oderate | 9 | 25.0\% | \$723 | 18.3\% | 9.7\% | 4 | 17.4\% | 4.5\% | \$441 | 15.8\% | 2.8\% | 5 | 38.5\% | 5.0\% | \$282 | 24.1\% | 3.2\% |
|  | Middle | 21 | 58.3\% | \$2,398 | 60.6\% | 67.6\% | 15 | 65.2\% | 60.2\% | \$1,819 | 65.2\% | 54.9\% | 6 | 46.2\% | 60.3\% | \$579 | 49.6\% | 54.3\% |
|  | Upper | 6 | 16.7\% | \$836 | 21.1\% | 22.2\% | 4 | 17.4\% | 35.0\% | \$529 | 19.0\% | 42.2\% | 2 | 15.4\% | 34.1\% | \$307 | 26.3\% | 42.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 36 | 100.0\% | \$3,957 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$2,789 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$1,168 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 6.4\% | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 6.2\% |
|  | Moderate | 1 | 14.3\% | \$53 | 11.5\% | 12.2\% | 1 | 14.3\% | 13.1\% | \$53 | 11.5\% | 15.0\% | 5 | 25.0\% | 12.4\% | \$396 | 41.0\% | 16.7\% |
|  | Middle | 6 | 85.7\% | \$408 | 88.5\% | 64.4\% | 6 | 85.7\% | 54.8\% | \$408 | 88.5\% | 50.7\% | 13 | 65.0\% | 56.2\% | \$505 | 52.3\% | 51.8\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 21.6\% | 0 | 0.0\% | 26.1\% | \$0 | 0.0\% | 26.6\% | 2 | 10.0\% | 26.2\% | \$65 | 6.7\% | 24.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 7 | 100.0\% | \$461 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$461 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$966 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\underset{\sim}{x}}^{\substack{4}} \\ & \underset{\sim}{\underset{~}{x}} \end{aligned}$ | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 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\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 7.4\% | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 4.4\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 3.9\% |
|  |  | 17 | 100.0\% | \$3,425 | 100.0\% | 83.7\% | 17 | 100.0\% | 92.0\% | \$3,425 | 100.0\% | 90.8\% | 13 | 100.0\% | 90.9\% | \$1,971 | 100.0\% | 90.9\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 8.8\% | 0 | 0.0\% | 3.5\% | \$0 | 0.0\% | 4.6\% | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 5.1\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.0\% |
|  |  | 17 | 100.0\% | \$3,425 | 100.0\% | 100.0\% | 17 | 100.0\% | 100.0\% | \$3,425 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$1,971 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IA Cedar Rapids


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## Appendices

## Combined Demographics Report

Assessment Area: IA Fayette-Tama


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IA Fayette-Tama


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: IA Fayette-Tama


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## Appendices

## Combined Demographics Report

Restricted-FR
Assessment Area(s): IA Iowa City


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: IA Iowa City

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank |  |  |  |  | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Count |  | Dollar |  | Units | Bank |  | Agg$\%$ | Bank |  | Agg | Bank |  | Agg | Bank |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% |  | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.5\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 12.6\% | 0 | 0.0\% | 8.9\% | \$0 | 0.0\% | 7.8\% | 0 | 0.0\% | 10.2\% | \$0 | 0.0\% | 8.0\% |
|  | Middle | 1 | 100.0\% | \$136 | 100.0\% | 47.1\% | 0 | 0.0\% | 59.3\% | \$0 | 0.0\% | 55.9\% | 1 | 100.0\% | 59.8\% | \$136 | 100.0\% | 57.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.4\% | 0 | 0.0\% | 31.8\% | \$0 | 0.0\% | 36.3\% | 0 | 0.0\% | 29.8\% | \$0 | 0.0\% | 33.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$136 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$136 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 2 | 16.7\% | \$170 | 8.6\% | 12.6\% | 2 | 20.0\% | 7.0\% | \$170 | 10.9\% | 5.2\% | 0 | 0.0\% | 7.3\% | \$0 | 0.0\% | 6.4\% |
|  | Middle | 6 | 50.0\% | \$1,154 | 58.5\% | 47.1\% | 5 | 50.0\% | 50.1\% | \$1,009 | 64.8\% | 49.0\% | 1 | 50.0\% | 51.5\% | \$145 | 34.8\% | 49.1\% |
|  | Upper | 4 | 33.3\% | \$649 | 32.9\% | 40.4\% | 3 | 30.0\% | 42.9\% | \$377 | 24.2\% | 45.7\% | 1 | 50.0\% | 41.2\% | \$272 | 65.2\% | 44.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 12 | 100.0\% | \$1,973 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,556 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$417 | 100.0\% | 100.0\% |
|  | 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\% | 12.6\% | 0 | 0.0\% | 8.9\% | \$0 | 0.0\% | 8.3\% | 0 | 0.0\% | 8.1\% | \$0 | 0.0\% | 7.9\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 47.1\% | 0 | 0.0\% | 49.5\% | \$0 | 0.0\% | 42.1\% | 0 | 0.0\% | 48.8\% | \$0 | 0.0\% | 41.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.4\% | 0 | 0.0\% | 41.6\% | \$0 | 0.0\% | 49.6\% | 0 | 0.0\% | 43.1\% | \$0 | 0.0\% | 50.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 4.4\% | 0 | 0.0\% | 5.5\% | \$0 | 0.0\% | 12.5\% | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 1.1\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 45.3\% | 0 | 0.0\% | 38.2\% | \$0 | 0.0\% | 28.7\% | 0 | 0.0\% | 52.5\% | \$0 | 0.0\% | 54.3\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 30.0\% | 0 | 0.0\% | 25.5\% | \$0 | 0.0\% | 30.4\% | 0 | 0.0\% | 33.9\% | \$0 | 0.0\% | 30.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 20.3\% | 0 | 0.0\% | 30.9\% | \$0 | 0.0\% | 28.4\% | 0 | 0.0\% | 11.9\% | \$0 | 0.0\% | 14.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 2 | 15.4\% | \$170 | 8.1\% | 12.6\% | 2 | 20.0\% | 7.9\% | \$170 | 10.9\% | 6.9\% | 0 | 0.0\% | 8.9\% | \$0 | 0.0\% | 10.0\% |
|  | Middle | 7 | 53.8\% | \$1,290 | 61.2\% | 47.1\% | 5 | 50.0\% | 53.0\% | \$1,009 | 64.8\% | 50.0\% | 2 | 66.7\% | 54.4\% | \$281 | 50.8\% | 50.5\% |
|  | Upper | 4 | 30.8\% | \$649 | 30.8\% | 40.4\% | 3 | 30.0\% | 39.1\% | \$377 | 24.2\% | 42.5\% | 1 | 33.3\% | 36.6\% | \$272 | 49.2\% | 39.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 13 | 100.0\% | \$2,109 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,556 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$553 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 2 | 28.6\% | \$25 | 19.2\% | 4.6\% | 1 | 50.0\% | 6.0\% | \$20 | 74.1\% | 6.0\% | 1 | 20.0\% | 5.5\% | \$5 | 4.9\% | 5.5\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.6\% | 0 | 0.0\% | 16.1\% | \$0 | 0.0\% | 18.7\% | 0 | 0.0\% | 15.8\% | \$0 | 0.0\% | 21.4\% |
|  | Middle | 2 | 28.6\% | \$17 | 13.1\% | 46.6\% | 0 | 0.0\% | 49.8\% | \$0 | 0.0\% | 53.7\% | 2 | 40.0\% | 51.1\% | \$17 | 16.5\% | 50.2\% |
|  | Upper | 3 | 42.9\% | \$88 | 67.7\% | 31.2\% | 1 | 50.0\% | 26.8\% | \$7 | 25.9\% | 21.4\% | 2 | 40.0\% | 26.2\% | \$81 | 78.6\% | 22.8\% |
|  | 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\% | 1.2\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 7 | 100.0\% | \$130 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$27 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$103 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 1.8\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 1.8\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 69.1\% | 0 | 0.0\% | 85.3\% | \$0 | 0.0\% | 85.6\% | 0 | 0.0\% | 82.3\% | \$0 | 0.0\% | 86.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 29.1\% | 0 | 0.0\% | 14.1\% | \$0 | 0.0\% | 13.7\% | 0 | 0.0\% | 15.8\% | \$0 | 0.0\% | 12.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |

[^406]Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

## Assessment Area: IA Iowa City



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## Appendices

## Combined Demographics Report

Assessment Area: KY Simpson


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: KY Simpson



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## Appendices

## Combined Demographics Report

## Assessment Area: LA Alexandria



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount |  | nk |  | Owner Occupied Units \% |  | Count ank $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \mathrm{Ba} \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | Ba $\$(000 s)$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.4\% |
|  | Moderate | 4 | 4.8\% | \$261 | 2.1\% | 15.8\% | 2 | 6.3\% | 6.9\% | \$182 | 3.5\% | 4.5\% | 2 | 3.9\% | 5.7\% | \$79 | 1.1\% | 3.0\% |
|  | Middle | 37 | 44.6\% | \$4,884 | 38.8\% | 42.7\% | 13 | 40.6\% | 37.3\% | \$1,708 | 33.2\% | 32.0\% | 24 | 47.1\% | 38.3\% | \$3,176 | 42.6\% | 33.2\% |
|  | Upper | 42 | 50.6\% | \$7,450 | 59.2\% | 38.8\% | 17 | 53.1\% | 55.1\% | \$3,247 | 63.2\% | 63.2\% | 25 | 49.0\% | 55.3\% | \$4,203 | 56.4\% | 63.4\% |
|  | 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 | 83 | 100.0\% | \$12,595 | 100.0\% | 100.0\% | 32 | 100.0\% | 100.0\% | \$5,137 | 100.0\% | 100.0\% | 51 | 100.0\% | 100.0\% | \$7,458 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.8\% | 0 | 0.0\% | 6.0\% | \$0 | 0.0\% | 3.5\% | 0 | 0.0\% | 5.6\% | \$0 | 0.0\% | 3.5\% |
|  | Middle | 34 | 33.3\% | \$3,327 | 24.1\% | 42.7\% | 26 | 35.1\% | 31.3\% | \$2,725 | 26.4\% | 26.6\% | 8 | 28.6\% | 36.7\% | \$602 | 17.3\% | 33.6\% |
|  | Upper | 68 | 66.7\% | \$10,488 | 75.9\% | 38.8\% | 48 | 64.9\% | 62.1\% | \$7,609 | 73.6\% | 69.0\% | 20 | 71.4\% | 57.2\% | \$2,879 | 82.7\% | 62.7\% |
|  | 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 | 102 | 100.0\% | \$13,815 | 100.0\% | 100.0\% | 74 | 100.0\% | 100.0\% | \$10,334 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$3,481 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.5\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.8\% | 0 | 0.0\% | 12.1\% | \$0 | 0.0\% | 8.4\% | 0 | 0.0\% | 7.1\% | \$0 | 0.0\% | 2.9\% |
|  | Middle | 6 | 42.9\% | \$67 | 55.4\% | 42.7\% | 3 | 100.0\% | 45.9\% | \$34 | 100.0\% | 41.2\% | 3 | 27.3\% | 46.1\% | \$33 | 37.9\% | 37.4\% |
|  | Upper | 8 | 57.1\% | \$54 | 44.6\% | 38.8\% | 0 | 0.0\% | 40.4\% | \$0 | 0.0\% | 49.4\% | 8 | 72.7\% | 46.1\% | \$54 | 62.1\% | 59.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 14 | 100.0\% | \$121 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$34 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$87 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | ily Units |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 5.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 20.3\% | 0 | 0.0\% | 23.5\% | \$0 | 0.0\% | 12.0\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 23.3\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 24.7\% | 0 | 0.0\% | 47.1\% | \$0 | 0.0\% | 15.6\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 49.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 49.5\% | 0 | 0.0\% | 29.4\% | \$0 | 0.0\% | 72.4\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 26.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 4 | 2.0\% | \$261 | 1.0\% | 15.8\% | 2 | 1.8\% | 6.9\% | \$182 | 1.2\% | 4.2\% | 2 | 2.2\% | 5.9\% | \$79 | 0.7\% | 3.5\% |
|  | Middle | 77 | 38.7\% | \$8,278 | 31.2\% | 42.7\% | 42 | 38.5\% | 34.9\% | \$4,467 | 28.8\% | 28.9\% | 35 | 38.9\% | 38.1\% | \$3,811 | 34.6\% | 33.7\% |
|  | Upper | 118 | 59.3\% | \$17,992 | 67.8\% | 38.8\% | 65 | 59.6\% | 57.5\% | \$10,856 | 70.0\% | 66.2\% | 53 | 58.9\% | 55.5\% | \$7,136 | 64.7\% | 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\% |
|  |  | 199 | 100.0\% | \$26,531 | 100.0\% | 100.0\% | 109 | 100.0\% | 100.0\% | \$15,505 | 100.0\% | 100.0\% | 90 | 100.0\% | 100.0\% | \$11,026 | 100.0\% | 100.0\% |
|  |  |  |  |  | Small | 1 Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 21 | 8.5\% | \$1,538 | 10.0\% | 8.0\% | 5 | 6.2\% | 7.1\% | \$390 | 5.4\% | 8.7\% | 16 | 9.6\% | 8.2\% | \$1,148 | 14.0\% | 13.2\% |
|  | Moderate | 23 | 9.3\% | \$2,067 | 13.4\% | 14.2\% | 7 | 8.6\% | 10.2\% | \$648 | 9.0\% | 11.6\% | 16 | 9.6\% | 9.3\% | \$1,419 | 17.3\% | 11.5\% |
|  | Middle | 85 | 34.3\% | \$6,060 | 39.3\% | 37.6\% | 28 | 34.6\% | 36.9\% | \$3,263 | 45.4\% | 36.5\% | 57 | 34.1\% | 34.9\% | \$2,797 | 34.1\% | 30.8\% |
|  | Upper | 119 | 48.0\% | \$5,736 | 37.2\% | 40.3\% | 41 | 50.6\% | 42.5\% | \$2,886 | 40.2\% | 42.2\% | 78 | 46.7\% | 44.7\% | \$2,850 | 34.7\% | 44.1\% |
|  | 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\% | 3.3\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 248 | 100.0\% | \$15,401 | 100.0\% | 100.0\% | 81 | 100.0\% | 100.0\% | \$7,187 | 100.0\% | 100.0\% | 167 | 100.0\% | 100.0\% | \$8,214 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 0.9\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 3.6\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 0.1\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 50.9\% | 0 | 0.0\% | 81.3\% | \$0 | 0.0\% | 87.5\% | 0 | 0.0\% | 68.2\% | \$0 | 0.0\% | 72.3\% |
|  | Upper | 1 | 100.0\% | \$75 | 100.0\% | 44.8\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 9.8\% | 1 | 100.0\% | 22.7\% | \$75 | 100.0\% | 26.5\% |
|  | 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\% | 4.5\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 1 | 100.0\% | \$75 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$75 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: LA Alexandria


[^410]Originations \& Purchases

## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ |  | ank <br> Dol \$(000s) | \$\% | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bar } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar k \$ \% | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar k \$ \% | Agg \$ \% |
| HOME PURCHASE | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 6 | 7.0\% | \$451 | 3.4\% | 14.5\% | 3 | 7.1\% | 8.5\% | \$246 | 3.6\% | 6.1\% | 3 | 6.8\% | 8.7\% | \$205 | 3.3\% | 6.5\% |
|  | Middle | 53 | 61.6\% | \$7,785 | 59.4\% | 69.7\% | 28 | 66.7\% | 67.1\% | \$4,415 | 64.8\% | 63.2\% | 25 | 56.8\% | 66.2\% | \$3,370 | 53.6\% | 61.0\% |
|  | Upper | 27 | 31.4\% | \$4,864 | 37.1\% | 15.0\% | 11 | 26.2\% | 23.8\% | \$2,157 | 31.6\% | 30.2\% | 16 | 36.4\% | 24.8\% | \$2,707 | 43.1\% | 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\% |
|  | Total | 86 | 100.0\% | \$13,100 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$6,818 | 100.0\% | 100.0\% | 44 | 100.0\% | 100.0\% | \$6,282 | 100.0\% | 100.0\% |
|  | Low | 3 | 1.6\% | \$274 | 1.1\% | 0.8\% | 2 | 1.9\% | 0.4\% | \$147 | 1.0\% | 0.2\% | 1 | 1.2\% | 0.3\% | \$127 | 1.1\% | 0.2\% |
|  | Moderate | 12 | 6.3\% | \$948 | 3.7\% | 14.5\% | 4 | 3.7\% | 6.6\% | \$281 | 1.9\% | 5.2\% | 8 | 9.6\% | 6.4\% | \$667 | 6.0\% | 5.2\% |
|  | Middle | 125 | 65.4\% | \$17,056 | 65.9\% | 69.7\% | 76 | 70.4\% | 65.1\% | \$10,384 | 70.3\% | 59.7\% | 49 | 59.0\% | 66.9\% | \$6,672 | 60.1\% | 60.3\% |
|  | Upper | 51 | 26.7\% | \$7,589 | 29.3\% | 15.0\% | 26 | 24.1\% | 27.8\% | \$3,954 | 26.8\% | 34.9\% | 25 | 30.1\% | 26.4\% | \$3,635 | 32.7\% | 34.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 191 | 100.0\% | \$25,867 | 100.0\% | 100.0\% | 108 | 100.0\% | 100.0\% | \$14,766 | 100.0\% | 100.0\% | 83 | 100.0\% | 100.0\% | \$11,101 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 4 | 21.1\% | \$31 | 20.7\% | 14.5\% | 2 | 22.2\% | 10.2\% | \$8 | 9.0\% | 5.5\% | 2 | 20.0\% | 11.6\% | \$23 | 37.7\% | 9.2\% |
|  | Middle | 13 | 68.4\% | \$113 | 75.3\% | 69.7\% | 7 | 77.8\% | 68.3\% | \$81 | 91.0\% | 61.2\% | 6 | 60.0\% | 71.0\% | \$32 | 52.5\% | 65.7\% |
|  | Upper | 2 | 10.5\% | \$6 | 4.0\% | 15.0\% | 0 | 0.0\% | 20.8\% | \$0 | 0.0\% | 33.1\% | 2 | 20.0\% | 16.5\% | \$6 | 9.8\% | 24.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 19 | 100.0\% | \$150 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$89 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$61 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-F | amily Units |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | $1.7 \%$ | 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\% | 8.0\% | 0 | 0.0\% | 8.0\% | \$0 | 0.0\% | 9.8\% | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 0.6\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 61.9\% | 0 | 0.0\% | 84.0\% | \$0 | 0.0\% | 81.7\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 17.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 28.3\% | 0 | 0.0\% | 8.0\% | \$0 | 0.0\% | 8.5\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 81.4\% |
|  | 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\% |
|  |  | 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\% |
|  | Low | 3 | 1.0\% | \$274 | 0.7\% | 0.8\% | 2 | 1.3\% | 0.5\% | \$147 | 0.7\% | 0.3\% | 1 | 0.7\% | 0.4\% | \$127 | 0.7\% | 0.2\% |
|  | Moderate | 22 | 7.4\% | \$1,430 | 3.7\% | 14.5\% | 9 | 5.7\% | 7.6\% | \$535 | 2.5\% | 5.5\% | 13 | 9.5\% | 7.7\% | \$895 | 5.1\% | 5.7\% |
|  | Middle | 191 | 64.5\% | \$24,954 | 63.8\% | 69.7\% | 111 | 69.8\% | 66.1\% | \$14,880 | 68.7\% | 61.1\% | 80 | 58.4\% | 67.0\% | \$10,074 | 57.8\% | 59.2\% |
|  | Upper | 80 | 27.0\% | \$12,459 | 31.9\% | 15.0\% | 37 | 23.3\% | 25.8\% | \$6,111 | 28.2\% | 33.0\% | 43 | 31.4\% | 24.9\% | \$6,348 | 36.4\% | 35.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 296 | 100.0\% | \$39,117 | 100.0\% | 100.0\% | 159 | 100.0\% | 100.0\% | \$21,673 | 100.0\% | 100.0\% | 137 | 100.0\% | 100.0\% | \$17,444 | 100.0\% | 100.0\% |
|  |  |  |  |  | Small | Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 24 | 10.5\% | \$2,958 | 14.4\% | 11.9\% | 9 | 12.9\% | 12.1\% | \$2,208 | 20.9\% | 18.4\% | 15 | 9.4\% | 12.0\% | \$750 | 7.5\% | 17.3\% |
|  | Middle | 127 | 55.5\% | \$11,086 | 54.0\% | 66.7\% | 40 | 57.1\% | 58.2\% | \$6,057 | 57.3\% | 55.6\% | 87 | 54.7\% | 59.1\% | \$5,029 | 50.6\% | 57.3\% |
|  | Upper | 71 | 31.0\% | \$6,172 | 30.1\% | 19.6\% | 18 | 25.7\% | 22.5\% | \$2,184 | 20.7\% | 22.9\% | 53 | 33.3\% | 22.3\% | \$3,988 | 40.1\% | 21.7\% |
|  | Unknown | 7 | 3.1\% | \$303 | 1.5\% | 0.5\% | 3 | 4.3\% | 0.5\% | \$125 | 1.2\% | 0.3\% | 4 | 2.5\% | 0.5\% | \$178 | 1.8\% | 0.2\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 3.3\% |
|  |  | 229 | 100.0\% | \$20,519 | 100.0\% | 100.0\% | 70 | 100.0\% | 100.0\% | \$10,574 | 100.0\% | 100.0\% | 159 | 100.0\% | 100.0\% | \$9,945 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | 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\% | 14.4\% | 0 | 0.0\% | 21.2\% | \$0 | 0.0\% | 30.0\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 3.8\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 67.1\% | 0 | 0.0\% | 57.6\% | \$0 | 0.0\% | 39.2\% | 0 | 0.0\% | 56.5\% | \$0 | 0.0\% | 50.8\% |
|  | Upper | 1 | 100.0\% | \$15 | 100.0\% | 17.8\% | 0 | 0.0\% | 18.2\% | \$0 | 0.0\% | 30.8\% | 1 | 100.0\% | 34.8\% | \$15 | 100.0\% | 42.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 3.0\% |
|  | Total | 1 | 100.0\% | \$15 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$15 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: LA Houma


[^412]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: LA Lafayette


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: LA Lafayette


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## Appendices

## Combined Demographics Report

Assessment Area: LA Morehouse


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: LA Morehouse

| $\stackrel{\underset{\nu}{\underset{\sim}{n}}}{ }$ | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount ${ }^{\text {B }}$ |  | Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | (000s) | Dollar | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | B $\$(000 s)$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 2 | 9.5\% | \$120 | 5.6\% | 12.7\% | 1 | 9.1\% | 8.7\% | \$73 | 5.9\% | 8.0\% | 1 | 10.0\% | 7.2\% | \$47 | 5.1\% | 7.0\% |
|  | Middle | 15 | 71.4\% | \$1,500 | 69.6\% | 76.8\% | 7 | 63.6\% | 76.0\% | \$725 | 58.5\% | 77.6\% | 8 | 80.0\% | 79.4\% | \$775 | 84.7\% | 79.8\% |
|  | Upper | 4 | 19.0\% | \$535 | 24.8\% | 9.0\% | 3 | 27.3\% | 12.7\% | \$442 | 35.6\% | 13.4\% | 1 | 10.0\% | 12.5\% | \$93 | 10.2\% | 12.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 21 | 100.0\% | \$2,155 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$1,240 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$915 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 3 | 10.0\% | \$419 | 15.0\% | 12.7\% | 2 | 10.5\% | 7.2\% | \$165 | 9.6\% | 6.7\% | 1 | 9.1\% | 8.9\% | \$254 | 23.9\% | 7.4\% |
|  | Middle | 26 | 86.7\% | \$2,304 | 82.6\% | 76.8\% | 17 | 89.5\% | 79.4\% | \$1,560 | 90.4\% | 79.7\% | 9 | 81.8\% | 79.1\% | \$744 | 69.9\% | 79.3\% |
|  | Upper | 1 | 3.3\% | \$66 | 2.4\% | 9.0\% | 0 | 0.0\% | 13.0\% | \$0 | 0.0\% | 13.2\% | 1 | 9.1\% | 11.7\% | \$66 | 6.2\% | 12.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 30 | 100.0\% | \$2,789 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$1,725 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$1,064 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 1.2\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 12.7\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 16.7\% | 0 | 0.0\% | 16.9\% | \$0 | 0.0\% | 10.7\% |
|  | Middle | 9 | 100.0\% | \$35 | 100.0\% | 76.8\% | 2 | 100.0\% | 69.0\% | \$13 | 100.0\% | 59.5\% | 7 | 100.0\% | 70.8\% | \$22 | 100.0\% | 73.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 9.0\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 23.8\% | 0 | 0.0\% | 11.2\% | \$0 | 0.0\% | 15.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 9 | 100.0\% | \$35 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$13 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$22 | 100.0\% | 100.0\% |
|  |  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 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\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 27.4\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 51.5\% | 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\% | 5.0\% | 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\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.3\% |
|  | Moderate | 5 | 8.3\% | \$539 | 10.8\% | 12.7\% | 3 | 9.4\% | 8.5\% | \$238 | 8.0\% | 8.0\% | 2 | 7.1\% | 8.8\% | \$301 | 15.0\% | 8.0\% |
|  | Middle | 50 | 83.3\% | \$3,839 | 77.1\% | 76.8\% | 26 | 81.3\% | 77.2\% | \$2,298 | 77.2\% | 77.9\% | 24 | 85.7\% | 78.6\% | \$1,541 | 77.0\% | 78.8\% |
|  | Upper | 5 | 8.3\% | \$601 | 12.1\% | 9.0\% | 3 | 9.4\% | 12.9\% | \$442 | 14.8\% | 13.5\% | 2 | 7.1\% | 12.0\% | \$159 | 7.9\% | 12.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 60 | 100.0\% | \$4,979 | 100.0\% | 100.0\% | 32 | 100.0\% | 100.0\% | \$2,978 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$2,001 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 2 | 3.0\% | \$28 | 1.3\% | 3.1\% | 1 | 6.3\% | 1.5\% | \$18 | 2.6\% | 1.4\% | 1 | 2.0\% | 2.6\% | \$10 | 0.7\% | 0.5\% |
|  |  | 4 | 6.1\% | \$174 | 7.9\% | 15.6\% | 0 | 0.0\% | 19.2\% | \$0 | 0.0\% | 29.3\% | 4 | 8.0\% | 14.6\% | \$174 | 11.5\% | 26.1\% |
|  |  | 55 | 83.3\% | \$1,763 | 80.0\% | 73.2\% | 14 | 87.5\% | 66.0\% | \$602 | 87.9\% | 61.3\% | 41 | 82.0\% | 68.1\% | \$1,161 | 76.5\% | 65.4\% |
|  |  | 4 | 6.1\% | \$235 | 10.7\% | 8.1\% | 1 | 6.3\% | 8.6\% | \$65 | 9.5\% | 6.8\% | 3 | 6.0\% | 7.7\% | \$170 | 11.2\% | 6.5\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 1 | 1.5\% | \$3 | 0.1\% |  | 0 | 0.0\% | 4.6\% | \$0 | 0.0\% | 1.1\% | 1 | 2.0\% | 7.0\% | \$3 | 0.2\% | 1.5\% |
|  |  | 66 | 100.0\% | \$2,203 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$685 | 100.0\% | 100.0\% | 50 | 100.0\% | 100.0\% | \$1,518 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 5.0\% | 0 | 0.0\% | 12.3\% | \$0 | 0.0\% | 13.3\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 10.1\% |
|  |  | 28 | 96.6\% | \$5,452 | 97.1\% | 87.5\% | 9 | 90.0\% | 78.8\% | \$2,264 | 93.4\% | 75.5\% | 19 | 100.0\% | 78.1\% | \$3,188 | 100.0\% | 74.1\% |
|  |  | 1 | 3.4\% | \$160 | 2.9\% | 4.8\% | 1 | 10.0\% | 4.8\% | \$160 | 6.6\% | 9.3\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 9.4\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 6.4\% |
|  |  | 29 | 100.0\% | \$5,612 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$2,424 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$3,188 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: LA Morehouse


[^416]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: LA New Orleans


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Geographic Distribution of HMDA，Small Business，\＆Small Farm Loans
Assessment Area：LA New Orleans

| $\stackrel{\text { 山上 }}{\stackrel{\sim}{㐅}}$ | Tract <br> Income <br> Levels | Bank Lending \＆Demographic Data Comparison 2010， 2011 |  |  |  |  | Bank \＆Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount ${ }^{\text {B }}$ |  | ank <br> Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ |  | Count ank <br> \％ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bar } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar k \＄\％ | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | \＃ | Count <br> ank <br> \％ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | （ ${ }_{\text {Ba }}^{\text {（000s）}}$ | Dollar k \＄\％ | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ |
|  | Low | 8 | 1．4\％ | \＄823 | 0．7\％ | 4．4\％ | 4 | 1．4\％ | 2．6\％ | \＄388 | 0．7\％ | 1．9\％ | 4 | 1．4\％ | 2．6\％ | \＄435 | 0．8\％ | 2．0\％ |
|  | Moderate | 56 | 9．5\％ | \＄7，855 | 7．1\％ | 16．2\％ | 25 | 8．6\％ | 11．5\％ | \＄3，652 | 6．6\％ | 9．4\％ | 31 | 10．5\％ | 11．8\％ | \＄4，203 | 7．5\％ | 9．7\％ |
|  | Middle | 212 | 36．1\％ | \＄31，723 | 28．6\％ | 42．5\％ | 101 | 34．6\％ | 38．2\％ | \＄13，864 | 25．1\％ | 32．7\％ | 111 | 37．6\％ | 38．4\％ | \＄17，859 | 32．0\％ | 32．4\％ |
|  | Upper | 311 | 53．0\％ | \＄70，585 | 63．6\％ | 36．8\％ | 162 | 55．5\％ | 47．7\％ | \＄37，271 | 67．6\％ | 55．9\％ | 149 | 50．5\％ | 47．2\％ | \＄33，314 | 59．7\％ | 55．8\％ |
|  | Unknown | 0 | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．1\％ | \＄0 | 0．0\％ | 0．1\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ |
|  | Total | 587 | 100．0\％ | \＄110，986 | 100．0\％ | 100．0\％ | 292 | 100．0\％ | 100．0\％ | \＄55，175 | 100．0\％ | 100．0\％ | 295 | 100．0\％ | 100．0\％ | \＄55，811 | 100．0\％ | 100．0\％ |
|  | Low | 21 | 1．7\％ | \＄2，450 | 1．2\％ | 4．4\％ | 13 | 1．8\％ | 1．8\％ | \＄1，551 | 1．3\％ | 1．3\％ | 8 | 1．6\％ | 1．9\％ | \＄899 | 1．1\％ | 1．4\％ |
|  | Moderate | 117 | 9．7\％ | \＄16，129 | 8．0\％ | 16．2\％ | 68 | 9．4\％ | 8．6\％ | \＄9，908 | 8．1\％ | 7．0\％ | 49 | 10．1\％ | 9．6\％ | \＄6，221 | 7．9\％ | 7．7\％ |
|  | Middle | 411 | 34．1\％ | \＄58，887 | 29．3\％ | 42．5\％ | 238 | 33．0\％ | 36．2\％ | \＄35，260 | 28．9\％ | 30．9\％ | 173 | 35．7\％ | 36．3\％ | \＄23，627 | 30．0\％ | 30．5\％ |
|  | Upper | 658 | 54．5\％ | \＄123，505 | 61．5\％ | 36．8\％ | 403 | 55．8\％ | 53．3\％ | \＄75，495 | 61．8\％ | 60．7\％ | 255 | 52．6\％ | 52．2\％ | \＄48，010 | 61．0\％ | 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 | 1，207 | 100．0\％ | \＄200，971 | 100．0\％ | 100．0\％ | 722 | 100．0\％ | 100．0\％ | \＄122，214 | 100．0\％ | 100．0\％ | 485 | 100．0\％ | 100．0\％ | \＄78，757 | 100．0\％ | 100．0\％ |
|  | Lo | 6 | 5．0\％ | \＄59 | 4．3\％ | 4．4\％ | 2 | 3．5\％ | 4．1\％ | \＄26 | 3．8\％ | 2．9\％ | 4 | 6．5\％ | 3．9\％ | \＄33 | 4．7\％ | 3．3\％ |
|  | Moderate | 21 | 17．6\％ | \＄170 | 12．3\％ | 16．2\％ | 11 | 19．3\％ | 15．6\％ | \＄93 | 13．7\％ | 13．3\％ | 10 | 16．1\％ | 16．0\％ | \＄77 | 11．0\％ | 14．5\％ |
|  | Middle | 49 | 41．2\％ | \＄570 | 41．3\％ | 42．5\％ | 24 | 42．1\％ | 43．1\％ | \＄316 | 46．5\％ | 34．1\％ | 25 | 40．3\％ | 41．7\％ | \＄254 | 36．3\％ | 29．5\％ |
|  | Upper | 43 | 36．1\％ | \＄581 | 42．1\％ | 36．8\％ | 20 | 35．1\％ | 37．2\％ | \＄245 | 36．0\％ | 49．7\％ | 23 | 37．1\％ | 38．5\％ | \＄336 | 48．0\％ | 52．7\％ |
|  | Unknown | 0 | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ |
|  | Total | 119 | 100．0\％ | \＄1，380 | 100．0\％ | 100．0\％ | 57 | 100．0\％ | 100．0\％ | \＄680 | 100．0\％ | 100．0\％ | 62 | 100．0\％ | 100．0\％ | \＄700 | 100．0\％ | 100．0\％ |
|  |  |  |  |  | Multi－Fa | amily Units |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0．0\％ | \＄0 | 0．0\％ | 16．4\％ | 0 | 0．0\％ | 11．5\％ | \＄0 | 0．0\％ | 9．1\％ | 0 | 0．0\％ | 14．5\％ | \＄0 | 0．0\％ | 6．6\％ |
|  | Moderate | 0 | 0．0\％ | \＄0 | 0．0\％ | 27．1\％ | 0 | 0．0\％ | 33．3\％ | \＄0 | 0．0\％ | 30．2\％ | 0 | 0．0\％ | 24．2\％ | \＄0 | 0．0\％ | 8．5\％ |
|  | Middle | 0 | 0．0\％ | \＄0 | 0．0\％ | 32．7\％ | 0 | 0．0\％ | 27．1\％ | \＄0 | 0．0\％ | 42．6\％ | 0 | 0．0\％ | 28．2\％ | \＄0 | 0．0\％ | 50．7\％ |
|  | Upper | 0 | 0．0\％ | \＄0 | 0．0\％ | 23．8\％ | 0 | 0．0\％ | 28．1\％ | \＄0 | 0．0\％ | 18．1\％ | 0 | 0．0\％ | 33．1\％ | \＄0 | 0．0\％ | 34．2\％ |
|  | Unknown | 0 | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ |
|  | 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\％ |
|  | Low | 35 | 1．8\％ | \＄3，332 | 1．1\％ | 4．4\％ | 19 | 1．8\％ | 2．2\％ | \＄1，965 | 1．1\％ | 1．7\％ | 16 | 1．9\％ | 2．3\％ | \＄1，367 | 1．0\％ | 1．8\％ |
|  | Moderate | 194 | 10．1\％ | \＄24，154 | 7．7\％ | 16．2\％ | 104 | 9．7\％ | 10．0\％ | \＄13，653 | 7．7\％ | 8．3\％ | 90 | 10．7\％ | 10．8\％ | \＄10，501 | 7．8\％ | 8．6\％ |
|  | Middle | 672 | 35．1\％ | \＄91，180 | 29．1\％ | 42．5\％ | 363 | 33．9\％ | 37．1\％ | \＄49，440 | 27．8\％ | 31．8\％ | 309 | 36．7\％ | 37．3\％ | \＄41，740 | 30．9\％ | 31．9\％ |
|  | Upper | 1，012 | 52．9\％ | \＄194，671 | 62．1\％ | 36．8\％ | 585 | 54．6\％ | 50．7\％ | \＄113，011 | 63．5\％ | 58．3\％ | 427 | 50．7\％ | 49．7\％ | \＄81，660 | 60．4\％ | 57．7\％ |
|  | Unknown | 0 | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ |
|  | Total | 1，913 | 100．0\％ | \＄313，337 | 100．0\％ | 100．0\％ | 1，071 | 100．0\％ | 100．0\％ | \＄178，069 | 100．0\％ | 100．0\％ | 842 | 100．0\％ | 100．0\％ | \＄135，268 | 100．0\％ | 100．0\％ |
|  |  |  |  |  | Small | I Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 77 | 4．0\％ | \＄12，081 | 7．7\％ | 5．5\％ | 28 | 4．7\％ | 4．7\％ | \＄5，577 | 8．3\％ | 6．4\％ | 49 | 3．7\％ | 5．2\％ | \＄6，504 | 7．3\％ | 6．4\％ |
|  | Moderate | 303 | 15．7\％ | \＄25，177 | 16．1\％ | 18．4\％ | 103 | 17．3\％ | 15．6\％ | \＄11，405 | 16．9\％ | 17．1\％ | 200 | 15．0\％ | 16．5\％ | \＄13，772 | 15．5\％ | 18．3\％ |
|  | Middle | 636 | 33．0\％ | \＄47，527 | 30．4\％ | 36．6\％ | 191 | 32．1\％ | 31．5\％ | \＄20，534 | 30．4\％ | 31．8\％ | 445 | 33．5\％ | 31．9\％ | \＄26，993 | 30．4\％ | 32．3\％ |
|  | Upper | 908 | 47．2\％ | \＄71，423 | 45．7\％ | 39．5\％ | 273 | 45．9\％ | 45．8\％ | \＄29，982 | 44．4\％ | 42．7\％ | 635 | 47．7\％ | 44．4\％ | \＄41，441 | 46．7\％ | 41．6\％ |
|  | 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 | 1 | 0．1\％ | \＄1 | 0．0\％ |  | 0 | 0．0\％ | 2．4\％ | \＄0 | 0．0\％ | 2．1\％ | 1 | 0．1\％ | 1．9\％ | \＄1 | 0．0\％ | 1．3\％ |
|  |  | 1，925 | 100．0\％ | \＄156，209 | 100．0\％ | 100．0\％ | 595 | 100．0\％ | 100．0\％ | \＄67，498 | 100．0\％ | 100．0\％ | 1，330 | 100．0\％ | 100．0\％ | \＄88，711 | 100．0\％ | 100．0\％ |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0．0\％ | \＄0 | 0．0\％ | 1．1\％ | 0 | 0．0\％ | 1．4\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ |
|  | Moderate | 2 | 25．0\％ | \＄508 | 62．3\％ | 11．3\％ | 1 | 100．0\％ | 18．8\％ | \＄320 | 100．0\％ | 27．5\％ | 1 | 14．3\％ | 15．4\％ | \＄188 | 37．9\％ | 16．9\％ |
|  | Middle | 2 | 25．0\％ | \＄153 | 18．8\％ | 54．7\％ | 0 | 0．0\％ | 37．7\％ | \＄0 | 0．0\％ | 26．4\％ | 2 | 28．6\％ | 47．7\％ | \＄153 | 30．8\％ | 37．9\％ |
|  | Upper | 4 | 50．0\％ | \＄155 | 19．0\％ | 32．8\％ | 0 | 0．0\％ | 39．1\％ | \＄0 | 0．0\％ | 44．7\％ | 4 | 57．1\％ | 32．3\％ | \＄155 | 31．3\％ | 43．0\％ |
|  | Unknown | 0 | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ | 0 | 0．0\％ | 0．0\％ | \＄0 | 0．0\％ | 0．0\％ |
|  | Tr Unknown | 0 | 0．0\％ | \＄0 | 0．0\％ |  | 0 | 0．0\％ | 2．9\％ | \＄0 | 0．0\％ | 1．3\％ | 0 | 0．0\％ | 4．6\％ | \＄0 | 0．0\％ | 2．2\％ |
|  | Total | 8 | 100．0\％ | \＄816 | 100．0\％ | 100．0\％ | 1 | 100．0\％ | 100．0\％ | \＄320 | 100．0\％ | 100．0\％ | 7 | 100．0\％ | 100．0\％ | \＄496 | 100．0\％ | 100．0\％ |

Originations \＆Purchases

## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: LA New Orleans

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count | $\begin{aligned} & \text { Bank } \\ & \left\lvert\, \begin{array}{r} \text { Doll } \\ \text { \$(000s) } \end{array}\right. \end{aligned}$ | lar <br> \$ \% | Families by Family Income <br> \% | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{gathered} \text { Banl } \\ \$(000 \mathrm{~s}) \end{gathered}$ | Dollar <br> k \$ \% | Agg \$ \% | \# | Count <br> ank <br> \% | Agg $\%$ | $\quad$ Ban \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  |  |  | Low | 43 | 7.3\% | \$3,596 | 3.2\% | 23.7\% | 21 | 7.2\% | 7.2\% | \$1,720 | 3.1\% | 3.6\% | 22 | 7.5\% | 7.4\% | \$1,876 | 3.4\% | 3.6\% |
|  |  | Moderate | 130 | 22.1\% | \$16,214 | 14.6\% | 16.3\% | 63 | 21.6\% | 22.4\% | \$7,778 | 14.1\% | 15.7\% | 67 | 22.7\% | 21.2\% | \$8,436 | 15.1\% | 14.9\% |
|  |  | Middle | 134 | 22.8\% | \$19,772 | 17.8\% | 18.9\% | 68 | 23.3\% | 23.4\% | \$9,824 | 17.8\% | 20.8\% | 66 | 22.4\% | 21.5\% | \$9,948 | 17.8\% | 19.4\% |
|  |  | Upper | 278 | 47.4\% | \$71,241 | 64.2\% | 41.1\% | 139 | 47.6\% | 37.3\% | \$35,777 | 64.8\% | 49.6\% | 139 | 47.1\% | 39.6\% | \$35,464 | 63.5\% | 53.1\% |
|  |  | Unknown | 2 | 0.3\% | \$163 | 0.1\% | 0.0\% | 1 | 0.3\% | 9.7\% | \$76 | 0.1\% | 10.2\% | 1 | 0.3\% | 10.3\% | \$87 | 0.2\% | 9.1\% |
|  |  | Total | 587 | 100.0\% | \$110,986 | 100.0\% | 100.0\% | 292 | 100.0\% | 100.0\% | \$55,175 | 100.0\% | 100.0\% | 295 | 100.0\% | 100.0\% | \$55,811 | 100.0\% | 100.0\% |
|  |  | Low | 93 | 7.7\% | \$7,985 | 4.0\% | 23.7\% | 59 | 8.2\% | 4.5\% | \$5,308 | 4.3\% | 2.4\% | 34 | 7.0\% | 4.3\% | \$2,677 | 3.4\% | 2.3\% |
|  |  | Moderate | 184 | 15.2\% | \$19,939 | 9.9\% | 16.3\% | 109 | 15.1\% | 12.4\% | \$11,825 | 9.7\% | 8.0\% | 75 | 15.5\% | 11.5\% | \$8,114 | 10.3\% | 7.3\% |
|  |  | Middle | 276 | 22.9\% | \$38,187 | 19.0\% | 18.9\% | 155 | 21.5\% | 19.0\% | \$22,401 | 18.3\% | 15.5\% | 121 | 24.9\% | 18.8\% | \$15,786 | 20.0\% | 14.8\% |
|  |  | Upper | 633 | 52.4\% | \$130,641 | 65.0\% | 41.1\% | 388 | 53.7\% | 46.9\% | \$80,470 | 65.8\% | 56.9\% | 245 | 50.5\% | 47.4\% | \$50,171 | 63.7\% | 58.9\% |
|  |  | Unknown | 21 | 1.7\% | \$4,219 | 2.1\% | 0.0\% | 11 | 1.5\% | 17.2\% | \$2,210 | 1.8\% | 17.2\% | 10 | 2.1\% | 17.9\% | \$2,009 | 2.6\% | 16.7\% |
|  |  | Total | 1,207 | 100.0\% | \$200,971 | 100.0\% | 100.0\% | 722 | 100.0\% | 100.0\% | \$122,214 | 100.0\% | 100.0\% | 485 | 100.0\% | 100.0\% | \$78,757 | 100.0\% | 100.0\% |
|  |  | Low | 21 | 17.6\% | \$197 | 14.3\% | 23.7\% | 9 | 15.8\% | 12.6\% | \$102 | 15.0\% | 4.7\% | 12 | 19.4\% | 11.6\% | \$95 | 13.6\% | 3.9\% |
|  |  | Moderate | 25 | 21.0\% | \$151 | 10.9\% | 16.3\% | 13 | 22.8\% | 17.9\% | \$80 | 11.8\% | 11.1\% | 12 | 19.4\% | 18.7\% | \$71 | 10.1\% | 12.8\% |
|  |  | Middle | 29 | 24.4\% | \$274 | 19.9\% | 18.9\% | 15 | 26.3\% | 21.3\% | \$143 | 21.0\% | 21.8\% | 14 | 22.6\% | 20.0\% | \$131 | 18.7\% | 16.5\% |
|  |  | Upper | 41 | 34.5\% | \$726 | 52.6\% | 41.1\% | 18 | 31.6\% | 35.5\% | \$332 | 48.8\% | 50.8\% | 23 | 37.1\% | 35.0\% | \$394 | 56.3\% | 49.1\% |
|  |  | Unknown | 3 | 2.5\% | \$32 | 2.3\% | 0.0\% | 2 | 3.5\% | 12.7\% | \$23 | 3.4\% | 11.7\% | 1 | 1.6\% | 14.8\% | \$9 | 1.3\% | 17.8\% |
|  |  | Total | 119 | 100.0\% | \$1,380 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$680 | 100.0\% | 100.0\% | 62 | 100.0\% | 100.0\% | \$700 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 23.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 16.3\% | 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\% | 18.9\% | 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\% | 41.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 157 | 8.2\% | \$11,778 | 3.8\% | 23.7\% | 89 | 8.3\% | 5.7\% | \$7,130 | 4.0\% | 2.8\% | 68 | 8.1\% | 5.8\% | \$4,648 | 3.4\% | 2.8\% |
|  |  | Moderate | 339 | 17.7\% | \$36,304 | 11.6\% | 16.3\% | 185 | 17.3\% | 16.1\% | \$19,683 | 11.1\% | 10.7\% | 154 | 18.3\% | 15.5\% | \$16,621 | 12.3\% | 10.1\% |
|  |  | Middle | 439 | 22.9\% | \$58,233 | 18.6\% | 18.9\% | 238 | 22.2\% | 20.6\% | \$32,368 | 18.2\% | 17.3\% | 201 | 23.9\% | 19.8\% | \$25,865 | 19.1\% | 16.1\% |
|  |  | Upper | 952 | 49.8\% | \$202,608 | 64.7\% | 41.1\% | 545 | 50.9\% | 43.0\% | \$116,579 | 65.5\% | 53.4\% | 407 | 48.3\% | 43.7\% | \$86,029 | 63.6\% | 54.6\% |
|  |  | Unknown | 26 | 1.4\% | \$4,414 | 1.4\% | 0.0\% | 14 | 1.3\% | 14.7\% | \$2,309 | 1.3\% | 15.8\% | 12 | 1.4\% | 15.1\% | \$2,105 | 1.6\% | 16.4\% |
|  |  | Total | 1,913 | 100.0\% | \$313,337 | 100.0\% | 100.0\% | 1,071 | 100.0\% | 100.0\% | \$178,069 | 100.0\% | 100.0\% | 842 | 100.0\% | 100.0\% | \$135,268 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Total | usinesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 583 | 30.3\% | \$46,598 | 29.8\% | 89.1\% | 312 | 52.4\% | 25.7\% | \$25,100 | 37.2\% | 30.9\% | 271 | 20.4\% | 37.7\% | \$21,498 | 24.2\% | 35.5\% |
|  |  | Over \$1 Million | 316 | 16.4\% | \$79,131 | 50.7\% | 5.8\% | 148 | 24.9\% |  |  |  |  | 168 | 12.6\% |  |  |  |  |
|  | $\stackrel{\substack{0}}{\substack{2}}$ | Total Rev. available | 899 | 46.7\% | \$125,729 | 80.5\% | 94.9\% | 460 | 77.3\% |  |  |  |  | 439 | 33.0\% |  |  |  |  |
|  | ¢ | Rev. Not Known | 1,026 | 53.3\% | \$30,480 | 19.5\% | 5.2\% | 135 | 22.7\% |  |  |  |  | 891 | 67.0\% |  |  |  |  |
|  |  | Total | 1,925 | 100.0\% | \$156,209 | 100.0\% | 100.0\% | 595 | 100.0\% |  |  |  |  | 1,330 | 100.0\% |  |  |  |  |
|  | - | \$100,000 or Less | 1,622 | 84.3\% | \$51,466 | 32.9\% |  | 457 | 76.8\% | 88.8\% | \$20,046 | 29.7\% | 23.8\% | 1,165 | 87.6\% | 90.5\% | \$31,420 | 35.4\% | 25.4\% |
|  | $\stackrel{N}{0}$ | \$100,001-\$250,000 | 159 | 8.3\% | \$27,653 | 17.7\% |  | 72 | 12.1\% | 5.4\% | \$11,929 | 17.7\% | 17.6\% | 87 | 6.5\% | 4.6\% | \$15,724 | 17.7\% | 17.7\% |
|  | ก్ర్ర్ | \$250,001-\$1 Million | 144 | 7.5\% | \$77,090 | 49.4\% |  | 66 | 11.1\% | 5.8\% | \$35,523 | 52.6\% | 58.7\% | 78 | 5.9\% | 4.9\% | \$41,567 | 46.9\% | 56.9\% |
|  |  | Total | 1,925 | 100.0\% | \$156,209 | 100.0\% |  | 595 | 100.0\% | 100.0\% | \$67,498 | 100.0\% | 100.0\% | 1,330 | 100.0\% | 100.0\% | \$88,711 | 100.0\% | 100.0\% |
|  |  |  |  |  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 2 | 25.0\% | \$248 | 30.4\% | 95.7\% | 0 | 0.0\% | 55.1\% | \$0 | 0.0\% | 46.0\% | 2 | 28.6\% | 63.1\% | \$248 | 50.0\% | 76.5\% |
|  |  |  | 2 | 25.0\% | \$463 | 56.7\% | 3.2\% | 1 | 100.0\% |  |  |  |  | 1 | 14.3\% |  |  |  |  |
|  |  |  | 4 | 50.0\% | \$105 | 12.9\% | 1.1\% | 0 | 0.0\% |  |  |  |  | 4 | 57.1\% |  |  |  |  |
|  |  |  | 8 | 100.0\% | \$816 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 7 | 100.0\% |  |  |  |  |
|  |  |  | 5 | 62.5\% | \$165 | 20.2\% |  | 0 | 0.0\% | 87.0\% | \$0 | 0.0\% | 30.3\% | 5 | 71.4\% | 87.7\% | \$165 | 33.3\% | 45.8\% |
|  |  |  | 2 | 25.0\% | \$331 | 40.6\% |  | 0 | 0.0\% | 7.2\% | \$0 | 0.0\% | 23.1\% | 2 | 28.6\% | 9.2\% | \$331 | 66.7\% | 31.1\% |
|  |  |  | 1 | 12.5\% | \$320 | 39.2\% |  | 1 | 100.0\% | 5.8\% | \$320 | 100.0\% | 46.6\% | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 23.0\% |
|  |  |  | 8 | 100.0\% | \$816 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$320 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$496 | 100.0\% | 100.0\% |

[^417]Originations \& Purchases

## Appendices

## Combined Demographics Report

## Assessment Area: LA Northwest LA



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: LA Northwest LA


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: LA Northwest LA

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | \% | $\begin{gathered} \text { ank } \\ \\ \\ \\ \text { Doll } \\ \text { \$ (000s) } \end{gathered}$ | \$\% | Families by Family Income <br> \% | \# | Count <br> chenk <br> $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar k \$ \% | Agg \$ \% | B | Count <br> ank <br> \% | \% | Ba \$(000s) | Dollar <br> k <br> \$ \% | Agg \$\% |
|  | Low | 4 | 8.2\% | \$286 | 5.1\% | 21.8\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 2.0\% | 4 | 16.0\% | 4.3\% | \$286 | 9.6\% | 1.6\% |
|  | Moderate | 7 | 14.3\% | \$679 | 12.1\% | 14.6\% | 5 | 20.8\% | 11.9\% | \$488 | 18.5\% | 7.6\% | 2 | 8.0\% | 13.3\% | \$191 | 6.4\% | 9.2\% |
|  | Middle | 14 | 28.6\% | \$1,465 | 26.1\% | 18.1\% | 9 | 37.5\% | 20.6\% | \$987 | 37.4\% | 16.8\% | 5 | 20.0\% | 21.0\% | \$478 | 16.1\% | 18.3\% |
|  | Upper | 24 | 49.0\% | \$3,175 | 56.6\% | 45.4\% | 10 | 41.7\% | 47.4\% | \$1,164 | 44.1\% | 54.5\% | 14 | 56.0\% | 47.7\% | \$2,011 | 67.8\% | 57.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 15.8\% | \$0 | 0.0\% | 19.1\% | 0 | 0.0\% | 13.8\% | \$0 | 0.0\% | 13.3\% |
|  | Total | 49 | 100.0\% | \$5,605 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$2,639 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$2,966 | 100.0\% | 100.0\% |
|  | Low | 6 | 9.1\% | \$262 | 3.9\% | 21.8\% | 2 | 5.7\% | 2.6\% | \$73 | 1.8\% | 1.1\% | 4 | 12.9\% | 4.0\% | \$189 | 6.9\% | 1.6\% |
|  | Moderate | 7 | 10.6\% | \$335 | 4.9\% | 14.6\% | 6 | 17.1\% | 7.6\% | \$240 | 5.9\% | 3.9\% | 1 | 3.2\% | 8.3\% | \$95 | 3.5\% | 5.4\% |
|  | Middle | 9 | 13.6\% | \$618 | 9.1\% | 18.1\% | 5 | 14.3\% | 11.4\% | \$314 | 7.7\% | 7.5\% | 4 | 12.9\% | 13.7\% | \$304 | 11.1\% | 10.5\% |
|  | Upper | 43 | 65.2\% | \$5,417 | 79.8\% | 45.4\% | 21 | 60.0\% | 56.7\% | \$3,278 | 80.8\% | 62.1\% | 22 | 71.0\% | 54.9\% | \$2,139 | 78.4\% | 60.1\% |
|  | Unknown | 1 | 1.5\% | \$153 | 2.3\% | 0.0\% | 1 | 2.9\% | 21.7\% | \$153 | 3.8\% | 25.5\% | 0 | 0.0\% | 19.2\% | \$0 | 0.0\% | 22.4\% |
|  | Total | 66 | 100.0\% | \$6,785 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$4,058 | 100.0\% | 100.0\% | 31 | 100.0\% | 100.0\% | \$2,727 | 100.0\% | 100.0\% |
|  | Low | 8 | 23.5\% | \$28 | 11.1\% | 21.8\% | 3 | 18.8\% | 9.7\% | \$11 | 11.0\% | 2.0\% | 5 | 27.8\% | 11.9\% | \$17 | 11.1\% | 5.8\% |
|  | Moderate | 6 | 17.6\% | \$24 | 9.5\% | 14.6\% | 4 | 25.0\% | 11.4\% | \$17 | 17.0\% | 5.1\% | 2 | 11.1\% | 14.9\% | \$7 | 4.6\% | 5.6\% |
|  | Middle | 9 | 26.5\% | \$55 | 21.7\% | 18.1\% | 5 | 31.3\% | 25.0\% | \$27 | 27.0\% | 12.8\% | 4 | 22.2\% | 18.6\% | \$28 | 18.3\% | 11.8\% |
|  | Upper | 10 | 29.4\% | \$142 | 56.1\% | 45.4\% | 4 | 25.0\% | 46.6\% | \$45 | 45.0\% | 66.4\% | 6 | 33.3\% | 47.9\% | \$97 | 63.4\% | 59.5\% |
|  | Unknown | 1 | 2.9\% | \$4 | 1.6\% | 0.0\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 13.7\% | 1 | 5.6\% | 6.7\% | \$4 | 2.6\% | 17.2\% |
|  | Total | 34 | 100.0\% | \$253 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$100 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$153 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{\stackrel{\rightharpoonup}{2}}$ | 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\% | 14.6\% | 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\% | 18.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 45.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 18 | 12.1\% | \$576 | 4.6\% | 21.8\% | 5 | 6.7\% | 3.7\% | \$84 | 1.2\% | 1.4\% | 13 | 17.6\% | 4.7\% | \$492 | 8.4\% | 1.7\% |
|  | Moderate | 20 | 13.4\% | \$1,038 | 8.2\% | 14.6\% | 15 | 20.0\% | 9.4\% | \$745 | 11.0\% | 5.3\% | 5 | 6.8\% | 10.7\% | \$293 | 5.0\% | 6.7\% |
|  | Middle | 32 | 21.5\% | \$2,138 | 16.9\% | 18.1\% | 19 | 25.3\% | 15.6\% | \$1,328 | 19.5\% | 10.9\% | 13 | 17.6\% | 16.8\% | \$810 | 13.9\% | 13.3\% |
|  | Upper | 77 | 51.7\% | \$8,734 | 69.1\% | 45.4\% | 35 | 46.7\% | 52.4\% | \$4,487 | 66.0\% | 59.0\% | 42 | 56.8\% | 51.3\% | \$4,247 | 72.6\% | 57.7\% |
|  | Unknown | 2 | 1.3\% | \$157 | 1.2\% | 0.0\% | 1 | 1.3\% | 18.8\% | \$153 | 2.3\% | 23.5\% | 1 | 1.4\% | 16.6\% | \$4 | 0.1\% | 20.5\% |
|  | Total | 149 | 100.0\% | \$12,643 | 100.0\% | 100.0\% | 75 | 100.0\% | 100.0\% | \$6,797 | 100.0\% | 100.0\% | 74 | 100.0\% | 100.0\% | \$5,846 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known <br> Total | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 56 | 28.7\% | \$3,895 | 37.8\% | 90.8\% | 35 | 56.5\% | 42.7\% | \$2,591 | 53.5\% | 60.1\% | 21 | 15.8\% | 47.1\% | \$1,304 | 23.9\% | 58.9\% |
|  |  | 22 | 11.3\% | \$3,442 | 33.4\% | 4.5\% | 9 | 14.5\% |  |  |  |  | 13 | 9.8\% |  |  |  |  |
|  |  | 78 | 40.0\% | \$7,337 | 71.2\% | 95.3\% | 44 | 71.0\% |  |  |  |  | 34 | 25.6\% |  |  |  |  |
|  |  | 117 | 60.0\% | \$2,970 | 28.8\% | 4.7\% | 18 | 29.0\% |  |  |  |  | 99 | 74.4\% |  |  |  |  |
|  |  | 195 | 100.0\% | \$10,307 | 100.0\% | 100.0\% | 62 | 100.0\% |  |  |  |  | 133 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 170 | 87.2\% | \$4,633 | 45.0\% |  | 50 | 80.6\% | 88.2\% | \$1,658 | 34.2\% | 33.3\% | 120 | 90.2\% | 90.0\% | \$2,975 | 54.5\% | 34.3\% |
|  | \$100,001-\$250,000 | 17 | 8.7\% | \$2,596 | 25.2\% |  | 7 | 11.3\% | 7.0\% | \$1,104 | 22.8\% | 22.7\% | 10 | 7.5\% | 5.8\% | \$1,492 | 27.3\% | 21.4\% |
|  | \$250,001-\$1 Million | 8 | 4.1\% | \$3,078 | 29.9\% |  | 5 | 8.1\% | 4.8\% | \$2,085 | 43.0\% | 44.0\% | 3 | 2.3\% | 4.1\% | \$993 | 18.2\% | 44.3\% |
|  | Total | 195 | 100.0\% | \$10,307 | 100.0\% |  | 62 | 100.0\% | 100.0\% | \$4,847 | 100.0\% | 100.0\% | 133 | 100.0\% | 100.0\% | \$5,460 | 100.0\% | 100.0\% |
| Small Farm | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 94.1\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 77.3\% | 0 | 0.0\% | 59.3\% | \$0 | 0.0\% | 61.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 5.1\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 4 | 100.0\% | \$122 | 100.0\% | 0.7\% | 0 | 0.0\% |  |  |  |  | 4 | 100.0\% |  |  |  |  |
|  |  | 4 | 100.0\% | \$122 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 4 | 100.0\% |  |  |  |  |
|  |  | 4 | 100.0\% | \$122 | 100.0\% |  | 0 | 0.0\% | 90.9\% | \$0 | 0.0\% | 60.8\% | 4 | 100.0\% | 92.6\% | \$122 | 100.0\% | 58.2\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 39.2\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 41.8\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 4 | 100.0\% | \$122 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$122 | 100.0\% | 100.0\% |

[^419]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: LA St. James


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: LA St. James

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$\text { 2010, } 2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count | ank <br> Do <br> \$ (000s) | \$ \% | Families by Family Income <br> \% | \# | Count <br> ank <br> \% | $\begin{aligned} & \text { Agg } \\ & \% \end{aligned}$ | $\begin{array}{r} \text { Bai } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar k \$ \% | Agg \$ \% | \# | Count <br> ank <br> \% | Agg $\%$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  |  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 21.2\% | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 1.7\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.3\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 11.4\% | 0 | 0.0\% | 7.5\% | \$0 | 0.0\% | 4.0\% | 0 | 0.0\% | 17.3\% | \$0 | 0.0\% | 10.2\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 14.3\% | 0 | 0.0\% | 33.8\% | \$0 | 0.0\% | 29.7\% | 0 | 0.0\% | 25.9\% | \$0 | 0.0\% | 22.0\% |
|  |  | Upper | 4 | 100.0\% | \$528 | 100.0\% | 53.2\% | 2 | 100.0\% | 49.6\% | \$252 | 100.0\% | 58.8\% | 2 | 100.0\% | 46.8\% | \$276 | 100.0\% | 62.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.0\% | \$0 | 0.0\% | 5.8\% | 0 | 0.0\% | 8.6\% | \$0 | 0.0\% | 5.5\% |
|  |  | Total | 4 | 100.0\% | \$528 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$252 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$276 | 100.0\% | 100.0\% |
|  |  | Low | 2 | 5.3\% | \$43 | 1.0\% | 21.2\% | 2 | 8.3\% | 1.5\% | \$43 | 1.7\% | 0.3\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.1\% |
|  |  | Moderate | 3 | 7.9\% | \$237 | 5.7\% | 11.4\% | 3 | 12.5\% | 4.8\% | \$237 | 9.1\% | 3.2\% | 0 | 0.0\% | 7.3\% | \$0 | 0.0\% | 4.7\% |
|  |  | Middle | 10 | 26.3\% | \$813 | 19.5\% | 14.3\% | 5 | 20.8\% | 8.8\% | \$402 | 15.5\% | 7.3\% | 5 | 35.7\% | 18.3\% | \$411 | 26.1\% | 12.0\% |
|  |  | Upper | 23 | 60.5\% | \$3,078 | 73.8\% | 53.2\% | 14 | 58.3\% | 75.8\% | \$1,916 | 73.7\% | 80.5\% | 9 | 64.3\% | 65.1\% | \$1,162 | 73.9\% | 75.3\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.3\% | \$0 | 0.0\% | 8.8\% | 0 | 0.0\% | 8.6\% | \$0 | 0.0\% | 7.8\% |
|  |  | Total | 38 | 100.0\% | \$4,171 | 100.0\% | 100.0\% | 24 | 100.0\% | 100.0\% | \$2,598 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$1,573 | 100.0\% | 100.0\% |
|  |  | Low | 2 | 28.6\% | \$7 | 9.5\% | 21.2\% | 0 | 0.0\% | 10.6\% | \$0 | 0.0\% | 2.3\% | 2 | 40.0\% | 14.6\% | \$7 | 29.2\% | 1.6\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 11.4\% | 0 | 0.0\% | 6.4\% | \$0 | 0.0\% | 2.3\% | 0 | 0.0\% | 14.6\% | \$0 | 0.0\% | 12.1\% |
|  |  | Middle | 1 | 14.3\% | \$40 | 54.1\% | 14.3\% | 1 | 50.0\% | 12.8\% | \$40 | 80.0\% | 18.8\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 25.4\% |
|  |  | Upper | 4 | 57.1\% | \$27 | 36.5\% | 53.2\% | 1 | 50.0\% | 48.9\% | \$10 | 20.0\% | 74.6\% | 3 | 60.0\% | 35.4\% | \$17 | 70.8\% | 56.4\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 21.3\% | \$0 | 0.0\% | 2.0\% | 0 | 0.0\% | 10.4\% | \$0 | 0.0\% | 4.5\% |
|  |  | Total | 7 | 100.0\% | \$74 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$50 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$24 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 21.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 11.4\% | 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\% | 14.3\% | 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\% | 53.2\% | 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\% |
|  |  | 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\% |
|  |  | Low | 4 | 8.2\% | \$50 | 1.0\% | 21.2\% | 2 | 7.1\% | 2.6\% | \$43 | 1.5\% | 0.6\% | 2 | 9.5\% | 2.3\% | \$7 | 0.4\% | 0.2\% |
|  |  | Moderate | 3 | 6.1\% | \$237 | 5.0\% | 11.4\% | 3 | 10.7\% | 5.5\% | \$237 | 8.2\% | 3.3\% | 0 | 0.0\% | 10.9\% | \$0 | 0.0\% | 6.5\% |
|  |  | Middle | 11 | 22.4\% | \$853 | 17.9\% | 14.3\% | 6 | 21.4\% | 14.8\% | \$442 | 15.2\% | 12.6\% | 5 | 23.8\% | 21.1\% | \$411 | 21.9\% | 15.2\% |
|  |  | Upper | 31 | 63.3\% | \$3,633 | 76.1\% | 53.2\% | 17 | 60.7\% | 67.6\% | \$2,178 | 75.1\% | 75.4\% | 14 | 66.7\% | 57.0\% | \$1,455 | 77.7\% | 71.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 7.9\% | 0 | 0.0\% | 8.8\% | \$0 | 0.0\% | 7.1\% |
|  |  | Total | 49 | 100.0\% | \$4,773 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$2,900 | 100.0\% | 100.0\% | 21 | 100.0\% | 100.0\% | \$1,873 | 100.0\% | 100.0\% |
|  |  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 8 | 22.9\% | \$433 | 31.2\% | 87.6\% | 4 | 66.7\% | 29.2\% | \$272 | 45.3\% | 32.3\% | 4 | 13.8\% | 32.2\% | \$161 | 20.4\% | 27.7\% |
|  |  | Over \$1 Million | 4 | 11.4\% | \$574 | 41.3\% | 6.3\% | 2 | 33.3\% |  |  |  |  | 2 | 6.9\% |  |  |  |  |
|  |  | Total Rev. available | 12 | 34.3\% | \$1,007 | 72.5\% | 93.9\% | 6 | 100.0\% |  |  |  |  | 6 | 20.7\% |  |  |  |  |
|  |  | Rev. Not Known | 23 | 65.7\% | \$382 | 27.5\% | 6.1\% | 0 | 0.0\% |  |  |  |  | 23 | 79.3\% |  |  |  |  |
|  |  | Total | 35 | 100.0\% | \$1,389 | 100.0\% | 100.0\% | 6 | 100.0\% |  |  |  |  | 29 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 32 | 91.4\% | \$716 | 51.5\% |  | 4 | 66.7\% | 87.6\% | \$153 | 25.5\% | 14.7\% | 28 | 96.6\% | 87.6\% | \$563 | 71.4\% | 16.7\% |
|  |  | \$100,001 - \$250,000 | 2 | 5.7\% | \$364 | 26.2\% |  | 1 | 16.7\% | 3.4\% | \$139 | 23.1\% | 11.2\% | 1 | 3.4\% | 3.3\% | \$225 | 28.6\% | 10.2\% |
|  |  | \$250,001-\$1 Million | 1 | 2.9\% | \$309 | 22.2\% |  | 1 | 16.7\% | 9.0\% | \$309 | 51.4\% | 74.1\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 73.1\% |
|  | $\begin{aligned} & \text { N } \\ & \text { W } \\ & \text { స్ర } \end{aligned}$ | Total | 35 | 100.0\% | \$1,389 | 100.0\% |  | 6 | 100.0\% | 100.0\% | \$601 | 100.0\% | 100.0\% | 29 | 100.0\% | 100.0\% | \$788 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 90.3\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 38.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Over \$1 Million | 1 | 50.0\% | \$14 | 58.3\% | 9.7\% | 1 | 100.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 1 | 50.0\% | \$10 | 41.7\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | Total | 2 | 100.0\% | \$24 | 100.0\% | 100.0\% | 1 | 100.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 2 | 100.0\% | \$24 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$14 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% |
|  | $\cdots$ | \$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\% |
|  | శ్ర్ | \$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 | 2 | 100.0\% | \$24 | 100.0\% |  | 1 | 100.0\% | 100.0\% | \$14 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$10 | 100.0\% | 100.0\% |

[^421]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: LA Tangipahoa


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ |  | Count <br> Bank | Agg | Ba | Dollar | Agg |  | Count ank | Agg | Dollar |  |  |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 4.3\% | \$74 | 1.3\% | 6.7\% | 1 | 4.3\% | 3.5\% | \$25 | 0.9\% | 2.2\% | 1 | 4.3\% | 4.6\% | \$49 | 1.7\% | 2.8\% |
|  | Middle | 16 | 34.8\% | \$1,997 | 34.6\% | 47.4\% | 9 | 39.1\% | 45.0\% | \$1,096 | 37.6\% | 45.0\% | 7 | 30.4\% | 40.9\% | \$901 | 31.5\% | 38.8\% |
|  | Upper | 28 | 60.9\% | \$3,707 | 64.2\% | 45.9\% | 13 | 56.5\% | 51.5\% | \$1,797 | 61.6\% | 52.8\% | 15 | 65.2\% | 54.6\% | \$1,910 | 66.8\% | 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\% |
|  | Total | 46 | 100.0\% | \$5,778 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$2,918 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$2,860 | 100.0\% | 100.0\% |
|  | 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 | 1.8\% | \$145 | 0.9\% | 6.7\% | 1 | 1.4\% | 3.8\% | \$90 | 0.8\% | 3.4\% | 1 | 2.5\% | 1.9\% | \$55 | 1.0\% | 1.2\% |
|  | Middle | 48 | 42.5\% | \$6,933 | 43.5\% | 47.4\% | 36 | 49.3\% | 41.9\% | \$5,316 | 49.8\% | 40.8\% | 12 | 30.0\% | 42.0\% | \$1,617 | 30.6\% | 39.6\% |
|  | Upper | 63 | 55.8\% | \$8,866 | 55.6\% | 45.9\% | 36 | 49.3\% | 54.3\% | \$5,260 | 49.3\% | 55.8\% | 27 | 67.5\% | 56.0\% | \$3,606 | 68.3\% | 59.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 113 | 100.0\% | \$15,944 | 100.0\% | 100.0\% | 73 | 100.0\% | 100.0\% | \$10,666 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$5,278 | 100.0\% | 100.0\% |
|  | 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 | 13.3\% | \$18 | 7.4\% | 6.7\% | 2 | 28.6\% | 6.6\% | \$18 | 20.5\% | 2.0\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 1.3\% |
|  | Middle | 5 | 33.3\% | \$63 | 25.9\% | 47.4\% | 4 | 57.1\% | 37.1\% | \$59 | 67.0\% | 33.9\% | 1 | 12.5\% | 43.9\% | \$4 | 2.6\% | 40.1\% |
|  | Upper | 8 | 53.3\% | \$162 | 66.7\% | 45.9\% | 1 | 14.3\% | 56.3\% | \$11 | 12.5\% | 64.0\% | 7 | 87.5\% | 52.3\% | \$151 | 97.4\% | 58.6\% |
|  | 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 | 15 | 100.0\% | \$243 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$88 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$155 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-F | amily 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\% | 11.7\% | 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\% | 41.4\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 12.6\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 7.3\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 47.0\% | 0 | 0.0\% | 87.5\% | \$0 | 0.0\% | 87.4\% | 0 | 0.0\% | 90.9\% | \$0 | 0.0\% | 92.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 3.4\% | \$237 | 1.1\% | 6.7\% | 4 | 3.9\% | 3.8\% | \$133 | 1.0\% | 2.9\% | 2 | 2.8\% | 3.2\% | \$104 | 1.3\% | 1.9\% |
|  | Middle | 69 | 39.7\% | \$8,993 | 40.9\% | 47.4\% | 49 | 47.6\% | 42.9\% | \$6,471 | 47.3\% | 42.2\% | 20 | 28.2\% | 41.5\% | \$2,522 | 30.4\% | 38.3\% |
|  | Upper | 99 | 56.9\% | \$12,735 | 58.0\% | 45.9\% | 50 | 48.5\% | 53.3\% | \$7,068 | 51.7\% | 54.9\% | 49 | 69.0\% | 55.3\% | \$5,667 | 68.3\% | 59.9\% |
|  | 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\% |
|  |  | 174 | 100.0\% | \$21,965 | 100.0\% | 100.0\% | 103 | 100.0\% | 100.0\% | \$13,672 | 100.0\% | 100.0\% | 71 | 100.0\% | 100.0\% | \$8,293 | 100.0\% | 100.0\% |
|  |  |  |  |  | Small | Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 14 | 6.2\% | \$1,504 | 9.4\% | 8.2\% | 6 | 7.0\% | 7.8\% | \$1,312 | 16.4\% | 13.7\% | 8 | 5.8\% | 5.6\% | \$192 | 2.4\% | 5.9\% |
|  | Middle | 119 | 52.9\% | \$9,825 | 61.3\% | 51.7\% | 48 | 55.8\% | 46.0\% | \$4,312 | 54.0\% | 40.8\% | 71 | 51.1\% | 45.3\% | \$5,513 | 68.6\% | 39.0\% |
|  | Upper | 92 | 40.9\% | \$4,695 | 29.3\% | 40.1\% | 32 | 37.2\% | 42.8\% | \$2,363 | 29.6\% | 42.9\% | 60 | 43.2\% | 44.0\% | \$2,332 | 29.0\% | 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\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.4\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 5.1\% | \$0 | 0.0\% | 2.2\% |
|  | Total | 225 | 100.0\% | \$16,024 | 100.0\% | 100.0\% | 86 | 100.0\% | 100.0\% | \$7,987 | 100.0\% | 100.0\% | 139 | 100.0\% | 100.0\% | \$8,037 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | 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\% | 5.1\% | 0 | 0.0\% | 17.6\% | \$0 | 0.0\% | 11.7\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 2.1\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 57.6\% | 0 | 0.0\% | 35.3\% | \$0 | 0.0\% | 57.2\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 33.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 37.3\% | 0 | 0.0\% | 41.2\% | \$0 | 0.0\% | 30.7\% | 0 | 0.0\% | 73.3\% | \$0 | 0.0\% | 64.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 5.9\% | \$0 | 0.0\% | 0.4\% | 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\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: LA Tangipahoa


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## Appendices

## Combined Demographics Report

Assessment Area: MO Cape Girardeau


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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: MO Cape Girardeau


[^425]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: MO Central MO


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## Appendices

Geographic Distribution of HMDA, Small Business, \& Small Farm Loans
Assessment Area: MO Central MO

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{aligned} & \text { F } \\ & \text { O} \\ & 0 \\ & 0 \\ & \text { 몸 } \end{aligned}$ |  | ount ${ }^{\text {B }}$ |  | Dollar |  | Owner Occupied Units \% | \# | Count <br> cank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$ (000s) | Dollar k \$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  | 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\% | 1.0\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 1.6\% |
|  | Middle | 25 | 83.3\% | \$2,194 | 71.9\% | 81.6\% | 17 | 81.0\% | 79.5\% | \$1,370 | 62.4\% | 76.3\% | 8 | 88.9\% | 78.7\% | \$824 | 96.5\% | 76.4\% |
|  | Upper | 5 | 16.7\% | \$857 | 28.1\% | 16.2\% | 4 | 19.0\% | 19.4\% | \$827 | 37.6\% | 22.6\% | 1 | 11.1\% | 19.7\% | \$30 | 3.5\% | 21.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 30 | 100.0\% | \$3,051 | 100.0\% | 100.0\% | 21 | 100.0\% | 100.0\% | \$2,197 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$854 | 100.0\% | 100.0\% |
|  | 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 | 3.8\% | \$308 | 3.1\% | 2.1\% | 2 | 4.5\% | 1.4\% | \$218 | 4.2\% | 1.1\% | 1 | 2.8\% | 2.3\% | \$90 | 1.9\% | 2.1\% |
|  | Middle | 59 | 73.8\% | \$6,926 | 70.7\% | 81.6\% | 32 | 72.7\% | 76.8\% | \$3,454 | 67.0\% | 77.3\% | 27 | 75.0\% | 77.3\% | \$3,472 | 74.9\% | 76.8\% |
|  | Upper | 18 | 22.5\% | \$2,562 | 26.2\% | 16.2\% | 10 | 22.7\% | 21.6\% | \$1,486 | 28.8\% | 21.3\% | 8 | 22.2\% | 20.2\% | \$1,076 | 23.2\% | 20.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 80 | 100.0\% | \$9,796 | 100.0\% | 100.0\% | 44 | 100.0\% | 100.0\% | \$5,158 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$4,638 | 100.0\% | 100.0\% |
|  | 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\% | 1.1\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 11.0\% |
|  | Middle | 2 | 100.0\% | \$5 | 100.0\% | 81.6\% | 2 | 100.0\% | 88.6\% | \$5 | 100.0\% | 90.6\% | 0 | 0.0\% | 79.2\% | \$0 | 0.0\% | 70.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 16.2\% | 0 | 0.0\% | 10.2\% | \$0 | 0.0\% | 9.3\% | 0 | 0.0\% | 17.7\% | \$0 | 0.0\% | 18.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2 | 100.0\% | \$5 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$5 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | 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\% | 26.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 19.1\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 66.9\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 62.5\% | \$0 | 0.0\% | 80.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 6.2\% | 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\% |
|  | 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\% |
|  | 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 | 2.7\% | \$308 | 2.4\% | 2.1\% | 2 | 3.0\% | 1.3\% | \$218 | 3.0\% | 1.1\% | 1 | 2.2\% | 2.2\% | \$90 | 1.6\% | 2.4\% |
|  | Middle | 86 | 76.8\% | \$9,125 | 71.0\% | 81.6\% | 51 | 76.1\% | 78.2\% | \$4,829 | 65.6\% | 77.4\% | 35 | 77.8\% | 77.8\% | \$4,296 | 78.2\% | 76.6\% |
|  | Upper | 23 | 20.5\% | \$3,419 | 26.6\% | 16.2\% | 14 | 20.9\% | 20.4\% | \$2,313 | 31.4\% | 21.4\% | 9 | 20.0\% | 19.8\% | \$1,106 | 20.1\% | 20.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 112 | 100.0\% | \$12,852 | 100.0\% | 100.0\% | 67 | 100.0\% | 100.0\% | \$7,360 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$5,492 | 100.0\% | 100.0\% |
|  |  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 1 | 3.4\% | \$10 | 0.9\% | 4.9\% | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 1.1\% | 1 | 5.6\% | 2.5\% | \$10 | 1.2\% | 0.8\% |
|  | Middle | 24 | 82.8\% | \$1,050 | 90.3\% | 81.0\% | 10 | 90.9\% | 83.2\% | \$306 | 88.4\% | 92.1\% | 14 | 77.8\% | 81.9\% | \$744 | 91.1\% | 90.8\% |
|  | Upper | 4 | 13.8\% | \$103 | 8.9\% | 14.1\% | 1 | 9.1\% | 10.7\% | \$40 | 11.6\% | 5.7\% | 3 | 16.7\% | 11.3\% | \$63 | 7.7\% | 7.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.7\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 0.8\% |
|  | Total | 29 | 100.0\% | \$1,163 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$346 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$817 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 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\% |
|  |  | 1 | 50.0\% | \$336 | 76.7\% | 88.7\% | 0 | 0.0\% | 96.5\% | \$0 | 0.0\% | 96.8\% | 1 | 50.0\% | 97.5\% | \$336 | 76.7\% | 96.8\% |
|  |  | 1 | 50.0\% | \$102 | 23.3\% | 10.7\% | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 3.2\% | 1 | 50.0\% | 2.1\% | \$102 | 23.3\% | 3.1\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% |
|  |  | 2 | 100.0\% | \$438 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$438 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MO Central MO


[^428]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: MO Columbia


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Combined Demographics Report

Assessment Area: MO Jefferson City


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

| $\stackrel{山}{\underset{\downarrow}{\sim}}$ | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{aligned} & \stackrel{-}{\mathrm{O}} \\ & 0 \\ & 0 \\ & 0 \\ & \stackrel{\mathrm{x}}{\mathrm{a}} \end{aligned}$ |  | Count |  | Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba $\$(000 s)$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 1 | 1.4\% | \$61 | 0.7\% | 0.7\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.3\% | 1 | 2.7\% | 0.6\% | \$61 | 1.3\% | 0.5\% |
|  | Moderate | 5 | 7.1\% | \$528 | 6.4\% | 8.5\% | 2 | 6.1\% | 5.2\% | \$143 | 4.0\% | 3.9\% | 3 | 8.1\% | 6.8\% | \$385 | 8.3\% | 6.5\% |
|  | Middle | 53 | 75.7\% | \$6,140 | 74.7\% | 73.0\% | 25 | 75.8\% | 75.2\% | \$2,722 | 76.4\% | 74.1\% | 28 | 75.7\% | 74.0\% | \$3,418 | 73.4\% | 71.4\% |
|  | Upper | 11 | 15.7\% | \$1,489 | 18.1\% | 17.8\% | 6 | 18.2\% | 19.1\% | \$697 | 19.6\% | 21.7\% | 5 | 13.5\% | 18.6\% | \$792 | 17.0\% | 21.6\% |
|  | 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 | 70 | 100.0\% | \$8,218 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$3,562 | 100.0\% | 100.0\% | 37 | 100.0\% | 100.0\% | \$4,656 | 100.0\% | 100.0\% |
|  | Low | 1 | 0.9\% | \$276 | 2.1\% | 0.7\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% | 1 | 2.1\% | 0.3\% | \$276 | 5.2\% | 0.2\% |
|  | Moderate | 6 | 5.3\% | \$456 | 3.4\% | 8.5\% | 4 | 6.2\% | 5.4\% | \$342 | 4.3\% | 4.4\% | 2 | 4.2\% | 4.2\% | \$114 | 2.1\% | 3.2\% |
|  | Middle | 88 | 77.9\% | \$10,388 | 78.3\% | 73.0\% | 49 | 75.4\% | 69.7\% | \$6,175 | 77.9\% | 68.8\% | 39 | 81.3\% | 70.1\% | \$4,213 | 78.8\% | 68.9\% |
|  | Upper | 18 | 15.9\% | \$2,155 | 16.2\% | 17.8\% | 12 | 18.5\% | 24.5\% | \$1,409 | 17.8\% | 26.6\% | 6 | 12.5\% | 25.4\% | \$746 | 13.9\% | 27.6\% |
|  | 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 | 113 | 100.0\% | \$13,275 | 100.0\% | 100.0\% | 65 | 100.0\% | 100.0\% | \$7,926 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$5,349 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 0.9\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 8.5\% | 0 | 0.0\% | 6.0\% | \$0 | 0.0\% | 4.3\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 5.5\% |
|  | Middle | 6 | 100.0\% | \$72 | 100.0\% | 73.0\% | 2 | 100.0\% | 75.6\% | \$13 | 100.0\% | 75.3\% | 4 | 100.0\% | 70.1\% | \$59 | 100.0\% | 65.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 17.8\% | 0 | 0.0\% | 16.2\% | \$0 | 0.0\% | 18.8\% | 0 | 0.0\% | 20.9\% | \$0 | 0.0\% | 28.6\% |
|  | 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 | 6 | 100.0\% | \$72 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$13 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$59 | 100.0\% | 100.0\% |
| Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | $14.8 \%$ | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 24.4\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 33.8\% | 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\% | 36.4\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 54.3\% | 0 | 0.0\% | 90.0\% | \$0 | 0.0\% | 75.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 15.0\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 45.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 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\% |
|  | Low | 2 | 1.1\% | \$337 | 1.6\% | 0.7\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.3\% | 2 | 2.2\% | 0.6\% | \$337 | 3.3\% | 0.7\% |
|  | Moderate | 11 | 5.8\% | \$984 | 4.6\% | 8.5\% | 6 | 6.0\% | 5.4\% | \$485 | 4.2\% | 4.2\% | 5 | 5.6\% | 5.3\% | \$499 | 5.0\% | 4.4\% |
|  | Middle | 147 | 77.8\% | \$16,600 | 77.0\% | 73.0\% | 76 | 76.0\% | 71.9\% | \$8,910 | 77.5\% | 70.6\% | 71 | 79.8\% | 71.5\% | \$7,690 | 76.4\% | 69.7\% |
|  | Upper | 29 | 15.3\% | \$3,644 | 16.9\% | 17.8\% | 18 | 18.0\% | 22.2\% | \$2,106 | 18.3\% | 24.9\% | 11 | 12.4\% | 22.6\% | \$1,538 | 15.3\% | 25.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 189 | 100.0\% | \$21,565 | 100.0\% | 100.0\% | 100 | 100.0\% | 100.0\% | \$11,501 | 100.0\% | 100.0\% | 89 | 100.0\% | 100.0\% | \$10,064 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 2 | 9.1\% | \$50 | 5.5\% | 9.5\% | 1 | 16.7\% | 8.8\% | \$20 | 4.5\% | 6.0\% | 1 | 6.3\% | 7.9\% | \$30 | 6.5\% | 8.7\% |
|  | Moderate | 2 | 9.1\% | \$16 | 1.8\% | 13.4\% | 0 | 0.0\% | 15.0\% | \$0 | 0.0\% | 17.7\% | 2 | 12.5\% | 14.1\% | \$16 | 3.5\% | 16.2\% |
|  | Middle | 17 | 77.3\% | \$836 | 92.1\% | 62.2\% | 5 | 83.3\% | 57.7\% | \$425 | 95.5\% | 65.7\% | 12 | 75.0\% | 60.6\% | \$411 | 88.8\% | 62.6\% |
|  | Upper | 1 | 4.5\% | \$6 | 0.7\% | 14.7\% | 0 | 0.0\% | 16.6\% | \$0 | 0.0\% | 10.4\% | 1 | 6.3\% | 15.4\% | \$6 | 1.3\% | 12.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.2\% |
|  |  | 22 | 100.0\% | \$908 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$445 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$463 | 100.0\% | 100.0\% |
| $\sum_{\substack{x}}^{4}$$\stackrel{y}{4}$$\stackrel{y}{4}$$\sum_{n}^{2}$ | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 2.5\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 1.6\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 8.7\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 3.8\% | 0 | 0.0\% | 5.2\% | \$0 | 0.0\% | 4.5\% |
|  | Middle | 1 | 100.0\% | \$15 | 100.0\% | 77.0\% | 0 | 0.0\% | 84.7\% | \$0 | 0.0\% | 81.8\% | 1 | 100.0\% | 83.3\% | \$15 | 100.0\% | 85.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 13.9\% | 0 | 0.0\% | 10.4\% | \$0 | 0.0\% | 11.7\% | 0 | 0.0\% | 10.3\% | \$0 | 0.0\% | 8.5\% |
|  | 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\% | 1.4\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1 | 100.0\% | \$15 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$15 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MO Jefferson City


[^431]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: MO Lawrence

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 1,718 | 17.3 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 1,778 | 17.9 |
| Middle-income | 6 | 100.0 |  | 100.0 | 1,087 | 11.0 | 2,473 | 24.9 |
| Upper-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 3,945 | 39.8 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 6 | 100.0 |  | 100.0 | 1,087 | 11.0 | 9,914 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 14,789 | 10,077 |  | 68.1 | 3,491 | 23.6 | 1,221 | 8.3 |
| Upper-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 14,789 | 10,077 |  | 68.1 | 3,491 | 23.6 | 1,221 | 8.3 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  |  |  | Over \$1 Million |  | Revenue Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 1,625 | 100.0 |  | 100.0 | 77 | 100.0 | 55 | 100.0 |
| Upper-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 1,625 | 100.0 |  | 100.0 | 77 | 100.0 | 55 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 91.9 |  | 4.7 |  | 3.4 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 204 | 100.0 |  | 100.0 | 1 | 100.0 | 1 | 100.0 |
| Upper-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 204 | 100.0 |  | 100.0 | 1 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 99.0 |  | . 5 |  | . 5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MO Lawrence

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ | nk <br> Dollar |  | Families by Family Income <br> \% | \# | Count ank $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | Agg $\%$ | ( $\begin{array}{r}\text { Ba } \\ \text { \$(000s) }\end{array}$ | Dollar \$ \% \$ | Agg \$ \% |
|  |  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 17.3\% | 0 | 0.0\% | 9.7\% | \$0 | 0.0\% | 5.7\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 5.5\% |
|  |  | Moderate | 5 | 38.5\% | \$336 | 30.7\% | 17.9\% | 3 | 42.9\% | 24.1\% | \$195 | 31.9\% | 20.3\% | 2 | 33.3\% | 25.8\% | \$141 | 29.1\% | 22.3\% |
|  |  | Middle | 2 | 15.4\% | \$148 | 13.5\% | 24.9\% | 1 | 14.3\% | 26.3\% | \$78 | 12.8\% | 26.6\% | 1 | 16.7\% | 18.2\% | \$70 | 14.4\% | 17.5\% |
|  |  | Upper | 6 | 46.2\% | \$612 | 55.8\% | 39.8\% | 3 | 42.9\% | 28.2\% | \$338 | 55.3\% | 36.8\% | 3 | 50.0\% | 30.5\% | \$274 | 56.5\% | 41.2\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 11.8\% | \$0 | 0.0\% | 10.6\% | 0 | 0.0\% | 16.1\% | \$0 | 0.0\% | 13.6\% |
|  |  | Total | 13 | 100.0\% | \$1,096 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$611 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$485 | 100.0\% | 100.0\% |
|  |  | Low | 3 | 7.7\% | \$131 | 3.5\% | 17.3\% | 0 | 0.0\% | 3.7\% | \$0 | 0.0\% | 2.3\% | 3 | 18.8\% | 5.2\% | \$131 | 10.4\% | 2.0\% |
|  |  | Moderate | 8 | 20.5\% | \$486 | 13.2\% | 17.9\% | 5 | 21.7\% | 18.6\% | \$379 | 15.6\% | 11.8\% | 3 | 18.8\% | 14.5\% | \$107 | 8.5\% | 10.0\% |
|  |  | Middle | 10 | 25.6\% | \$903 | 24.5\% | 24.9\% | 5 | 21.7\% | 18.8\% | \$491 | 20.2\% | 15.9\% | 5 | 31.3\% | 21.4\% | \$412 | 32.8\% | 18.8\% |
|  |  | Upper | 18 | 46.2\% | \$2,171 | 58.8\% | 39.8\% | 13 | 56.5\% | 42.6\% | \$1,564 | 64.3\% | 52.1\% | 5 | 31.3\% | 36.9\% | \$607 | 48.3\% | 47.2\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 16.2\% | \$0 | 0.0\% | 17.8\% | 0 | 0.0\% | 22.0\% | \$0 | 0.0\% | 22.0\% |
|  |  | Total | 39 | 100.0\% | \$3,691 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$2,434 | 100.0\% | 100.0\% | 16 | 100.0\% | 100.0\% | \$1,257 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 17.3\% | 0 | 0.0\% | 9.7\% | \$0 | 0.0\% | 5.7\% | 0 | 0.0\% | 14.9\% | \$0 | 0.0\% | 1.0\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.9\% | 0 | 0.0\% | 6.5\% | \$0 | 0.0\% | 3.2\% | 0 | 0.0\% | 27.7\% | \$0 | 0.0\% | 17.6\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 24.9\% | 0 | 0.0\% | 22.6\% | \$0 | 0.0\% | 19.2\% | 0 | 0.0\% | 14.9\% | \$0 | 0.0\% | 43.3\% |
|  |  | Upper | 1 | 100.0\% | \$13 | 100.0\% | 39.8\% | 1 | 100.0\% | 58.1\% | \$13 | 100.0\% | 59.1\% | 0 | 0.0\% | 40.4\% | \$0 | 0.0\% | 37.8\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.2\% | \$0 | 0.0\% | 12.8\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.2\% |
|  |  | Total | 1 | 100.0\% | \$13 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$13 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 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\% |
|  |  | 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\% | 24.9\% | 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\% | 39.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 3 | 5.7\% | \$131 | 2.7\% | 17.3\% | 0 | 0.0\% | 6.0\% | \$0 | 0.0\% | 3.4\% | 3 | 13.6\% | 7.5\% | \$131 | 7.5\% | 3.2\% |
|  |  | Moderate | 13 | 24.5\% | \$822 | 17.1\% | 17.9\% | 8 | 25.8\% | 20.3\% | \$574 | 18.8\% | 14.4\% | 5 | 22.7\% | 20.1\% | \$248 | 14.2\% | 14.5\% |
|  |  | Middle | 12 | 22.6\% | \$1,051 | 21.9\% | 24.9\% | 6 | 19.4\% | 21.6\% | \$569 | 18.6\% | 19.3\% | 6 | 27.3\% | 19.6\% | \$482 | 27.7\% | 18.3\% |
|  |  | Upper | 25 | 47.2\% | \$2,796 | 58.3\% | 39.8\% | 17 | 54.8\% | 37.8\% | \$1,915 | 62.6\% | 47.4\% | 8 | 36.4\% | 34.1\% | \$881 | 50.6\% | 43.3\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 15.5\% | 0 | 0.0\% | 18.6\% | \$0 | 0.0\% | 20.6\% |
|  |  | Total | 53 | 100.0\% | \$4,800 | 100.0\% | 100.0\% | 31 | 100.0\% | 100.0\% | \$3,058 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$1,742 | 100.0\% | 100.0\% |
|  |  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 8 | 47.1\% | \$463 | 42.4\% | 91.9\% | 6 | 66.7\% | 43.9\% | \$407 | 42.7\% | 45.9\% | 2 | 25.0\% | 46.2\% | \$56 | 40.9\% | 30.1\% |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% | 4.7\% |  | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  |  | 8 | 47.1\% | \$463 | 42.4\% | 96.6\% | 6 | 66.7\% |  |  |  |  | 2 | 25.0\% |  |  |  |  |
|  |  |  |  | 52.9\% | \$628 | 57.6\% | 3.4\% | 3 | 33.3\% |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 17 | 100.0\% | \$1,091 | 100.0\% | 100.0\% | 9 | 100.0\% |  |  |  |  | 8 | 100.0\% |  |  |  |  |
|  | $\begin{aligned} & \text { N } \\ & \text { N } \\ & \text { ్ָర } \end{aligned}$ | \$100,000 or Less | 14 | 82.4\% | \$354 | 32.4\% |  | 6 | 66.7\% | 90.3\% | \$217 | 22.7\% | 22.5\% | 8 | 100.0\% | 94.2\% | \$137 | 100.0\% | 26.2\% |
|  |  | \$100,001 - \$250,000 | 2 | 11.8\% | \$464 | 42.5\% |  | 2 | 22.2\% | 5.9\% | \$464 | 48.6\% | 28.4\% | 0 | 0.0\% | $1.4 \%$ |  | 0.0\% | 7.6\% |
|  |  | \$250,001 - \$1 Million | 1 | 5.9\% | \$273 | 25.0\% |  | 1 | 11.1\% | 3.8\% | \$273 | 28.6\% | 49.1\% | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 66.3\% |
|  |  |  | 17 | 100.0\% | \$1,091 | 100.0\% |  | 9 | 100.0\% | 100.0\% | \$954 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$137 | 100.0\% | 100.0\% |
|  | $\begin{aligned} & \mathbb{\otimes} \\ & \stackrel{\rightharpoonup}{0} \\ & \underset{\sim}{む} \\ & \underset{\sim}{0} \end{aligned}$ | \$1 Million or Less <br> Over $\$ 1$ Million <br> Not Known <br> Total |  |  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 3 | 100.0\% | \$84 | 100.0\% | 99.0\% | 0 | 0.0\% | 84.1\% | \$0 | 0.0\% | 85.0\% | 3 | 100.0\% | 84.3\% | \$84 | 100.0\% | 93.7\% |
|  |  |  | 0 | $0.0 \%$ | \$0 | 0.0\% | $0.5 \%$ | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  |  | 3 | 100.0\% | \$84 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 3 | 100.0\% |  |  |  |  |
|  | © $\$ 100,000$ or Less <br> N $\$ 100,001-\$ 250,000$ <br> ్ㅢ  <br> $\$ 250,001-\$ 500,000$  <br>  Total |  | 3 | 100.0\% | \$84 | 100.0\% |  | 0 | 0.0\% | 69.6\% | \$0 | 0.0\% | 18.7\% | 3 | 100.0\% | 85.2\% | \$84 | 100.0\% | 37.5\% |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 17.4\% | \$0 | 0.0\% | 31.0\% | 0 | 0.0\% | 9.3\% | \$0 | 0.0\% | 29.0\% |
|  |  |  |  | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 13.0\% | \$0 | 0.0\% | 50.3\% | 0 | 0.0\% | 5.6\% | \$0 | 0.0\% | 33.5\% |
|  |  |  | 3 | 100.0\% | \$84 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$84 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: MO Springfield

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2 | 2.6 |  | 0.3 | 89 | 39.6 | 14,257 | 16.7 |
| Moderate-income | 16 | 20.5 |  | 17.2 | 2,486 | 17.0 | 16,210 | 19.0 |
| Middle-income | 39 | 50.0 |  | 53.2 | 3,378 | 7.5 | 20,406 | 23.9 |
| Upper-income | 21 | 26.9 |  | 29.4 | 693 | 2.8 | 34,357 | 40.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 78 | 100.0 |  | 100.0 | 6,646 | 7.8 | 85,230 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | $1,774$ | 35 |  | 2.0 | 1,551 | 87.4 | 188 | 10.6 |
| Moderate-income | $\begin{array}{r} 1,1 / 4 \\ \hline 28.132 \end{array}$ | 13,074 |  | 46.5 | 12,337 | 43.9 | 2,721 | 9.7 |
| Middle-income | 72,224 | 45,336 |  | 62.8 | 22,163 | 30.7 | 4,725 | 6.5 |
| Upper-income | 35,397 | 26,584 |  | 75.1 | 7,121 | 20.1 | 1,692 | 4.8 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 137,527 | 85,029 |  | 61.8 | 43,172 | 31.4 | 9,326 | 6.8 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 424 | 2.5 |  | 2.4 | 41 | 3.8 | 25 | 3.2 |
| Moderate-income | 2,619 | 15.6 |  | 14.4 | 289 | 27.1 | 173 | 21.9 |
| Middle-income | 8,628 | 51.2 |  | 52.2 | 432 | 40.4 | 367 | 46.5 |
| Upper-income | 5,171 | 30.7 |  | 31.0 | 306 | 28.7 | 224 | 28.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 16,842 | 100.0 |  | 100.0 | 1,068 | 100.0 | 789 | 100.0 |
|  | Percentage of Total Businesses: |  |  | $89.0$ |  | 6.3 | 4.7 |  |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# \% |  |
| Low-income | 1 | 0.2 |  | 0.2 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 57 | 10.8 |  | 10.8 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 370 | 69.9 |  | 70.0 | 1 | 50.0 | 1 | 100.0 |
| Upper-income | 101 | 19.1 |  | 19.0 | 1 | 50.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 529 | 100.0 |  | 100.0 | 2 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 99.4 |  | . 4 |  | . 2 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Owner Occupied Units \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar k $\%$ \$ | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( ${ }_{\text {Ba }}$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 10 | 12.3\% | \$1,003 | 9.7\% | 15.4\% | 7 | 15.6\% | 10.8\% | \$725 | 13.2\% | 6.5\% | 3 | 8.3\% | 9.1\% | \$278 | 5.7\% | 4.9\% |
|  | Middle | 49 | 60.5\% | \$5,448 | 52.4\% | 53.3\% | 29 | 64.4\% | 55.6\% | \$3,440 | 62.5\% | 51.6\% | 20 | 55.6\% | 56.4\% | \$2,008 | 41.1\% | 50.2\% |
|  | Upper | 22 | 27.2\% | \$3,938 | 37.9\% | 31.3\% | 9 | 20.0\% | 33.5\% | \$1,339 | 24.3\% | 41.8\% | 13 | 36.1\% | 34.4\% | \$2,599 | 53.2\% | 44.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 81 | 100.0\% | \$10,389 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$5,504 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$4,885 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 7 | 2.5\% | \$523 | 1.6\% | 15.4\% | 2 | 1.4\% | 6.0\% | \$162 | 0.9\% | 3.4\% | 5 | 3.9\% | 7.1\% | \$361 | 2.5\% | 4.0\% |
|  | Middle | 172 | 62.3\% | \$18,076 | 54.8\% | 53.3\% | 97 | 65.5\% | 49.1\% | \$10,522 | 57.1\% | 43.3\% | 75 | 58.6\% | 49.3\% | \$7,554 | 51.9\% | 41.9\% |
|  | Upper | 97 | 35.1\% | \$14,384 | 43.6\% | 31.3\% | 49 | 33.1\% | 44.9\% | \$7,758 | 42.1\% | 53.3\% | 48 | 37.5\% | 43.5\% | \$6,626 | 45.6\% | 54.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 276 | 100.0\% | \$32,983 | 100.0\% | 100.0\% | 148 | 100.0\% | 100.0\% | \$18,442 | 100.0\% | 100.0\% | 128 | 100.0\% | 100.0\% | \$14,541 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 1.2\% |
|  | Moderate | 1 | 16.7\% | \$4 | 8.0\% | 15.4\% | 1 | 100.0\% | 12.8\% | \$4 | 100.0\% | 8.2\% | 0 | 0.0\% | 11.6\% | \$0 | 0.0\% | 7.6\% |
|  | Middle | 4 | 66.7\% | \$35 | 70.0\% | 53.3\% | 0 | 0.0\% | 55.9\% | \$0 | 0.0\% | 50.7\% | 4 | 80.0\% | 56.7\% | \$35 | 76.1\% | 50.6\% |
|  | Upper | 1 | 16.7\% | \$11 | 22.0\% | 31.3\% | 0 | 0.0\% | 30.9\% | \$0 | 0.0\% | 40.4\% | 1 | 20.0\% | 31.2\% | \$11 | 23.9\% | 40.7\% |
|  | 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 | 6 | 100.0\% | \$50 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$4 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$46 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-F | mily Units |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 8.0\% | 0 | 0.0\% | 7.0\% | \$0 | 0.0\% | 1.8\% | 0 | 0.0\% | 7.5\% | \$0 | 0.0\% | 2.2\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 20.3\% | 0 | 0.0\% | 24.6\% | \$0 | 0.0\% | 21.5\% | 0 | 0.0\% | 10.4\% | \$0 | 0.0\% | 7.1\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 53.0\% | 0 | 0.0\% | 43.9\% | \$0 | 0.0\% | 56.8\% | 0 | 0.0\% | 53.7\% | \$0 | 0.0\% | 58.6\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 18.7\% | 0 | 0.0\% | 24.6\% | \$0 | 0.0\% | 19.9\% | 0 | 0.0\% | 28.4\% | \$0 | 0.0\% | 32.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 18 | 5.0\% | \$1,530 | 3.5\% | 15.4\% | 10 | 5.2\% | 7.8\% | \$891 | 3.7\% | 5.1\% | 8 | 4.7\% | 8.0\% | \$639 | 3.3\% | 4.6\% |
|  | Middle | 225 | 62.0\% | \$23,559 | 54.3\% | 53.3\% | 126 | 64.9\% | 51.4\% | \$13,962 | 58.3\% | 46.4\% | 99 | 58.6\% | 52.1\% | \$9,597 | 49.3\% | 45.9\% |
|  | Upper | 120 | 33.1\% | \$18,333 | 42.2\% | 31.3\% | 58 | 29.9\% | 40.7\% | \$9,097 | 38.0\% | 48.4\% | 62 | 36.7\% | 39.8\% | \$9,236 | 47.4\% | 49.3\% |
|  | 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 | 363 | 100.0\% | \$43,422 | 100.0\% | 100.0\% | 194 | 100.0\% | 100.0\% | \$23,950 | 100.0\% | 100.0\% | 169 | 100.0\% | 100.0\% | \$19,472 | 100.0\% | 100.0\% |
|  |  |  |  |  | Smal | Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.4\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 4.7\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 4.8\% |
|  | Moderate | 9 | 9.7\% | \$1,389 | 14.0\% | 14.4\% | 1 | 3.2\% | 15.8\% | \$76 | 1.5\% | 21.6\% | 8 | 12.9\% | 16.5\% | \$1,313 | 27.1\% | 20.5\% |
|  | Middle | 50 | 53.8\% | \$4,788 | 48.1\% | 52.2\% | 16 | 51.6\% | 45.3\% | \$2,558 | 50.2\% | 40.0\% | 34 | 54.8\% | 45.1\% | \$2,230 | 46.0\% | 43.3\% |
|  | Upper | 34 | 36.6\% | \$3,767 | 37.9\% | 31.0\% | 14 | 45.2\% | 33.0\% | \$2,458 | 48.3\% | 33.2\% | 20 | 32.3\% | 33.5\% | \$1,309 | 27.0\% | 31.2\% |
|  | 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\% | 3.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 93 | 100.0\% | \$9,944 | 100.0\% | 100.0\% | 31 | 100.0\% | 100.0\% | \$5,092 | 100.0\% | 100.0\% | 62 | 100.0\% | 100.0\% | \$4,852 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 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\% |
|  | Moderate | 1 | 20.0\% | \$125 | 26.2\% | 10.8\% | 0 | 0.0\% | 9.3\% | \$0 | 0.0\% | 6.3\% | 1 | 20.0\% | 8.4\% | \$125 | 26.2\% | 10.5\% |
|  | Middle | 4 | 80.0\% | \$352 | 73.8\% | 70.0\% | 0 | 0.0\% | 79.1\% | \$0 | 0.0\% | 73.1\% | 4 | 80.0\% | 77.9\% | \$352 | 73.8\% | 72.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 19.0\% | 0 | 0.0\% | 10.7\% | \$0 | 0.0\% | 20.4\% | 0 | 0.0\% | 12.6\% | \$0 | 0.0\% | 17.2\% |
|  | 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\% | 0.9\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.4\% |
|  | Total | 5 | 100.0\% | \$477 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$477 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MO Springfield


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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MO Taney

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | ank |  | Families |  | Count |  |  | Dollar |  | Count |  |  | Dollar |  |  |
|  |  |  |  | come |  | ank | Agg |  |  | Agg |  | nk | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  |  |  |  | Low | 3 | 18.8\% | \$208 | 9.7\% | 15.8\% | 1 | 10.0\% | 7.4\% | \$71 | 5.9\% | 4.3\% | 2 | 33.3\% | 7.7\% | \$137 | 14.5\% | 3.6\% |
|  |  | Moderate | 4 | 25.0\% | \$428 | 19.9\% | 19.0\% | 3 | 30.0\% | 17.8\% | \$289 | 23.9\% | 13.1\% | 1 | 16.7\% | 16.3\% | \$139 | 14.7\% | 12.6\% |
|  |  | Middle | 4 | 25.0\% | \$387 | 18.0\% | 24.9\% | 3 | 30.0\% | 23.5\% | \$277 | 22.9\% | 21.6\% | 1 | 16.7\% | 19.7\% | \$110 | 11.6\% | 17.0\% |
|  |  | Upper | 5 | 31.3\% | \$1,131 | 52.5\% | 40.3\% | 3 | 30.0\% | 39.8\% | \$570 | 47.2\% | 48.3\% | 2 | 33.3\% | 44.1\% | \$561 | 59.2\% | 55.6\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 11.5\% | \$0 | 0.0\% | 12.6\% | 0 | 0.0\% | 12.2\% | \$0 | 0.0\% | 11.2\% |
|  |  | Total | 16 | 100.0\% | \$2,154 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$1,207 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$947 | 100.0\% | 100.0\% |
|  |  | Low | 6 | 10.7\% | \$449 | 5.8\% | 15.8\% | 2 | 5.9\% | 4.6\% | \$112 | 2.3\% | 2.8\% | 4 | 18.2\% | 3.7\% | \$337 | 11.8\% | 2.1\% |
|  |  | Moderate | 10 | 17.9\% | \$872 | 11.3\% | 19.0\% | 6 | 17.6\% | 11.8\% | \$563 | 11.6\% | 7.9\% | 4 | 18.2\% | 11.1\% | \$309 | 10.8\% | 8.1\% |
|  |  | Middle | 13 | 23.2\% | \$1,337 | 17.3\% | 24.9\% | 10 | 29.4\% | 20.6\% | \$976 | 20.1\% | 16.6\% | 3 | 13.6\% | 18.3\% | \$361 | 12.6\% | 16.2\% |
|  |  | Upper | 27 | 48.2\% | \$5,049 | 65.5\% | 40.3\% | 16 | 47.1\% | 45.9\% | \$3,193 | 65.9\% | 56.3\% | 11 | 50.0\% | 45.6\% | \$1,856 | 64.8\% | 53.9\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 17.0\% | \$0 | 0.0\% | 16.4\% | 0 | 0.0\% | 21.3\% | \$0 | 0.0\% | 19.7\% |
|  |  | Total | 56 | 100.0\% | \$7,707 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$4,844 | 100.0\% | 100.0\% | 22 | 100.0\% | 100.0\% | \$2,863 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 15.8\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 3.4\% | 0 | 0.0\% | 15.0\% | \$0 | 0.0\% | 1.9\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.0\% | 0 | 0.0\% | 26.9\% | \$0 | 0.0\% | 18.7\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 14.8\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 24.9\% | 0 | 0.0\% | 11.5\% | \$0 | 0.0\% | 13.0\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 14.8\% |
|  |  | Upper | 1 | 100.0\% | \$5 | 100.0\% | 40.3\% | 1 | 100.0\% | 50.0\% | \$5 | 100.0\% | 64.6\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 48.8\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 19.6\% |
|  |  | Total | 1 | 100.0\% | \$5 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$5 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 15.8\% | 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\% | 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\% | 24.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 40.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 9 | 12.3\% | \$657 | 6.7\% | 15.8\% | 3 | 6.7\% | 5.8\% | \$183 | 3.0\% | 3.3\% | 6 | 21.4\% | 5.5\% | \$474 | 12.4\% | 2.6\% |
|  |  | Moderate | 14 | 19.2\% | \$1,300 | 13.2\% | 19.0\% | 9 | 20.0\% | 14.4\% | \$852 | 14.1\% | 9.8\% | 5 | 17.9\% | 13.4\% | \$448 | 11.8\% | 9.7\% |
|  |  | Middle | 17 | 23.3\% | \$1,724 | 17.5\% | 24.9\% | 13 | 28.9\% | 21.6\% | \$1,253 | 20.7\% | 18.3\% | 4 | 14.3\% | 18.8\% | \$471 | 12.4\% | 16.0\% |
|  |  | Upper | 33 | 45.2\% | \$6,185 | 62.7\% | 40.3\% | 20 | 44.4\% | 43.5\% | \$3,768 | 62.2\% | 53.3\% | 13 | 46.4\% | 44.5\% | \$2,417 | 63.4\% | 53.1\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.7\% | \$0 | 0.0\% | 15.3\% | 0 | 0.0\% | 17.8\% | \$0 | 0.0\% | 18.6\% |
|  |  | Total | 73 | 100.0\% | \$9,866 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$6,056 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$3,810 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known <br> Total |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 20 | 38.5\% | \$1,898 | 46.7\% | 90.7\% | 7 | 70.0\% | 51.1\% | \$757 | 40.4\% | 47.5\% | 13 | 31.0\% | 53.7\% | \$1,141 | 52.2\% | 51.9\% |
|  |  |  | 3 | 5.8\% | \$1,602 | 39.4\% | 4.0\% | 2 | 20.0\% |  |  |  |  | 1 | 2.4\% |  |  |  |  |
|  |  |  | 23 | 44.3\% | \$3,500 | 86.1\% | 94.7\% | 9 | 90.0\% |  |  |  |  | 14 | 33.4\% |  |  |  |  |
|  |  |  | 29 | 55.8\% | \$561 | 13.8\% | 5.3\% | 1 | 10.0\% |  |  |  |  | 28 | 66.7\% |  |  |  |  |
|  |  |  | 52 | 100.0\% | \$4,061 | 100.0\% | 100.0\% | 10 | 100.0\% |  |  |  |  | 42 | 100.0\% |  |  |  |  |
|  |  |  | 44 | 84.6\% | \$1,054 | 26.0\% |  | 6 | 60.0\% | 83.2\% | \$81 | 4.3\% | 15.5\% | 38 | 90.5\% | 84.5\% | \$973 | 44.5\% | 15.9\% |
|  |  |  | 3 | 5.8\% | \$466 | 11.5\% |  | 1 | 10.0\% | 6.2\% | \$203 | 10.8\% | 13.0\% | 2 | 4.8\% | 6.2\% | \$263 | 12.0\% | 14.9\% |
|  |  |  | 5 | 9.6\% | \$2,541 | 62.6\% |  | 3 | 30.0\% | 10.6\% | \$1,590 | 84.8\% | 71.4\% | 2 | 4.8\% | 9.4\% | \$951 | 43.5\% | 69.2\% |
|  |  |  | 52 | 100.0\% | \$4,061 | 100.0\% |  | 10 | 100.0\% | 100.0\% | \$1,874 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$2,187 | 100.0\% | 100.0\% |
|  | $\begin{aligned} & \stackrel{\otimes}{\stackrel{0}{0}} \\ & \stackrel{\rightharpoonup}{\omega} \\ & \underset{\sim}{0} \end{aligned}$ |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 1 | 100.0\% | \$145 | 100.0\% | 98.5\% | 0 | 0.0\% | 80.0\% | \$0 | 0.0\% | 80.7\% | 1 | 100.0\% | 68.8\% | \$145 | 100.0\% | 84.9\% |
|  |  | Over \$1 Million | 0 | 0.0\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Total | 1 | 100.0\% | \$145 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 70.0\% | \$0 | 0.0\% | 17.8\% | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 25.0\% |
|  |  | \$100,001-\$250,000 | 1 | 100.0\% | \$145 | 100.0\% |  | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 16.0\% | 1 | 100.0\% | 12.5\% | \$145 | 100.0\% | 24.5\% |
|  |  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 66.3\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 50.5\% |
|  |  | Total | 1 | 100.0\% | \$145 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$145 | 100.0\% | 100.0\% |

## Appendices

## Combined Demographics Report

Assessment Area: MS Adams-Wilkinson


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: MS Adams-Wilkinson

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ |  | ( Dollar |  | Owner Occupied Units |  | Count | Agg |  | Dollar | Agg |  | Count | Agg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% | \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 4.9\% | 0 | 0.0\% | 2.9\% | \$0 | 0.0\% | 1.8\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 2 | 10.5\% | \$154 | 5.0\% | 48.4\% | 1 | 16.7\% | 24.7\% | \$55 | 8.1\% | 23.8\% | 1 | 7.7\% | 29.1\% | \$99 | 4.1\% | 26.3\% |
|  | Middle | 7 | 36.8\% | \$1,558 | 50.6\% | 35.8\% | 2 | 33.3\% | 42.4\% | \$255 | 37.6\% | 44.3\% | 5 | 38.5\% | 44.5\% | \$1,303 | 54.2\% | 48.5\% |
|  | Upper | 10 | 52.6\% | \$1,368 | 44.4\% | 11.0\% | 3 | 50.0\% | 27.9\% | \$368 | 54.3\% | 29.3\% | 7 | 53.8\% | 26.0\% | \$1,000 | 41.6\% | 25.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 19 | 100.0\% | \$3,080 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$678 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$2,402 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 4.9\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 13 | 38.2\% | \$2,453 | 48.4\% | 48.4\% | 6 | 31.6\% | 22.7\% | \$1,332 | 42.6\% | 27.5\% | 7 | 46.7\% | 31.3\% | \$1,121 | 57.8\% | 30.7\% |
|  | Middle | 14 | 41.2\% | \$1,824 | 36.0\% | 35.8\% | 7 | 36.8\% | 46.3\% | \$1,071 | 34.3\% | 48.0\% | 7 | 46.7\% | 44.7\% | \$753 | 38.8\% | 48.3\% |
|  | Upper | 7 | 20.6\% | \$789 | 15.6\% | 11.0\% | 6 | 31.6\% | 29.5\% | \$724 | 23.2\% | 24.0\% | 1 | 6.7\% | 24.1\% | \$65 | 3.4\% | 21.1\% |
|  | 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 | 34 | 100.0\% | \$5,066 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$3,127 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$1,939 | 100.0\% | 100.0\% |
|  | Low | 3 | 16.7\% | \$27 | 24.3\% | 4.9\% | 2 | 20.0\% | 11.6\% | \$25 | 37.9\% | 6.9\% | 1 | 12.5\% | 4.3\% | \$2 | 4.4\% | 0.4\% |
|  | Moderate | 7 | 38.9\% | \$34 | 30.6\% | 48.4\% | 3 | 30.0\% | 44.2\% | \$12 | 18.2\% | 26.6\% | 4 | 50.0\% | 48.9\% | \$22 | 48.9\% | 27.8\% |
|  | Middle | 5 | 27.8\% | \$28 | 25.2\% | 35.8\% | 4 | 40.0\% | 37.2\% | \$23 | 34.8\% | 46.0\% | 1 | 12.5\% | 25.5\% | \$5 | 11.1\% | 21.8\% |
|  | Upper | 3 | 16.7\% | \$22 | 19.8\% | 11.0\% | 1 | 10.0\% | 7.0\% | \$6 | 9.1\% | 20.5\% | 2 | 25.0\% | 21.3\% | \$16 | 35.6\% | 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 | 18 | 100.0\% | \$111 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$66 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$45 | 100.0\% | 100.0\% |
|  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 17.9\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 24.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 35.4\% | 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\% | 22.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 3 | 4.2\% | \$27 | 0.3\% | 4.9\% | 2 | 5.7\% | 2.9\% | \$25 | 0.6\% | 1.2\% | 1 | 2.8\% | 0.5\% | \$2 | 0.0\% | 0.1\% |
|  | Moderate | 22 | 31.0\% | \$2,641 | 32.0\% | 48.4\% | 10 | 28.6\% | 24.9\% | \$1,399 | 36.1\% | 26.0\% | 12 | 33.3\% | 31.5\% | \$1,242 | 28.3\% | 28.5\% |
|  | Middle | 26 | 36.6\% | \$3,410 | 41.3\% | 35.8\% | 13 | 37.1\% | 43.9\% | \$1,349 | 34.8\% | 46.5\% | 13 | 36.1\% | 43.1\% | \$2,061 | 47.0\% | 47.5\% |
|  | Upper | 20 | 28.2\% | \$2,179 | 26.4\% | 11.0\% | 10 | 28.6\% | 27.4\% | \$1,098 | 28.4\% | 26.0\% | 10 | 27.8\% | 24.9\% | \$1,081 | 24.6\% | 23.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 71 | 100.0\% | \$8,257 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$3,871 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$4,386 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 10 | 6.2\% | \$718 | 10.0\% | 6.1\% | 7 | 10.1\% | 4.6\% | \$608 | 14.2\% | 4.7\% | 3 | 3.3\% | 4.5\% | \$110 | 3.7\% | 2.0\% |
|  | Moderate | 53 | 32.9\% | \$1,889 | 26.2\% | 36.0\% | 23 | 33.3\% | 26.1\% | \$1,055 | 24.7\% | 16.4\% | 30 | 32.6\% | 34.5\% | \$834 | 28.4\% | 20.9\% |
|  | Middle | 73 | 45.3\% | \$3,438 | 47.7\% | 45.4\% | 26 | 37.7\% | 43.4\% | \$1,864 | 43.6\% | 33.3\% | 47 | 51.1\% | 43.7\% | \$1,574 | 53.6\% | 39.8\% |
|  | Upper | 24 | 14.9\% | \$1,152 | 16.0\% | 12.5\% | 13 | 18.8\% | 17.2\% | \$746 | 17.5\% | 44.0\% | 11 | 12.0\% | 11.7\% | \$406 | 13.8\% | 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 | 1 | 0.6\% | \$11 | 0.2\% |  | 0 | 0.0\% | 8.6\% | \$0 | 0.0\% | 1.7\% | 1 | 1.1\% | 5.6\% | \$11 | 0.4\% | 1.3\% |
|  | Total | 161 | 100.0\% | \$7,208 | 100.0\% | 100.0\% | 69 | 100.0\% | 100.0\% | \$4,273 | 100.0\% | 100.0\% | 92 | 100.0\% | 100.0\% | \$2,935 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 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\% |
|  |  | 1 | 100.0\% | \$8 | 100.0\% | 58.3\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 80.4\% | 1 | 100.0\% | 100.0\% | \$8 | 100.0\% | 100.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 30.6\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 2.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 9.7\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 17.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 1 | 100.0\% | \$8 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$8 | 100.0\% | 100.0\% |

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## Appendices

## Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size

Assessment Area: MS Adams-Wilkinson

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | Count |  | nk |  | Families by Family Income <br> \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Dollar |  | ank | Agg |  |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
| HOME PURCHASE |  |  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 30.3\% | 0 | 0.0\% | 8.8\% | \$0 | 0.0\% | 5.1\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 0.8\% |
|  |  | Moderate | 1 | 5.3\% | \$65 | 2.1\% | 17.4\% | 0 | 0.0\% | 21.5\% | \$0 | 0.0\% | 15.7\% | 1 | 7.7\% | 18.5\% | \$65 | 2.7\% | 11.1\% |
|  |  | Middle | 6 | 31.6\% | \$805 | 26.1\% | 17.6\% | 3 | 50.0\% | 20.9\% | \$341 | 50.3\% | 19.1\% | 3 | 23.1\% | 20.2\% | \$464 | 19.3\% | 15.5\% |
|  |  | Upper | 12 | 63.2\% | \$2,210 | 71.8\% | 34.7\% | 3 | 50.0\% | 34.7\% | \$337 | 49.7\% | 43.5\% | 9 | 69.2\% | 39.0\% | \$1,873 | 78.0\% | 50.1\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.1\% | \$0 | 0.0\% | 16.7\% | 0 | 0.0\% | 20.2\% | \$0 | 0.0\% | 22.6\% |
|  |  | Total | 19 | 100.0\% | \$3,080 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$678 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$2,402 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 30.3\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 0.9\% |
|  |  | Moderate | 5 | 14.7\% | \$314 | 6.2\% | 17.4\% | 2 | 10.5\% | 12.8\% | \$113 | 3.6\% | 7.0\% | 3 | 20.0\% | 5.2\% | \$201 | 10.4\% | 3.2\% |
|  |  | Middle | 2 | 5.9\% | \$137 | 2.7\% | 17.6\% | 1 | 5.3\% | 16.8\% | \$73 | 2.3\% | 11.5\% | 1 | 6.7\% | 13.1\% | \$64 | 3.3\% | 9.0\% |
|  |  | Upper | 27 | 79.4\% | \$4,615 | 91.1\% | 34.7\% | 16 | 84.2\% | 43.2\% | \$2,941 | 94.1\% | 52.2\% | 11 | 73.3\% | 49.8\% | \$1,674 | 86.3\% | 56.5\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 26.7\% | \$0 | 0.0\% | 29.0\% | 0 | 0.0\% | 30.2\% | \$0 | 0.0\% | 30.4\% |
|  |  | Total | 34 | 100.0\% | \$5,066 | 100.0\% | 100.0\% | 19 | 100.0\% | 100.0\% | \$3,127 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$1,939 | 100.0\% | 100.0\% |
|  |  | Low | 5 | 27.8\% | \$29 | 26.1\% | 30.3\% | 3 | 30.0\% | 20.9\% | \$23 | 34.8\% | 2.8\% | 2 | 25.0\% | 17.0\% | \$6 | 13.3\% | 1.9\% |
|  |  | Moderate | 2 | 11.1\% | \$7 | 6.3\% | 17.4\% | 2 | 20.0\% | 16.3\% | \$7 | 10.6\% | 4.5\% | 0 | 0.0\% | 12.8\% | \$0 | 0.0\% | 7.5\% |
|  |  | Middle | 2 | 11.1\% | \$11 | 9.9\% | 17.6\% | 1 | 10.0\% | 11.6\% | \$5 | 7.6\% | 1.9\% | 1 | 12.5\% | 17.0\% | \$6 | 13.3\% | 4.9\% |
|  |  | Upper | 9 | 50.0\% | \$64 | 57.7\% | 34.7\% | 4 | 40.0\% | 39.5\% | \$31 | 47.0\% | 59.4\% | 5 | 62.5\% | 42.6\% | \$33 | 73.3\% | 51.4\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 11.6\% | \$0 | 0.0\% | 31.3\% | 0 | 0.0\% | 10.6\% | \$0 | 0.0\% | 34.3\% |
|  |  | Total | 18 | 100.0\% | \$111 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$66 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$45 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 30.3\% | 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\% | 17.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 17.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 34.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 5 | 7.0\% | \$29 | 0.4\% | 30.3\% | 3 | 8.6\% | 5.6\% | \$23 | 0.6\% | 2.2\% | 2 | 5.6\% | 3.0\% | \$6 | 0.1\% | 0.9\% |
|  |  | Moderate | 8 | 11.3\% | \$386 | 4.7\% | 17.4\% | 4 | 11.4\% | 17.0\% | \$120 | 3.1\% | 10.4\% | 4 | 11.1\% | 11.9\% | \$266 | 6.1\% | 6.8\% |
|  |  | Middle | 10 | 14.1\% | \$953 | 11.5\% | 17.6\% | 5 | 14.3\% | 18.3\% | \$419 | 10.8\% | 14.3\% | 5 | 13.9\% | 16.6\% | \$534 | 12.2\% | 11.8\% |
|  |  | Upper | 48 | 67.6\% | \$6,889 | 83.4\% | 34.7\% | 23 | 65.7\% | 39.0\% | \$3,309 | 85.5\% | 48.8\% | 25 | 69.4\% | 44.2\% | \$3,580 | 81.6\% | 53.3\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 20.1\% | \$0 | 0.0\% | 24.2\% | 0 | 0.0\% | 24.2\% | \$0 | 0.0\% | 27.3\% |
|  |  | Total | 71 | 100.0\% | \$8,257 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$3,871 | 100.0\% | 100.0\% | 36 | 100.0\% | 100.0\% | \$4,386 | 100.0\% | 100.0\% |
|  |  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 36 | 22.4\% | \$1,797 | 24.9\% | 89.7\% | 26 | 37.7\% | 24.7\% | \$1,528 | 35.8\% | 18.9\% | 10 | 10.9\% | 26.6\% | \$269 | 9.2\% | 12.4\% |
|  |  | Over \$1 Million | 9 | 5.6\% | \$1,393 | 19.3\% | 5.5\% | 6 | 8.7\% |  |  |  |  | 3 | 3.3\% |  |  |  |  |
|  |  | Total Rev. available | 45 | 28.0\% | \$3,190 | 44.2\% | 95.2\% | 32 | 46.4\% |  |  |  |  | 13 | 14.2\% |  |  |  |  |
|  |  | Rev. Not Known | 116 | 72.0\% | \$4,018 | 55.7\% | 4.9\% | 37 | 53.6\% |  |  |  |  | 79 | 85.9\% |  |  |  |  |
|  |  | Total | 161 | 100.0\% | \$7,208 | 100.0\% | 100.0\% | 69 | 100.0\% |  |  |  |  | 92 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 154 | 95.7\% | \$5,030 | 69.8\% |  | 63 | 91.3\% | 92.2\% | \$2,595 | 60.7\% | 33.2\% | 91 | 98.9\% | 93.5\% | \$2,435 | 83.0\% | 41.7\% |
|  |  | \$100,001-\$250,000 | 3 | 1.9\% | \$614 | 8.5\% |  | 3 | 4.3\% | 2.3\% | \$614 | 14.4\% | 11.0\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 18.3\% |
|  |  | \$250,001 - \$1 Million | 4 | 2.5\% | \$1,564 | 21.7\% |  | 3 | 4.3\% | 5.5\% | \$1,064 | 24.9\% | 55.8\% | 1 | 1.1\% | 2.7\% | \$500 | 17.0\% | 39.9\% |
|  |  | Total | 161 | 100.0\% | \$7,208 | 100.0\% |  | 69 | 100.0\% | 100.0\% | \$4,273 | 100.0\% | 100.0\% | 92 | 100.0\% | 100.0\% | \$2,935 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 97.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 95.4\% |
|  |  | Over \$1 Million | 0 | 0.0\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 1 | 100.0\% | \$8 | 100.0\% | 1.4\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | Total | 1 | 100.0\% | \$8 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 1 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 1 | 100.0\% | \$8 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 50.0\% | \$8 | 100.0\% | 4.6\% |
|  | $\stackrel{N}{\omega}$ | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 95.4\% |
|  | \%్రీ | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Total | 1 | 100.0\% | \$8 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$8 | 100.0\% | 100.0\% |

[^438]Originations \& Purchases

## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount |  | Dollar |  | Owner Occupied Units \% |  | Count ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \\ \hline \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar k \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba $\$(000 s)$ | Dollar k $\%$ \$ | Agg \$ \% |
|  | 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 | 3.7\% | \$392 | 1.8\% | 8.4\% | 5 | 5.9\% | 3.6\% | \$364 | 3.2\% | 2.5\% | 1 | 1.3\% | 3.7\% | \$28 | 0.3\% | 2.6\% |
|  | Middle | 125 | 76.2\% | \$16,239 | 75.7\% | 74.4\% | 61 | 71.8\% | 75.1\% | \$7,788 | 68.6\% | 74.3\% | 64 | 81.0\% | 77.3\% | \$8,451 | 83.7\% | 76.2\% |
|  | Upper | 33 | 20.1\% | \$4,825 | 22.5\% | 17.2\% | 19 | 22.4\% | 21.3\% | \$3,206 | 28.2\% | 23.1\% | 14 | 17.7\% | 18.9\% | \$1,619 | 16.0\% | 21.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 164 | 100.0\% | \$21,456 | 100.0\% | 100.0\% | 85 | 100.0\% | 100.0\% | \$11,358 | 100.0\% | 100.0\% | 79 | 100.0\% | 100.0\% | \$10,098 | 100.0\% | 100.0\% |
|  | 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 | 2.3\% | \$302 | 0.9\% | 8.4\% | 4 | 2.5\% | 3.2\% | \$222 | 1.0\% | 2.5\% | 2 | 1.9\% | 2.8\% | \$80 | 0.6\% | 1.8\% |
|  | Middle | 218 | 82.6\% | \$28,252 | 80.8\% | 74.4\% | 134 | 84.3\% | 75.5\% | \$17,402 | 79.3\% | 73.8\% | 84 | 80.0\% | 74.4\% | \$10,850 | 83.4\% | 71.7\% |
|  | Upper | 40 | 15.2\% | \$6,411 | 18.3\% | 17.2\% | 21 | 13.2\% | 21.3\% | \$4,328 | 19.7\% | 23.7\% | 19 | 18.1\% | 22.8\% | \$2,083 | 16.0\% | 26.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 264 | 100.0\% | \$34,965 | 100.0\% | 100.0\% | 159 | 100.0\% | 100.0\% | \$21,952 | 100.0\% | 100.0\% | 105 | 100.0\% | 100.0\% | \$13,013 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 3 | 13.6\% | \$9 | 6.4\% | 8.4\% | 3 | 37.5\% | 5.5\% | \$9 | 27.3\% | 2.3\% | 0 | 0.0\% | 6.6\% | \$0 | 0.0\% | 3.4\% |
|  | Middle | 18 | 81.8\% | \$127 | 90.7\% | 74.4\% | 5 | 62.5\% | 79.4\% | \$24 | 72.7\% | 80.9\% | 13 | 92.9\% | 75.9\% | \$103 | 96.3\% | 71.3\% |
|  | Upper | 1 | 4.5\% | \$4 | 2.9\% | 17.2\% | 0 | 0.0\% | 15.0\% | \$0 | 0.0\% | 16.9\% | 1 | 7.1\% | 17.2\% | \$4 | 3.7\% | 25.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.3\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 22 | 100.0\% | \$140 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$33 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$107 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-F | mily 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\% | 18.4\% | 0 | 0.0\% | 38.5\% | \$0 | 0.0\% | 51.7\% | 0 | 0.0\% | 28.6\% | \$0 | 0.0\% | 11.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 61.5\% | 0 | 0.0\% | 61.5\% | \$0 | 0.0\% | 48.3\% | 0 | 0.0\% | 52.4\% | \$0 | 0.0\% | 62.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 20.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 26.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 15 | 3.3\% | \$703 | 1.2\% | 8.4\% | 12 | 4.8\% | 3.6\% | \$595 | 1.8\% | 7.6\% | 3 | 1.5\% | 3.5\% | \$108 | 0.5\% | 2.7\% |
|  | Middle | 361 | 80.2\% | \$44,618 | 78.9\% | 74.4\% | 200 | 79.4\% | 75.6\% | \$25,214 | 75.6\% | 71.5\% | 161 | 81.3\% | 75.7\% | \$19,404 | 83.6\% | 72.9\% |
|  | Upper | 74 | 16.4\% | \$11,240 | 19.9\% | 17.2\% | 40 | 15.9\% | 20.7\% | \$7,534 | 22.6\% | 20.9\% | 34 | 17.2\% | 20.7\% | \$3,706 | 16.0\% | 24.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 450 | 100.0\% | \$56,561 | 100.0\% | 100.0\% | 252 | 100.0\% | 100.0\% | \$33,343 | 100.0\% | 100.0\% | 198 | 100.0\% | 100.0\% | \$23,218 | 100.0\% | 100.0\% |
|  |  |  |  |  | Smal | 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 | 34 | 18.9\% | \$1,866 | 16.8\% | 13.5\% | 9 | 17.0\% | 12.1\% | \$592 | 16.3\% | 13.3\% | 25 | 19.7\% | 13.0\% | \$1,274 | 17.0\% | 16.1\% |
|  | Middle | 121 | 67.2\% | \$8,505 | 76.5\% | 69.3\% | 38 | 71.7\% | 65.4\% | \$2,863 | 79.0\% | 62.9\% | 83 | 65.4\% | 64.4\% | \$5,642 | 75.4\% | 61.7\% |
|  | Upper | 25 | 13.9\% | \$740 | 6.7\% | 15.7\% | 6 | 11.3\% | 18.6\% | \$170 | 4.7\% | 21.1\% | 19 | 15.0\% | 18.2\% | \$570 | 7.6\% | 19.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 2.1\% | \$0 | 0.0\% | 2.1\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 180 | 100.0\% | \$11,111 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$3,625 | 100.0\% | 100.0\% | 127 | 100.0\% | 100.0\% | \$7,486 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | 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\% | 13.1\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 31.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 82.0\% | 0 | 0.0\% | 76.9\% | \$0 | 0.0\% | 48.1\% | 0 | 0.0\% | 69.2\% | \$0 | 0.0\% | 80.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 3.3\% | 0 | 0.0\% | 15.4\% | \$0 | 0.0\% | 20.1\% | 0 | 0.0\% | 23.1\% | \$0 | 0.0\% | 17.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 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\% | 7.7\% | \$0 | 0.0\% | 2.4\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MS Gulfport


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## Appendices

## Combined Demographics Report

Assessment Area: MS Hattiesburg

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2 | 8.7 |  | 5.9 | 680 | 41.0 | 6,351 | 22.5 |
| Moderate-income | 6 | 26.1 |  | 13.1 | 938 | 25.3 | 4,333 | 15.4 |
| Middle-income | 10 | 43.5 |  | 44.2 | 1,673 | 13.4 | 5,834 | 20.7 |
| Upper-income | 5 | 21.7 |  | 36.7 | 744 | 7.2 | 11,682 | 41.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 23 | 100.0 |  | 100.0 | 4,035 | 14.3 | 28,200 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 2,828 |  |  | 37.6 | 1,262 | 44.6 | 503 | 17.8 |
| Moderate-income | 7,478 |  |  | 40.1 | 3,694 | 49.4 | 785 | 10.5 |
| Middle-income | 19,570 |  |  | 65.0 | 5,271 | 26.9 | 1,574 | 8.0 |
| Upper-income | 15,470 |  |  | 68.2 | 4,020 | 26.0 | 905 | 5.9 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 45,346 | 27,332 |  | 60.3 | 14,247 | 31.4 | 3,767 | 8.3 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 394 | 6.4 |  | 6.3 | 29 | 9.2 | 14 | 5.5 |
| Moderate-income | 759 | 12.3 |  | 12.0 | 53 | 16.9 | 37 | 14.6 |
| Middle-income | 2,250 | 36.5 |  | 36.7 | 100 | 31.8 | 95 | 37.5 |
| Upper-income | 2,761 | 44.8 |  | 45.1 | 132 | 42.0 | 107 | 42.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 6,164 | 100.0 |  | 100.0 | 314 | 100.0 | 253 | 100.0 |
|  | Percentage of Total Businesses: |  |  | $\begin{array}{\|l\|l\|} \hline 90.8 & \\ \hline \end{array}$ |  | 5.1 |  | 4.1 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \text { \$1 Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3 | 2.9 |  | 3.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 7 | 6.7 |  | 6.9 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 67 | 63.8 |  | 62.4 | 3 | 100.0 | 1 | 100.0 |
| Upper-income | 28 | 26.7 |  | 27.7 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 105 | 100.0 |  | 100.0 | 3 | 100.0 | 1 | 100.0 |
|  | Percentage of Total Farms: |  |  | 96.2 |  | 2.9 |  | 1.0 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MS Hattiesburg

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Families by Family Income <br> \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Dol |  |  | ank |  | Agg | Ba |  | Agg |  | nk | Agg |  |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  |  |  |  | Low | 9 | 8.7\% | \$523 | 3.4\% | 22.5\% | 7 | 12.1\% | 5.2\% | \$387 | 4.3\% | 2.4\% | 2 | 4.3\% | 3.9\% | \$136 | 2.1\% | 1.5\% |
|  |  | Moderate | 17 | 16.3\% | \$1,765 | 11.4\% | 15.4\% | 7 | 12.1\% | 16.2\% | \$714 | 8.0\% | 11.3\% | 10 | 21.7\% | 15.9\% | \$1,051 | 16.1\% | 10.5\% |
|  |  | Middle | 29 | 27.9\% | \$3,521 | 22.8\% | 20.7\% | 17 | 29.3\% | 23.2\% | \$2,080 | 23.3\% | 19.9\% | 12 | 26.1\% | 21.5\% | \$1,441 | 22.1\% | 18.7\% |
|  |  | Upper | 47 | 45.2\% | \$9,399 | 60.9\% | 41.4\% | 27 | 46.6\% | 40.7\% | \$5,737 | 64.3\% | 50.4\% | 20 | 43.5\% | 41.1\% | \$3,662 | 56.1\% | 52.2\% |
|  |  | Unknown | 2 | 1.9\% | \$238 | 1.5\% | 0.0\% | 0 | 0.0\% | 14.7\% | \$0 | 0.0\% | 16.1\% | 2 | 4.3\% | 17.5\% | \$238 | 3.6\% | 17.1\% |
|  |  | Total | 104 | 100.0\% | \$15,446 | 100.0\% | 100.0\% | 58 | 100.0\% | 100.0\% | \$8,918 | 100.0\% | 100.0\% | 46 | 100.0\% | 100.0\% | \$6,528 | 100.0\% | 100.0\% |
|  |  | Low | 11 | 5.9\% | \$819 | 3.5\% | 22.5\% | 6 | 5.6\% | 2.5\% | \$475 | 3.5\% | 1.0\% | 5 | 6.4\% | 3.6\% | \$344 | 3.5\% | 1.8\% |
|  |  | Moderate | 25 | 13.4\% | \$2,108 | 9.0\% | 15.4\% | 14 | 13.0\% | 7.7\% | \$1,325 | 9.8\% | 4.5\% | 11 | 14.1\% | 7.5\% | \$783 | 8.1\% | 4.5\% |
|  |  | Middle | 43 | 23.1\% | \$4,146 | 17.8\% | 20.7\% | 23 | 21.3\% | 16.4\% | \$2,275 | 16.7\% | 11.8\% | 20 | 25.6\% | 16.9\% | \$1,871 | 19.3\% | 12.1\% |
|  |  | Upper | 99 | 53.2\% | \$15,202 | 65.3\% | 41.4\% | 61 | 56.5\% | 55.7\% | \$9,048 | 66.6\% | 64.0\% | 38 | 48.7\% | 53.0\% | \$6,154 | 63.4\% | 60.9\% |
|  |  | Unknown | 8 | 4.3\% | \$1,018 | 4.4\% | 0.0\% | 4 | 3.7\% | 17.6\% | \$460 | 3.4\% | 18.7\% | 4 | 5.1\% | 19.0\% | \$558 | 5.7\% | 20.6\% |
|  |  | Total | 186 | 100.0\% | \$23,293 | 100.0\% | 100.0\% | 108 | 100.0\% | 100.0\% | \$13,583 | 100.0\% | 100.0\% | 78 | 100.0\% | 100.0\% | \$9,710 | 100.0\% | 100.0\% |
|  |  | Low | 5 | 21.7\% | \$27 | 14.1\% | 22.5\% | 5 | 45.5\% | 12.3\% | \$27 | 29.3\% | 5.9\% | 0 | 0.0\% | 5.5\% | \$0 | 0.0\% | 0.5\% |
|  |  | Moderate | 4 | 17.4\% | \$16 | 8.4\% | 15.4\% | 1 | 9.1\% | 12.9\% | \$3 | 3.3\% | 9.2\% | 3 | 25.0\% | 13.7\% | \$13 | 13.1\% | 4.6\% |
|  |  | Middle | 2 | 8.7\% | \$10 | 5.2\% | 20.7\% | 1 | 9.1\% | 22.2\% | \$5 | 5.4\% | 16.2\% | 1 | 8.3\% | 20.8\% | \$5 | 5.1\% | 16.1\% |
|  |  | Upper | 12 | 52.2\% | \$138 | 72.3\% | 41.4\% | 4 | 36.4\% | 48.0\% | \$57 | 62.0\% | 66.0\% | 8 | 66.7\% | 51.4\% | \$81 | 81.8\% | 72.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.7\% | \$0 | 0.0\% | 2.6\% | 0 | 0.0\% | 8.7\% | \$0 | 0.0\% | 6.8\% |
|  |  | Total | 23 | 100.0\% | \$191 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$92 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$99 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{2}$ |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 22.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.4\% | 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\% | 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\% | 41.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 25 | 8.0\% | \$1,369 | 3.5\% | 22.5\% | 18 | 10.2\% | 4.0\% | \$889 | 3.9\% | 1.5\% | 7 | 5.1\% | 3.8\% | \$480 | 2.9\% | 1.6\% |
|  |  | Moderate | 46 | 14.7\% | \$3,889 | 10.0\% | 15.4\% | 22 | 12.4\% | 11.4\% | \$2,042 | 9.0\% | 7.0\% | 24 | 17.6\% | 11.3\% | \$1,847 | 11.3\% | 6.6\% |
|  |  | Middle | 74 | 23.6\% | \$7,677 | 19.7\% | 20.7\% | 41 | 23.2\% | 19.4\% | \$4,360 | 19.3\% | 14.5\% | 33 | 24.3\% | 18.9\% | \$3,317 | 20.3\% | 14.0\% |
|  |  | Upper | 158 | 50.5\% | \$24,739 | 63.5\% | 41.4\% | 92 | 52.0\% | 49.0\% | \$14,842 | 65.7\% | 55.5\% | 66 | 48.5\% | 47.6\% | \$9,897 | 60.6\% | 53.4\% |
|  |  | Unknown | 10 | 3.2\% | \$1,256 | 3.2\% | 0.0\% | 4 | 2.3\% | 16.3\% | \$460 | 2.0\% | 21.5\% | 6 | 4.4\% | 18.4\% | \$796 | 4.9\% | 24.4\% |
|  |  | Total | 313 | 100.0\% | \$38,930 | 100.0\% | 100.0\% | 177 | 100.0\% | 100.0\% | \$22,593 | 100.0\% | 100.0\% | 136 | 100.0\% | 100.0\% | \$16,337 | 100.0\% | 100.0\% |
|  |  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 171 | 40.7\% | \$9,682 | 32.8\% | 90.8\% | 97 | 56.1\% | 46.6\% | \$4,752 | 34.2\% | 42.8\% | 74 | 30.0\% | 48.5\% | \$4,930 | 31.5\% | 44.8\% |
|  |  | Over \$1 Million | 68 | 16.2\% | \$10,011 | 33.9\% | 5.1\% | 38 | 22.0\% |  |  |  |  | 30 | 12.1\% |  |  |  |  |
|  |  | Total Rev. available | 239 | 56.9\% | \$19,693 | 66.7\% | 95.9\% | 135 | 78.1\% |  |  |  |  | 104 | 42.1\% |  |  |  |  |
|  |  | Rev. Not Known | 181 | 43.1\% | \$9,870 | 33.4\% | 4.1\% | 38 | 22.0\% |  |  |  |  | 143 | 57.9\% |  |  |  |  |
|  |  | Total | 420 | 100.0\% | \$29,563 | 100.0\% | 100.0\% | 173 | 100.0\% |  |  |  |  | 247 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 365 | 86.9\% | \$12,267 | 41.5\% |  | 147 | 85.0\% | 87.5\% | \$5,813 | 41.8\% | 31.3\% | 218 | 88.3\% | 89.1\% | \$6,454 | 41.2\% | 32.0\% |
|  |  | $\$ 100,001 \text { - \$250,000 }$ | 33 | 7.9\% | \$5,737 | 19.4\% |  | 15 | 8.7\% | 6.3\% | \$2,614 | 18.8\% | 17.1\% | 18 | 7.3\% | 5.4\% | \$3,123 | 19.9\% | 17.0\% |
|  |  | \$250,001-\$1 Million | 22 | 5.2\% | \$11,559 | 39.1\% |  | 11 | 6.4\% | 6.1\% | \$5,469 | 39.4\% | 51.6\% | 11 | 4.5\% | 5.5\% | \$6,090 | 38.9\% | 51.0\% |
|  |  | Total | 420 | 100.0\% | \$29,563 | 100.0\% |  | 173 | 100.0\% | 100.0\% | \$13,896 | 100.0\% | 100.0\% | 247 | 100.0\% | 100.0\% | \$15,667 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 1 | 50.0\% | \$431 | 92.5\% | 96.2\% | 0 | 0.0\% | 87.5\% | \$0 | 0.0\% | 70.5\% | 1 | 50.0\% | 85.1\% | \$431 | 92.5\% | 81.5\% |
|  |  | Over \$1 Million | 0 | 0.0\% | \$0 | 0.0\% | 2.9\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 1 | 50.0\% | \$35 | 7.5\% |  | 0 | 0.0\% |  |  |  |  | 1 | 50.0\% |  |  |  |  |
|  |  | Total | 2 | 100.0\% | \$466 | 100.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 2 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 1 | 50.0\% | \$35 | 7.5\% |  | 0 | 0.0\% | 75.0\% | \$0 | 0.0\% | 32.6\% | 1 | 50.0\% | 82.4\% | \$35 | 7.5\% | 41.0\% |
|  |  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 18.8\% | \$0 | 0.0\% | 38.3\% | 0 | 0.0\% | 13.5\% | \$0 | 0.0\% | 36.5\% |
|  |  | \$250,001-\$500,000 | 1 | 50.0\% | \$431 | 92.5\% |  | 0 | 0.0\% | 6.3\% | \$0 | 0.0\% | 29.0\% | 1 | 50.0\% | 4.1\% | \$431 | 92.5\% | 22.5\% |
|  |  | Total | 2 | 100.0\% | \$466 | 100.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$466 | 100.0\% | 100.0\% |

## Appendices

## Combined Demographics Report

Assessment Area: MS Northern MS

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 17,028 | 18.8 |
| Moderate-income | 2 | 3.2 |  | 1.8 | 493 | 30.4 | 14,007 | 15.5 |
| Middle-income | 46 | 73.0 | 60,894 | 67.4 | 9,341 | 15.3 | 18,024 | 19.9 |
| Upper-income | 15 | 23.8 |  | 30.8 | 2,669 | 9.6 | 41,334 | 45.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 63 | 100.0 | 90,393 | 100.0 | 12,503 | 13.8 | 90,393 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# \% |  |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 2,587 | 1,371 |  | 53.0 | 1,005 | 38.8 | 211 | 8.2 |
| Middle-income | 95,202 | 63,823 |  | 67.0 | 21,169 | 22.2 | 10,210 | 10.7 |
| Upper-income | 45,017 | 28,314 |  | 62.9 | 12,413 | 27.6 | 4,290 | 9.5 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 142,806 | 93,508 |  | 65.5 | 34,587 | 24.2 | 14,711 10.3 | 10.3 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 385 | 2.3 |  | 2.2 | 19 | 2.3 | 26 | 3.4 |
| Middle-income | 10,824 | 64.2 |  | 64.2 | 503 | 61.3 | 517 | 67.8 |
| Upper-income | 5,646 | 33.5 |  | 33.6 | 299 | 36.4 | 219 | 28.7 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 16,855 | 100.0 |  | 100.0 | 821 | 100.0 | 762 | 100.0 |
|  | Percentage of | Total B | ess | 90.6 |  | 4.9 |  | 4.5 |
|  | Total Fari |  |  | Farm | by Tract \& R | evenue |  |  |
|  | Tract |  |  |  | Over \$1 Million |  | Revenue Reporte |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 8 | 1.3 |  | 1.3 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 517 | 84.6 |  | 84.6 | 11 | 91.7 | 1 | 50.0 |
| Upper-income | 86 | 14.1 |  | 14.1 | 1 | 8.3 | 1 | 50.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 611 | 100.0 |  | 100.0 | 12 | 100.0 | 2 | 100.0 |
|  | Percentage of | Total F |  | 97.7 |  | 2.0 |  | . 3 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: MS Northern MS

| $\stackrel{\underset{\nu}{\stackrel{u}{n}}}{ }$ | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount |  | nk $\begin{array}{r} \\ \\ \text { Dollar }\end{array}$ |  | Owner Occupied Units \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 10 | 2.0\% | \$945 | 1.5\% | 1.5\% | 3 | 1.3\% | 1.4\% | \$251 | 0.9\% | 1.1\% | 7 | 2.5\% | 1.0\% | \$694 | 1.9\% | 0.6\% |
|  | Middle | 282 | 55.8\% | \$31,291 | 48.4\% | 68.3\% | 133 | 59.6\% | 44.5\% | \$14,559 | 50.5\% | 37.3\% | 149 | 52.8\% | 47.4\% | \$16,732 | 46.6\% | 38.9\% |
|  | Upper | 213 | 42.2\% | \$32,463 | 50.2\% | 30.3\% | 87 | 39.0\% | 52.9\% | \$14,016 | 48.6\% | 61.2\% | 126 | 44.7\% | 51.6\% | \$18,447 | 51.4\% | 60.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 505 | 100.0\% | \$64,699 | 100.0\% | 100.0\% | 223 | 100.0\% | 100.0\% | \$28,826 | 100.0\% | 100.0\% | 282 | 100.0\% | 100.0\% | \$35,873 | 100.0\% | 100.0\% |
|  | 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 | 16 | 2.0\% | \$1,462 | 1.2\% | 1.5\% | 11 | 2.4\% | 1.1\% | \$1,198 | 1.7\% | 0.6\% | 5 | 1.5\% | 0.9\% | \$264 | 0.5\% | 0.5\% |
|  | Middle | 472 | 58.3\% | \$58,354 | 49.4\% | 68.3\% | 265 | 57.0\% | 48.7\% | \$32,838 | 47.0\% | 39.0\% | 207 | 60.2\% | 50.2\% | \$25,516 | 53.0\% | 42.4\% |
|  | Upper | 321 | 39.7\% | \$58,256 | 49.3\% | 30.3\% | 189 | 40.6\% | 50.2\% | \$35,900 | 51.3\% | 60.4\% | 132 | 38.4\% | 49.0\% | \$22,356 | 46.4\% | 57.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 809 | 100.0\% | \$118,072 | 100.0\% | 100.0\% | 465 | 100.0\% | 100.0\% | \$69,936 | 100.0\% | 100.0\% | 344 | 100.0\% | 100.0\% | \$48,136 | 100.0\% | 100.0\% |
|  | 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 | 3.0\% | \$19 | 2.4\% | 1.5\% | 1 | 2.0\% | 2.7\% | \$8 | 2.3\% | 1.3\% | 2 | 3.9\% | 2.9\% | \$11 | 2.5\% | 1.5\% |
|  | Middle | 77 | 77.0\% | \$591 | 75.1\% | 68.3\% | 39 | 79.6\% | 71.1\% | \$253 | 73.3\% | 48.8\% | 38 | 74.5\% | 70.4\% | \$338 | 76.5\% | 53.6\% |
|  | Upper | 20 | 20.0\% | \$177 | 22.5\% | 30.3\% | 9 | 18.4\% | 26.3\% | \$84 | 24.3\% | 49.9\% | 11 | 21.6\% | 26.7\% | \$93 | 21.0\% | 45.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 100 | 100.0\% | \$787 | 100.0\% | 100.0\% | 49 | 100.0\% | 100.0\% | \$345 | 100.0\% | 100.0\% | 51 | 100.0\% | 100.0\% | \$442 | 100.0\% | 100.0\% |
|  | 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\% | 4.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 47.9\% | 0 | 0.0\% | 55.6\% | \$0 | 0.0\% | 67.9\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 87.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 47.7\% | 0 | 0.0\% | 44.4\% | \$0 | 0.0\% | 32.1\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 12.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 29 | 2.1\% | \$2,426 | 1.3\% | 1.5\% | 15 | 2.0\% | 1.3\% | \$1,457 | 1.5\% | 0.8\% | 14 | 2.1\% | 1.0\% | \$969 | 1.1\% | 0.6\% |
|  | Middle | 831 | 58.8\% | \$90,236 | 49.2\% | 68.3\% | 437 | 59.3\% | 49.1\% | \$47,650 | 48.1\% | 39.1\% | 394 | 58.2\% | 50.7\% | \$42,586 | 50.4\% | 42.3\% |
|  | Upper | 554 | 39.2\% | \$90,896 | 49.5\% | 30.3\% | 285 | 38.7\% | 49.3\% | \$50,000 | 50.5\% | 60.0\% | 269 | 39.7\% | 48.3\% | \$40,896 | 48.4\% | 57.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 1,414 | 100.0\% | \$183,558 | 100.0\% | 100.0\% | 737 | 100.0\% | 100.0\% | \$99,107 | 100.0\% | 100.0\% | 677 | 100.0\% | 100.0\% | \$84,451 | 100.0\% | 100.0\% |
|  | 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 | 26 | 2.9\% | \$4,577 | 6.8\% | 2.2\% | 6 | 1.7\% | 0.8\% | \$1,243 | 4.1\% | 0.8\% | 20 | 3.7\% | 1.7\% | \$3,334 | 9.0\% | 2.5\% |
|  | Middle | 567 | 63.5\% | \$43,008 | 64.1\% | 64.2\% | 234 | 65.9\% | 56.9\% | \$18,585 | 61.7\% | 53.4\% | 333 | 61.9\% | 57.5\% | \$24,423 | 66.0\% | 56.5\% |
|  | Upper | 294 | 32.9\% | \$19,264 | 28.7\% | 33.6\% | 112 | 31.5\% | 38.5\% | \$10,198 | 33.9\% | 44.5\% | 182 | 33.8\% | 38.0\% | \$9,066 | 24.5\% | 40.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 6 | 0.7\% | \$274 | 0.4\% |  | 3 | 0.8\% | 3.8\% | \$80 | 0.3\% | 1.3\% | 3 | 0.6\% | 2.8\% | \$194 | 0.5\% | 0.5\% |
|  | Total | 893 | 100.0\% | \$67,123 | 100.0\% | 100.0\% | 355 | 100.0\% | 100.0\% | \$30,106 | 100.0\% | 100.0\% | 538 | 100.0\% | 100.0\% | \$37,017 | 100.0\% | 100.0\% |
|  | 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 | 4 | 2.8\% | \$594 | 2.5\% | 1.3\% | 3 | 4.2\% | 1.9\% | \$315 | 2.5\% | 1.1\% | 1 | 1.4\% | 0.6\% | \$279 | 2.5\% | 1.5\% |
|  | Middle | 138 | 95.8\% | \$22,789 | 96.7\% | 84.6\% | 67 | 94.4\% | 87.4\% | \$11,958 | 96.1\% | 89.3\% | 71 | 97.3\% | 90.4\% | \$10,831 | 97.4\% | 90.9\% |
|  | Upper | 2 | 1.4\% | \$191 | 0.8\% | 14.1\% | 1 | 1.4\% | 10.5\% | \$176 | 1.4\% | 9.6\% | 1 | 1.4\% | 8.4\% | \$15 | 0.1\% | 7.5\% |
|  | 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\% | 0.2\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 144 | 100.0\% | \$23,574 | 100.0\% | 100.0\% | 71 | 100.0\% | 100.0\% | \$12,449 | 100.0\% | 100.0\% | 73 | 100.0\% | 100.0\% | \$11,125 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: MS Northwest MS


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ |  | Dollar |  | $\begin{array}{\|c\|\|} \text { Owner } \\ \text { Occupied } \\ \text { Units } \\ \% \\ \hline \end{array}$ |  | Count ank | Agg | Ba | Dollar | Agg |  | Count ank | Agg |  | Dollar | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$ (000s) | \$ \% | \$ \% |
|  | Low | 2 | 1.0\% | \$140 | 0.7\% | 5.0\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 1.8\% | 2 | 1.9\% | 1.7\% | \$140 | 1.4\% | 1.0\% |
|  | Moderate | 23 | 11.8\% | \$1,913 | 9.7\% | 45.0\% | 12 | 13.0\% | 17.3\% | \$874 | 9.1\% | 15.3\% | 11 | 10.7\% | 17.2\% | \$1,039 | 10.2\% | 14.2\% |
|  | Middle | 61 | 31.3\% | \$5,948 | 30.1\% | 27.0\% | 28 | 30.4\% | 26.7\% | \$2,940 | 30.7\% | 25.6\% | 33 | 32.0\% | 28.9\% | \$3,008 | 29.5\% | 27.8\% |
|  | Upper | 109 | 55.9\% | \$11,783 | 59.6\% | 23.0\% | 52 | 56.5\% | 53.6\% | \$5,766 | 60.2\% | 57.2\% | 57 | 55.3\% | 52.2\% | \$6,017 | 59.0\% | 57.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 195 | 100.0\% | \$19,784 | 100.0\% | 100.0\% | 92 | 100.0\% | 100.0\% | \$9,580 | 100.0\% | 100.0\% | 103 | 100.0\% | 100.0\% | \$10,204 | 100.0\% | 100.0\% |
|  | Low | 7 | 3.6\% | \$1,256 | 5.8\% | 5.0\% | 3 | 2.9\% | 1.9\% | \$456 | 4.0\% | 1.7\% | 4 | 4.4\% | 1.5\% | \$800 | 7.9\% | 1.7\% |
|  | Moderate | 43 | 22.2\% | \$3,819 | 17.7\% | 45.0\% | 21 | 20.4\% | 28.0\% | \$1,764 | 15.3\% | 20.2\% | 22 | 24.2\% | 32.7\% | \$2,055 | 20.4\% | 23.8\% |
|  | Middle | 55 | 28.4\% | \$5,384 | 24.9\% | 27.0\% | 26 | 25.2\% | 24.9\% | \$2,451 | 21.2\% | 22.8\% | 29 | 31.9\% | 26.5\% | \$2,933 | 29.1\% | 28.0\% |
|  | Upper | 89 | 45.9\% | \$11,159 | 51.6\% | 23.0\% | 53 | 51.5\% | 45.2\% | \$6,870 | 59.5\% | 55.2\% | 36 | 39.6\% | 39.2\% | \$4,289 | 42.6\% | 46.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 194 | 100.0\% | \$21,618 | 100.0\% | 100.0\% | 103 | 100.0\% | 100.0\% | \$11,541 | 100.0\% | 100.0\% | 91 | 100.0\% | 100.0\% | \$10,077 | 100.0\% | 100.0\% |
|  | Low | 4 | 6.2\% | \$16 | 3.9\% | 5.0\% | 1 | 3.3\% | 5.1\% | \$5 | 2.5\% | 1.9\% | 3 | 8.6\% | 7.3\% | \$11 | 5.4\% | 1.5\% |
|  | Moderate | 25 | 38.5\% | \$168 | 41.4\% | 45.0\% | 13 | 43.3\% | 41.1\% | \$96 | 47.3\% | 37.2\% | 12 | 34.3\% | 40.2\% | \$72 | 35.5\% | 38.6\% |
|  | Middle | 17 | 26.2\% | \$101 | 24.9\% | 27.0\% | 8 | 26.7\% | 29.2\% | \$44 | 21.7\% | 37.8\% | 9 | 25.7\% | 24.0\% | \$57 | 28.1\% | 23.3\% |
|  | Upper | 19 | 29.2\% | \$121 | 29.8\% | 23.0\% | 8 | 26.7\% | 24.6\% | \$58 | 28.6\% | 23.0\% | 11 | 31.4\% | 28.5\% | \$63 | 31.0\% | 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\% |
|  | Total | 65 | 100.0\% | \$406 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$203 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$203 | 100.0\% | 100.0\% |
|  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 13.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 45.3\% | 0 | 0.0\% | 57.1\% | \$0 | 0.0\% | 39.8\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 22.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 17.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 67.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 23.9\% | 0 | 0.0\% | 42.9\% | \$0 | 0.0\% | 60.2\% | 0 | 0.0\% | 37.5\% | \$0 | 0.0\% | 9.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% |
|  | Low | 13 | 2.9\% | \$1,412 | 3.4\% | 5.0\% | 4 | 1.8\% | 2.4\% | \$461 | 2.2\% | 1.7\% | 9 | 3.9\% | 2.2\% | \$951 | 4.6\% | 1.4\% |
|  | Moderate | 91 | 20.0\% | \$5,900 | 14.1\% | 45.0\% | 46 | 20.4\% | 25.4\% | \$2,734 | 12.8\% | 19.1\% | 45 | 19.7\% | 27.6\% | \$3,166 | 15.5\% | 20.0\% |
|  | Middle | 133 | 29.3\% | \$11,433 | 27.3\% | 27.0\% | 62 | 27.6\% | 26.0\% | \$5,435 | 25.5\% | 23.7\% | 71 | 31.0\% | 27.1\% | \$5,998 | 29.3\% | 28.8\% |
|  | Upper | 217 | 47.8\% | \$23,063 | 55.2\% | 23.0\% | 113 | 50.2\% | 46.1\% | \$12,694 | 59.5\% | 55.5\% | 104 | 45.4\% | 43.1\% | \$10,369 | 50.6\% | 49.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 454 | 100.0\% | \$41,808 | 100.0\% | 100.0\% | 225 | 100.0\% | 100.0\% | \$21,324 | 100.0\% | 100.0\% | 229 | 100.0\% | 100.0\% | \$20,484 | 100.0\% | 100.0\% |
|  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 35 | 10.6\% | \$4,683 | 19.0\% | 9.8\% | 8 | 7.8\% | 7.7\% | \$1,784 | 16.7\% | 14.8\% | 27 | 11.8\% | 8.5\% | \$2,899 | 20.8\% | 10.5\% |
|  | Moderate | 121 | 36.6\% | \$8,658 | 35.1\% | 42.0\% | 31 | 30.1\% | 34.6\% | \$3,872 | 36.2\% | 45.3\% | 90 | 39.5\% | 34.5\% | \$4,786 | 34.3\% | 50.3\% |
|  | Middle | 63 | 19.0\% | \$4,077 | 16.5\% | 22.3\% | 16 | 15.5\% | 20.9\% | \$1,301 | 12.2\% | 17.4\% | 47 | 20.6\% | 23.4\% | \$2,776 | 19.9\% | 19.4\% |
|  | Upper | 111 | 33.5\% | \$7,223 | 29.3\% | 25.8\% | 48 | 46.6\% | 25.7\% | \$3,745 | 35.0\% | 20.5\% | 63 | 27.6\% | 27.1\% | \$3,478 | 24.9\% | 18.7\% |
|  | 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 | 1 | 0.3\% | \$10 | 0.0\% |  | 0 | 0.0\% | 11.0\% | \$0 | 0.0\% | 2.0\% | 1 | 0.4\% | 6.5\% | \$10 | 0.1\% | 1.1\% |
|  | Total | 331 | 100.0\% | \$24,651 | 100.0\% | 100.0\% | 103 | 100.0\% | 100.0\% | \$10,702 | 100.0\% | 100.0\% | 228 | 100.0\% | 100.0\% | \$13,949 | 100.0\% | 100.0\% |
|  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.8\% |
|  | Moderate | 111 | 54.7\% | \$17,243 | 49.3\% | 39.7\% | 55 | 59.8\% | 50.7\% | \$9,613 | 53.3\% | 49.6\% | 56 | 50.5\% | 49.4\% | \$7,630 | 45.0\% | 45.5\% |
|  | Middle | 63 | 31.0\% | \$10,898 | 31.2\% | 39.7\% | 21 | 22.8\% | 28.4\% | \$4,460 | 24.7\% | 30.9\% | 42 | 37.8\% | 30.3\% | \$6,438 | 38.0\% | 35.6\% |
|  | Upper | 28 | 13.8\% | \$6,825 | 19.5\% | 19.4\% | 16 | 17.4\% | 16.5\% | \$3,948 | 21.9\% | 18.8\% | 12 | 10.8\% | 14.9\% | \$2,877 | 17.0\% | 17.8\% |
|  | 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 | 1 | 0.5\% | \$10 | 0.0\% |  | 0 | 0.0\% | 3.6\% | \$0 | 0.0\% | 0.5\% | 1 | 0.9\% | 5.0\% | \$10 | 0.1\% | 0.4\% |
|  | Total | 203 | 100.0\% | \$34,976 | 100.0\% | 100.0\% | 92 | 100.0\% | 100.0\% | \$18,021 | 100.0\% | 100.0\% | 111 | 100.0\% | 100.0\% | \$16,955 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: MS Pascagoula


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MS Pascagoula


[^444]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: MS Southeast MS

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 17,808 | 23.1 |
| Moderate-income | 8 | 15.7 |  | 15.7 | 3,316 | 27.5 | 13,537 | 17.6 |
| Middle-income | 39 | 76.5 |  | 72.9 | 9,493 | 16.9 | 15,178 | 19.7 |
| Upper-income | 4 | 7.8 |  | 11.4 | 807 | 9.2 | 30,456 | 39.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 51 | 100.0 |  | 100.0 | 13,616 | 17.7 | 76,979 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 19,325 | 11,834 |  | 61.2 | 5,101 | 26.4 | 2,390 | 12.4 |
| Middle-income | 84,836 | 61,347 |  | 72.3 | 13,901 | 16.4 | 9,588 | 11.3 |
| Upper-income | 13,248 | 9,528 |  | 71.9 | 2,508 | 18.9 | 1,212 | 9.1 |
| Unknown-income | 0 | 0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 117,409 | 82,709 |  | 70.4 | 21,510 | 18.3 | 13,190 | 11.2 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 2,291 | 16.3 |  | 15.8 | 122 | 22.0 | 116 | 21.9 |
| Middle-income | 10,202 | 72.5 |  | 73.1 | 361 | 65.2 | 348 | 65.7 |
| Upper-income | 1,570 | 11.2 |  | 11.0 | 71 | 12.8 | 66 | 12.5 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 14,063 | 100.0 |  | 100.0 | 554 | 100.0 | 530 | 100.0 |
|  | Percentage of Total Businesses: |  |  | $\mathbf{9 2 . 3}$ |  | 3.9 |  | 3.8 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 62 | 11.2 |  | 10.6 | 4 | 44.4 | 1 | 33.3 |
| Middle-income | 465 | 84.2 |  | 85.0 | 4 | 44.4 | 2 | 66.7 |
| Upper-income | 25 | 4.5 |  | 4.4 | 1 | 11.1 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 552 | 100.0 |  | 100.0 | 9 | 100.0 | 3 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.8 |  | 1.6 |  | . 5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: MS Southeast MS

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{aligned} & \text { ㄴ } \\ & \text { D } \\ & 0 \\ & 0 \\ & \text { x } \end{aligned}$ |  | Count |  | nk <br> Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( ${ }_{\text {Ba }}$ (000s) | Dollar k \$ \% | Agg \$ \% |
|  | 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 | 12.0\% | \$1,998 | 9.3\% | 14.3\% | 12 | 15.6\% | 8.4\% | \$946 | 11.2\% | 7.0\% | 10 | 9.3\% | 10.5\% | \$1,052 | 8.1\% | 8.3\% |
|  | Middle | 115 | 62.5\% | \$13,460 | 62.9\% | 74.2\% | 45 | 58.4\% | 71.0\% | \$4,690 | 55.3\% | 70.1\% | 70 | 65.4\% | 71.5\% | \$8,770 | 67.9\% | 70.9\% |
|  | Upper | 47 | 25.5\% | \$5,933 | 27.7\% | 11.5\% | 20 | 26.0\% | 18.8\% | \$2,847 | 33.6\% | 22.0\% | 27 | 25.2\% | 18.0\% | \$3,086 | 23.9\% | 20.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.8\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 184 | 100.0\% | \$21,391 | 100.0\% | 100.0\% | 77 | 100.0\% | 100.0\% | \$8,483 | 100.0\% | 100.0\% | 107 | 100.0\% | 100.0\% | \$12,908 | 100.0\% | 100.0\% |
|  | Lo | 0 | 0.0\% | \$0 | 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 | 38 | 10.6\% | \$3,598 | 8.4\% | 14.3\% | 21 | 11.1\% | 8.0\% | \$2,071 | 9.0\% | 7.3\% | 17 | 9.9\% | 7.2\% | \$1,527 | 7.7\% | 6.3\% |
|  | Middle | 272 | 75.6\% | \$32,407 | 75.5\% | 74.2\% | 139 | 73.5\% | 74.0\% | \$16,791 | 72.6\% | 73.7\% | 133 | 77.8\% | 74.9\% | \$15,616 | 79.0\% | 74.0\% |
|  | Upper | 50 | 13.9\% | \$6,902 | 16.1\% | 11.5\% | 29 | 15.3\% | 18.1\% | \$4,268 | 18.5\% | 18.9\% | 21 | 12.3\% | 17.8\% | \$2,634 | 13.3\% | 19.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 360 | 100.0\% | \$42,907 | 100.0\% | 100.0\% | 189 | 100.0\% | 100.0\% | \$23,130 | 100.0\% | 100.0\% | 171 | 100.0\% | 100.0\% | \$19,777 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 10 | 10.0\% | \$182 | 20.4\% | 14.3\% | 3 | 7.0\% | 8.2\% | \$119 | 25.8\% | 7.0\% | 7 | 12.3\% | 9.6\% | \$63 | 14.6\% | 8.5\% |
|  | Middle | 85 | 85.0\% | \$680 | 76.2\% | 74.2\% | 39 | 90.7\% | 82.5\% | \$339 | 73.5\% | 78.2\% | 46 | 80.7\% | 79.8\% | \$341 | 79.1\% | 78.2\% |
|  | Upper | 5 | 5.0\% | \$30 | 3.4\% | 11.5\% | 1 | 2.3\% | 9.3\% | \$3 | 0.7\% | 14.8\% | 4 | 7.0\% | 10.6\% | \$27 | 6.3\% | 13.3\% |
|  | 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 | 100 | 100.0\% | \$892 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$461 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$431 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-F | amily 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\% | 27.6\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 42.4\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 12.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 52.0\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 46.9\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 30.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 20.4\% | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 10.7\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 58.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 70 | 10.9\% | \$5,778 | 8.9\% | 14.3\% | 36 | 11.7\% | 8.2\% | \$3,136 | 9.8\% | 7.3\% | 34 | 10.1\% | 8.7\% | \$2,642 | 8.0\% | 7.2\% |
|  | Middle | 472 | 73.3\% | \$46,547 | 71.4\% | 74.2\% | 223 | 72.2\% | 73.8\% | \$21,820 | 68.0\% | 72.5\% | 249 | 74.3\% | 74.0\% | \$24,727 | 74.7\% | 72.1\% |
|  | Upper | 102 | 15.8\% | \$12,865 | 19.7\% | 11.5\% | 50 | 16.2\% | 17.4\% | \$7,118 | 22.2\% | 19.8\% | 52 | 15.5\% | 17.3\% | \$5,747 | 17.4\% | 20.6\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 644 | 100.0\% | \$65,190 | 100.0\% | 100.0\% | 309 | 100.0\% | 100.0\% | \$32,074 | 100.0\% | 100.0\% | 335 | 100.0\% | 100.0\% | \$33,116 | 100.0\% | 100.0\% |
|  |  |  |  |  | Smal | 1 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 | 96 | 18.5\% | \$3,587 | 12.3\% | 15.8\% | 36 | 17.9\% | 11.1\% | \$1,044 | 8.4\% | 12.2\% | 60 | 18.9\% | 12.0\% | \$2,543 | 15.1\% | 18.1\% |
|  | Middle | 328 | 63.3\% | \$21,749 | 74.3\% | 73.1\% | 129 | 64.2\% | 74.8\% | \$9,702 | 78.1\% | 74.0\% | 199 | 62.8\% | 74.6\% | \$12,047 | 71.5\% | 74.2\% |
|  | Upper | 84 | 16.2\% | \$3,773 | 12.9\% | 11.0\% | 31 | 15.4\% | 10.4\% | \$1,575 | 12.7\% | 12.8\% | 53 | 16.7\% | 10.2\% | \$2,198 | 13.0\% | 7.2\% |
|  | 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 | 10 | 1.9\% | \$155 | 0.5\% |  | 5 | 2.5\% | 3.7\% | \$100 | 0.8\% | 1.0\% | 5 | 1.6\% | 3.2\% | \$55 | 0.3\% | 0.6\% |
|  |  | 518 | 100.0\% | \$29,264 | 100.0\% | 100.0\% | 201 | 100.0\% | 100.0\% | \$12,421 | 100.0\% | 100.0\% | 317 | 100.0\% | 100.0\% | \$16,843 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | 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 | 4 | 16.7\% | \$227 | 10.0\% | 10.6\% | 2 | 28.6\% | 7.5\% | \$74 | 7.4\% | 5.4\% | 2 | 11.8\% | 7.2\% | \$153 | 12.0\% | 5.2\% |
|  | Middle | 20 | 83.3\% | \$2,046 | 90.0\% | 85.0\% | 5 | 71.4\% | 89.9\% | \$924 | 92.6\% | 92.1\% | 15 | 88.2\% | 89.6\% | \$1,122 | 88.0\% | 93.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 4.4\% | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 2.5\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 1.6\% |
|  | 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\% | 0.3\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 24 | 100.0\% | \$2,273 | 100.0\% | 100.0\% | 7 | 100.0\% | 100.0\% | \$998 | 100.0\% | 100.0\% | 17 | 100.0\% | 100.0\% | \$1,275 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: MS Southeast MS

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  |  | ar <br> \$ \% | Families by Family Income <br> \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar <br> k <br> \$ \% | Agg \$ \% |
|  | Low | 7 | 3.8\% | \$339 | 1.6\% | 23.1\% | 2 | 2.6\% | 4.5\% | \$143 | 1.7\% | 1.9\% | 5 | 4.7\% | 3.4\% | \$196 | 1.5\% | 1.4\% |
|  | Moderate | 32 | 17.4\% | \$2,254 | 10.5\% | 17.6\% | 14 | 18.2\% | 15.1\% | \$885 | 10.4\% | 9.5\% | 18 | 16.8\% | 14.4\% | \$1,369 | 10.6\% | 8.6\% |
|  | Middle | 50 | 27.2\% | \$4,990 | 23.3\% | 19.7\% | 26 | 33.8\% | 23.8\% | \$2,394 | 28.2\% | 20.2\% | 24 | 22.4\% | 20.7\% | \$2,596 | 20.1\% | 18.4\% |
|  | Upper | 95 | 51.6\% | \$13,808 | 64.6\% | 39.6\% | 35 | 45.5\% | 45.9\% | \$5,061 | 59.7\% | 56.4\% | 60 | 56.1\% | 46.3\% | \$8,747 | 67.8\% | 57.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 10.6\% | \$0 | 0.0\% | 12.0\% | 0 | 0.0\% | 15.2\% | \$0 | 0.0\% | 14.1\% |
|  | Total | 184 | 100.0\% | \$21,391 | 100.0\% | 100.0\% | 77 | 100.0\% | 100.0\% | \$8,483 | 100.0\% | 100.0\% | 107 | 100.0\% | 100.0\% | \$12,908 | 100.0\% | 100.0\% |
|  | Low | 22 | 6.1\% | \$1,452 | 3.4\% | 23.1\% | 8 | 4.2\% | 3.6\% | \$652 | 2.8\% | 1.1\% | 14 | 8.2\% | 4.0\% | \$800 | 4.0\% | 1.3\% |
|  | Moderate | 33 | 9.2\% | \$2,308 | 5.4\% | 17.6\% | 15 | 7.9\% | 8.1\% | \$1,080 | 4.7\% | 4.3\% | 18 | 10.5\% | 8.8\% | \$1,228 | 6.2\% | 4.3\% |
|  | Middle | 69 | 19.2\% | \$6,575 | 15.3\% | 19.7\% | 35 | 18.5\% | 16.2\% | \$3,343 | 14.5\% | 11.4\% | 34 | 19.9\% | 14.7\% | \$3,232 | 16.3\% | 10.7\% |
|  | Upper | 230 | 63.9\% | \$31,718 | 73.9\% | 39.6\% | 128 | 67.7\% | 58.0\% | \$17,575 | 76.0\% | 64.2\% | 102 | 59.6\% | 55.3\% | \$14,143 | 71.5\% | 63.1\% |
|  | Unknown | 6 | 1.7\% | \$854 | 2.0\% | 0.0\% | 3 | 1.6\% | 14.0\% | \$480 | 2.1\% | 18.9\% | 3 | 1.8\% | 17.3\% | \$374 | 1.9\% | 20.7\% |
|  | Total | 360 | 100.0\% | \$42,907 | 100.0\% | 100.0\% | 189 | 100.0\% | 100.0\% | \$23,130 | 100.0\% | 100.0\% | 171 | 100.0\% | 100.0\% | \$19,777 | 100.0\% | 100.0\% |
|  | Low | 13 | 13.0\% | \$58 | 6.5\% | 23.1\% | 5 | 11.6\% | 10.8\% | \$29 | 6.3\% | 3.2\% | 8 | 14.0\% | 8.7\% | \$29 | 6.7\% | 2.9\% |
|  | Moderate | 15 | 15.0\% | \$202 | 22.6\% | 17.6\% | 6 | 14.0\% | 14.3\% | \$128 | 27.8\% | 6.9\% | 9 | 15.8\% | 13.5\% | \$74 | 17.2\% | 5.2\% |
|  | Middle | 24 | 24.0\% | \$154 | 17.3\% | 19.7\% | 8 | 18.6\% | 21.2\% | \$56 | 12.1\% | 19.0\% | 16 | 28.1\% | 19.4\% | \$98 | 22.7\% | 9.3\% |
|  | Upper | 47 | 47.0\% | \$475 | 53.3\% | 39.6\% | 24 | 55.8\% | 44.2\% | \$248 | 53.8\% | 65.1\% | 23 | 40.4\% | 46.0\% | \$227 | 52.7\% | 69.5\% |
|  | Unknown | 1 | 1.0\% | \$3 | 0.3\% | 0.0\% | 0 | 0.0\% | 9.4\% | \$0 | 0.0\% | 5.7\% | 1 | 1.8\% | 12.5\% | \$3 | 0.7\% | 13.1\% |
|  | Total | 100 | 100.0\% | \$892 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$461 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$431 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{2}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 23.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 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\% | 19.7\% | 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\% | 39.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 42 | 6.5\% | \$1,849 | 2.8\% | 23.1\% | 15 | 4.9\% | 4.7\% | \$824 | 2.6\% | 1.5\% | 27 | 8.1\% | 4.2\% | \$1,025 | 3.1\% | 1.4\% |
|  | Moderate | 80 | 12.4\% | \$4,764 | 7.3\% | 17.6\% | 35 | 11.3\% | 11.3\% | \$2,093 | 6.5\% | 6.2\% | 45 | 13.4\% | 11.3\% | \$2,671 | 8.1\% | 5.9\% |
|  | Middle | 143 | 22.2\% | \$11,719 | 18.0\% | 19.7\% | 69 | 22.3\% | 19.4\% | \$5,793 | 18.1\% | 14.6\% | 74 | 22.1\% | 17.3\% | \$5,926 | 17.9\% | 13.3\% |
|  | Upper | 372 | 57.8\% | \$46,001 | 70.6\% | 39.6\% | 187 | 60.5\% | 52.1\% | \$22,884 | 71.3\% | 61.4\% | 185 | 55.2\% | 50.9\% | \$23,117 | 69.8\% | 59.9\% |
|  | Unknown | 7 | 1.1\% | \$857 | 1.3\% | 0.0\% | 3 | 1.0\% | 12.5\% | \$480 | 1.5\% | 16.4\% | 4 | 1.2\% | 16.3\% | \$377 | 1.1\% | 19.6\% |
|  | Total | 644 | 100.0\% | \$65,190 | 100.0\% | 100.0\% | 309 | 100.0\% | 100.0\% | \$32,074 | 100.0\% | 100.0\% | 335 | 100.0\% | 100.0\% | \$33,116 | 100.0\% | 100.0\% |
|  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 170 | 32.8\% | \$8,311 | 28.4\% | 92.3\% | 100 | 49.8\% | 46.5\% | \$4,585 | 36.9\% | 45.1\% | 70 | 22.1\% | 47.8\% | \$3,726 | 22.1\% | 42.2\% |
|  | Over \$1 Million | 73 | 14.1\% | \$14,020 | 47.9\% | 3.9\% | 40 | 19.9\% |  |  |  |  | 33 | 10.4\% |  |  |  |  |
|  | Total Rev. available | 243 | 46.9\% | \$22,331 | 76.3\% | 96.2\% | 140 | 69.7\% |  |  |  |  | 103 | 32.5\% |  |  |  |  |
|  | Rev. Not Known | 275 | 53.1\% | \$6,933 | 23.7\% | 3.8\% | 61 | 30.3\% |  |  |  |  | 214 | 67.5\% |  |  |  |  |
|  | Total | 518 | 100.0\% | \$29,264 | 100.0\% | 100.0\% | 201 | 100.0\% |  |  |  |  | 317 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 468 | 90.3\% | \$12,262 | 41.9\% |  | 175 | 87.1\% | 89.8\% | \$5,370 | 43.2\% | 36.6\% | 293 | 92.4\% | 91.5\% | \$6,892 | 40.9\% | 38.0\% |
|  | \$100,001 - \$250,000 | 28 | 5.4\% | \$5,056 | 17.3\% |  | 16 | 8.0\% | 6.4\% | \$2,505 | 20.2\% | 22.6\% | 12 | 3.8\% | 5.1\% | \$2,551 | 15.1\% | 21.0\% |
|  | \$250,001-\$1 Million | 22 | 4.2\% | \$11,946 | 40.8\% |  | 10 | 5.0\% | 3.8\% | \$4,546 | 36.6\% | 40.8\% | 12 | 3.8\% | 3.4\% | \$7,400 | 43.9\% | 41.0\% |
|  | Total | 518 | 100.0\% | \$29,264 | 100.0\% |  | 201 | 100.0\% | 100.0\% | \$12,421 | 100.0\% | 100.0\% | 317 | 100.0\% | 100.0\% | \$16,843 | 100.0\% | 100.0\% |
|  | \$1 Million or Less <br> Over \$1 Million <br> Not Known <br> Total |  |  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 8 | 33.3\% | \$901 | 39.6\% | 97.8\% | 1 | 14.3\% | 87.4\% | \$201 | 20.1\% | 76.1\% | 7 | 41.2\% | 87.6\% | \$700 | 54.9\% | 81.7\% |
|  |  | 1 | 4.2\% | \$41 | 1.8\% | 1.6\% | 1 | 14.3\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 15 | 62.5\% | \$1,331 | 58.6\% | 0.5\% | 5 | 71.4\% |  |  |  |  | 10 | 58.8\% |  |  |  |  |
|  |  | 24 | 100.0\% | \$2,273 | 100.0\% | 100.0\% | 7 | 100.0\% |  |  |  |  | 17 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less$\mathbf{N}$$\$ 100,001-\$ 250,000$$\$ 250,001-\$ 500,000$Total | 16 | 66.7\% | \$448 | 19.7\% |  | 3 | 42.9\% | 87.1\% | \$115 | 11.5\% | 50.8\% | 13 | 76.5\% | 84.3\% | \$333 | 26.1\% | 42.9\% |
|  |  | 6 | 25.0\% | \$1,080 | 47.5\% |  | 3 | 42.9\% | 11.2\% | \$558 | 55.9\% | 38.1\% | 3 | 17.6\% | 12.3\% | \$522 | 40.9\% | 35.8\% |
|  |  | 2 | 8.3\% | \$745 | 32.8\% |  | 1 | 14.3\% | 1.7\% | \$325 | 32.6\% | 11.1\% | 1 | 5.9\% | 3.5\% | \$420 | 32.9\% | 21.3\% |
|  |  | 24 | 100.0\% | \$2,273 | 100.0\% |  | 7 | 100.0\% | 100.0\% | \$998 | 100.0\% | 100.0\% | 17 | 100.0\% | 100.0\% | \$1,275 | 100.0\% | 100.0\% |

[^446]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: MS Yazoo-Warren


[^447]
## Appendices

## Combined Demographics Report

Assessment Area: NC Greensboro

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 7 | 7.1 |  | 5.8 | 2,166 | 33.7 | 19,512 | 17.7 |
| Moderate-income | 21 | 21.4 |  | 13.6 | 2,171 | 14.4 | 18,007 | 16.3 |
| Middle-income | 38 | 38.8 |  | 39.6 | 2,838 | 6.5 | 23,872 | 21.6 |
| Upper-income | 32 | 32.7 | 45,248 | 41.0 | 1,237 | 2.7 | 49,052 | 44.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 98 | 100.0 | 110,443 | 100.0 | 8,412 | 7.6 | 110,443 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 10,968 | 2,715 |  | 24.8 | 7,089 | 64.6 | 1,164 | 10.6 |
| Moderate-income | 26,808 | 11,137 |  | 41.5 | 13,521 | 50.4 | 2,150 | 8.0 |
| Middle-income | 72,061 | 43,169 |  | 59.9 | 24,312 | 33.7 | 4,580 | 6.4 |
| Upper-income | 70,554 | 48,679 |  | 69.0 | 18,045 | 25.6 | 3,830 | 5.4 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 180,391 | 105,700 |  | 58.6 | 62,967 | 34.9 | 11,724 | 6.5 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 903 | 3.6 |  | 3.6 | 62 | 4.0 | 42 | 3.4 |
| Moderate-income | 3,573 | 14.3 |  | 13.8 | 325 | 20.8 | 195 | 15.7 |
| Middle-income | 10,289 | 41.1 |  | 40.9 | 656 | 41.9 | 554 | 44.6 |
| Upper-income | 10,240 | 41.0 |  | 41.7 | 521 | 33.3 | 451 | 36.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 25,005 | 100.0 |  | 100.0 | 1,564 | 100.0 | 1,242 | 100.0 |
|  | Percentage of | Total B | ess | 88.8 |  | 6.3 |  | 5.0 |
|  | Total Fari |  |  | Farm | by Tract \& R | evenue |  |  |
|  | Tract |  |  |  | Over \$1 Million |  | Revenue Reporte |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2 | 0.8 |  | 0.8 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 3 | 1.3 |  | 1.3 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 155 | 65.1 |  | 65.3 | 1 | 100.0 | 0 | 0.0 |
| Upper-income | 78 | 32.8 |  | 32.6 | 0 | 0.0 | 1 | 100.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 238 | 100.0 |  | 100.0 | 1 | 100.0 | 1 | 100.0 |
|  | Percentage of | Total F |  | 99.2 |  | . 4 |  | . 4 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount ${ }^{\text {B }}$ |  | k <br> Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$ (000s) | Dollar <br> k \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.6\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.8\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 10.5\% | 0 | 0.0\% | 7.1\% | \$0 | 0.0\% | 4.1\% | 0 | 0.0\% | 5.8\% | \$0 | 0.0\% | 3.0\% |
|  | Middle | 6 | 42.9\% | \$1,018 | 40.5\% | 40.8\% | 3 | 60.0\% | 39.6\% | \$545 | 49.5\% | 34.0\% | 3 | 33.3\% | 39.7\% | \$473 | 33.4\% | 34.1\% |
|  | Upper | 8 | 57.1\% | \$1,497 | 59.5\% | 46.1\% | 2 | 40.0\% | 52.0\% | \$555 | 50.5\% | 61.0\% | 6 | 66.7\% | 53.1\% | \$942 | 66.6\% | 62.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 14 | 100.0\% | \$2,515 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$1,100 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$1,415 | 100.0\% | 100.0\% |
| $\begin{aligned} & 山 己 \\ & \underset{\sim}{u} \\ & \vdots \\ & \vdots \\ & \underset{\sim}{\underset{\sim}{u}} \end{aligned}$ | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.6\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 0.5\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 10.5\% | 0 | 0.0\% | 3.4\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 2.0\% |
|  | Middle | 7 | 25.9\% | \$708 | 16.6\% | 40.8\% | 5 | 27.8\% | 31.0\% | \$590 | 19.3\% | 27.3\% | 2 | 22.2\% | 32.4\% | \$118 | 9.7\% | 28.1\% |
|  | Upper | 20 | 74.1\% | \$3,562 | 83.4\% | 46.1\% | 13 | 72.2\% | 65.1\% | \$2,461 | 80.7\% | 70.6\% | 7 | 77.8\% | 62.9\% | \$1,101 | 90.3\% | 69.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 27 | 100.0\% | \$4,270 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$3,051 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$1,219 | 100.0\% | 100.0\% |
|  | Lo | 0 | 0.0\% | \$0 | 0.0\% | 2.6\% | 0 | 0.0\% | 2.6\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 1.8\% | \$0 | 0.0\% | 0.2\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 10.5\% | 0 | 0.0\% | 7.2\% | \$0 | 0.0\% | 5.4\% | 0 | 0.0\% | 9.5\% | \$0 | 0.0\% | 2.7\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 40.8\% | 0 | 0.0\% | 35.7\% | \$0 | 0.0\% | 25.7\% | 0 | 0.0\% | 42.2\% | \$0 | 0.0\% | 41.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 46.1\% | 0 | 0.0\% | 54.5\% | \$0 | 0.0\% | 66.2\% | 0 | 0.0\% | 46.5\% | \$0 | 0.0\% | 55.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  |  |  |  | Multi-F | amily Units |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 7.0\% | 0 | 0.0\% | 13.6\% | \$0 | 0.0\% | 17.5\% | 0 | 0.0\% | 26.7\% | \$0 | 0.0\% | 15.7\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 15.0\% | 0 | 0.0\% | 27.3\% | \$0 | 0.0\% | 4.4\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 8.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 40.6\% | 0 | 0.0\% | 36.4\% | \$0 | 0.0\% | 20.8\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 42.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 37.4\% | 0 | 0.0\% | 22.7\% | \$0 | 0.0\% | 57.3\% | 0 | 0.0\% | 23.3\% | \$0 | 0.0\% | 33.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 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\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 2.6\% | 0 | 0.0\% | 0.9\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 1.2\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 10.5\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 2.7\% | 0 | 0.0\% | 4.7\% | \$0 | 0.0\% | 2.6\% |
|  | Middle | 13 | 31.7\% | \$1,726 | 25.4\% | 40.8\% | 8 | 34.8\% | 34.2\% | \$1,135 | 27.3\% | 29.1\% | 5 | 27.8\% | 35.3\% | \$591 | 22.4\% | 30.9\% |
|  | Upper | 28 | 68.3\% | \$5,059 | 74.6\% | 46.1\% | 15 | 65.2\% | 60.2\% | \$3,016 | 72.7\% | 66.9\% | 13 | 72.2\% | 58.9\% | \$2,043 | 77.6\% | 65.2\% |
|  | 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\% |
|  | Total | 41 | 100.0\% | \$6,785 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$4,151 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$2,634 | 100.0\% | 100.0\% |
|  |  |  |  |  | Smal | 1 Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 8 | 29.6\% | \$131 | 3.4\% | 3.6\% | 8 | 53.3\% | 3.0\% | \$131 | 5.0\% | 3.3\% | 0 | 0.0\% | 3.1\% | \$0 | 0.0\% | 3.6\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 13.8\% | 0 | 0.0\% | 11.5\% | \$0 | 0.0\% | 16.0\% | 0 | 0.0\% | 12.2\% | \$0 | 0.0\% | 16.1\% |
|  | Middle | 11 | 40.7\% | \$1,320 | 34.4\% | 40.9\% | 4 | 26.7\% | 36.2\% | \$615 | 23.3\% | 35.1\% | 7 | 58.3\% | 36.9\% | \$705 | 59.0\% | 36.6\% |
|  | Upper | 8 | 29.6\% | \$2,382 | 62.1\% | 41.7\% | 3 | 20.0\% | 46.5\% | \$1,892 | 71.7\% | 44.8\% | 5 | 41.7\% | 46.4\% | \$490 | 41.0\% | 43.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.8\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 1.4\% | \$0 | 0.0\% | 0.2\% |
|  |  | 27 | 100.0\% | \$3,833 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$2,638 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$1,195 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 1.4\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 65.3\% | 0 | 0.0\% | 38.1\% | \$0 | 0.0\% | 47.3\% | 0 | 0.0\% | 66.7\% | \$0 | 0.0\% | 38.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 32.6\% | 0 | 0.0\% | 52.4\% | \$0 | 0.0\% | 52.1\% | 0 | 0.0\% | 28.6\% | \$0 | 0.0\% | 59.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 0.4\% | 0 | 0.0\% | 0.0\% | \$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\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

## Combined Demographics Report

| Assessment Area: NC Raleigh |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 7 | 6.7 |  | 2.8 | 1,291 | 28.7 | 26,746 | 16.7 |
| Moderate-income | 16 | 15.2 |  | 12.0 | 2,011 | 10.5 | 26,394 | 16.5 |
| Middle-income | 54 | 51.4 |  | 52.8 | 3,655 | 4.3 | 35,673 | 22.3 |
| Upper-income | 28 | 26.7 |  | 32.4 | 925 | 1.8 | 71,011 | 44.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 105 | 100.0 |  | 100.0 | 7,882 | 4.9 | 159,824 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# | \% |
| Low-income | 9,901 | 1,617 |  | 16.3 | 7,527 | 76.0 | 757 | 7.6 |
| Moderate-income | 34,436 | 15,911 |  | 46.2 | 16,248 | 47.2 | 2,277 | 6.6 |
| Middle-income | 140,596 | 87,666 |  | 62.4 | 43,358 | 30.8 | 9,572 | 6.8 |
| Upper-income | 74,020 | 54,262 |  | 73.3 | 15,451 | 20.9 | 4,307 | 5.8 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 258,953 | 159,456 |  | 61.6 | 82,584 | 31.9 | 16,913 | 6.5 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 752 | 1.6 |  | 1.6 | 43 | 1.6 | 43 | 2.1 |
| Moderate-income | 4,229 | 9.0 |  | 8.9 | 277 | 10.4 | 196 | 9.4 |
| Middle-income | 27,089 | 57.8 |  | 57.6 | 1,609 | 60.3 | 1,222 | 58.9 |
| Upper-income | 14,768 | 31.5 |  | 31.9 | 738 | 27.7 | 614 | 29.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 46,838 | 100.0 |  | 100.0 | 2,667 | 100.0 | 2,075 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.9 |  | 5.7 |  | 4.4 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 0.3 |  | 0.3 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 24 | 7.2 |  | 7.1 | 0 | 0.0 | 1 | 50.0 |
| Middle-income | 216 | 65.1 |  | 64.9 | 7 | 87.5 | 0 | 0.0 |
| Upper-income | 91 | 27.4 |  | 27.6 | 1 | 12.5 | 1 | 50.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 332 | 100.0 |  | 100.0 | 8 | 100.0 | 2 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.0 |  | 2.4 |  | . 6 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

| $\stackrel{\underset{\nu}{\mathrm{n}}}{\stackrel{u}{2}}$ | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ |  | nk <br> Dollar |  | Owner Occupied Units \% |  | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Bai } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar k \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.9\% |
|  | Moderate | 7 | 7.9\% | \$1,057 | 5.1\% | 10.0\% | 4 | 7.1\% | 6.8\% | \$597 | 4.6\% | 4.6\% | 3 | 9.1\% | 6.0\% | \$460 | 5.8\% | 3.8\% |
|  | Middle | 56 | 62.9\% | \$12,144 | 58.0\% | 55.0\% | 34 | 60.7\% | 57.8\% | \$6,993 | 54.1\% | 52.9\% | 22 | 66.7\% | 59.7\% | \$5,151 | 64.5\% | 55.0\% |
|  | Upper | 26 | 29.2\% | \$7,724 | 36.9\% | 34.0\% | 18 | 32.1\% | 34.4\% | \$5,343 | 41.3\% | 41.8\% | 8 | 24.2\% | 33.1\% | \$2,381 | 29.8\% | 40.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 89 | 100.0\% | \$20,925 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$12,933 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$7,992 | 100.0\% | 100.0\% |
|  | Low | 3 | 2.2\% | \$210 | 0.6\% | 1.0\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.4\% | 3 | 5.7\% | 0.5\% | \$210 | 1.6\% | 0.4\% |
|  | Moderate | 4 | 3.0\% | \$526 | 1.5\% | 10.0\% | 4 | 4.9\% | 4.3\% | \$526 | 2.5\% | 2.9\% | 0 | 0.0\% | 4.6\% | \$0 | 0.0\% | 2.9\% |
|  | Middle | 63 | 47.0\% | \$12,722 | 37.1\% | 55.0\% | 36 | 44.4\% | 50.4\% | \$6,967 | 33.3\% | 45.6\% | 27 | 50.9\% | 51.2\% | \$5,755 | 43.1\% | 45.9\% |
|  | Upper | 64 | 47.8\% | \$20,835 | 60.8\% | 34.0\% | 41 | 50.6\% | 44.8\% | \$13,455 | 64.2\% | 51.1\% | 23 | 43.4\% | 43.7\% | \$7,380 | 55.3\% | 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\% |
|  | Total | 134 | 100.0\% | \$34,293 | 100.0\% | 100.0\% | 81 | 100.0\% | 100.0\% | \$20,948 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$13,345 | 100.0\% | 100.0\% |
|  | Low | 1 | 50.0\% | \$25 | 62.5\% | 1.0\% | 1 | 50.0\% | 2.1\% | \$25 | 62.5\% | 2.8\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 1.4\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 10.0\% | 0 | 0.0\% | 6.8\% | \$0 | 0.0\% | 3.1\% | 0 | 0.0\% | 7.8\% | \$0 | 0.0\% | 5.4\% |
|  | Middle | 1 | 50.0\% | \$15 | 37.5\% | 55.0\% | 1 | 50.0\% | 53.6\% | \$15 | 37.5\% | 49.8\% | 0 | 0.0\% | 52.0\% | \$0 | 0.0\% | 43.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 34.0\% | 0 | 0.0\% | 37.4\% | \$0 | 0.0\% | 44.2\% | 0 | 0.0\% | 38.9\% | \$0 | 0.0\% | 49.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 2 | 100.0\% | \$40 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$40 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | amily Units |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 7.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.0\% | \$0 | 0.0\% | 2.1\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 17.5\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 7.9\% | 0 | 0.0\% | 9.3\% | \$0 | 0.0\% | 7.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 51.6\% | 0 | 0.0\% | 56.7\% | \$0 | 0.0\% | 44.2\% | 0 | 0.0\% | 46.5\% | \$0 | 0.0\% | 47.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 24.0\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 47.9\% | 0 | 0.0\% | 30.2\% | \$0 | 0.0\% | 42.8\% |
|  | 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\% |
|  | Low | 4 | 1.8\% | \$235 | 0.4\% | 1.0\% | 1 | 0.7\% | 0.7\% | \$25 | 0.1\% | 0.5\% | 3 | 3.5\% | 0.8\% | \$210 | 1.0\% | 0.6\% |
|  | Moderate | 11 | 4.9\% | \$1,583 | 2.9\% | 10.0\% | 8 | 5.8\% | 5.1\% | \$1,123 | 3.3\% | 3.5\% | 3 | 3.5\% | 5.1\% | \$460 | 2.2\% | 3.4\% |
|  | Middle | 120 | 53.3\% | \$24,881 | 45.0\% | 55.0\% | 71 | 51.1\% | 52.8\% | \$13,975 | 41.2\% | 47.9\% | 49 | 57.0\% | 54.1\% | \$10,906 | 51.1\% | 49.0\% |
|  | Upper | 90 | 40.0\% | \$28,559 | 51.7\% | 34.0\% | 59 | 42.4\% | 41.4\% | \$18,798 | 55.4\% | 48.1\% | 31 | 36.0\% | 40.0\% | \$9,761 | 45.7\% | 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 | 225 | 100.0\% | \$55,258 | 100.0\% | 100.0\% | 139 | 100.0\% | 100.0\% | \$33,921 | 100.0\% | 100.0\% | 86 | 100.0\% | 100.0\% | \$21,337 | 100.0\% | 100.0\% |
|  |  |  |  |  | Small | Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 1.5\% | \$0 | 0.0\% | 1.3\% |
|  | Moderate | 1 | 1.4\% | \$9 | 0.1\% | 8.9\% | 0 | 0.0\% | 6.9\% | \$0 | 0.0\% | 7.2\% | 1 | 2.4\% | 7.4\% | \$9 | 0.2\% | 6.8\% |
|  | Middle | 40 | 58.0\% | \$10,094 | 76.2\% | 57.6\% | 17 | 60.7\% | 54.5\% | \$7,431 | 83.7\% | 55.8\% | 23 | 56.1\% | 54.0\% | \$2,663 | 60.8\% | 56.7\% |
|  | Upper | 28 | 40.6\% | \$3,151 | 23.8\% | 31.9\% | 11 | 39.3\% | 35.7\% | \$1,445 | 16.3\% | 35.1\% | 17 | 41.5\% | 35.9\% | \$1,706 | 39.0\% | 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\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.8\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 69 | 100.0\% | \$13,254 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$8,876 | 100.0\% | 100.0\% | 41 | 100.0\% | 100.0\% | \$4,378 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 7.1\% | 0 | 0.0\% | 10.8\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 0.1\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 64.9\% | 0 | 0.0\% | 52.3\% | \$0 | 0.0\% | 44.4\% | 0 | 0.0\% | 76.3\% | \$0 | 0.0\% | 83.9\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 27.6\% | 0 | 0.0\% | 36.9\% | \$0 | 0.0\% | 53.7\% | 0 | 0.0\% | 18.6\% | \$0 | 0.0\% | 15.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 3.4\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: NC Raleigh

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Bank |  | Families by Family Income <br> \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  | Dol | lar |  | ank |  | Agg |  |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# | \% | \$ (000s) | \$ \% |  | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
|  |  |  |  | Low | 11 | 12.4\% | \$1,446 | 6.9\% | 16.7\% | 9 | 16.1\% | 12.2\% | \$1,202 | 9.3\% | 7.0\% | 2 | 6.1\% | 11.7\% | \$244 | 3.1\% | 6.6\% |
|  |  | Moderate | 16 | 18.0\% | \$2,720 | 13.0\% | 16.5\% | 11 | 19.6\% | 22.7\% | \$2,084 | 16.1\% | 17.4\% | 5 | 15.2\% | 20.6\% | \$636 | 8.0\% | 16.1\% |
|  |  | Middle | 28 | 31.5\% | \$5,623 | 26.9\% | 22.3\% | 17 | 30.4\% | 21.6\% | \$3,633 | 28.1\% | 21.7\% | 11 | 33.3\% | 21.5\% | \$1,990 | 24.9\% | 20.9\% |
|  |  | Upper | 34 | 38.2\% | \$11,136 | 53.2\% | 44.4\% | 19 | 33.9\% | 30.7\% | \$6,014 | 46.5\% | 42.0\% | 15 | 45.5\% | 33.2\% | \$5,122 | 64.1\% | 44.2\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.8\% | \$0 | 0.0\% | 12.0\% | 0 | 0.0\% | 13.0\% | \$0 | 0.0\% | 12.2\% |
|  |  | Total | 89 | 100.0\% | \$20,925 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$12,933 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$7,992 | 100.0\% | 100.0\% |
| $\underset{\sim}{山}$ |  | Low | 4 | 3.0\% | \$507 | 1.5\% | 16.7\% | 2 | 2.5\% | 4.5\% | \$224 | 1.1\% | 2.4\% | 2 | 3.8\% | 5.1\% | \$283 | 2.1\% | 2.7\% |
|  |  | Moderate | 12 | 9.0\% | \$1,596 | 4.7\% | 16.5\% | 6 | 7.4\% | 13.0\% | \$811 | 3.9\% | 9.1\% | 6 | 11.3\% | 13.2\% | \$785 | 5.9\% | 9.2\% |
|  |  | Middle | 26 | 19.4\% | \$4,618 | 13.5\% | 22.3\% | 12 | 14.8\% | 20.2\% | \$2,172 | 10.4\% | 17.7\% | 14 | 26.4\% | 19.0\% | \$2,446 | 18.3\% | 16.7\% |
|  |  | Upper | 88 | 65.7\% | \$26,396 | 77.0\% | 44.4\% | 57 | 70.4\% | 43.1\% | \$16,565 | 79.1\% | 51.5\% | 31 | 58.5\% | 43.9\% | \$9,831 | 73.7\% | 53.3\% |
|  |  | Unknown | 4 | 3.0\% | \$1,176 | 3.4\% | 0.0\% | 4 | 4.9\% | 19.2\% | \$1,176 | 5.6\% | 19.3\% | 0 | 0.0\% | 18.8\% | \$0 | 0.0\% | 18.0\% |
|  |  | Total | 134 | 100.0\% | \$34,293 | 100.0\% | 100.0\% | 81 | 100.0\% | 100.0\% | \$20,948 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$13,345 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 16.7\% | 0 | 0.0\% | 7.9\% | \$0 | 0.0\% | 3.5\% | 0 | 0.0\% | 12.0\% | \$0 | 0.0\% | 5.9\% |
|  |  | Moderate | 1 | 50.0\% | \$25 | 62.5\% | 16.5\% | 1 | 50.0\% | 17.8\% | \$25 | 62.5\% | 10.9\% | 0 | 0.0\% | 17.8\% | \$0 | 0.0\% | 11.5\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.3\% | 0 | 0.0\% | 22.5\% | \$0 | 0.0\% | 21.5\% | 0 | 0.0\% | 23.5\% | \$0 | 0.0\% | 18.1\% |
|  |  | Upper | 1 | 50.0\% | \$15 | 37.5\% | 44.4\% | 1 | 50.0\% | 42.9\% | \$15 | 37.5\% | 50.6\% | 0 | 0.0\% | 39.7\% | \$0 | 0.0\% | 54.6\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.0\% | \$0 | 0.0\% | 13.5\% | 0 | 0.0\% | 7.0\% | \$0 | 0.0\% | 10.0\% |
|  |  | Total | 2 | 100.0\% | \$40 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$40 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 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\% |
|  |  | 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\% | 22.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 44.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 15 | 6.7\% | \$1,953 | 3.5\% | 16.7\% | 11 | 7.9\% | 7.0\% | \$1,426 | 4.2\% | 3.8\% | 4 | 4.7\% | 7.4\% | \$527 | 2.5\% | 3.9\% |
|  |  | Moderate | 29 | 12.9\% | \$4,341 | 7.9\% | 16.5\% | 18 | 12.9\% | 16.2\% | \$2,920 | 8.6\% | 11.5\% | 11 | 12.8\% | 15.8\% | \$1,421 | 6.7\% | 11.1\% |
|  |  | Middle | 54 | 24.0\% | \$10,241 | 18.5\% | 22.3\% | 29 | 20.9\% | 20.6\% | \$5,805 | 17.1\% | 18.6\% | 25 | 29.1\% | 19.9\% | \$4,436 | 20.8\% | 17.4\% |
|  |  | Upper | 123 | 54.7\% | \$37,547 | 67.9\% | 44.4\% | 77 | 55.4\% | 39.1\% | \$22,594 | 66.6\% | 47.5\% | 46 | 53.5\% | 40.1\% | \$14,953 | 70.1\% | 48.2\% |
|  |  | Unknown | 4 | 1.8\% | \$1,176 | 2.1\% | 0.0\% | 4 | 2.9\% | 17.1\% | \$1,176 | 3.5\% | 18.7\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 19.4\% |
|  |  | Total | 225 | 100.0\% | \$55,258 | 100.0\% | 100.0\% | 139 | 100.0\% | 100.0\% | \$33,921 | 100.0\% | 100.0\% | 86 | 100.0\% | 100.0\% | \$21,337 | 100.0\% | 100.0\% |
| $\begin{aligned} & \text { n } \\ & \stackrel{0}{0} \\ & \stackrel{=}{\omega} \\ & \infty \\ & \overline{\bar{\sigma}} \\ & \dot{\omega} \end{aligned}$ | \$1 Million or Less <br> O Over \$1 Million <br> Total Rev. available <br> © <br> Rev. Not Known <br> Total |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 20 | 29.0\% | \$4,081 | 30.8\% | 89.9\% | 14 | 50.0\% | 38.8\% | \$2,912 | 32.8\% | 48.4\% | 6 | 14.6\% | 50.3\% | \$1,169 | 26.7\% | 47.5\% |
|  |  |  | 20 | 29.0\% | \$6,527 | 49.2\% | 5.7\% | 12 | 42.9\% |  |  |  |  | 8 | 19.5\% |  |  |  |  |
|  |  |  | 40 | 58.0\% | \$10,608 | 80.0\% | 95.6\% | 26 | 92.9\% |  |  |  |  | 14 | 34.1\% |  |  |  |  |
|  |  |  | 29 | 42.0\% | \$2,646 | 20.0\% | 4.4\% | 2 | 7.1\% |  |  |  |  | 27 | 65.9\% |  |  |  |  |
|  |  |  | 69 | 100.0\% | \$13,254 | 100.0\% | 100.0\% | 28 | 100.0\% |  |  |  |  | 41 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 45 | 65.2\% | \$1,565 | 11.8\% |  | 11 | 39.3\% | 89.3\% | \$715 | 8.1\% | 24.4\% | 34 | 82.9\% | 89.5\% | \$850 | 19.4\% | 25.5\% |
|  |  | \$100,001 - \$250,000 | 7 | 10.1\% | \$1,275 | 9.6\% |  | 6 | 21.4\% | 5.1\% | \$1,025 | 11.5\% | 17.5\% | 1 | 2.4\% | 4.8\% | \$250 | 5.7\% | 16.3\% |
|  |  | \$250,001-\$1 Million | 17 | 24.6\% | \$10,414 | 78.6\% |  | 11 | 39.3\% | 5.6\% | \$7,136 | 80.4\% | 58.1\% | 6 | 14.6\% | 5.7\% | \$3,278 | 74.9\% | 58.2\% |
|  |  | Total | 69 | 100.0\% | \$13,254 | 100.0\% |  | 28 | 100.0\% | 100.0\% | \$8,876 | 100.0\% | 100.0\% | 41 | 100.0\% | 100.0\% | \$4,378 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 97.0\% | 0 | 0.0\% | 58.5\% | \$0 | 0.0\% | 68.3\% | 0 | 0.0\% | 71.2\% | \$0 | 0.0\% | 50.8\% |
|  |  | Over \$1 Million | 0 | 0.0\% | \$0 | 0.0\% | 2.4\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 0 | 0.0\% | \$0 | 0.0\% | 0.6\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 75.4\% | \$0 | 0.0\% | 29.5\% | 0 | 0.0\% | 71.2\% | \$0 | 0.0\% | 19.4\% |
|  |  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 18.5\% | \$0 | 0.0\% | 39.3\% | 0 | 0.0\% | 15.3\% | \$0 | 0.0\% | 26.1\% |
|  |  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 6.2\% | \$0 | 0.0\% | 31.3\% | 0 | 0.0\% | 13.6\% | \$0 | 0.0\% | 54.5\% |
|  |  |  | 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\% |

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## Appendices

## Combined Demographics Report

Assessment Area: NC Wilmington


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: NC Wilmington

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count | Dollar |  | Families by Family Income <br> \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> nk <br> \$ \% | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar \$ \% | $\begin{array}{r} \text { Agg } \\ \$ \% \\ \hline \end{array}$ |
|  |  |  | Low | 1 | 5.3\% | \$99 | 1.5\% | 18.3\% | 1 | 9.1\% | 4.5\% | \$99 | 2.2\% | 2.3\% | 0 | 0.0\% | 4.7\% | \$0 | 0.0\% | 2.3\% |
|  |  | Moderate | 1 | 5.3\% | \$198 | 3.1\% | 16.1\% | 0 | 0.0\% | 19.9\% | \$0 | 0.0\% | 13.6\% | 1 | 12.5\% | 17.3\% | \$198 | 10.4\% | 11.7\% |
|  |  | Middle | 2 | 10.5\% | \$389 | 6.1\% | 21.0\% | 0 | 0.0\% | 19.6\% | \$0 | 0.0\% | 16.4\% | 2 | 25.0\% | 18.3\% | \$389 | 20.4\% | 15.2\% |
|  |  | Upper | 15 | 78.9\% | \$5,739 | 89.3\% | 44.7\% | 10 | 90.9\% | 42.0\% | \$4,417 | 97.8\% | 54.2\% | 5 | 62.5\% | 46.1\% | \$1,322 | 69.3\% | 57.8\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.0\% | \$0 | 0.0\% | 13.5\% | 0 | 0.0\% | 13.6\% | \$0 | 0.0\% | 13.1\% |
|  |  | Total | 19 | 100.0\% | \$6,425 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$4,516 | 100.0\% | 100.0\% | 8 | 100.0\% | 100.0\% | \$1,909 | 100.0\% | 100.0\% |
|  |  | Low | 4 | 6.0\% | \$178 | 1.2\% | 18.3\% | 1 | 2.9\% | 4.0\% | \$85 | 1.1\% | 2.1\% | 3 | 9.1\% | 3.5\% | \$93 | 1.3\% | 1.8\% |
|  |  | Moderate | 4 | 6.0\% | \$497 | 3.4\% | 16.1\% | 2 | 5.9\% | 11.5\% | \$352 | 4.6\% | 7.2\% | 2 | 6.1\% | 11.6\% | \$145 | 2.1\% | 7.0\% |
|  |  | Middle | 14 | 20.9\% | \$1,290 | 8.9\% | 21.0\% | 8 | 23.5\% | 17.8\% | \$963 | 12.6\% | 13.3\% | 6 | 18.2\% | 17.9\% | \$327 | 4.7\% | 12.6\% |
|  |  | Upper | 42 | 62.7\% | \$11,915 | 82.1\% | 44.7\% | 21 | 61.8\% | 49.3\% | \$5,874 | 77.2\% | 60.4\% | 21 | 63.6\% | 47.7\% | \$6,041 | 87.6\% | 60.7\% |
|  |  | Unknown | 3 | 4.5\% | \$629 | 4.3\% | 0.0\% | 2 | 5.9\% | 17.4\% | \$339 | 4.5\% | 17.1\% | 1 | 3.0\% | 19.2\% | \$290 | 4.2\% | 18.0\% |
|  |  |  | 67 | 100.0\% | \$14,509 | 100.0\% | 100.0\% | 34 | 100.0\% | 100.0\% | \$7,613 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$6,896 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.3\% | 0 | 0.0\% | 6.6\% | \$0 | 0.0\% | 3.9\% | 0 | 0.0\% | 6.3\% | \$0 | 0.0\% | 2.7\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 16.1\% | 0 | 0.0\% | 22.8\% | \$0 | 0.0\% | 11.8\% | 0 | 0.0\% | 21.0\% | \$0 | 0.0\% | 11.4\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 21.0\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 24.2\% | 0 | 0.0\% | 23.8\% | \$0 | 0.0\% | 15.8\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 44.7\% | 0 | 0.0\% | 36.0\% | \$0 | 0.0\% | 47.4\% | 0 | 0.0\% | 39.2\% | \$0 | 0.0\% | 55.4\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.6\% | \$0 | 0.0\% | 12.6\% | 0 | 0.0\% | 9.8\% | \$0 | 0.0\% | 14.7\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 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\% |
|  |  | 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\% | 21.0\% | 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\% | 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\% |
|  |  | 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\% |
|  |  | Low | 5 | 5.8\% | \$277 | 1.3\% | 18.3\% | 2 | 4.4\% | 4.2\% | \$184 | 1.5\% | 2.1\% | 3 | 7.3\% | 4.0\% | \$93 | 1.1\% | 1.8\% |
|  |  | Moderate | 5 | 5.8\% | \$695 | 3.3\% | 16.1\% | 2 | 4.4\% | 14.4\% | \$352 | 2.9\% | 9.1\% | 3 | 7.3\% | 13.8\% | \$343 | 3.9\% | 8.1\% |
|  |  | Middle | 16 | 18.6\% | \$1,679 | 8.0\% | 21.0\% | 8 | 17.8\% | 18.5\% | \$963 | 7.9\% | 14.1\% | 8 | 19.5\% | 18.2\% | \$716 | 8.1\% | 12.6\% |
|  |  | Upper | 57 | 66.3\% | \$17,654 | 84.3\% | 44.7\% | 31 | 68.9\% | 46.7\% | \$10,291 | 84.8\% | 56.9\% | 26 | 63.4\% | 46.9\% | \$7,363 | 83.6\% | 55.1\% |
|  |  | Unknown | 3 | 3.5\% | \$629 | 3.0\% | 0.0\% | 2 | 4.4\% | 16.2\% | \$339 | 2.8\% | 17.9\% | 1 | 2.4\% | 17.1\% | \$290 | 3.3\% | 22.4\% |
|  |  | Total | 86 | 100.0\% | \$20,934 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$12,129 | 100.0\% | 100.0\% | 41 | 100.0\% | 100.0\% | \$8,805 | 100.0\% | 100.0\% |
|  |  | \$1 Million or Less <br> Over \$1 Million <br> Total Rev. available <br> Rev. Not Known <br> Total | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 22 | 47.8\% | \$5,129 | 55.4\% | 89.9\% | 14 | 60.9\% | 42.0\% | \$3,787 | 54.0\% | 50.4\% | 8 | 34.8\% | 50.6\% | \$1,342 | 59.8\% | 50.6\% |
|  |  |  | 6 | 13.0\% | \$1,518 | 16.4\% | 5.5\% | 4 | 17.4\% |  |  |  |  |  | 8.7\% |  |  |  |  |
|  |  |  | 28 | 60.8\% | \$6,647 | 71.8\% | 95.4\% | 18 | 78.3\% |  |  |  |  | 10 | 43.5\% |  |  |  |  |
|  |  |  |  | 39.1\% | \$2,614 | 28.2\% |  | 5 | 21.7\% |  |  |  |  | 13 |  |  |  |  |  |
|  |  |  | 46 | 100.0\% | \$9,261 | 100.0\% | 100.0\% | 23 | 100.0\% |  |  |  |  | 23 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less$\$ 100,001$ - $\$ 250,000$$\$ 250,001-\$ 1$ MillionTotal | 27 | 58.7\% | \$912 | 9.8\% |  | 10 | 43.5\% | 87.4\% | \$443 | 6.3\% | 23.3\% | 17 | 73.9\% | 88.7\% | \$469 | 20.9\% | 25.7\% |
|  |  |  | 7 | 15.2\% | \$1,234 | 13.3\% |  | 3 | 13.0\% | 5.8\% | \$655 | 9.3\% | 17.2\% | 4 | 17.4\% | 5.0\% | \$579 | 25.8\% | 15.3\% |
|  |  |  | 12 | 26.1\% | \$7,115 | 76.8\% |  | 10 | 43.5\% | 6.8\% | \$5,919 | 84.4\% | 59.5\% | 2 | 8.7\% | 6.3\% | \$1,196 | 53.3\% | 59.0\% |
|  |  |  | 46 | 100.0\% | \$9,261 | 100.0\% |  | 23 | 100.0\% | 100.0\% | \$7,017 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$2,244 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 98.6\% | 0 | 0.0\% | 80.0\% | \$0 | 0.0\% | 95.4\% | 0 | 0.0\% | 80.0\% | \$0 | 0.0\% | 95.1\% |
|  |  | Over \$1 Million | 0 | $0.0 \%$ | \$0 | 0.0\% | $1.4 \%$ | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  | $$ |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 93.3\% | \$0 | 0.0\% | 34.7\% | 0 | 0.0\% | 70.0\% | \$0 | 0.0\% | 17.5\% |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | $0.0 \%$ | 0 | 0.0\% | 20.0\% | \$0 | 0.0\% | 37.6\% |
|  |  |  | 0 | $0.0 \%$ | \$0 | 0.0\% |  | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 65.3\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 44.9\% |
|  |  |  | 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\% |

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## Appendices

## Combined Demographics Report

Assessment Area: SC Anderson


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: SC Anderson


[^453]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: SC Charleston


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

## Assessment Area: SC Charleston



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: SC Charleston

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ | $\begin{aligned} & \text { Bank } \\ & \begin{array}{c} \text { Doll } \\ \$(\mathbf{0 0 0}) \end{array} \end{aligned}$ | lar <br> \$ \% | Families by Family Income <br> \% | \# | Count ank $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> nk <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( ${ }_{\text {Ba }}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \\ \hline \end{gathered}$ |
|  |  |  | Low | 7 | 4.2\% | \$895 | 2.0\% | 21.6\% | 4 | 4.7\% | 6.7\% | \$591 | 2.4\% | 3.1\% | 3 | 3.8\% | 5.9\% | \$304 | 1.4\% | 2.5\% |
|  |  | Moderate | 28 | 17.0\% | \$3,820 | 8.4\% | 16.5\% | 17 | 19.8\% | 19.7\% | \$2,433 | 10.1\% | 12.5\% | 11 | 13.9\% | 18.8\% | \$1,387 | 6.5\% | 11.7\% |
|  |  | Middle | 25 | 15.2\% | \$4,390 | 9.6\% | 19.8\% | 15 | 17.4\% | 21.8\% | \$2,682 | 11.1\% | 17.7\% | 10 | 12.7\% | 21.1\% | \$1,708 | 7.9\% | 17.0\% |
|  |  | Upper | 104 | 63.0\% | \$36,546 | 80.0\% | 42.0\% | 49 | 57.0\% | 39.9\% | \$18,459 | 76.3\% | 55.7\% | 55 | 69.6\% | 42.4\% | \$18,087 | 84.2\% | 58.0\% |
|  |  | Unknown | 1 | 0.6\% | \$23 | 0.1\% | 0.0\% | 1 | 1.2\% | 11.9\% | \$23 | 0.1\% | 11.0\% | 0 | 0.0\% | 11.7\% | \$0 | 0.0\% | 10.7\% |
|  |  | Total | 165 | 100.0\% | \$45,674 | 100.0\% | 100.0\% | 86 | 100.0\% | 100.0\% | \$24,188 | 100.0\% | 100.0\% | 79 | 100.0\% | 100.0\% | \$21,486 | 100.0\% | 100.0\% |
|  |  | Low | 11 | 3.8\% | \$1,162 | 1.5\% | 21.6\% | 7 | 4.7\% | 3.7\% | \$585 | 1.4\% | 1.6\% | 4 | 2.8\% | 3.7\% | \$577 | 1.6\% | 1.7\% |
|  |  | Moderate | 20 | 6.8\% | \$2,051 | 2.6\% | 16.5\% | 13 | 8.8\% | 10.9\% | \$1,398 | 3.3\% | 6.2\% | 7 | 4.9\% | 9.6\% | \$653 | 1.8\% | 5.2\% |
|  |  | Middle | 41 | 14.0\% | \$5,063 | 6.4\% | 19.8\% | 21 | 14.2\% | 17.7\% | \$2,701 | 6.5\% | 12.6\% | 20 | 13.9\% | 16.6\% | \$2,362 | 6.4\% | 11.3\% |
|  |  | Upper | 217 | 74.3\% | \$70,077 | 88.9\% | 42.0\% | 106 | 71.6\% | 49.7\% | \$37,058 | 88.7\% | 63.1\% | 111 | 77.1\% | 49.3\% | \$33,019 | 89.2\% | 63.8\% |
|  |  | Unknown | 3 | 1.0\% | \$436 | 0.6\% | 0.0\% | 1 | 0.7\% | 18.0\% | \$44 | 0.1\% | 16.5\% | 2 | 1.4\% | 20.7\% | \$392 | 1.1\% | 18.0\% |
|  |  |  | 292 | 100.0\% | \$78,789 | 100.0\% | 100.0\% | 148 | 100.0\% | 100.0\% | \$41,786 | 100.0\% | 100.0\% | 144 | 100.0\% | 100.0\% | \$37,003 | 100.0\% | 100.0\% |
|  |  | Low | 1 | 12.5\% | \$5 | 3.8\% | 21.6\% | 0 | 0.0\% | 13.6\% | \$0 | 0.0\% | 3.5\% | 1 | 20.0\% | 12.9\% | \$5 | 9.3\% | 3.5\% |
|  |  | Moderate | 1 | 12.5\% | \$7 | 5.3\% | 16.5\% | 0 | 0.0\% | 18.9\% | \$0 | 0.0\% | 8.8\% | 1 | 20.0\% | 19.8\% | \$7 | 13.0\% | 7.9\% |
|  |  | Middle | 1 | 12.5\% | \$8 | 6.1\% | 19.8\% | 0 | 0.0\% | 23.6\% | \$0 | 0.0\% | 18.7\% | 1 | 20.0\% | 24.1\% | \$8 | 14.8\% | 16.6\% |
|  |  | Upper | 5 | 62.5\% | \$111 | 84.7\% | 42.0\% | 3 | 100.0\% | 39.3\% | \$77 | 100.0\% | 56.8\% | 2 | 40.0\% | 38.4\% | \$34 | 63.0\% | 64.6\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.6\% | \$0 | 0.0\% | 12.2\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 7.5\% |
|  |  | Total | 8 | 100.0\% | \$131 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$77 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$54 | 100.0\% | 100.0\% |
|  |  | 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\% | 16.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 19.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 42.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 19 | 4.1\% | \$2,062 | 1.7\% | 21.6\% | 11 | 4.6\% | 5.2\% | \$1,176 | 1.8\% | 2.2\% | 8 | 3.5\% | 4.9\% | \$886 | 1.5\% | 2.0\% |
|  |  | Moderate | 49 | 10.5\% | \$5,878 | 4.7\% | 16.5\% | 30 | 12.7\% | 14.8\% | \$3,831 | 5.8\% | 8.8\% | 19 | 8.3\% | 14.1\% | \$2,047 | 3.5\% | 7.8\% |
|  |  | Middle | 67 | 14.4\% | \$9,461 | 7.6\% | 19.8\% | 36 | 15.2\% | 19.6\% | \$5,383 | 8.1\% | 14.7\% | 31 | 13.6\% | 18.9\% | \$4,078 | 7.0\% | 13.3\% |
|  |  | Upper | 326 | 70.1\% | \$106,734 | 85.7\% | 42.0\% | 158 | 66.7\% | 45.3\% | \$55,594 | 84.2\% | 59.7\% | 168 | 73.7\% | 45.8\% | \$51,140 | 87.4\% | 58.6\% |
|  |  | Unknown | 4 | 0.9\% | \$459 | 0.4\% | 0.0\% | 2 | 0.8\% | 15.2\% | \$67 | 0.1\% | 14.6\% | 2 | 0.9\% | 16.3\% | \$392 | 0.7\% | 18.4\% |
|  |  | Total | 465 | 100.0\% | \$124,594 | 100.0\% | 100.0\% | 237 | 100.0\% | 100.0\% | \$66,051 | 100.0\% | 100.0\% | 228 | 100.0\% | 100.0\% | \$58,543 | 100.0\% | 100.0\% |
| $\begin{aligned} & \text { n } \\ & \stackrel{0}{0} \\ & \stackrel{=}{\omega} \\ & \infty \\ & \overline{\bar{\sigma}} \\ & \dot{\omega} \end{aligned}$ |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 106 | 39.4\% | \$23,218 | 50.6\% | 89.5\% | 47 | 58.0\% | 31.8\% | \$9,962 | 52.3\% | 51.2\% | 59 | 31.4\% | 44.9\% | \$13,256 | 49.4\% | 47.0\% |
|  |  | Over \$1 Million | 65 | 24.2\% | \$19,516 | 42.5\% | 5.6\% | 26 | 32.1\% |  |  |  |  |  | 20.7\% |  |  |  |  |
|  |  | Total Rev. available | 171 | 63.6\% | \$42,734 | 93.1\% | 95.1\% | 73 | 90.1\% |  |  |  |  | 98 | 52.1\% |  |  |  |  |
|  |  | Rev. Not Known | 98 | 36.4\% | \$3,133 | 6.8\% | 4.9\% |  | 9.9\% |  |  |  |  |  |  |  |  |  |  |
|  |  | Total | 269 | 100.0\% | \$45,867 | 100.0\% | 100.0\% | 81 | 100.0\% |  |  |  |  | 188 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 173 | 64.3\% | \$5,039 | 11.0\% |  | 42 | 51.9\% | 90.4\% | \$1,561 | 8.2\% | 24.5\% | 131 | 69.7\% | 89.9\% | \$3,478 | 13.0\% | 25.4\% |
|  |  | \$100,001 - \$250,000 | 33 | 12.3\% | \$5,883 | 12.8\% |  | 12 | 14.8\% | 4.6\% | \$2,090 | 11.0\% | 18.1\% | 21 | 11.2\% | 4.7\% | \$3,793 | 14.1\% | 17.1\% |
|  |  | \$250,001 - \$1 Million | 63 | 23.4\% | \$34,945 | 76.2\% |  | 27 | 33.3\% | 5.0\% | \$15,387 | 80.8\% | 57.4\% | 36 | 19.1\% | 5.5\% | \$19,558 | 72.9\% | 57.5\% |
|  |  |  | 269 | 100.0\% | \$45,867 | 100.0\% |  | 81 | 100.0\% | 100.0\% | \$19,038 | 100.0\% | 100.0\% | 188 | 100.0\% | 100.0\% | \$26,829 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 96.8\% | 0 | 0.0\% | 72.7\% | \$0 | 0.0\% | 41.4\% | 0 | 0.0\% | 81.4\% | \$0 | 0.0\% | 61.8\% |
|  |  | Over \$1 Million | 3 | 75.0\% | \$934 | 86.2\% | 2.8\% | 2 | 100.0\% |  |  |  |  | 1 | 50.0\% |  |  |  |  |
|  |  | Not Known | 1 | 25.0\% | \$150 | 13.8\% |  | 0 | 0.0\% |  |  |  |  |  |  |  |  |  |  |
|  |  | Total | 4 | 100.0\% | \$1,084 | 100.0\% | 100.0\% | 2 | 100.0\% |  |  |  |  | 2 | 100.0\% |  |  |  |  |
|  |  | © $\$ 100,000$ or Less <br> N $\$ 100,001-\$ 250,000$ <br> 厄్త  <br> \$250,001 - $\$ 500,000$  <br> Total  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 72.7\% | \$0 | 0.0\% | 12.9\% | 0 | 0.0\% | 69.8\% | \$0 | 0.0\% | 22.2\% |
|  |  | 2 | 50.0\% | \$400 | 36.9\% |  | 1 | 50.0\% | 18.2\% | \$250 | 47.1\% | 52.5\% | 1 | 50.0\% | 18.6\% | \$150 | 27.1\% | 36.6\% |
|  |  | 2 | 50.0\% | \$684 | 63.1\% |  | 1 | 50.0\% | 9.1\% | \$281 | 52.9\% | 34.6\% | 1 | 50.0\% | 11.6\% | \$403 | 72.9\% | 41.2\% |
|  |  | 4 | 100.0\% | \$1,084 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$531 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$553 | 100.0\% | 100.0\% |

[^455]Originations \& Purchases

## Appendices

## Combined Demographics Report

## Assessment Area: SC Greenville

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 5 | 5.6 |  | 2.5 | 764 | 29.9 | 19,046 | 18.5 |
| Moderate-income | 24 | 26.7 |  | 18.9 | 3,077 | 15.9 | 17,733 | 17.3 |
| Middle-income | 38 | 42.2 |  | 46.1 | 3,259 | 6.9 | 21,258 | 20.7 |
| Upper-income | 23 | 25.6 |  | 32.5 | 1,058 | 3.2 | 44,639 | 43.5 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 90 | 100.0 |  | 100.0 | 8,158 | 7.9 | 102,676 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 4,992 | 1,653 |  | 33.1 | 2,523 | 50.5 | 816 | 16.3 |
| Moderate-income | 33,386 | 16,569 |  | 49.6 | 13,369 | 40.0 | 3,448 | 10.3 |
| Middle-income | 75,539 | 48,149 |  | 63.7 | 21,604 | 28.6 | 5,786 | 7.7 |
| Upper-income | 48,886 | 35,600 |  | 72.8 | 10,089 | 20.6 | 3,197 | 6.5 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 162,803 | 101,971 |  | 62.6 | 47,585 | 29.2 | 13,247 | 8.1 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 819 | 3.9 |  | 3.5 | 108 | 8.0 | 59 | 5.5 |
| Moderate-income | 3,241 | 15.5 |  | 15.3 | 218 | 16.1 | 210 | 19.6 |
| Middle-income | 9,307 | 44.6 |  | 44.8 | 588 | 43.3 | 462 | 43.2 |
| Upper-income | 7,503 | 36.0 |  | 36.4 | 444 | 32.7 | 338 | 31.6 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 20,870 | 100.0 |  | 100.0 | 1,358 | 100.0 | 1,069 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 88.4 |  | 6.5 |  | 5.1 |
|  | Total Farms by $\quad$ Farms by Tract \& Revenue Size |  |  |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or }= \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 3 | 1.9 |  | 2.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 3 | 1.9 |  | 2.0 | 0 | 0.0 | 0 | 0.0 |
| Middle-income | 115 | 74.2 |  | 74.3 | 1 | 50.0 | 1 | 100.0 |
| Upper-income | 34 | 21.9 |  | 21.7 | 1 | 50.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 155 | 100.0 |  | 100.0 | 2 | 100.0 | 1 | 100.0 |
|  | Percentage of | Total F |  | 98.1 |  | 1.3 |  | . 6 |

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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount |  | Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ |  | Count ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ |  | Dollar k $\%$ | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | Count <br> ank <br> \% | Agg $\%$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  | Low | 3 | 2.6\% | \$330 | 1.6\% | 1.6\% | 2 | 3.1\% | 1.3\% | \$225 | 2.0\% | 1.4\% | 1 | 2.0\% | 0.8\% | \$105 | 1.2\% | 0.6\% |
|  | Moderate | 8 | 7.0\% | \$1,152 | 5.6\% | 16.2\% | 4 | 6.2\% | 7.6\% | \$784 | 6.9\% | 4.2\% | 4 | 8.0\% | 6.1\% | \$368 | 4.0\% | 3.6\% |
|  | Middle | 46 | 40.0\% | \$7,389 | 36.0\% | 47.2\% | 25 | 38.5\% | 44.5\% | \$3,971 | 34.8\% | 40.1\% | 21 | 42.0\% | 46.3\% | \$3,418 | 37.5\% | 41.3\% |
|  | Upper | 58 | 50.4\% | \$11,662 | 56.8\% | 34.9\% | 34 | 52.3\% | 46.5\% | \$6,443 | 56.4\% | 54.3\% | 24 | 48.0\% | 46.8\% | \$5,219 | 57.3\% | 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\% |
|  | Total | 115 | 100.0\% | \$20,533 | 100.0\% | 100.0\% | 65 | 100.0\% | 100.0\% | \$11,423 | 100.0\% | 100.0\% | 50 | 100.0\% | 100.0\% | \$9,110 | 100.0\% | 100.0\% |
|  | Low | 3 | 1.4\% | \$420 | 1.1\% | 1.6\% | 2 | 1.3\% | 0.7\% | \$220 | 0.8\% | 0.8\% | 1 | 1.5\% | 0.7\% | \$200 | 1.7\% | 0.9\% |
|  | Moderate | 11 | 5.0\% | \$944 | 2.4\% | 16.2\% | 9 | 5.9\% | 4.6\% | \$791 | 2.8\% | 2.6\% | 2 | 2.9\% | 4.3\% | \$153 | 1.3\% | 2.2\% |
|  | Middle | 98 | 44.3\% | \$18,831 | 47.9\% | 47.2\% | 66 | 43.1\% | 40.3\% | \$13,006 | 46.7\% | 36.2\% | 32 | 47.1\% | 40.4\% | \$5,825 | 50.9\% | 34.8\% |
|  | Upper | 109 | 49.3\% | \$19,102 | 48.6\% | 34.9\% | 76 | 49.7\% | 54.4\% | \$13,833 | 49.7\% | 60.4\% | 33 | 48.5\% | 54.6\% | \$5,269 | 46.0\% | 62.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 221 | 100.0\% | \$39,297 | 100.0\% | 100.0\% | 153 | 100.0\% | 100.0\% | \$27,850 | 100.0\% | 100.0\% | 68 | 100.0\% | 100.0\% | \$11,447 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 0.9\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 16.2\% | 0 | 0.0\% | 8.5\% | \$0 | 0.0\% | 4.5\% | 0 | 0.0\% | 10.0\% | \$0 | 0.0\% | 3.3\% |
|  | Middle | 5 | 83.3\% | \$49 | 90.7\% | 47.2\% | 3 | 75.0\% | 47.9\% | \$18 | 78.3\% | 37.5\% | 2 | 100.0\% | 48.2\% | \$31 | 100.0\% | 41.2\% |
|  | Upper | 1 | 16.7\% | \$5 | 9.3\% | 34.9\% | 1 | 25.0\% | 43.0\% | \$5 | 21.7\% | 57.9\% | 0 | 0.0\% | 39.8\% | \$0 | 0.0\% | 54.6\% |
|  | 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 | 6 | 100.0\% | \$54 | 100.0\% | 100.0\% | 4 | 100.0\% | 100.0\% | \$23 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$31 | 100.0\% | 100.0\% |
|  |  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 3.5\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 8.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.2\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 10.8\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 7.7\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 48.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 40.0\% | \$0 | 0.0\% | 21.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 29.1\% | 0 | 0.0\% | 50.0\% | \$0 | 0.0\% | 80.7\% | 0 | 0.0\% | 30.0\% | \$0 | 0.0\% | 71.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
| HMDA TOTALS | Low | 6 | 1.8\% | \$750 | 1.3\% | 1.6\% | 4 | 1.8\% | 0.9\% | \$445 | 1.1\% | 1.0\% | 2 | 1.7\% | 0.7\% | \$305 | 1.5\% | 0.8\% |
|  | Moderate | 19 | 5.6\% | \$2,096 | 3.5\% | 16.2\% | 13 | 5.9\% | 5.8\% | \$1,575 | 4.0\% | 3.3\% | 6 | 5.0\% | 5.2\% | \$521 | 2.5\% | 2.9\% |
|  | Middle | 149 | 43.6\% | \$26,269 | 43.9\% | 47.2\% | 94 | 42.3\% | 42.1\% | \$16,995 | 43.2\% | 37.3\% | 55 | 45.8\% | 43.0\% | \$9,274 | 45.0\% | 37.2\% |
|  | Upper | 168 | 49.1\% | \$30,769 | 51.4\% | 34.9\% | 111 | 50.0\% | 51.2\% | \$20,281 | 51.6\% | 58.4\% | 57 | 47.5\% | 51.1\% | \$10,488 | 50.9\% | 59.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 342 | 100.0\% | \$59,884 | 100.0\% | 100.0\% | 222 | 100.0\% | 100.0\% | \$39,296 | 100.0\% | 100.0\% | 120 | 100.0\% | 100.0\% | \$20,588 | 100.0\% | 100.0\% |
|  |  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 14 | 8.6\% | \$3,717 | 16.7\% | 3.5\% | 7 | 14.6\% | 3.8\% | \$2,657 | 20.0\% | 5.2\% | 7 | 6.1\% | 3.8\% | \$1,060 | 11.8\% | 5.0\% |
|  | Moderate | 17 | 10.5\% | \$2,949 | 13.2\% | 15.3\% | 4 | 8.3\% | 9.9\% | \$826 | 6.2\% | 10.8\% | 13 | 11.4\% | 10.5\% | \$2,123 | 23.6\% | 13.7\% |
|  | Middle | 64 | 39.5\% | \$7,615 | 34.2\% | 44.8\% | 19 | 39.6\% | 41.5\% | \$4,959 | 37.4\% | 43.1\% | 45 | 39.5\% | 42.2\% | \$2,656 | 29.5\% | 41.3\% |
|  | Upper | 67 | 41.4\% | \$7,990 | 35.9\% | 36.4\% | 18 | 37.5\% | 41.8\% | \$4,825 | 36.4\% | 39.8\% | 49 | 43.0\% | 41.5\% | \$3,165 | 35.2\% | 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\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.0\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 0.6\% |
|  | Total | 162 | 100.0\% | \$22,271 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$13,267 | 100.0\% | 100.0\% | 114 | 100.0\% | 100.0\% | \$9,004 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{x}}^{\underset{\sim}{u}} \\ & \underset{\sim}{\underset{1}{4}} \end{aligned}$ | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.0\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.0\% | 0 | 0.0\% | 13.3\% | \$0 | 0.0\% | 0.7\% | 0 | 0.0\% | 7.1\% | \$0 | 0.0\% | 10.6\% |
|  |  | 1 | 50.0\% | \$29 | 20.6\% | 74.3\% | 0 | 0.0\% | 46.7\% | \$0 | 0.0\% | 57.2\% | 1 | 100.0\% | 57.1\% | \$29 | 100.0\% | 64.6\% |
|  |  | 1 | 50.0\% | \$112 | 79.4\% | 21.7\% | 1 | 100.0\% | 33.3\% | \$112 | 100.0\% | 42.0\% | 0 | 0.0\% | 35.7\% | \$0 | 0.0\% | 24.9\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 2 | 100.0\% | \$141 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$112 | 100.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$29 | 100.0\% | 100.0\% |

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## Appendices

## Combined Demographics Report

Assessment Area: SC McCormick-Barnwell


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## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: SC McCormick-Barnwell


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: SC McCormick-Barnwell


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## Appendices

## Combined Demographics Report

Assessment Area: SC Myrtle Beach


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: SC Myrtle Beach

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ | $\begin{aligned} & \text { Doll } \\ & \$(000 \mathrm{~s}) \\ & \\ & \hline \end{aligned}$ | \$ \% | Families by Family Income <br> \% | \# | Count ank $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> k <br> \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  |  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.2\% | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 2.3\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 2.5\% |
|  |  | Moderate | 3 | 4.1\% | \$352 | 2.8\% | 19.5\% | 1 | 2.4\% | 15.4\% | \$128 | 1.5\% | 11.0\% | 2 | 6.5\% | 14.9\% | \$224 | 5.5\% | 10.6\% |
|  |  | Middle | 3 | 4.1\% | \$244 | 1.9\% | 22.9\% | 1 | 2.4\% | 18.7\% | \$131 | 1.5\% | 16.0\% | 2 | 6.5\% | 18.2\% | \$113 | 2.8\% | 15.9\% |
|  |  | Upper | 63 | 86.3\% | \$11,556 | 91.2\% | 39.4\% | 40 | 95.2\% | 53.8\% | \$8,331 | 97.0\% | 63.0\% | 23 | 74.2\% | 51.2\% | \$3,225 | 79.1\% | 59.7\% |
|  |  | Unknown | 4 | 5.5\% | \$514 | 4.1\% | 0.0\% | 0 | 0.0\% | 7.6\% | \$0 | 0.0\% | 7.8\% | 4 | 12.9\% | 10.9\% | \$514 | 12.6\% | 11.3\% |
|  |  | Total | 73 | 100.0\% | \$12,666 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$8,590 | 100.0\% | 100.0\% | 31 | 100.0\% | 100.0\% | \$4,076 | 100.0\% | 100.0\% |
|  |  | Low | 1 | 3.6\% | \$331 | 4.5\% | 18.2\% | 0 | 0.0\% | 5.2\% | \$0 | 0.0\% | 3.0\% | 1 | 10.0\% | 5.8\% | \$331 | 8.7\% | 3.0\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.5\% | 0 | 0.0\% | 14.7\% | \$0 | 0.0\% | 9.9\% | 0 | 0.0\% | 12.8\% | \$0 | 0.0\% | 8.1\% |
|  |  | Middle | 1 | 3.6\% | \$188 | 2.6\% | 22.9\% | 1 | 5.6\% | 20.1\% | \$188 | 5.4\% | 16.2\% | 0 | 0.0\% | 17.9\% | \$0 | 0.0\% | 15.0\% |
|  |  | Upper | 26 | 92.9\% | \$6,795 | 92.9\% | 39.4\% | 17 | 94.4\% | 47.2\% | \$3,310 | 94.6\% | 55.0\% | 9 | 90.0\% | 46.1\% | \$3,485 | 91.3\% | 54.8\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.8\% | \$0 | 0.0\% | 15.9\% | 0 | 0.0\% | 17.4\% | \$0 | 0.0\% | 19.1\% |
|  |  | Total | 28 | 100.0\% | \$7,314 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$3,498 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$3,816 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.2\% | 0 | 0.0\% | 11.9\% | \$0 | 0.0\% | 4.0\% | 0 | 0.0\% | 13.3\% | \$0 | 0.0\% | 6.6\% |
|  |  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 19.5\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 8.8\% | 0 | 0.0\% | 21.3\% | \$0 | 0.0\% | 11.6\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.9\% | 0 | 0.0\% | 24.2\% | \$0 | 0.0\% | 17.1\% | 0 | 0.0\% | 20.4\% | \$0 | 0.0\% | 14.8\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 39.4\% | 0 | 0.0\% | 32.9\% | \$0 | 0.0\% | 42.3\% | 0 | 0.0\% | 39.3\% | \$0 | 0.0\% | 59.9\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 27.8\% | 0 | 0.0\% | 5.7\% | \$0 | 0.0\% | 7.1\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 18.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Moderate | 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\% |
|  |  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 22.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 39.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 1 | 1.0\% | \$331 | 1.7\% | 18.2\% | 0 | 0.0\% | 5.0\% | \$0 | 0.0\% | 2.7\% | 1 | 2.4\% | 5.4\% | \$331 | 4.2\% | 2.8\% |
|  |  | Moderate | 3 | 3.0\% | \$352 | 1.8\% | 19.5\% | 1 | 1.7\% | 15.1\% | \$128 | 1.1\% | 10.3\% | 2 | 4.9\% | 14.0\% | \$224 | 2.8\% | 9.2\% |
|  |  | Middle | 4 | 4.0\% | \$432 | 2.2\% | 22.9\% | 2 | 3.3\% | 19.5\% | \$319 | 2.6\% | 16.1\% | 2 | 4.9\% | 18.0\% | \$113 | 1.4\% | 15.2\% |
|  |  | Upper | 89 | 88.1\% | \$18,351 | 91.8\% | 39.4\% | 57 | 95.0\% | 49.9\% | \$11,641 | 96.3\% | 58.2\% | 32 | 78.0\% | 48.4\% | \$6,710 | 85.0\% | 56.4\% |
|  |  | Unknown | 4 | 4.0\% | \$514 | 2.6\% | 0.0\% | 0 | 0.0\% | 10.5\% | \$0 | 0.0\% | 12.7\% | 4 | 9.8\% | 14.1\% | \$514 | 6.5\% | 16.5\% |
|  |  | Total | 101 | 100.0\% | \$19,980 | 100.0\% | 100.0\% | 60 | 100.0\% | 100.0\% | \$12,088 | 100.0\% | 100.0\% | 41 | 100.0\% | 100.0\% | \$7,892 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 6 | 40.0\% | \$363 | 45.5\% | 89.4\% | 3 | 50.0\% | 55.0\% | \$137 | 38.2\% | 70.6\% | 3 | 33.3\% | 56.7\% | \$226 | 51.5\% | 62.5\% |
|  |  | Over \$1 Million | 2 | 13.3\% | \$200 | 25.1\% | 5.2\% |  | 16.7\% |  |  |  |  | 1 | 11.1\% |  |  |  |  |
|  |  | Total Rev. available | 8 | 53.3\% | \$563 | 70.6\% | 94.6\% | 4 | 66.7\% |  |  |  |  | 4 | 44.4\% |  |  |  |  |
|  |  | Rev. Not Known | 7 | 46.7\% | \$235 | 29.4\% | 5.4\% |  | 33.3\% |  |  |  |  |  | 55.6\% |  |  |  |  |
|  |  | Total | 15 | 100.0\% | \$798 | 100.0\% | 100.0\% | 6 | 100.0\% |  |  |  |  | 9 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 14 | 93.3\% | \$697 | 87.3\% |  | 6 | 100.0\% | 90.3\% | \$359 | 100.0\% | 31.2\% | 8 | 88.9\% | 91.4\% | \$338 | 77.0\% | 32.5\% |
|  |  | \$100,001 - \$250,000 |  | 6.7\% |  | 12.7\% |  | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 20.3\% | 1 | 11.1\% | 4.5\% | \$101 | 23.0\% | 18.6\% |
|  |  | \$250,001 - \$1 Million | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.4\% | \$0 | 0.0\% | 48.5\% | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 48.9\% |
|  |  |  | 15 | 100.0\% | \$798 | 100.0\% |  | 6 | 100.0\% | 100.0\% | \$359 | 100.0\% | 100.0\% | 9 | 100.0\% | 100.0\% | \$439 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 0 | 0.0\% | \$0 | 0.0\% | 98.1\% | 0 | 0.0\% | 95.9\% | \$0 | 0.0\% | 99.7\% | 0 | 0.0\% | 90.4\% | \$0 | 0.0\% | 97.2\% |
|  |  | Over \$1 Million | 0 | $0.0 \%$ | \$0 | 0.0\% | $1.5 \%$ | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 85.6\% | \$0 | 0.0\% | 34.3\% | 0 | 0.0\% | 85.5\% | \$0 | 0.0\% | 43.1\% |
|  |  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 10.3\% | \$0 | 0.0\% | 34.7\% | 0 | 0.0\% | 10.8\% | \$0 | 0.0\% | 34.3\% |
|  |  | \$250,001-\$500,000 |  | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.1\% | \$0 | 0.0\% | 31.0\% | 0 | 0.0\% | 3.6\% | \$0 | 0.0\% | 22.6\% |
|  |  |  | 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\% |

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## Appendices

## Combined Demographics Report

Assessment Areas: SC Spartanburg

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 6 | 11.8 |  | 3.5 | 974 | 39.5 | 13,976 | 20.0 |
| Moderate-income | 10 | 19.6 |  | 14.7 | 1,596 | 15.6 | 12,722 | 18.2 |
| Middle-income | 28 | 54.9 |  | 66.2 | 3,283 | 7.1 | 15,705 | 22.5 |
| Upper-income | 7 | 13.7 |  | 15.6 | 548 | 5.0 | 27,350 | 39.2 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 51 | 100.0 |  | 100.0 | 6,401 | 9.2 | 69,753 | 100.0 |
|  | Housing Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 4,670 | 1,329 |  | 28.5 | 2,863 | 61.3 | 478 | 10.2 |
| Moderate-income | 17,907 | 8,821 |  | 49.3 | 7,134 | 39.8 | 1,952 | 10.9 |
| Middle-income | 67,791 | 48,545 |  | 71.6 | 13,737 | 20.3 | 5,509 | 8.1 |
| Upper-income | 16,618 | 11,659 |  | 70.2 | 3,647 | 21.9 | 1,312 | 7.9 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 106,986 | 70,354 |  | 65.8 | 27,381 | 25.6 | 9,251 | 8.6 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | $\begin{gathered} \text { Less Than or = } \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 620 | 5.6 |  | 5.1 | 58 | 8.0 | 65 | 10.2 |
| Moderate-income | 1,700 | 15.2 |  | 14.5 | 139 | 19.1 | 136 | 21.3 |
| Middle-income | 6,552 | 58.7 |  | 59.5 | 391 | 53.8 | 334 | 52.2 |
| Upper-income | 2,294 | 20.5 |  | 20.9 | 139 | 19.1 | 105 | 16.4 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 11,166 | 100.0 |  | 100.0 | 727 | 100.0 | 640 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 87.8 |  | 6.5 |  | 5.7 |
|  | Total Farms by $\quad$ Farms by Tract \& Revenue Size |  |  |  |  |  |  |  |
|  |  |  | $\begin{gathered} \hline \text { Less Than or }= \\ \$ 1 \text { Million } \end{gathered}$ |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2 | 1.0 |  | 1.0 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 5 | 2.5 |  | 2.0 | 1 | 33.3 | 0 | 0.0 |
| Middle-income | 171 | 84.2 |  | 84.4 | 2 | 66.7 | 1 | 100.0 |
| Upper-income | 25 | 12.3 |  | 12.6 | 0 | 0.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 203 | 100.0 |  | 100.0 | 3 | 100.0 | 1 | 100.0 |
|  | Percentage of | Total Fa |  | 98.0 |  | 1.5 |  | . 5 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ |  | Dollar |  | Owner Occupied Units \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ва } \\ \$(\mathbf{0 0 0} \mathbf{s}) \end{array}$ | Dollar k $\%$ \$ | $\begin{aligned} & \text { Agg } \\ & \text { \$ \% } \end{aligned}$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$ (000s) | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 3 | 8.6\% | \$288 | 5.7\% | 12.5\% | 3 | 13.0\% | 6.4\% | \$288 | 8.6\% | 4.4\% | 0 | 0.0\% | 6.5\% | \$0 | 0.0\% | 4.0\% |
|  | Middle | 22 | 62.9\% | \$2,983 | 59.3\% | 69.0\% | 12 | 52.2\% | 69.6\% | \$1,703 | 50.8\% | 66.0\% | 10 | 83.3\% | 69.6\% | \$1,280 | 76.6\% | 66.9\% |
|  | Upper | 10 | 28.6\% | \$1,756 | 34.9\% | 16.6\% | 8 | 34.8\% | 23.5\% | \$1,364 | 40.7\% | 29.3\% | 2 | 16.7\% | 23.7\% | \$392 | 23.4\% | 29.1\% |
|  | 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 | 35 | 100.0\% | \$5,027 | 100.0\% | 100.0\% | 23 | 100.0\% | 100.0\% | \$3,355 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$1,672 | 100.0\% | 100.0\% |
|  | Low | 1 | 1.2\% | \$59 | 0.5\% | 1.9\% | 1 | 1.9\% | 0.5\% | \$59 | 0.8\% | 0.4\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 5 | 6.0\% | \$258 | 2.2\% | 12.5\% | 0 | 0.0\% | 5.5\% | \$0 | 0.0\% | 3.7\% | 5 | 16.1\% | 6.0\% | \$258 | 6.7\% | 3.9\% |
|  | Middle | 46 | 54.8\% | \$5,737 | 49.7\% | 69.0\% | 32 | 60.4\% | 65.1\% | \$3,985 | 51.7\% | 61.9\% | 14 | 45.2\% | 64.0\% | \$1,752 | 45.5\% | 60.9\% |
|  | Upper | 32 | 38.1\% | \$5,497 | 47.6\% | 16.6\% | 20 | 37.7\% | 29.0\% | \$3,659 | 47.5\% | 33.9\% | 12 | 38.7\% | 29.6\% | \$1,838 | 47.8\% | 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\% |
|  | Total | 84 | 100.0\% | \$11,551 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$7,703 | 100.0\% | 100.0\% | 31 | 100.0\% | 100.0\% | \$3,848 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.9\% | 0 | 0.0\% | 0.6\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 1.0\% |
|  | Moderate | 1 | 12.5\% | \$13 | 13.7\% | 12.5\% | 1 | 16.7\% | 12.2\% | \$13 | 18.3\% | 4.5\% | 0 | 0.0\% | 7.6\% | \$0 | 0.0\% | 5.6\% |
|  | Middle | 6 | 75.0\% | \$67 | 70.5\% | 69.0\% | 4 | 66.7\% | 69.4\% | \$43 | 60.6\% | 61.1\% | 2 | 100.0\% | 69.7\% | \$24 | 100.0\% | 54.0\% |
|  | Upper | 1 | 12.5\% | \$15 | 15.8\% | 16.6\% | 1 | 16.7\% | 17.8\% | \$15 | 21.1\% | 34.2\% | 0 | 0.0\% | 20.7\% | \$0 | 0.0\% | 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\% |
|  | Total | 8 | 100.0\% | \$95 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$71 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$24 | 100.0\% | 100.0\% |
|  |  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 8.3\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 33.4\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 22.2\% | 0 | 0.0\% | 42.9\% | \$0 | 0.0\% | 11.5\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 34.4\% | 0 | 0.0\% | 42.9\% | \$0 | 0.0\% | 65.9\% | 0 | 0.0\% | 28.6\% | \$0 | 0.0\% | 80.1\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 23.9\% | 0 | 0.0\% | 28.6\% | \$0 | 0.0\% | 10.9\% | 0 | 0.0\% | 28.6\% | \$0 | 0.0\% | 8.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 1 | 0.8\% | \$59 | 0.4\% | 1.9\% | 1 | 1.2\% | 0.5\% | \$59 | 0.5\% | 0.4\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 9 | 7.1\% | \$559 | 3.4\% | 12.5\% | 4 | 4.9\% | 6.0\% | \$301 | 2.7\% | 4.1\% | 5 | 11.1\% | 6.3\% | \$258 | 4.7\% | 4.2\% |
|  | Middle | 74 | 58.3\% | \$8,787 | 52.7\% | 69.0\% | 48 | 58.5\% | 67.0\% | \$5,731 | 51.5\% | 63.5\% | 26 | 57.8\% | 66.5\% | \$3,056 | 55.1\% | 63.8\% |
|  | Upper | 43 | 33.9\% | \$7,268 | 43.6\% | 16.6\% | 29 | 35.4\% | 26.5\% | \$5,038 | 45.3\% | 32.0\% | 14 | 31.1\% | 26.8\% | \$2,230 | 40.2\% | 32.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 127 | 100.0\% | \$16,673 | 100.0\% | 100.0\% | 82 | 100.0\% | 100.0\% | \$11,129 | 100.0\% | 100.0\% | 45 | 100.0\% | 100.0\% | \$5,544 | 100.0\% | 100.0\% |
|  |  | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 7 | 7.0\% | \$1,622 | 10.0\% | 5.1\% | 1 | 3.6\% | 3.8\% | \$556 | 7.7\% | 3.9\% | 6 | 8.3\% | 5.1\% | \$1,066 | 11.8\% | 5.4\% |
|  | Moderate | 12 | 12.0\% | \$2,473 | 15.3\% | 14.5\% | 3 | 10.7\% | 14.4\% | \$1,203 | 16.7\% | 18.4\% | 9 | 12.5\% | 14.0\% | \$1,270 | 14.1\% | 17.2\% |
|  | Middle | 48 | 48.0\% | \$6,406 | 39.5\% | 59.5\% | 11 | 39.3\% | 51.6\% | \$2,772 | 38.5\% | 46.6\% | 37 | 51.4\% | 54.3\% | \$3,634 | 40.3\% | 53.2\% |
|  | Upper | 33 | 33.0\% | \$5,703 | 35.2\% | 20.9\% | 13 | 46.4\% | 26.2\% | \$2,661 | 37.0\% | 29.6\% | 20 | 27.8\% | 22.4\% | \$3,042 | 33.8\% | 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\% | 4.0\% | \$0 | 0.0\% | 1.4\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 0.6\% |
|  | Total | 100 | 100.0\% | \$16,204 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$7,192 | 100.0\% | 100.0\% | 72 | 100.0\% | 100.0\% | \$9,012 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 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\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.0\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 84.4\% | 0 | 0.0\% | 63.6\% | \$0 | 0.0\% | 12.2\% | 0 | 0.0\% | 61.5\% | \$0 | 0.0\% | 23.4\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 12.6\% | 0 | 0.0\% | 27.3\% | \$0 | 0.0\% | 86.5\% | 0 | 0.0\% | 38.5\% | \$0 | 0.0\% | 76.6\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$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\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: SC Spartanburg


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## Appendices

## Combined Demographics Report

Assessment Area: TN Clarksville


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Geographic Distribution of HMDA, Small Business, \& Small Farm Loans


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TN Clarksville

|  | Borrower Income Levels |  | Bank Lending \& Demographic Data Comparison$\text { 2010, } 2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | ount |  | lar \$ \% | Families by Family Income <br> \% | \# | $\begin{gathered} \text { Count } \\ \text { ank } \\ \% \end{gathered}$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> k \$ \% | Agg \$\% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | Agg \$\% |
|  |  | Low | 4 | 6.2\% | \$314 | 3.3\% | 15.1\% | 2 | 6.7\% | 3.0\% | \$231 | 5.7\% | 1.5\% | 2 | 5.7\% | 2.0\% | \$83 | 1.5\% | 1.1\% |
|  |  | Moderate | 9 | 13.8\% | \$859 | 9.1\% | 18.9\% | 6 | 20.0\% | 18.7\% | \$552 | 13.5\% | 13.8\% | 3 | 8.6\% | 19.6\% | \$307 | 5.7\% | 14.9\% |
|  |  | Middle | 19 | 29.2\% | \$2,818 | 29.7\% | 24.1\% | 6 | 20.0\% | 30.5\% | \$715 | 17.5\% | 28.0\% | 13 | 37.1\% | 32.2\% | \$2,103 | 38.9\% | 31.1\% |
|  |  | Upper | 32 | 49.2\% | \$5,172 | 54.6\% | 41.9\% | 16 | 53.3\% | 32.6\% | \$2,581 | 63.3\% | 40.4\% | 16 | 45.7\% | 31.8\% | \$2,591 | 48.0\% | 39.0\% |
|  |  | Unknown | 1 | 1.5\% | \$317 | 3.3\% | 0.0\% | 0 | 0.0\% | 15.2\% | \$0 | 0.0\% | 16.3\% | 1 | 2.9\% | 14.3\% | \$317 | 5.9\% | 13.9\% |
|  |  | Total | 65 | 100.0\% | \$9,480 | 100.0\% | 100.0\% | 30 | 100.0\% | 100.0\% | \$4,079 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$5,401 | 100.0\% | 100.0\% |
|  |  | Low | 12 | 6.2\% | \$782 | 2.8\% | 15.1\% | 5 | 5.0\% | 2.6\% | \$371 | 2.3\% | 1.4\% | 7 | 7.4\% | 2.8\% | \$411 | 3.4\% | 1.6\% |
|  |  | Moderate | 31 | 15.9\% | \$2,852 | 10.3\% | 18.9\% | 22 | 21.8\% | 8.8\% | \$2,098 | 13.2\% | 5.9\% | 9 | 9.6\% | 7.9\% | \$754 | 6.3\% | 5.3\% |
|  |  | Middle | 43 | 22.1\% | \$5,219 | 18.8\% | 24.1\% | 24 | 23.8\% | 15.2\% | \$3,104 | 19.6\% | 12.5\% | 19 | 20.2\% | 15.1\% | \$2,115 | 17.7\% | 12.7\% |
|  |  | Upper | 97 | 49.7\% | \$16,873 | 60.6\% | 41.9\% | 48 | 47.5\% | 34.9\% | \$9,731 | 61.4\% | 39.9\% | 49 | 52.1\% | 29.9\% | \$7,142 | 59.7\% | 34.2\% |
|  |  | Unknown | 12 | 6.2\% | \$2,098 | 7.5\% | 0.0\% | 2 | 2.0\% | 38.5\% | \$551 | 3.5\% | 40.4\% | 10 | 10.6\% | 44.3\% | \$1,547 | 12.9\% | 46.2\% |
|  |  | Total | 195 | 100.0\% | \$27,824 | 100.0\% | 100.0\% | 101 | 100.0\% | 100.0\% | \$15,855 | 100.0\% | 100.0\% | 94 | 100.0\% | 100.0\% | \$11,969 | 100.0\% | 100.0\% |
|  |  | Low | 4 | 11.4\% | \$62 | 19.1\% | 15.1\% | 2 | 11.8\% | 7.0\% | \$53 | 34.6\% | 4.6\% | 2 | 11.1\% | 5.5\% | \$9 | 5.2\% | 3.0\% |
|  |  | Moderate | 9 | 25.7\% | \$63 | 19.4\% | 18.9\% | 3 | 17.6\% | 16.9\% | \$20 | 13.1\% | 14.8\% | 6 | 33.3\% | 19.1\% | \$43 | 25.0\% | 12.1\% |
|  |  | Middle | 11 | 31.4\% | \$72 | 22.2\% | 24.1\% | 5 | 29.4\% | 29.1\% | \$19 | 12.4\% | 21.9\% | 6 | 33.3\% | 24.6\% | \$53 | 30.8\% | 16.7\% |
|  |  | Upper | 11 | 31.4\% | \$128 | 39.4\% | 41.9\% | 7 | 41.2\% | 45.1\% | \$61 | 39.9\% | 55.7\% | 4 | 22.2\% | 46.4\% | \$67 | 39.0\% | 61.9\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 3.0\% | 0 | 0.0\% | 4.4\% | \$0 | 0.0\% | 6.2\% |
|  |  | Total | 35 | 100.0\% | \$325 | 100.0\% | 100.0\% | 17 | 100.0\% | 100.0\% | \$153 | 100.0\% | 100.0\% | 18 | 100.0\% | 100.0\% | \$172 | 100.0\% | 100.0\% |
|  |  | Low | 0 | 0.0\% | \$0 | 0.0\% | 15.1\% | 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\% | 18.9\% | 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\% | 24.1\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 41.9\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 20 | 6.8\% | \$1,158 | 3.1\% | 15.1\% | 9 | 6.1\% | 2.9\% | \$655 | 3.3\% | 1.5\% | 11 | 7.5\% | 2.4\% | \$503 | 2.9\% | 1.3\% |
|  |  | Moderate | 49 | 16.6\% | \$3,774 | 10.0\% | 18.9\% | 31 | 20.9\% | 14.3\% | \$2,670 | 13.3\% | 10.3\% | 18 | 12.2\% | 14.7\% | \$1,104 | 6.3\% | 10.9\% |
|  |  | Middle | 73 | 24.7\% | \$8,109 | 21.5\% | 24.1\% | 35 | 23.6\% | 23.8\% | \$3,838 | 19.1\% | 21.1\% | 38 | 25.9\% | 24.9\% | \$4,271 | 24.3\% | 23.3\% |
|  |  | Upper | 140 | 47.5\% | \$22,173 | 58.9\% | 41.9\% | 71 | 48.0\% | 33.8\% | \$12,373 | 61.6\% | 39.7\% | 69 | 46.9\% | 31.2\% | \$9,800 | 55.9\% | 36.5\% |
|  |  | Unknown | 13 | 4.4\% | \$2,415 | 6.4\% | 0.0\% | 2 | 1.4\% | 25.2\% | \$551 | 2.7\% | 27.4\% | 11 | 7.5\% | 26.8\% | \$1,864 | 10.6\% | 28.0\% |
|  |  | Total | 295 | 100.0\% | \$37,629 | 100.0\% | 100.0\% | 148 | 100.0\% | 100.0\% | \$20,087 | 100.0\% | 100.0\% | 147 | 100.0\% | 100.0\% | \$17,542 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 174 | 34.7\% | \$9,068 | 29.9\% | 92.3\% | 113 | 57.9\% | 41.3\% | \$6,647 | 42.9\% | 53.0\% | 61 | 19.9\% | 36.8\% | \$2,421 | 16.3\% | 37.0\% |
|  |  | Over \$1 Million | 64 | 12.8\% | \$13,957 | 46.0\% | 3.6\% | 36 | 18.5\% |  |  |  |  | 28 | 9.2\% |  |  |  |  |
|  |  | Total Rev. available | 238 | 47.5\% | \$23,025 | 75.9\% | 95.9\% | 149 | 76.4\% |  |  |  |  | 89 | 29.1\% |  |  |  |  |
|  |  | Rev. Not Known | 263 | 52.5\% | \$7,336 | 24.2\% | 4.2\% | 46 | 23.6\% |  |  |  |  | 217 | 70.9\% |  |  |  |  |
|  |  | Total | 501 | 100.0\% | \$30,361 | 100.0\% | 100.0\% | 195 | 100.0\% |  |  |  |  | 306 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 449 | 89.6\% | \$14,199 | 46.8\% |  | 165 | 84.6\% | 92.1\% | \$6,759 | 43.6\% | 37.0\% | 284 | 92.8\% | 94.1\% | \$7,440 | 50.1\% | 35.1\% |
|  |  | \$100,001-\$250,000 | 29 | 5.8\% | \$5,160 | 17.0\% |  | 17 | 8.7\% | 4.5\% | \$2,992 | 19.3\% | 21.5\% | 12 | 3.9\% | 2.8\% | \$2,168 | 14.6\% | 13.9\% |
|  |  | \$250,001-\$1 Million | 23 | 4.6\% | \$11,002 | 36.2\% |  | 13 | 6.7\% | 3.4\% | \$5,755 | 37.1\% | 41.4\% | 10 | 3.3\% | 3.1\% | \$5,247 | 35.3\% | 51.0\% |
|  |  | Total | 501 | 100.0\% | \$30,361 | 100.0\% |  | 195 | 100.0\% | 100.0\% | \$15,506 | 100.0\% | 100.0\% | 306 | 100.0\% | 100.0\% | \$14,855 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 6 | 85.7\% | \$347 | 96.7\% | 99.5\% | 2 | 100.0\% | 61.5\% | \$165 | 100.0\% | 81.9\% | 4 | 80.0\% | 66.7\% | \$182 | 93.8\% | 78.3\% |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.5\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  |  | 1 | 14.3\% | \$12 | 3.3\% | 0.0\% | 0 | 0.0\% |  |  |  |  | 1 | 20.0\% |  |  |  |  |
|  |  |  | 7 | 100.0\% | \$359 | 100.0\% | 100.0\% | 2 | 100.0\% |  |  |  |  | 5 | 100.0\% |  |  |  |  |
|  | 2 $\$ 100,000$ or LessNN100,001 - $\$ 250,000$్ㅡ $\$ 250,001-\$ 500,000$Total |  | 6 | 85.7\% | \$209 | 58.2\% |  | 1 | 50.0\% | 92.3\% | \$15 | 9.1\% | 57.0\% | 5 | 100.0\% | 100.0\% | \$194 | 100.0\% | 100.0\% |
|  |  |  | 1 | 14.3\% | \$150 | 41.8\% |  | 1 | 50.0\% | 7.7\% | \$150 | 90.9\% | 43.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  |  | 7 | 100.0\% | \$359 | 100.0\% |  | 2 | 100.0\% | 100.0\% | \$165 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$194 | 100.0\% | 100.0\% |

[^465]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: TN Cleveland


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

| $\underset{\llcorner }{\underset{\sim}{\wedge}}$ | Tract Income Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ |  | $\begin{aligned} & \text { ank } \\ & \\ & \\ & \\ & \$(000 s) \\ & \text { Dol } \end{aligned}$ | ar | Owner Occupied Units \% | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | ( ${ }_{\text {Ba }}$ | Dollar k $\%$ | Agg \$ \% | \# | Count ank \% | Agg $\%$ | Ba $\$(000 s)$ | Dollar k \$ \% | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | Moderate | 8 | 7.7\% | \$731 | 5.3\% | 8.0\% | 4 | 7.1\% | 7.7\% | \$297 | 4.1\% | 5.0\% | 4 | 8.3\% | 6.4\% | \$434 | 6.6\% | 4.1\% |
|  | Middle | 71 | 68.3\% | \$9,546 | 68.8\% | 71.0\% | 37 | 66.1\% | 64.4\% | \$4,948 | 67.8\% | 64.2\% | 34 | 70.8\% | 70.4\% | \$4,598 | 70.0\% | 70.8\% |
|  | Upper | 25 | 24.0\% | \$3,593 | 25.9\% | 19.7\% | 15 | 26.8\% | 27.5\% | \$2,055 | 28.2\% | 30.7\% | 10 | 20.8\% | 23.0\% | \$1,538 | 23.4\% | 24.9\% |
|  | 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 | 104 | 100.0\% | \$13,870 | 100.0\% | 100.0\% | 56 | 100.0\% | 100.0\% | \$7,300 | 100.0\% | 100.0\% | 48 | 100.0\% | 100.0\% | \$6,570 | 100.0\% | 100.0\% |
|  | Low | 4 | 2.3\% | \$254 | 1.1\% | 1.3\% | 3 | 2.8\% | 0.5\% | \$221 | 1.5\% | 0.2\% | 1 | 1.6\% | 0.6\% | \$33 | 0.4\% | 0.3\% |
|  | Moderate | 8 | 4.6\% | \$551 | 2.3\% | 8.0\% | 5 | 4.6\% | 3.5\% | \$249 | 1.7\% | 2.0\% | 3 | 4.7\% | 4.3\% | \$302 | 3.4\% | 2.8\% |
|  | Middle | 121 | 69.9\% | \$16,329 | 69.6\% | 71.0\% | 81 | 74.3\% | 69.6\% | \$11,099 | 76.6\% | 68.6\% | 40 | 62.5\% | 69.7\% | \$5,230 | 58.4\% | 69.6\% |
|  | Upper | 40 | 23.1\% | \$6,324 | 27.0\% | 19.7\% | 20 | 18.3\% | 26.4\% | \$2,928 | 20.2\% | 29.1\% | 20 | 31.3\% | 25.4\% | \$3,396 | 37.9\% | 27.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 173 | 100.0\% | \$23,458 | 100.0\% | 100.0\% | 109 | 100.0\% | 100.0\% | \$14,497 | 100.0\% | 100.0\% | 64 | 100.0\% | 100.0\% | \$8,961 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.3\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.7\% | \$0 | 0.0\% | 1.1\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 8.0\% | 0 | 0.0\% | 7.4\% | \$0 | 0.0\% | 3.1\% | 0 | 0.0\% | 5.1\% | \$0 | 0.0\% | 3.7\% |
|  | Middle | 18 | 72.0\% | \$173 | 82.0\% | 71.0\% | 8 | 80.0\% | 71.9\% | \$59 | 88.1\% | 73.5\% | 10 | 66.7\% | 70.1\% | \$114 | 79.2\% | 70.8\% |
|  | Upper | 7 | 28.0\% | \$38 | 18.0\% | 19.7\% | 2 | 20.0\% | 20.0\% | \$8 | 11.9\% | 23.3\% | 5 | 33.3\% | 23.1\% | \$30 | 20.8\% | 24.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 25 | 100.0\% | \$211 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$67 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$144 | 100.0\% | 100.0\% |
|  |  | Multi-Family Units |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 14.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 4.1\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 20.5\% | 0 | 0.0\% | 25.0\% | \$0 | 0.0\% | 17.8\% | 0 | 0.0\% | 5.6\% | \$0 | 0.0\% | 3.0\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 50.2\% | 0 | 0.0\% | 62.5\% | \$0 | 0.0\% | 63.6\% | 0 | 0.0\% | 55.6\% | \$0 | 0.0\% | 18.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 15.1\% | 0 | 0.0\% | 12.5\% | \$0 | 0.0\% | 18.6\% | 0 | 0.0\% | 22.2\% | \$0 | 0.0\% | 74.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 4 | 1.3\% | \$254 | 0.7\% | 1.3\% | 3 | 1.7\% | 0.5\% | \$221 | 1.0\% | 0.2\% | 1 | 0.8\% | 0.6\% | \$33 | 0.2\% | 0.4\% |
|  | Moderate | 16 | 5.3\% | \$1,282 | 3.4\% | 8.0\% | 9 | 5.1\% | 5.0\% | \$546 | 2.5\% | 3.0\% | 7 | 5.5\% | 5.1\% | \$736 | 4.7\% | 3.3\% |
|  | Middle | 210 | 69.5\% | \$26,048 | 69.4\% | 71.0\% | 126 | 72.0\% | 68.0\% | \$16,106 | 73.7\% | 67.4\% | 84 | 66.1\% | 69.9\% | \$9,942 | 63.4\% | 67.6\% |
|  | Upper | 72 | 23.8\% | \$9,955 | 26.5\% | 19.7\% | 37 | 21.1\% | 26.5\% | \$4,991 | 22.8\% | 29.5\% | 35 | 27.6\% | 24.4\% | \$4,964 | 31.7\% | 28.8\% |
|  | 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 | 302 | 100.0\% | \$37,539 | 100.0\% | 100.0\% | 175 | 100.0\% | 100.0\% | \$21,864 | 100.0\% | 100.0\% | 127 | 100.0\% | 100.0\% | \$15,675 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total | Small Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 2 | 0.6\% | \$40 | 0.2\% | 2.1\% | 1 | 0.8\% | 0.3\% | \$20 | 0.2\% | 0.1\% | 1 | 0.5\% | 1.2\% | \$20 | 0.3\% | 1.8\% |
|  |  | 41 | 13.0\% | \$1,809 | 9.7\% | 10.9\% | 13 | 10.2\% | 12.9\% | \$684 | 6.2\% | 8.1\% | 28 | 14.9\% | 11.3\% | \$1,125 | 14.8\% | 12.5\% |
|  |  | 193 | 61.1\% | \$12,152 | 65.3\% | 68.6\% | 82 | 64.1\% | 60.8\% | \$8,083 | 73.5\% | 71.8\% | 111 | 59.0\% | 63.6\% | \$4,069 | 53.4\% | 64.8\% |
|  |  | 80 | 25.3\% | \$4,619 | 24.8\% | 18.4\% | 32 | 25.0\% | 20.7\% | \$2,211 | 20.1\% | 19.0\% | 48 | 25.5\% | 19.6\% | \$2,408 | 31.6\% | 20.1\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 5.3\% | \$0 | 0.0\% | 1.1\% | 0 | 0.0\% | 4.3\% | \$0 | 0.0\% | 0.9\% |
|  |  | 316 | 100.0\% | \$18,620 | 100.0\% | 100.0\% | 128 | 100.0\% | 100.0\% | \$10,998 | 100.0\% | 100.0\% | 188 | 100.0\% | 100.0\% | \$7,622 | 100.0\% | 100.0\% |
|  | Low <br> Moderate <br> Middle <br> Upper <br> Unknown <br> Tr Unknown <br> Total | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 3.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 1 | 100.0\% | \$300 | 100.0\% | 73.3\% | 0 | 0.0\% | 84.6\% | \$0 | 0.0\% | 97.2\% | 1 | 100.0\% | 66.7\% | \$300 | 100.0\% | 79.6\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 23.8\% | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 33.3\% | \$0 | 0.0\% | 20.4\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 7.7\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | 1 | 100.0\% | \$300 | 100.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 1 | 100.0\% | 100.0\% | \$300 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TN Cleveland


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## Appendices

## Combined Demographics Report

## Assessment Area: TN Jackson

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty <br> Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 5 | 16.7 |  | 10.8 | 1,124 | 35.9 | 6,351 | 21.9 |
| Moderate-income | 3 | 10.0 |  | 6.9 | 298 | 15.0 | 4,599 | 15.9 |
| Middle-income | 12 | 40.0 |  | 49.4 | 1,366 | 9.5 | 6,146 | 21.2 |
| Upper-income | 10 | 33.3 |  | 33.0 | 364 | 3.8 | 11,885 | 41.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 30 | 100.0 |  | 100.0 | 3,152 | 10.9 | 28,981 | 100.0 |
|  | Housing <br> Units by Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 5,720 | 1,994 |  | 34.9 | 3,048 | 53.3 | 678 | 11.9 |
| Moderate-income | 3,595 | 1,835 |  | 51.0 | 1,423 | 39.6 | 337 | 9.4 |
| Middle-income | 21,871 | 14,489 |  | 66.2 | 5,808 | 26.6 | 1,574 | 7.2 |
| Upper-income | 13,197 | 9,872 |  | 74.8 | 2,743 | 20.8 | 582 | 4.4 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 44,383 | 28,190 |  | 63.5 | 13,022 | 29.3 | 3,171 | 7.1 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 618 | 11.7 |  | 11.3 | 52 | 16.3 | 34 | 14.7 |
| Moderate-income | 316 | 6.0 |  | 6.2 | 17 | 5.3 | 8 | 3.4 |
| Middle-income | 2,569 | 48.8 |  | 48.8 | 152 | 47.6 | 115 | 49.6 |
| Upper-income | 1,764 | 33.5 |  | 33.7 | 98 | 30.7 | 75 | 32.3 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 5,267 | 100.0 |  | 100.0 | 319 | 100.0 | 232 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 89.5 |  | 6.1 |  | 4.4 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 1 | 0.6 |  | 0.6 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 19 | 10.5 |  | 10.2 | 1 | 20.0 | 0 | 0.0 |
| Middle-income | 101 | 55.8 |  | 56.3 | 2 | 40.0 | 0 | 0.0 |
| Upper-income | 60 | 33.1 |  | 33.0 | 2 | 40.0 | 0 | 0.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 181 | 100.0 |  | 100.0 | 5 | 100.0 | 0 | . 0 |
|  | Percentage of Total Farms: |  |  | 97.2 |  | 2.8 |  | . 0 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TN Jackson


[^469]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: TN Johnson City


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TN Johnson City


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## Appendices

## Combined Demographics Report

## Assessment Area: TN Knoxville

| Income Categories | Tract Distribution |  | Families by Tract Income |  | Families < Poverty Level as \% of Families by Tract |  | Families by Family Income |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 15 | 12.1 |  | 4.6 | 2,670 | 35.0 | 32,135 | 19.6 |
| Moderate-income | 26 | 21.0 |  | 12.8 | 3,222 | 15.4 | 29,473 | 17.9 |
| Middle-income | 58 | 46.8 |  | 58.5 | 6,636 | 6.9 | 35,884 | 21.8 |
| Upper-income | 24 | 19.4 |  | 24.1 | 1,085 | 2.7 | 66,750 | 40.6 |
| Unknown-income | 1 | 0.8 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 124 | 100.0 |  | 100.0 | 13,613 | 8.3 | 164,242 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  | \# |  | \% | \# | \% | \# | \% |
| Low-income | 18,096 | 5,061 |  | 28.0 | 10,587 | 58.5 | 2,448 | 13.5 |
| Moderate-income | 42,441 | 20,557 |  | 48.4 | 17,314 | 40.8 | 4,570 | 10.8 |
| Middle-income | 148,402 | 102,516 |  | 69.1 | 34,345 | 23.1 | 11,541 | 7.8 |
| Upper-income | 59,287 | 44,044 |  | 74.3 | 11,839 | 20.0 | 3,404 | 5.7 |
| Unknown-income | 0 |  | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 268,226 | 172,178 |  | 64.2 | 74,085 | 27.6 | 21,963 | 8.2 |
|  | Total Businesses by Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 2,208 | 7.2 |  | 6.5 | 262 | 13.6 | 177 | 11.8 |
| Moderate-income | 4,211 | 13.8 |  | 13.5 | 299 | 15.5 | 266 | 17.8 |
| Middle-income | 14,981 | 49.1 |  | 50.1 | 782 | 40.6 | 612 | 41.0 |
| Upper-income | 9,107 | 29.8 |  | 29.8 | 582 | 30.2 | 439 | 29.4 |
| Unknown-income | 5 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 30,512 | 100.0 |  | 100.0 | 1,925 | 100.0 | 1,494 | 100.0 |
|  | Percentage of Total Businesses: |  |  | 88.8 |  | 6.3 |  | 4.9 |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or $=$ \$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 4 | 1.1 |  | 0.8 | 1 | 25.0 | 0 | 0.0 |
| Moderate-income | 26 | 6.9 |  | 6.8 | 0 | 0.0 | 1 | 25.0 |
| Middle-income | 272 | 72.0 |  | 72.7 | 2 | 50.0 | 1 | 25.0 |
| Upper-income | 76 | 20.1 |  | 19.7 | 1 | 25.0 | 2 | 50.0 |
| Unknown-income | 0 | 0.0 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 378 | 100.0 |  | 100.0 | 4 | 100.0 | 4 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.9 |  | 1.1 |  | 1.1 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Combined Demographics Report

Assessment Area: TN Morristown


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

| $\stackrel{\underset{\nu}{\stackrel{u}{n}}}{ }$ | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{aligned} & \stackrel{\rightharpoonup}{0} \\ & 0 \\ & 0 \\ & \text { O} \\ & \text { 몸 } \end{aligned}$ |  | Count |  | Dollar |  | Owner <br> Occupied <br> Units <br> $\%$ | \# | Count Bank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \mathrm{Ba} \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar <br> nk \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$ (000s) | Dollar k $\%$ \$ | Agg \$ \% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 4.2\% | \$134 | 2.2\% | 4.7\% | 1 | 3.6\% | 3.0\% | \$57 | 1.5\% | 1.9\% | 1 | 5.0\% | 2.3\% | \$77 | 3.3\% | 1.2\% |
|  | Middle | 31 | 64.6\% | \$3,591 | 59.1\% | 76.3\% | 17 | 60.7\% | 75.4\% | \$1,989 | 52.8\% | 73.8\% | 14 | 70.0\% | 75.8\% | \$1,602 | 69.4\% | 74.6\% |
|  | Upper | 15 | 31.3\% | \$2,353 | 38.7\% | 19.0\% | 10 | 35.7\% | 21.6\% | \$1,722 | 45.7\% | 24.2\% | 5 | 25.0\% | 21.9\% | \$631 | 27.3\% | 24.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 48 | 100.0\% | \$6,078 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$3,768 | 100.0\% | 100.0\% | 20 | 100.0\% | 100.0\% | \$2,310 | 100.0\% | 100.0\% |
|  | 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\% | 4.7\% | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 2.2\% | \$0 | 0.0\% | 2.3\% |
|  | Middle | 49 | 71.0\% | \$5,921 | 62.1\% | 76.3\% | 29 | 70.7\% | 75.9\% | \$3,868 | 62.4\% | 75.9\% | 20 | 71.4\% | 75.5\% | \$2,053 | 61.7\% | 74.9\% |
|  | Upper | 20 | 29.0\% | \$3,609 | 37.9\% | 19.0\% | 12 | 29.3\% | 21.7\% | \$2,332 | 37.6\% | 22.6\% | 8 | 28.6\% | 22.3\% | \$1,277 | 38.3\% | 22.9\% |
|  | 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 | 69 | 100.0\% | \$9,530 | 100.0\% | 100.0\% | 41 | 100.0\% | 100.0\% | \$6,200 | 100.0\% | 100.0\% | 28 | 100.0\% | 100.0\% | \$3,330 | 100.0\% | 100.0\% |
|  | 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\% | 4.7\% | 0 | 0.0\% | 2.3\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 3.3\% | \$0 | 0.0\% | 3.1\% |
|  | Middle | 14 | 93.3\% | \$94 | 95.9\% | 76.3\% | 9 | 90.0\% | 76.2\% | \$68 | 94.4\% | 73.9\% | 5 | 100.0\% | 75.8\% | \$26 | 100.0\% | 72.8\% |
|  | Upper | 1 | 6.7\% | \$4 | 4.1\% | 19.0\% | 1 | 10.0\% | 21.5\% | \$4 | 5.6\% | 24.5\% | 0 | 0.0\% | 20.9\% | \$0 | 0.0\% | 24.1\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 15 | 100.0\% | \$98 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$72 | 100.0\% | 100.0\% | 5 | 100.0\% | 100.0\% | \$26 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | amily 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\% | 9.8\% | 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\% | 77.0\% | 0 | 0.0\% | 90.9\% | \$0 | 0.0\% | 95.3\% | 0 | 0.0\% | 83.3\% | \$0 | 0.0\% | 94.5\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 13.2\% | 0 | 0.0\% | 9.1\% | \$0 | 0.0\% | 4.7\% | 0 | 0.0\% | 16.7\% | \$0 | 0.0\% | 5.5\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 1.5\% | \$134 | 0.9\% | 4.7\% | 1 | 1.3\% | 2.5\% | \$57 | 0.6\% | 1.6\% | 1 | 1.9\% | 2.3\% | \$77 | 1.4\% | 1.9\% |
|  | Middle | 94 | 71.2\% | \$9,606 | 61.2\% | 76.3\% | 55 | 69.6\% | 75.8\% | \$5,925 | 59.0\% | 75.5\% | 39 | 73.6\% | 75.6\% | \$3,681 | 65.0\% | 74.9\% |
|  | Upper | 36 | 27.3\% | \$5,966 | 38.0\% | 19.0\% | 23 | 29.1\% | 21.6\% | \$4,058 | 40.4\% | 22.9\% | 13 | 24.5\% | 22.1\% | \$1,908 | 33.7\% | 23.2\% |
|  | 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 | 132 | 100.0\% | \$15,706 | 100.0\% | 100.0\% | 79 | 100.0\% | 100.0\% | \$10,040 | 100.0\% | 100.0\% | 53 | 100.0\% | 100.0\% | \$5,666 | 100.0\% | 100.0\% |
|  |  |  |  |  | Small | 1 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 | 29 | 16.5\% | \$5,019 | 31.2\% | 10.2\% | 14 | 18.7\% | 11.3\% | \$3,194 | 40.7\% | 18.4\% | 15 | 14.9\% | 9.8\% | \$1,825 | 22.1\% | 17.7\% |
|  | Middle | 108 | 61.4\% | \$7,002 | 43.5\% | 73.8\% | 47 | 62.7\% | 64.8\% | \$3,735 | 47.6\% | 59.8\% | 61 | 60.4\% | 70.5\% | \$3,267 | 39.6\% | 60.5\% |
|  | Upper | 39 | 22.2\% | \$4,078 | 25.3\% | 16.0\% | 14 | 18.7\% | 19.1\% | \$923 | 11.8\% | 20.8\% | 25 | 24.8\% | 15.9\% | \$3,155 | 38.3\% | 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\% | 4.9\% | \$0 | 0.0\% | 1.0\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 0.8\% |
|  | Total | 176 | 100.0\% | \$16,099 | 100.0\% | 100.0\% | 75 | 100.0\% | 100.0\% | \$7,852 | 100.0\% | 100.0\% | 101 | 100.0\% | 100.0\% | \$8,247 | 100.0\% | 100.0\% |
| $\begin{aligned} & \sum_{\substack{x}}^{\underset{u}{u}} \\ & \underset{\sim}{\underset{\sim}{x}} \end{aligned}$ |  |  |  |  |  | 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\% | 2.8\% | 0 | 0.0\% | 11.5\% | \$0 | 0.0\% | 12.4\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 13.3\% |
|  | Middle | 5 | 100.0\% | \$365 | 100.0\% | 91.7\% | 2 | 100.0\% | 84.6\% | \$295 | 100.0\% | 84.1\% | 3 | 100.0\% | 90.5\% | \$70 | 100.0\% | 86.4\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 5.5\% | 0 | 0.0\% | 3.8\% | \$0 | 0.0\% | 3.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.8\% | \$0 | 0.0\% | 0.3\% |
|  | Total | 5 | 100.0\% | \$365 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$295 | 100.0\% | 100.0\% | 3 | 100.0\% | 100.0\% | \$70 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TN Morristown


[^472]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: TN Southern TN


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ount |  | Dollar |  | Owner Occupied Units \% |  | Count ank $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(\mathbf{0 0 0 s}) \end{array}$ | Dollar k \$ \% | $\begin{gathered} \text { Agg } \\ \$ \% \end{gathered}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar <br> k <br> \$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ |
|  | 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 | 0.5\% | \$54 | 0.2\% | 2.3\% | 1 | 0.8\% | 1.4\% | \$54 | 0.4\% | 0.9\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.8\% |
|  | Middle | 97 | 43.9\% | \$12,471 | 42.2\% | 68.4\% | 48 | 40.7\% | 56.9\% | \$5,324 | 34.8\% | 52.4\% | 49 | 47.6\% | 57.6\% | \$7,147 | 50.1\% | 53.2\% |
|  | Upper | 123 | 55.7\% | \$17,024 | 57.6\% | 29.4\% | 69 | 58.5\% | 41.7\% | \$9,902 | 64.8\% | 46.7\% | 54 | 52.4\% | 41.1\% | \$7,122 | 49.9\% | 46.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 221 | 100.0\% | \$29,549 | 100.0\% | 100.0\% | 118 | 100.0\% | 100.0\% | \$15,280 | 100.0\% | 100.0\% | 103 | 100.0\% | 100.0\% | \$14,269 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 5 | 1.2\% | \$252 | 0.5\% | 2.3\% | 3 | 1.3\% | 0.9\% | \$127 | 0.4\% | 0.5\% | 2 | 1.0\% | 1.2\% | \$125 | 0.5\% | 0.9\% |
|  | Middle | 233 | 53.7\% | \$25,984 | 46.8\% | 68.4\% | 121 | 53.1\% | 56.4\% | \$14,354 | 47.7\% | 53.1\% | 112 | 54.4\% | 59.2\% | \$11,630 | 45.7\% | 55.9\% |
|  | Upper | 196 | 45.2\% | \$29,327 | 52.8\% | 29.4\% | 104 | 45.6\% | 42.7\% | \$15,624 | 51.9\% | 46.4\% | 92 | 44.7\% | 39.5\% | \$13,703 | 53.8\% | 43.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 434 | 100.0\% | \$55,563 | 100.0\% | 100.0\% | 228 | 100.0\% | 100.0\% | \$30,105 | 100.0\% | 100.0\% | 206 | 100.0\% | 100.0\% | \$25,458 | 100.0\% | 100.0\% |
|  | 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\% | 2.3\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.9\% | 0 | 0.0\% | 3.9\% | \$0 | 0.0\% | 1.8\% |
|  | Middle | 62 | 75.6\% | \$494 | 77.7\% | 68.4\% | 36 | 76.6\% | 65.5\% | \$283 | 79.9\% | 55.7\% | 26 | 74.3\% | 69.1\% | \$211 | 74.8\% | 66.5\% |
|  | Upper | 20 | 24.4\% | \$142 | 22.3\% | 29.4\% | 11 | 23.4\% | 33.6\% | \$71 | 20.1\% | 43.4\% | 9 | 25.7\% | 27.1\% | \$71 | 25.2\% | 31.7\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 82 | 100.0\% | \$636 | 100.0\% | 100.0\% | 47 | 100.0\% | 100.0\% | \$354 | 100.0\% | 100.0\% | 35 | 100.0\% | 100.0\% | \$282 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | amily 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\% | 7.4\% | 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\% | 66.8\% | 0 | 0.0\% | 85.7\% | \$0 | 0.0\% | 88.6\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 25.8\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 11.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | 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 | 0.8\% | \$306 | 0.4\% | 2.3\% | 4 | 1.0\% | 1.1\% | \$181 | 0.4\% | 0.6\% | 2 | 0.6\% | 1.4\% | \$125 | 0.3\% | 0.9\% |
|  | Middle | 392 | 53.2\% | \$38,949 | 45.4\% | 68.4\% | 205 | 52.2\% | 57.0\% | \$19,961 | 43.6\% | 53.1\% | 187 | 54.4\% | 59.1\% | \$18,988 | 47.5\% | 55.1\% |
|  | Upper | 339 | 46.0\% | \$46,493 | 54.2\% | 29.4\% | 184 | 46.8\% | 41.9\% | \$25,597 | 56.0\% | 46.3\% | 155 | 45.1\% | 39.5\% | \$20,896 | 52.2\% | 43.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  |  | 737 | 100.0\% | \$85,748 | 100.0\% | 100.0\% | 393 | 100.0\% | 100.0\% | \$45,739 | 100.0\% | 100.0\% | 344 | 100.0\% | 100.0\% | \$40,009 | 100.0\% | 100.0\% |
|  |  |  |  |  | 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 | 16 | 6.9\% | \$825 | 4.5\% | 4.6\% | 16 | 6.9\% | 4.6\% | \$825 | 4.5\% | 5.2\% | 20 | 4.3\% | 3.0\% | \$535 | 2.3\% | 1.8\% |
|  | Middle | 145 | 62.8\% | \$11,754 | 64.1\% | 69.5\% | 145 | 62.8\% | 59.0\% | \$11,754 | 64.1\% | 54.5\% | 312 | 67.7\% | 61.3\% | \$14,043 | 61.1\% | 66.0\% |
|  | Upper | 70 | 30.3\% | \$5,745 | 31.4\% | 25.9\% | 70 | 30.3\% | 33.0\% | \$5,745 | 31.4\% | 38.8\% | 129 | 28.0\% | 33.2\% | \$8,423 | 36.6\% | 31.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 3.4\% | \$0 | 0.0\% | 1.6\% | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 0.8\% |
|  | Total | 231 | 100.0\% | \$18,324 | 100.0\% | 100.0\% | 231 | 100.0\% | 100.0\% | \$18,324 | 100.0\% | 100.0\% | 461 | 100.0\% | 100.0\% | \$23,001 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | 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\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.6\% |
|  | Middle | 9 | 81.8\% | \$1,395 | 70.8\% | 74.5\% | 9 | 81.8\% | 66.4\% | \$1,395 | 70.8\% | 50.5\% | 11 | 73.3\% | 67.9\% | \$1,136 | 65.2\% | 61.7\% |
|  | Upper | 2 | 18.2\% | \$575 | 29.2\% | 25.2\% | 2 | 18.2\% | 32.0\% | \$575 | 29.2\% | 48.9\% | 4 | 26.7\% | 29.6\% | \$606 | 34.8\% | 37.5\% |
|  | 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\% | 0.6\% | 0 | 0.0\% | 1.2\% | \$0 | 0.0\% | 0.2\% |
|  | Total | 11 | 100.0\% | \$1,970 | 100.0\% | 100.0\% | 11 | 100.0\% | 100.0\% | \$1,970 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$1,742 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TN Southern TN


[^474]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: TN Western TN


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract Income Levels | Bank Lending \& Demographic Data Comparison 2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | Dollar |  | Owner Occupied Units \% |  | Count ank $\%$ | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\$(000 s)$ | Dollar k \$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | \$(000s) | Dollar k ${ }^{\text {\% }}$ \% | $\begin{aligned} & \text { Agg } \\ & \$ \% \end{aligned}$ |
| 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\% | \$121 | 0.3\% | 1.8\% | 0 | 0.0\% | 1.1\% | \$0 | 0.0\% | 0.9\% | 1 | 0.6\% | 1.0\% | \$121 | 0.7\% | 0.8\% |
|  | Middle | 310 | 84.0\% | \$29,021 | 78.4\% | 89.1\% | 157 | 83.1\% | 79.3\% | \$15,041 | 78.0\% | 75.5\% | 153 | 85.0\% | 79.9\% | \$13,980 | 78.9\% | 76.3\% |
|  | Upper | 58 | 15.7\% | \$7,852 | 21.2\% | 9.1\% | 32 | 16.9\% | 19.2\% | \$4,242 | 22.0\% | 23.3\% | 26 | 14.4\% | 18.9\% | \$3,610 | 20.4\% | 22.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.4\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 369 | 100.0\% | \$36,994 | 100.0\% | 100.0\% | 189 | 100.0\% | 100.0\% | \$19,283 | 100.0\% | 100.0\% | 180 | 100.0\% | 100.0\% | \$17,711 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 7 | 1.2\% | \$727 | 1.3\% | 1.8\% | 4 | 1.2\% | 0.8\% | \$417 | 1.3\% | 0.7\% | 3 | 1.2\% | 0.5\% | \$310 | 1.4\% | 0.3\% |
|  | Middle | 517 | 88.7\% | \$47,898 | 88.0\% | 89.1\% | 291 | 87.7\% | 80.6\% | \$27,864 | 87.1\% | 77.3\% | 226 | 90.0\% | 85.1\% | \$20,034 | 89.3\% | 82.3\% |
|  | Upper | 59 | 10.1\% | \$5,810 | 10.7\% | 9.1\% | 37 | 11.1\% | 18.5\% | \$3,723 | 11.6\% | 21.9\% | 22 | 8.8\% | 14.4\% | \$2,087 | 9.3\% | 17.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 583 | 100.0\% | \$54,435 | 100.0\% | 100.0\% | 332 | 100.0\% | 100.0\% | \$32,004 | 100.0\% | 100.0\% | 251 | 100.0\% | 100.0\% | \$22,431 | 100.0\% | 100.0\% |
|  | 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 | 2.4\% | \$76 | 7.8\% | 1.8\% | 1 | 1.7\% | 1.5\% | \$7 | 1.6\% | 1.1\% | 2 | 3.1\% | 1.2\% | \$69 | 13.0\% | 0.8\% |
|  | Middle | 109 | 87.9\% | \$802 | 81.9\% | 89.1\% | 54 | 90.0\% | 89.1\% | \$377 | 84.3\% | 82.8\% | 55 | 85.9\% | 88.8\% | \$425 | 79.9\% | 86.6\% |
|  | Upper | 12 | 9.7\% | \$101 | 10.3\% | 9.1\% | 5 | 8.3\% | 9.2\% | \$63 | 14.1\% | 16.1\% | 7 | 10.9\% | 10.1\% | \$38 | 7.1\% | 12.6\% |
|  | 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 | 124 | 100.0\% | \$979 | 100.0\% | 100.0\% | 60 | 100.0\% | 100.0\% | \$447 | 100.0\% | 100.0\% | 64 | 100.0\% | 100.0\% | \$532 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | mily 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\% | 2.8\% | 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\% | 84.6\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 72.7\% | \$0 | 0.0\% | 31.2\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 12.6\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 27.3\% | \$0 | 0.0\% | 68.8\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 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\% |
|  | 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 | 11 | 1.0\% | \$924 | 1.0\% | 1.8\% | 5 | 0.9\% | 1.0\% | \$424 | 0.8\% | 0.8\% | 6 | 1.2\% | 0.7\% | \$500 | 1.2\% | 0.5\% |
|  | Middle | 936 | 87.0\% | \$77,721 | 84.1\% | 89.1\% | 502 | 86.4\% | 80.7\% | \$43,282 | 83.7\% | 76.8\% | 434 | 87.7\% | 83.1\% | \$34,439 | 84.7\% | 79.5\% |
|  | Upper | 129 | 12.0\% | \$13,763 | 14.9\% | 9.1\% | 74 | 12.7\% | 18.1\% | \$8,028 | 15.5\% | 22.3\% | 55 | 11.1\% | 16.1\% | \$5,735 | 14.1\% | 19.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.2\% | 0 | 0.0\% | 0.1\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 1,076 | 100.0\% | \$92,408 | 100.0\% | 100.0\% | 581 | 100.0\% | 100.0\% | \$51,734 | 100.0\% | 100.0\% | 495 | 100.0\% | 100.0\% | \$40,674 | 100.0\% | 100.0\% |
|  |  |  |  |  | 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 | 35 | 6.1\% | \$4,479 | 11.1\% | 2.5\% | 15 | 7.2\% | 1.7\% | \$3,256 | 14.4\% | 2.8\% | 20 | 5.5\% | 2.1\% | \$1,223 | 6.9\% | 2.1\% |
|  | Middle | 495 | 86.2\% | \$31,778 | 79.0\% | 87.1\% | 178 | 85.6\% | 79.7\% | \$17,902 | 79.2\% | 78.3\% | 317 | 86.6\% | 79.1\% | \$13,876 | 78.7\% | 78.4\% |
|  | Upper | 43 | 7.5\% | \$3,948 | 9.8\% | 10.5\% | 14 | 6.7\% | 15.7\% | \$1,418 | 6.3\% | 18.0\% | 29 | 7.9\% | 16.1\% | \$2,530 | 14.4\% | 19.0\% |
|  | 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 | 1 | 0.2\% | \$30 | 0.1\% |  | 1 | 0.5\% | 3.0\% | \$30 | 0.1\% | 0.8\% | 0 | 0.0\% | 2.7\% | \$0 | 0.0\% | 0.5\% |
|  | Total | 574 | 100.0\% | \$40,235 | 100.0\% | 100.0\% | 208 | 100.0\% | 100.0\% | \$22,606 | 100.0\% | 100.0\% | 366 | 100.0\% | 100.0\% | \$17,629 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 2 | 2.1\% | \$300 | 2.5\% | 1.5\% | 2 | 6.3\% | 1.2\% | \$300 | 6.3\% | 1.2\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.6\% |
|  | Middle | 83 | 87.4\% | \$10,496 | 88.0\% | 91.0\% | 27 | 84.4\% | 82.9\% | \$4,164 | 87.6\% | 82.2\% | 56 | 88.9\% | 81.0\% | \$6,332 | 88.3\% | 77.6\% |
|  | Upper | 10 | 10.5\% | \$1,125 | 9.4\% | 7.5\% | 3 | 9.4\% | 15.5\% | \$290 | 6.1\% | 16.5\% | 7 | 11.1\% | 18.3\% | \$835 | 11.7\% | 21.9\% |
|  | 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\% | 0.3\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.2\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 95 | 100.0\% | \$11,921 | 100.0\% | 100.0\% | 32 | 100.0\% | 100.0\% | \$4,754 | 100.0\% | 100.0\% | 63 | 100.0\% | 100.0\% | \$7,167 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TN Western TN


[^476]Originations \& Purchases

## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TX Cass


[^478]Originations \& Purchases

## Appendices

## 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 | $62 \quad 9.8$ |  | 55,349 | 7.0 | 16,815 | 30.4 | 166,678 | 20.9 |
| Moderate-income | $183-28.8$ |  | 193,656 | 24.3 | 28,904 | 14.9 | 140,490 | 17.7 |
| Middle-income | $191 \quad 30.1$ |  | 259,458 | 32.6 | 14,441 | 5.6 | 158,477 | 19.9 |
| Upper-income | 195 | 30.7 | 287,148 | 36.1 | 6,106 | 2.1 | 329,966 | 41.5 |
| Unknown-income | 4 | 0.6 |  | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 635 | 100.0 | 795,611 | 100.0 | 66,266 | 8.3 | 795,611 | 100.0 |
|  | Housing <br> Units by <br> Tract | Housing Types by Tract |  |  |  |  |  |  |
|  |  | Owner-Occupied |  |  | Rental |  | Vacant |  |
|  |  |  | \# | \% | \# | \% | \# $\quad$ \% |  |
| Low-income | 93,880 | 18,234 |  | 19.4 | 66,925 | 71.3 | 8,721 | 9.3 |
| Moderate-income | 307,497 | 129,558 |  | 42.1 | 160,606 | 52.2 | 17,333 | 5.6 |
| Middle-income | 417,473 | 223,946 |  | 53.6 | 171,970 | 41.2 | 21,557 | 5.2 |
| Upper-income | 413,565 | 292,464 |  | 70.7 | 99,311 | 24.0 | 21,790 | 5.3 |
| Unknown-income | 16 |  | 0 | 0.0 | 10 | 62.5 | 6 | 37.5 |
| Total Assessment Area | 1,232,431 | 664,202 |  | 53.9 | 498,822 | 40.5 | 69,407 | 5.6 |
|  | Total Businesses by <br> Tract |  | Businesses by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or = \$1 Million |  | Over \$1 Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 8,559 | 4.2 |  | 4.1 | 514 | 4.6 | 536 | 5.1 |
| Moderate-income | 43,225 | 21.0 |  | 20.0 | 3,537 | 31.9 | 2,837 | 26.9 |
| Middle-income | 65,258 | 31.7 |  | 31.6 | 3,584 | 32.3 | 3,377 | 32.0 |
| Upper-income | 87,312 | 42.4 |  | 43.6 | 3,214 | 29.0 | 3,635 | 34.4 |
| Unknown-income | 1,684 | 0.8 |  | 0.7 | 243 | 2.2 | 178 | 1.7 |
| Total Assessment Area | 206,038 | 100.0 |  | 100.0 | 11,092 | 100.0 | 10,563 | 100.0 |
|  | Percentage of Total Businesses: |  |  | $89.5$ |  | 5.4 | 5.1 |  |
|  | Total Farms by Tract |  | Farms by Tract \& Revenue Size |  |  |  |  |  |
|  |  |  | Less Than or =\$1 Million |  | Over \$1 <br> Million |  | Revenue Not Reported |  |
|  | \# | \% |  | \% | \# | \% | \# | \% |
| Low-income | 16 | 1.1 |  | 1.2 | 0 | 0.0 | 0 | 0.0 |
| Moderate-income | 128 | 9.0 |  | 8.7 | 4 | 22.2 | 3 | 17.6 |
| Middle-income | 678 | 47.7 |  | 48.1 | 4 | 22.2 | 7 | 41.2 |
| Upper-income | 596 | 41.9 |  | 41.7 | 10 | 55.6 | 7 | 41.2 |
| Unknown-income | 4 | 0.3 |  | 0.3 | 0 | 0.0 | 0 | 0.0 |
| Total Assessment Area | 1,422 | 100.0 |  | 100.0 | 18 | 100.0 | 17 | 100.0 |
|  | Percentage of Total Farms: |  |  | 97.5 |  | 1.3 |  | 1.2 |

Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

|  | Tract <br> Income <br> Levels | Bank Lending \& Demographic Data Comparison2010, 2011 |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count ${ }^{\text {B }}$ |  | Bank $\$(000 s)$ | ar <br> \$ \% | Owner <br> Occupied <br> Units <br> $\%$ |  | Count Bank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 s) \end{array}$ | Dollar <br> nk \$ \% | $\begin{gathered} \text { Agg } \\ \text { \$ \% } \end{gathered}$ | \# | Count ank \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k \$ \% | Agg \$ \% |
|  | Low | 3 | 1.0\% | \$496 | 0.6\% | 2.7\% | 3 | 3.2\% | 1.0\% | \$496 | 2.0\% | 0.7\% | 0 | 0.0\% | 0.8\% | \$0 | 0.0\% | 0.6\% |
|  | Moderate | 19 | 6.3\% | \$2,625 | 3.3\% | 19.5\% | 9 | 9.5\% | 8.6\% | \$1,276 | 5.1\% | 4.8\% | 10 | 4.9\% | 8.0\% | \$1,349 | 2.4\% | 4.4\% |
|  | Middle | 89 | 29.6\% | \$17,520 | 21.9\% | 33.7\% | 29 | 30.5\% | 35.0\% | \$4,927 | 19.7\% | 28.9\% | 60 | 29.1\% | 34.5\% | \$12,593 | 22.8\% | 27.6\% |
|  | Upper | 190 | 63.1\% | \$59,502 | 74.2\% | 44.0\% | 54 | 56.8\% | 55.3\% | \$18,305 | 73.2\% | 65.7\% | 136 | 66.0\% | 56.7\% | \$41,197 | 74.7\% | 67.3\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.1\% |
|  | Total | 301 | 100.0\% | \$80,143 | 100.0\% | 100.0\% | 95 | 100.0\% | 100.0\% | \$25,004 | 100.0\% | 100.0\% | 206 | 100.0\% | 100.0\% | \$55,139 | 100.0\% | 100.0\% |
|  | Low | 3 | 1.3\% | \$528 | 0.7\% | 2.7\% | 3 | 2.7\% | 0.6\% | \$528 | 1.6\% | 0.5\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.4\% |
|  | Moderate | 10 | 4.3\% | \$1,431 | 2.0\% | 19.5\% | 5 | 4.5\% | 3.8\% | \$591 | 1.8\% | 2.4\% | 5 | 4.2\% | 4.5\% | \$840 | 2.2\% | 2.8\% |
|  | Middle | 50 | 21.6\% | \$8,460 | 11.9\% | 33.7\% | 30 | 27.0\% | 24.2\% | \$5,271 | 15.8\% | 19.3\% | 20 | 16.7\% | 25.2\% | \$3,189 | 8.4\% | 19.5\% |
|  | Upper | 168 | 72.7\% | \$60,963 | 85.4\% | 44.0\% | 73 | 65.8\% | 71.5\% | \$26,921 | 80.8\% | 77.8\% | 95 | 79.2\% | 69.8\% | \$34,042 | 89.4\% | 77.3\% |
|  | 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 | 231 | 100.0\% | \$71,382 | 100.0\% | 100.0\% | 111 | 100.0\% | 100.0\% | \$33,311 | 100.0\% | 100.0\% | 120 | 100.0\% | 100.0\% | \$38,071 | 100.0\% | 100.0\% |
|  | Lo | 1 | 3.4\% | \$10 | 2.7\% | 2.7\% | 1 | 7.1\% | 1.2\% | \$10 | 5.1\% | 0.8\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.5\% |
|  | Moderate | 4 | 13.8\% | \$26 | 6.9\% | 19.5\% | 2 | 14.3\% | 9.1\% | \$13 | 6.6\% | 5.4\% | 2 | 13.3\% | 7.2\% | \$13 | 7.3\% | 3.9\% |
|  | Middle | 10 | 34.5\% | \$119 | 31.7\% | 33.7\% | 4 | 28.6\% | 26.6\% | \$33 | 16.7\% | 18.6\% | 6 | 40.0\% | 28.7\% | \$86 | 48.6\% | 18.6\% |
|  | Upper | 14 | 48.3\% | \$220 | 58.7\% | 44.0\% | 7 | 50.0\% | 63.0\% | \$142 | 71.7\% | 75.3\% | 7 | 46.7\% | 63.1\% | \$78 | 44.1\% | 77.1\% |
|  | 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 | 29 | 100.0\% | \$375 | 100.0\% | 100.0\% | 14 | 100.0\% | 100.0\% | \$198 | 100.0\% | 100.0\% | 15 | 100.0\% | 100.0\% | \$177 | 100.0\% | 100.0\% |
|  |  |  |  |  | Multi-Fa | amily Units |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 14.5\% | 0 | 0.0\% | 25.4\% | \$0 | 0.0\% | 16.3\% | 0 | 0.0\% | 17.0\% | \$0 | 0.0\% | 3.4\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 30.2\% | 0 | 0.0\% | 28.2\% | \$0 | 0.0\% | 11.7\% | 0 | 0.0\% | 31.9\% | \$0 | 0.0\% | 28.4\% |
|  | Middle | 0 | 0.0\% | \$0 | 0.0\% | 33.2\% | 0 | 0.0\% | 26.8\% | \$0 | 0.0\% | 27.5\% | 0 | 0.0\% | 30.3\% | \$0 | 0.0\% | 33.7\% |
|  | Upper | 0 | 0.0\% | \$0 | 0.0\% | 22.1\% | 0 | 0.0\% | 19.7\% | \$0 | 0.0\% | 44.5\% | 0 | 0.0\% | 20.2\% | \$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\% | 0.5\% | \$0 | 0.0\% | 0.3\% |
|  |  | 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\% |
|  | Low | 7 | 1.2\% | \$1,034 | 0.7\% | 2.7\% | 7 | 3.2\% | 0.8\% | \$1,034 | 1.8\% | 0.9\% | 0 | 0.0\% | 0.7\% | \$0 | 0.0\% | 0.6\% |
|  | Moderate | 33 | 5.9\% | \$4,082 | 2.7\% | 19.5\% | 16 | 7.3\% | 6.2\% | \$1,880 | 3.2\% | 3.7\% | 17 | 5.0\% | 6.2\% | \$2,202 | 2.4\% | 4.8\% |
|  | Middle | 149 | 26.6\% | \$26,099 | 17.2\% | 33.7\% | 63 | 28.6\% | 29.4\% | \$10,231 | 17.5\% | 23.7\% | 86 | 25.2\% | 29.6\% | \$15,868 | 17.0\% | 23.8\% |
|  | Upper | 372 | 66.3\% | \$120,685 | 79.5\% | 44.0\% | 134 | 60.9\% | 63.6\% | \$45,368 | 77.5\% | 71.6\% | 238 | 69.8\% | 63.4\% | \$75,317 | 80.7\% | 70.7\% |
|  | 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\% | 0.1\% |
|  | Total | 561 | 100.0\% | \$151,900 | 100.0\% | 100.0\% | 220 | 100.0\% | 100.0\% | \$58,513 | 100.0\% | 100.0\% | 341 | 100.0\% | 100.0\% | \$93,387 | 100.0\% | 100.0\% |
|  |  |  |  |  | Small | 1 Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 37 | 5.8\% | \$4,229 | 5.5\% | 4.1\% | 13 | 5.9\% | 2.8\% | \$2,432 | 6.3\% | 3.8\% | 24 | 5.7\% | 2.8\% | \$1,797 | 4.6\% | 3.2\% |
|  | Moderate | 176 | 27.6\% | \$30,699 | 39.6\% | 20.0\% | 65 | 29.7\% | 17.3\% | \$16,005 | 41.3\% | 25.3\% | 111 | 26.6\% | 17.2\% | \$14,694 | 37.9\% | 24.8\% |
|  | Middle | 163 | 25.6\% | \$14,785 | 19.1\% | 31.6\% | 55 | 25.1\% | 27.6\% | \$6,541 | 16.9\% | 27.8\% | 108 | 25.8\% | 28.4\% | \$8,244 | 21.3\% | 28.3\% |
|  | Upper | 250 | 39.2\% | \$26,255 | 33.9\% | 43.6\% | 80 | 36.5\% | 49.1\% | \$12,917 | 33.4\% | 40.1\% | 170 | 40.7\% | 49.5\% | \$13,338 | 34.4\% | 41.8\% |
|  | Unknown | 11 | 1.7\% | \$1,532 | 2.0\% | 0.7\% | 6 | 2.7\% | 0.7\% | \$820 | 2.1\% | 1.6\% | 5 | 1.2\% | 0.8\% | \$712 | 1.8\% | 1.5\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 2.4\% | \$0 | 0.0\% | 1.5\% | 0 | 0.0\% | 1.3\% | \$0 | 0.0\% | 0.4\% |
|  |  | 637 | 100.0\% | \$77,500 | 100.0\% | 100.0\% | 219 | 100.0\% | 100.0\% | \$38,715 | 100.0\% | 100.0\% | 418 | 100.0\% | 100.0\% | \$38,785 | 100.0\% | 100.0\% |
|  |  |  |  |  |  | Small Farms |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 1.2\% | 0 | 0.0\% | 1.9\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 1.0\% | \$0 | 0.0\% | 0.8\% |
|  | Moderate | 1 | 12.5\% | \$101 | 9.5\% | 8.7\% | 0 | 0.0\% | 8.3\% | \$0 | 0.0\% | 3.5\% | 1 | 16.7\% | 7.4\% | \$101 | 15.2\% | 8.2\% |
|  | Middle | 6 | 75.0\% | \$953 | 89.6\% | 48.1\% | 2 | 100.0\% | 46.4\% | \$400 | 100.0\% | 48.9\% | 4 | 66.7\% | 41.8\% | \$553 | 83.3\% | 40.3\% |
|  | Upper | 1 | 12.5\% | \$10 | 0.9\% | 41.7\% | 0 | 0.0\% | 39.2\% | \$0 | 0.0\% | 45.4\% | 1 | 16.7\% | 49.4\% | \$10 | 1.5\% | 50.4\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.5\% | \$0 | 0.0\% | 0.3\% |
|  | Tr Unknown | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.2\% | \$0 | 0.0\% | 1.8\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Total | 8 | 100.0\% | \$1,064 | 100.0\% | 100.0\% | 2 | 100.0\% | 100.0\% | \$400 | 100.0\% | 100.0\% | 6 | 100.0\% | 100.0\% | \$664 | 100.0\% | 100.0\% |

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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TX Dallas


[^480]Originations \& Purchases

## Appendices

## Combined Demographics Report

Assessment Area: TX Ft. Worth


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TX Ft. Worth


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## Appendices

## Combined Demographics Report

Assessment Area: TX Longview


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans



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## Appendices

## Combined Demographics Report

Assessment Area: TX Nacogdoches-Angelina-Anderson


Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TX Nacogdoches-Angelina-Anderson

|  |  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bank | Families by Family Income <br> \% | Count |  |  | Dollar |  |  | Count |  |  | Dollar |  |  |
|  |  |  |  | Count | Dol | Ilar |  | ank | Agg | B |  | Agg |  | ank | Agg | Ba |  | Agg |
|  |  | \# |  | \% | \$ (000s) | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% | \# | \% | \% | \$(000s) | \$ \% | \$ \% |
| HOME PURCHASE |  |  | Low | 1 | 1.7\% | \$62 | 0.7\% | 19.3\% | 0 | 0.0\% | 2.5\% | \$0 | 0.0\% | 1.3\% | 1 | 3.0\% | 2.6\% | \$62 | 1.3\% | 1.5\% |
|  |  | Moderate | 7 | 12.1\% | \$577 | 6.5\% | 16.0\% | 4 | 16.0\% | 13.3\% | \$382 | 8.9\% | 8.6\% | 3 | 9.1\% | 13.9\% | \$195 | 4.2\% | 9.2\% |
|  |  | Middle | 13 | 22.4\% | \$1,406 | 15.8\% | 21.0\% | 5 | 20.0\% | 23.0\% | \$517 | 12.0\% | 19.1\% | 8 | 24.2\% | 23.4\% | \$889 | 19.3\% | 19.8\% |
|  |  | Upper | 37 | 63.8\% | \$6,851 | 77.0\% | 43.7\% | 16 | 64.0\% | 54.4\% | \$3,394 | 79.1\% | 64.5\% | 21 | 63.6\% | 51.2\% | \$3,457 | 75.1\% | 62.3\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 6.7\% | \$0 | 0.0\% | 6.5\% | 0 | 0.0\% | 8.8\% | \$0 | 0.0\% | 7.2\% |
|  |  | Total | 58 | 100.0\% | \$8,896 | 100.0\% | 100.0\% | 25 | 100.0\% | 100.0\% | \$4,293 | 100.0\% | 100.0\% | 33 | 100.0\% | 100.0\% | \$4,603 | 100.0\% | 100.0\% |
|  |  |  | Low | 8 | 7.8\% | \$390 | 2.8\% | 19.3\% | 4 | 6.6\% | 2.1\% | \$188 | 2.2\% | 1.2\% | 4 | 9.5\% | 2.0\% | \$202 | 3.9\% | 0.8\% |
|  |  | Moderate | 9 | 8.7\% | \$722 | 5.2\% | 16.0\% | 7 | 11.5\% | 6.0\% | \$519 | 6.1\% | 3.5\% | 2 | 4.8\% | 5.6\% | \$203 | 3.9\% | 3.5\% |
|  |  | Middle | 23 | 22.3\% | \$2,377 | 17.2\% | 21.0\% | 12 | 19.7\% | 16.3\% | \$1,230 | 14.4\% | 11.9\% | 11 | 26.2\% | 15.4\% | \$1,147 | 21.9\% | 11.4\% |
|  |  | Upper | 63 | 61.2\% | \$10,318 | 74.7\% | 43.7\% | 38 | 62.3\% | 62.7\% | \$6,626 | 77.4\% | 70.5\% | 25 | 59.5\% | 59.6\% | \$3,692 | 70.4\% | 68.7\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 12.8\% | \$0 | 0.0\% | 13.0\% | 0 | 0.0\% | 17.4\% | \$0 | 0.0\% | 15.7\% |
|  |  | Total | 103 | 100.0\% | \$13,807 | 100.0\% | 100.0\% | 61 | 100.0\% | 100.0\% | \$8,563 | 100.0\% | 100.0\% | 42 | 100.0\% | 100.0\% | \$5,244 | 100.0\% | 100.0\% |
|  |  |  | Low | 7 | 28.0\% | \$90 | 38.1\% | 19.3\% | 2 | 16.7\% | 9.9\% | \$10 | 11.0\% | 1.3\% | 5 | 38.5\% | 7.5\% | \$80 | 55.2\% | 2.0\% |
|  |  | Moderate | 6 | 24.0\% | \$25 | 10.6\% | 16.0\% | 3 | 25.0\% | 14.1\% | \$15 | 16.5\% | 6.7\% | 3 | 23.1\% | 12.9\% | \$10 | 6.9\% | 5.4\% |
|  |  | Middle | 3 | 12.0\% | \$20 | 8.5\% | 21.0\% | 0 | 0.0\% | 14.1\% | \$0 | 0.0\% | 10.7\% | 3 | 23.1\% | 20.1\% | \$20 | 13.8\% | 17.6\% |
|  |  | Upper | 8 | 32.0\% | \$98 | 41.5\% | 43.7\% | 6 | 50.0\% | 59.0\% | \$63 | 69.2\% | 78.6\% | 2 | 15.4\% | 57.9\% | \$35 | 24.1\% | 66.7\% |
|  |  | Unknown | 1 | 4.0\% | \$3 | 1.3\% | 0.0\% | 1 | 8.3\% | 2.8\% | \$3 | 3.3\% | 2.6\% | 0 | 0.0\% | 1.6\% | \$0 | 0.0\% | 8.3\% |
|  |  | Total | 25 | 100.0\% | \$236 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$91 | 100.0\% | 100.0\% | 13 | 100.0\% | 100.0\% | \$145 | 100.0\% | 100.0\% |
| $\stackrel{\searrow}{2}$ |  | 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\% | 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\% | 21.0\% | 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\% | 43.7\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  |  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  |  | Low | 16 | 8.6\% | \$542 | 2.4\% | 19.3\% | 6 | 6.1\% | 3.1\% | \$198 | 1.5\% | 1.2\% | 10 | 11.4\% | 2.9\% | \$344 | 3.4\% | 1.2\% |
|  |  | Moderate | 22 | 11.8\% | \$1,324 | 5.8\% | 16.0\% | 14 | 14.3\% | 10.7\% | \$916 | 7.1\% | 6.3\% | 8 | 9.1\% | 10.5\% | \$408 | 4.1\% | 6.4\% |
|  |  | Middle | 39 | 21.0\% | \$3,803 | 16.6\% | 21.0\% | 17 | 17.3\% | 19.6\% | \$1,747 | 13.5\% | 15.6\% | 22 | 25.0\% | 19.9\% | \$2,056 | 20.6\% | 15.7\% |
|  |  | Upper | 108 | 58.1\% | \$17,267 | 75.3\% | 43.7\% | 60 | 61.2\% | 57.8\% | \$10,083 | 77.9\% | 66.3\% | 48 | 54.5\% | 55.2\% | \$7,184 | 71.9\% | 64.8\% |
|  |  | Unknown | 1 | 0.5\% | \$3 | 0.0\% | 0.0\% | 1 | 1.0\% | 8.9\% | \$3 | 0.0\% | 10.6\% | 0 | 0.0\% | 11.6\% | \$0 | 0.0\% | 12.0\% |
|  |  |  | 186 | 100.0\% | \$22,939 | 100.0\% | 100.0\% | 98 | 100.0\% | 100.0\% | \$12,947 | 100.0\% | 100.0\% | 88 | 100.0\% | 100.0\% | \$9,992 | 100.0\% | 100.0\% |
|  |  | Total Businesses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 94 | 29.5\% | \$9,607 | 33.4\% | 90.9\% | 52 | 59.1\% | 36.2\% | \$5,969 | 52.1\% | 54.7\% | 42 | 18.2\% | 40.7\% | \$3,638 | 21.0\% | 45.2\% |
|  |  | Over \$1 Million | 53 | 16.6\% | \$14,102 | 49.0\% | 4.8\% | 20 | 22.7\% |  |  |  |  | 33 | 14.3\% |  |  |  |  |
|  |  | Total Rev. available | 147 | 46.1\% | \$23,709 | 82.4\% | 95.7\% | 72 | 81.8\% |  |  |  |  | 75 | 32.5\% |  |  |  |  |
|  |  | Rev. Not Known | 172 | 53.9\% | \$5,072 | 17.6\% | 4.3\% | 16 | 18.2\% |  |  |  |  | 156 | 67.5\% |  |  |  |  |
|  |  | Total | 319 | 100.0\% | \$28,781 | 100.0\% | 100.0\% | 88 | 100.0\% |  |  |  |  | 231 | 100.0\% |  |  |  |  |
|  |  | \$100,000 or Less | 264 | 82.8\% | \$7,230 | 25.1\% |  | 67 | 76.1\% | 94.0\% | \$2,483 | 21.7\% | 44.1\% | 197 | 85.3\% | 93.6\% | \$4,747 | 27.4\% | 37.2\% |
|  |  | \$100,001-\$250,000 | 23 | 7.2\% | \$4,196 | 14.6\% |  | 6 | 6.8\% | 3.5\% | \$1,072 | 9.4\% | 17.9\% | 17 | 7.4\% | 3.5\% | \$3,124 | 18.0\% | 16.8\% |
|  |  | \$250,001-\$1 Million | 32 | 10.0\% | \$17,355 | 60.3\% |  | 15 | 17.0\% | 2.5\% | \$7,892 | 68.9\% | 37.9\% | 17 | 7.4\% | 2.9\% | \$9,463 | 54.6\% | 46.0\% |
|  |  | Total | 319 | 100.0\% | \$28,781 | 100.0\% |  | 88 | 100.0\% | 100.0\% | \$11,447 | 100.0\% | 100.0\% | 231 | 100.0\% | 100.0\% | \$17,334 | 100.0\% | 100.0\% |
|  |  |  | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | \$1 Million or Less | 18 | 78.3\% | \$1,851 | 77.9\% | 96.3\% | 8 | 72.7\% | 86.3\% | \$541 | 51.0\% | 76.6\% | 10 | 83.3\% | 88.2\% | \$1,310 | 99.5\% | 96.6\% |
|  |  | Over \$1 Million | 2 | 8.7\% | \$515 | 21.7\% | 3.3\% | 2 | 18.2\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | Not Known | 3 | 13.0\% | \$10 | 0.4\% | 0.4\% | 1 | 9.1\% |  |  |  |  | 2 | 16.7\% |  |  |  |  |
|  |  | Total | 23 | 100.0\% | \$2,376 | 100.0\% | 100.0\% | 11 | 100.0\% |  |  |  |  | 12 | 100.0\% |  |  |  |  |
|  | $\begin{array}{ll} \hline \stackrel{\$ 100,000}{ } \text { or Less } \\ \text { N } & \$ 100,001-\$ 250,000 \\ \text { 刃్ } & \$ 250,001-\$ 500,000 \\ \text { - } & \text { Total } \\ \hline \end{array}$ |  | 17 | 73.9\% | \$840 | 35.4\% |  | 8 | 72.7\% | 84.3\% | \$425 | 40.1\% | 32.0\% | 9 | 75.0\% | 86.3\% | \$415 | 31.5\% | 42.8\% |
|  |  |  | 3 | 13.0\% | \$573 | 24.1\% |  | 2 | 18.2\% | 8.8\% | \$335 | 31.6\% | 27.5\% | 1 | 8.3\% | 6.9\% | \$238 | 18.1\% | 17.5\% |
|  |  |  | 3 | 13.0\% | \$963 | 40.5\% |  | 1 | 9.1\% | 6.9\% | \$300 | 28.3\% | 40.4\% | 2 | 16.7\% | 6.9\% | \$663 | 50.4\% | 39.7\% |
|  |  |  | 23 | 100.0\% | \$2,376 | 100.0\% |  | 11 | 100.0\% | 100.0\% | \$1,060 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$1,316 | 100.0\% | 100.0\% |

[^484]Originations \& Purchases

## Appendices

## Combined Demographics Report



Based on 2010 D\&B information according to 2000 Census Boundaries.

## Appendices

## Geographic Distribution of HMDA, Small Business, \& Small Farm Loans

Assessment Area: TX Tyler


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## Appendices

Borrower Distribution of HMDA Loans \& Small Business/Small Farm Lending by Revenue \& Loan Size
Assessment Area: TX Tyler

|  | Borrower Income Levels | Bank Lending \& Demographic Data Comparison$2010,2011$ |  |  |  |  | Bank \& Aggregate Lending Comparison2010 |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Count |  | $\begin{aligned} & \text { ank } \\ & \quad \begin{array}{c} \text { Doll } \\ \text { S (000s) } \end{array} \end{aligned}$ | \$ \% | Families by Family Income <br> \% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | $\begin{array}{r} \text { Ba } \\ \$(000 \mathrm{~s}) \end{array}$ | Dollar <br> k <br> \$ \% | Agg \$\% | \# | Count <br> ank <br> \% | $\begin{gathered} \text { Agg } \\ \% \end{gathered}$ | Ba \$(000s) | Dollar k $\%$ | Agg \$\% |
|  | Low | 3 | 3.0\% | \$189 | 1.3\% | 20.3\% | 2 | 4.7\% | 5.5\% | \$149 | 2.3\% | 2.7\% | 1 | 1.8\% | 5.0\% | \$40 | 0.5\% | 2.4\% |
|  | Moderate | 16 | 16.0\% | \$1,848 | 12.5\% | 18.4\% | 5 | 11.6\% | 16.2\% | \$500 | 7.9\% | 10.9\% | 11 | 19.3\% | 17.7\% | \$1,348 | 15.9\% | 12.4\% |
|  | Middle | 29 | 29.0\% | \$3,783 | 25.5\% | 20.7\% | 10 | 23.3\% | 25.5\% | \$1,199 | 18.9\% | 23.1\% | 19 | 33.3\% | 22.6\% | \$2,584 | 30.4\% | 20.0\% |
|  | Upper | 52 | 52.0\% | \$9,014 | 60.8\% | 40.5\% | 26 | 60.5\% | 43.1\% | \$4,499 | 70.9\% | 55.3\% | 26 | 45.6\% | 43.8\% | \$4,515 | 53.2\% | 55.9\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 9.8\% | \$0 | 0.0\% | 8.0\% | 0 | 0.0\% | 10.9\% | \$0 | 0.0\% | 9.3\% |
|  | Total | 100 | 100.0\% | \$14,834 | 100.0\% | 100.0\% | 43 | 100.0\% | 100.0\% | \$6,347 | 100.0\% | 100.0\% | 57 | 100.0\% | 100.0\% | \$8,487 | 100.0\% | 100.0\% |
|  | Low | 8 | 6.7\% | \$642 | 3.4\% | 20.3\% | 4 | 5.0\% | 2.2\% | \$294 | 2.4\% | 1.0\% | 4 | 10.0\% | 3.1\% | \$348 | 5.0\% | 1.6\% |
|  | Moderate | 5 | 4.2\% | \$521 | 2.7\% | 18.4\% | 5 | 6.3\% | 7.7\% | \$521 | 4.3\% | 4.3\% | 0 | 0.0\% | 10.4\% | \$0 | 0.0\% | 6.6\% |
|  | Middle | 25 | 20.8\% | \$3,629 | 19.0\% | 20.7\% | 18 | 22.5\% | 16.9\% | \$2,459 | 20.3\% | 11.8\% | 7 | 17.5\% | 16.7\% | \$1,170 | 16.7\% | 12.3\% |
|  | Upper | 81 | 67.5\% | \$14,203 | 74.3\% | 40.5\% | 53 | 66.3\% | 58.5\% | \$8,835 | 73.0\% | 68.1\% | 28 | 70.0\% | 52.4\% | \$5,368 | 76.5\% | 62.7\% |
|  | Unknown | 1 | 0.8\% | \$133 | 0.7\% | 0.0\% | 0 | 0.0\% | 14.7\% | \$0 | 0.0\% | 14.8\% | 1 | 2.5\% | 17.3\% | \$133 | 1.9\% | 16.8\% |
|  | Total | 120 | 100.0\% | \$19,128 | 100.0\% | 100.0\% | 80 | 100.0\% | 100.0\% | \$12,109 | 100.0\% | 100.0\% | 40 | 100.0\% | 100.0\% | \$7,019 | 100.0\% | 100.0\% |
|  | Low | 7 | 31.8\% | \$31 | 19.9\% | 20.3\% | 3 | 30.0\% | 6.2\% | \$16 | 26.7\% | 1.7\% | 4 | 33.3\% | 4.8\% | \$15 | 15.6\% | 1.2\% |
|  | Moderate | 6 | 27.3\% | \$33 | 21.2\% | 18.4\% | 2 | 20.0\% | 14.0\% | \$16 | 26.7\% | 6.2\% | 4 | 33.3\% | 8.9\% | \$17 | 17.7\% | 4.5\% |
|  | Middle | 1 | 4.5\% | \$6 | 3.8\% | 20.7\% | 1 | 10.0\% | 17.9\% | \$6 | 10.0\% | 13.4\% | 0 | 0.0\% | 13.7\% | \$0 | 0.0\% | 8.1\% |
|  | Upper | 8 | 36.4\% | \$86 | 55.1\% | 40.5\% | 4 | 40.0\% | 57.5\% | \$22 | 36.7\% | 73.9\% | 4 | 33.3\% | 64.9\% | \$64 | 66.7\% | 76.2\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 4.5\% | \$0 | 0.0\% | 4.8\% | 0 | 0.0\% | 7.6\% | \$0 | 0.0\% | 10.1\% |
|  | Total | 22 | 100.0\% | \$156 | 100.0\% | 100.0\% | 10 | 100.0\% | 100.0\% | \$60 | 100.0\% | 100.0\% | 12 | 100.0\% | 100.0\% | \$96 | 100.0\% | 100.0\% |
|  | Low | 0 | 0.0\% | \$0 | 0.0\% | 20.3\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Moderate | 0 | 0.0\% | \$0 | 0.0\% | 18.4\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | 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\% | 40.5\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 0.0\% | \$0 | 0.0\% | 0.0\% |
|  | Unknown | 0 | 0.0\% | \$0 | 0.0\% | 0.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |
|  | Low | 18 | 7.4\% | \$862 | 2.5\% | 20.3\% | 9 | 6.8\% | 4.0\% | \$459 | 2.5\% | 1.8\% | 9 | 8.3\% | 4.2\% | \$403 | 2.6\% | 1.8\% |
|  | Moderate | 27 | 11.2\% | \$2,402 | 7.0\% | 18.4\% | 12 | 9.0\% | 12.3\% | \$1,037 | 5.6\% | 7.5\% | 15 | 13.8\% | 14.1\% | \$1,365 | 8.7\% | 8.5\% |
|  | Middle | 55 | 22.7\% | \$7,418 | 21.7\% | 20.7\% | 29 | 21.8\% | 21.3\% | \$3,664 | 19.8\% | 17.0\% | 26 | 23.9\% | 19.6\% | \$3,754 | 24.1\% | 14.5\% |
|  | Upper | 141 | 58.3\% | \$23,303 | 68.3\% | 40.5\% | 83 | 62.4\% | 50.6\% | \$13,356 | 72.1\% | 60.6\% | 58 | 53.2\% | 48.4\% | \$9,947 | 63.8\% | 53.1\% |
|  | Unknown | 1 | 0.4\% | \$133 | 0.4\% | 0.0\% | 0 | 0.0\% | 11.9\% | \$0 | 0.0\% | 13.1\% | 1 | 0.9\% | 13.7\% | \$133 | 0.9\% | 22.1\% |
|  | Total | 242 | 100.0\% | \$34,118 | 100.0\% | 100.0\% | 133 | 100.0\% | 100.0\% | \$18,516 | 100.0\% | 100.0\% | 109 | 100.0\% | 100.0\% | \$15,602 | 100.0\% | 100.0\% |
|  |  |  |  |  | Total | Businesses |  |  |  |  |  |  |  |  |  |  |  |  |
|  | \$1 Million or Less | 77 | 32.0\% | \$5,593 | 30.8\% | 90.8\% | 34 | 43.6\% | 43.3\% | \$2,735 | 30.3\% | 52.0\% | 43 | 26.4\% | 44.1\% | \$2,858 | 31.2\% | 45.4\% |
|  | Over \$1 Million | 36 | 14.9\% | \$9,095 | 50.0\% | 4.8\% | 19 | 24.4\% |  |  |  |  | 17 | 10.4\% |  |  |  |  |
|  | Total Rev. available | 113 | 46.9\% | \$14,688 | 80.8\% | 95.6\% | 53 | 68.0\% |  |  |  |  | 60 | 36.8\% |  |  |  |  |
|  | Rev. Not Known | 128 | 53.1\% | \$3,500 | 19.2\% | 4.4\% | 25 | 32.1\% |  |  |  |  | 103 | 63.2\% |  |  |  |  |
|  | Total | 241 | 100.0\% | \$18,188 | 100.0\% | 100.0\% | 78 | 100.0\% |  |  |  |  | 163 | 100.0\% |  |  |  |  |
|  | \$100,000 or Less | 202 | 83.8\% | \$6,103 | 33.6\% |  | 59 | 75.6\% | 90.0\% | \$2,674 | 29.6\% | 30.4\% | 143 | 87.7\% | 89.7\% | \$3,429 | 37.4\% | 29.0\% |
|  | \$100,001-\$250,000 | 19 | 7.9\% | \$3,391 | 18.6\% |  | 8 | 10.3\% | 4.7\% | \$1,545 | 17.1\% | 17.3\% | 11 | 6.7\% | 4.7\% | \$1,846 | 20.1\% | 15.7\% |
|  | \$250,001 - \$1 Million | 20 | 8.3\% | \$8,694 | 47.8\% |  | 11 | 14.1\% | 5.3\% | \$4,806 | 53.3\% | 52.3\% | 9 | 5.5\% | 5.6\% | \$3,888 | 42.4\% | 55.3\% |
|  | Total | 241 | 100.0\% | \$18,188 | 100.0\% |  | 78 | 100.0\% | 100.0\% | \$9,025 | 100.0\% | 100.0\% | 163 | 100.0\% | 100.0\% | \$9,163 | 100.0\% | 100.0\% |
|  | \$1 Million or Le <br> Over \$1 Million <br> Not Known <br> Total | Total Farms |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 97.5\% | 0 | 0.0\% | 79.2\% | \$0 | 0.0\% | 64.1\% | 0 | 0.0\% | 81.6\% | \$0 | 0.0\% | 72.1\% |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 2.2\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 0.3\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  |  | 0 | 0.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% |  |  |  |  | 0 | 0.0\% |  |  |  |  |
|  | \$100,000 or Less | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 89.6\% | \$0 | 0.0\% | 46.9\% | 0 | 0.0\% | 83.7\% | \$0 | 0.0\% | 50.5\% |
|  | \$100,001-\$250,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 4.2\% | \$0 | 0.0\% | 13.8\% | 0 | 0.0\% | 14.3\% | \$0 | 0.0\% | 34.7\% |
|  | \$250,001-\$500,000 | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 6.3\% | \$0 | 0.0\% | 39.4\% | 0 | 0.0\% | 2.0\% | \$0 | 0.0\% | 14.8\% |
|  | Total | 0 | 0.0\% | \$0 | 0.0\% |  | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% | 0 | 0.0\% | 100.0\% | \$0 | 0.0\% | 100.0\% |

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[^0]:    ${ }^{1}$ Home mortgage loans are reported by institutions on the Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR). The register includes home purchase, refinance, home improvement, and multi-family loans originated and purchased by the institution.

[^1]:    ${ }^{2}$ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

[^2]:    ${ }^{3}$ Internal Revenue Service, Statistics of Income - Migration Data. Access through PolicyMap. (accessed July 29, 2012); available from www.policymap.com.

[^3]:    ${ }^{4}$ US Census Bureau. Accessed through PolicyMap (accessed on January 7, 2013); available from www.policymap.com
    ${ }^{5}$ US Census Bureau. Accessed through Policy Map. (accessed on January 9, 2013); available from www.policymap.com.

[^4]:    ${ }^{6}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{7}$ US Department of Housing and Urban Development. "Comprehensive Housing Market Analysis - August, Georgia-South Carolina" (accessed on January 9, 2013); available from http://www.huduser.org/portal/publications/econdev/mkt_analysis.html.
    ${ }^{8}$ US Department of Housing and Urban Development. "Comprehensive Housing Market Analysis - August, Georgia-South Carolina" (accessed on January 9, 2013); available from http://www.huduser.org/portal/publications/econdev/mkt_analysis.html.
    ${ }^{9}$ Savannah River Site. (accessed on January 9, 2013); available from http://www.srs.gov/general/news/factsheets/srs.pdf.

[^5]:    ${ }^{10}$ The Augusta Chronicle. "SRS job losses to have ripple effect across region" (accessed January 9, 2013); available from http://chronicle.augusta.com/news/business/2011-07-14/srs-job-losses-have-ripple-effect-across-region.
    ${ }^{11}$ WRDW. "Augusta tops list of cities with largest numbers of private job losses" (accessed January 9, 2013); available from http://www.wrdw.com/home/headlines/Augusta_tops_list_of_private_job_losses_157667105.html.
    ${ }^{12}$ The Atlanta-Journal Constitution. "Plant Vogtle nuclear expansion approved 4-1" (accessed January 9, 2013); available from http://www.ajc.com/news/business/plant-vogtle-nuclear-expansion-approved-4-1/nQRBK/.
    ${ }^{13}$ Starbucks. (accessed January 9, 2013); available from http://news.starbucks.com/article_display.cfm?article_id=679
    ${ }^{14}$ Columbia County, GA. "2012 Economic Assessment" (accessed on January 9, 2013); available from
    http://da.choosecolumbiacounty.com/wp-content/uploads/2010/10/Economic-Assessment-of-Columbia-County-GA-2012.pdf.
    ${ }^{15}$ Brookings Institute. "Metro Monitor" (accessed January 10, 2013); available from
    http://www.brookings.edu/~/media/programs/metro/0314_metro_monitor.
    ${ }^{16}$ Forbes.com. "Best Bank-For-The-Buck Cities" (accessed January 10, 2013); available from http://www.forbes.com/2009/11/30/cities-affordable-cheap-lifestyle-real-estate-housing-foreclosures.html
    ${ }^{17}$ Forbes.com. "America's Fastest Recovering Cities." (accessed January 10, 2013); available from http://www.forbes.com/2009/11/19/cities-recovery-unemployment-lifestyle-real-estate-top-ten-chart.html
    ${ }^{18}$ Columbia County, GA. "2012 Economic Assessment" (accessed on January 9, 2013); available from http://da.choosecolumbiacounty.com/wp-content/uploads/2010/10/Economic-Assessment-of-Columbia-County-GA-2012.pdf.

[^6]:    ${ }^{19}$ Bureau of Labor Statistics. (accessed on January 8, 2013); available from http://www.bls.gov/home.htm.
    ${ }^{20}$ Laney Walker-Bethlehem. (accessed on January 10, 2013); available from http://www.laneywalkerbethlehem.com/overview/history/

[^7]:    ${ }^{21}$ Bank On. 2011. (accessed on January 3, 2013); available from http://webtools.joinbankon.org/community/profile?state=GA\&place=Augusta
    ${ }^{22}$ US Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{23}$ SC State Housing. (accessed on January 8, 2013); available from http://www.schousing.com/Housing_Partners/Tax_Credits.

[^8]:    ${ }^{24}$ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

[^9]:    ${ }^{25}$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on January 30, 2013); available from http://www.policymap.com
    ${ }^{26}$ US Census Bureau, Accessed through PolicyMap. (accessed on January 30, 2013); available from http://www.policymap.com

[^10]:    ${ }^{27}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{28}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{29}$ National Association of Realtors. "Metropolitan Median Area Prices and Affordability" (accessed on November 5, 2012); available from: http://www.realtor.org/sites/default/files/reports/2012/embargoes/2012-q1-metro-home-prices-49bc10b1efdc1b8cc3eb66dbcdad55f7/metro-home-prices-q1-single-family-2012-05-09.pdf
    ${ }^{30}$ TN Housing Development Agency calculations of data provided by Property Assessment Division, Office of the Comptroller, State of Tennessee. (accessed on January 28, 2013); available at: http://tn-tennesseehda.civicplus.com/index.aspx?NID=178
    ${ }^{31}$ US Census Bureau, Residential Construction Branch. Accessed through PolicyMap. (accessed on January 31, 2013); available at: http://www.policymap.com
    ${ }^{32}$ Chattanooga Times Free Press. "Homes Sales Rise to Five-Year High in Chattanooga Area." (accessed on January 31, 2013); available at: http://www.timesfreepress.com/news/2013/jan/23/home-sales-rise-to-five-year-high/?businesstnvalley
    ${ }^{33}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{34}$ US Census Bureau. Accessed through PolicyMap. (accessed on February 6, 2013); available from http://www.policymap.com

[^11]:    ${ }^{35}$ U.S. Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{36}$ Brookings Institute, Metropolitan Policy Program (September 2008). "Chattanooga, Tennessee: A Restoring Prosperity Case Study" (accessed on February 1, 2013); available at:
    http://www.brookings.edu/~/media/research/files/papers/2008/9/17\%20chattanooga\%20eichenthal\%20windeknecht/200809_chattano oga.pdf
    ${ }^{37}$ Chattanooga Chamber of Commerce, Chattanooga Can-Do. (accessed on February 1, 2013); available at: http://www.chattanoogachamber.com/can-do/
    ${ }^{38}$ Chattanooga Times Free Press, January 1, 2013. "Recession rebound: Chattanooga leads state in job growth during 2012." (accessed on February 1, 2013); available at: http://www.timesfreepress.com/news/2013/jan/01/rebound-chattanooga-leads-state-jobgrowth/

[^12]:    ${ }^{39}$ Chattanooga Times Free Press, January 1, 2013. "Recession rebound: Chattanooga leads state in job growth during 2012." (accessed on February 1, 2013); available at: http://www.timesfreepress.com/news/2013/jan/01/rebound-chattanooga-leads-state-jobgrowth/
    ${ }^{40}$ River City Company. (accessed on February 1, 2013); available at: http://www.downtownchattanooga.org
    ${ }^{41}$ Brookings Institute, Metropolitan Policy Program (September 2008). "Chattanooga, Tennessee: A Restoring Prosperity Case Study" (accessed on February 1, 2013); available at: http://www.brookings.edu/~/media/research/files/papers/2008/9/17\%20chattanooga\%20eichenthal\%20windeknecht/200809_chattano oga.pdf

[^13]:    ${ }^{42}$ Chattanooga-Hamilton County Regional Planning Agency. "Chattanooga Housing Study" (accessed on February 1, 2013); available at: http://www.chcrpa.org/HousingStudy.htm
    ${ }^{43}$ US Department of Housing and Urban Development, Neighborhood Stabilization Program Grantee Exchange. (accessed on February 1, 2013); available at: https://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults

[^14]:    ${ }^{44}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^15]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^16]:    ${ }^{45}$ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

[^17]:    ${ }^{46}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^18]:    ${ }^{47}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{48}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{49}$ Ledger Enquirer. "UGA Economist says Columbus to Add 1,400 Jobs This Year, Housing Market Stable but in a 'Through'." (accessed on January 8, 2013); available at: http://www.thevalleypartnership.com/documents/Humphreys\%202012.pdf
    ${ }^{50}$ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic.
    ${ }^{51}$ US Census Bureau Residential Construction Branch. Accessed through PolicyMap. (accessed on January 8, 2013); available at: http://www.policymap.com
    ${ }_{52}^{52}$ Boxwood Means. Accessed through PolicyMap. (accessed on January 8, 2013); available at: http://www.policymap.com
    ${ }_{54}^{53}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{54}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^19]:    ${ }_{56}^{55}$ Columbus Planning Department. (accessed on January 8, 2013); available at: http://www.columbusga.org/planning/special-projects/brac/
    ${ }^{56}$ The Times-Herald. October 28, 2012. "Kia investment at West Point plant $\$ 1.1$ billion." (accessed on January 8, 2013); available at: http://www.times-herald.com/Local/20121028KiaPlantTour-MOS
    ${ }^{57}$ Georgia Trend, June 2010. "COLUMBUS: SUCCESS BRINGS SUCCESS." (accessed on January 8, 2013); available at http://www.georgiatrend.com/June-2010/Columbus-Success-Brings-Success/
    ${ }^{58}$ The Valley Partnership. (accessed on January 8, 2013); available at: http://www.thevalleypartnership.com/about.php?refMenuItem=62
    ${ }^{59}$ Regional Economic Information Systems.
    ${ }^{60}$ Bureau of Labor Statistics

[^20]:    ${ }^{61}$ NeighborWorks® Columbus. (accessed on January 8, 2013) available at: http://www.nwcolumbus.org

[^21]:    ${ }^{62}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^22]:    ${ }^{63}$ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

[^23]:    ${ }^{64}$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on January 30, 2013); available from http://www.policymap.com

[^24]:    ${ }^{65}$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on January 30, 2013); available from http://www.policymap.com
    ${ }^{66}$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{67}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{68}$ TN Housing Development Agency calculations of data provided by Property Assessment Division, Office of the Comptroller, State of Tennessee. (accessed on January 28, 2013); available at: http://tn-tennesseehda.civicplus.com/index.aspx?NID=178
    ${ }^{69}$ TriCities.com. "Home sales fall significantly for third year in both Bristols." January 31, 2012. (accessed on January 30, 2013); available at: http://www.tricities.com/news/article_311134d3-3ad0-5267-9ae6-9a800f5ca72d.html
    ${ }^{71}$ Boxwood Means. Accessed through PolicyMap. (accessed on January 8, 2013); available at: http://www.policymap.com
    ${ }^{71}$ TN Housing Development Agency calculations of data provided by Property Assessment Division, Office of the Comptroller, State of Tennessee. (accessed on January 28, 2013); available at: http://tn-tennesseehda.civicplus.com/index.aspx?NID=178
    ${ }^{72}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.

[^25]:    ${ }^{73}$ U.S. Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{74}$ Bureau of Labor Statistics, 2010 Regional Economic Information Systems
    ${ }^{75}$ NETWORKS-Sullivan Partnership. "Sullivan County Community Profile" (accessed on January ); available at: http://www.networkstn.com/files/Oct\%202012\%20Community\%20Profile.pdf
    ${ }^{76}$ Eastman Chemical. "Kingsport Facts and Figures through 2011" (accessed on January 31, 2013); available at: http://www.eastman.com/Literature_Center/Misc/Kingsport_Facts_Figures.pdf
    ${ }^{77}$ NETWORKS-Sullivan Partnership. "Sullivan County Community Profile" (accessed on January 31, 2013); available at: http://www.networkstn.com/files/Oct\%202012\%20Community\%20Profile.pdf
    ${ }^{78}$ Middle Tennessee State University, Business and Economic Research Center. Tracking Tennessee Economic Recovery, Kingsport-Bristol MSA. (access on January 31, 2013); available at: http://capone.mtsu.edu/berc/tacir/kingsportbristol.html
    ${ }^{79}$ Bureau of Labor Statistics

[^26]:    ${ }^{80}$ NETWORKS-Sullivan Partnership. "Sullivan County Community Profile" (accessed on January 31, 2013); available at: http://www.networkstn.com/files/Oct\%202012\%20Community\%20Profile.pdf
    ${ }^{80}$ Middle Tennessee State University, Business and Economic Research Center. Tracking Tennessee Economic Recovery, Kingsport-Bristol MSA. (access on January 31, 2013); available at: http://capone.mtsu.edu/berc/tacir/kingsportbristol.html

[^27]:    ${ }^{81}$ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

[^28]:    ${ }^{82}$ US Census Bureau, Accessed through PolicyMap. (accessed on January 30, 2013); available from http://www.policymap.com
    ${ }^{83}$ US Census Bureau, Accessed through PolicyMap. (accessed on January 30, 2013); available from http://www.policymap.com

[^29]:    ${ }^{84}$ US Census Bureau, Accessed through PolicyMap. (accessed on January 30, 2013); available from http://www.policymap.com
    ${ }^{85}$ The Commercial Appeal. "Census calls Memphis poorest in nation." September 23, 2011. (accessed on February 6, 2013); available at: http://www.commercialappeal.com/news/2011/sep/23/census-calls-city-poorest-in-nation/
    ${ }^{86}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{87}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{88}$ National Association of Realtors. "Metropolitan Median Area Prices and Affordability" (accessed on November 5, 2012); available from: http://www.realtor.org/sites/default/files/reports/2012/embargoes/2012-q1-metro-home-prices-49bc10b1efdc1b8cc3eb66dbcdad55f7/metro-home-prices-q1-single-family-2012-05-09.pdf
    ${ }^{89}$ Memphis Area Association of Realtors. "December and Year End 2011 Report." (accessed on February 7, 2013); available at: http://www.maar.org/default.aspx?p=38107\&naid=9199
    ${ }^{90}$ Memphis Area Association of Realtors, Market Reports. (accessed on February 7, 2013); available at: http://www.maar.org/assets/1151/sales_stats_december_2012.pdf

[^30]:    ${ }^{91}$ US Census Bureau, Residential Construction Branch. Accessed through PolicyMap. (accessed on January 31, 2013); available at: http://www.policymap.com
    ${ }^{92}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Memphis, Tennessee-Mississippi-Arkansas, April 1,2012" (accessed February 8, 2013); available at: http://www.huduser.org/portal/publications/PDF/MemphisTN_comp.pdf
    ${ }^{93}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{94}$ US Census Bureau. Accessed through PolicyMap. (accessed on February 6, 2013); available from http://www.policymap.com
    ${ }^{95}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{96}$ Greater Memphis Chamber. (accessed on February 8, 2013); available at: http://www.memphischamber.com/EconomicDevelopment/Aerotropolis.aspx

[^31]:    ${ }^{97}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Memphis, Tennessee-Mississippi-Arkansas, April 1,2012" (accessed February 8, 2013); available at: http://www.huduser.org/portal/publications/PDF/MemphisTN_comp.pdf
    ${ }^{98}$ CNNMoney.com. "Fortune 500 2011: States: Tennessee Companies " (accessed on February 8, 2013); available at: http://money.cnn.com/magazines/fortune/fortune500/2011/states/TN.html
    ${ }^{99}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Memphis, Tennessee-Mississippi-Arkansas, April 1,2012" (accessed February 8, 2013); available at:
    http://www.huduser.org/portal/publications/PDF/MemphisTN_comp.pdf
    ${ }^{100}$ Bureau of Labor Statistics, Economy at a Glance, Memphis TN-AR-MS. (accessed on February 10, 2013); available at: http://www.bls.gov/eag/eag.tn_memphis_msa.htm
    ${ }^{101}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Memphis, Tennessee-Mississippi-Arkansas, April 1,2012" (accessed February 8, 2013); available at: http://www.huduser.org/portal/publications/PDF/MemphisTN_comp.pdf

[^32]:    ${ }^{102}$ Brookings Institute, Metro Monitor 2012. (accessed on February 10, 2013); available at; http://www.brookings.edu/research/interactives/metromonitor\#M32820-recovery-overall-mv
    ${ }^{103}$ NBCNews.com, January 2013. "Electrolux plant in Memphis to crank up in May." (accessed on February 10, 2013); available at: http://www.nbcnews.com/id/50482083/ns/business/\#.URgGxqXC2Cl
    ${ }^{104}$ Memphis Business Journal, December 12, 2012. "International Paper confirms Memphis expansion plans." (accessed on February 10, 2013); available at: http://www.bizjournals.com/memphis/news/2012/12/12/international-paper-confirms-expansion.html?page=all

[^33]:    ${ }^{105}$ New York Times. May 30, 2010. "Blacks in Memphis Lose Decades of Economic Gains" (accessed on February 11, 2013); available at: http://www.nytimes.com/2010/05/31/business/economy/31memphis.html?pagewanted=all\&_r=0
    ${ }^{106}$ Memphis Nonprofit Housing Development Center. (accessed on February 11, 2013); available at: http://www.memphistn.gov/chdo/index.html

[^34]:    ${ }^{107}$ Tennessee Housing Development Agency. Tennessee Housing Needs Assessment, September 2012. (accessed on February 11, 2013); available at: http://www.thda.org/DocumentCenter/Home/View/2819
    ${ }^{108}$ US Department of Housing and Urban Development, Neighborhood Stabilization Program Resource Exchange. (accessed on February 11, 2013); available at: https://hudnsphelp.info/index.cfm
    ${ }^{109}$ Calculations by CFED of data from the 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed February); available at: http://joinbankon.org/

[^35]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^36]:    ${ }^{110}$ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

[^37]:    ${ }^{111}$ Internal Revenue Service, Statistics of Income - Migration Data. Access through PolicyMap. (accessed July 29, 2012); available from www.policymap.com.

[^38]:    ${ }^{112}$ US Census Bureau. Accessed through Policy Map. (accessed on September 5, 2012); available from www.policymap.com.
    ${ }^{113}$ PD\&R, Economic and Market Analysis Division. November 2012. (accessed November 14, 2012); available from http://www.huduser.org/portal/MCCharts/MsasCharts.html?msaID=294118,41180\&msaName=St. Louis, Missouri-IL CBSA\&dt=November 13, 2012.

[^39]:    ${ }^{114}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{115}$ FFIEC. Home Mortgage Disclosure Act. (accessed on September 5, 2012); available from http://www.ffiec.gov/hmda/.
    ${ }^{116}$ PNC, St. Louis Market Outlook. $2^{\text {nd }}$ Quarter 2012. (accessed on November 14, 2012); available from
    https://www.pnc.com/webapp/unsec/Requester?resource=/wps/wcm/connect/59ac6c804fd3e216bc8fbf267cb633c4/StLouis_2012Q2.p df?MOD=AJPERES\&CACHEID=59ac6c804fd3e216bc8fbf267cb633c4
    ${ }^{117}$ St. Louis Business Journal. June 2012. (accessed on November 14, 2012); available from http://www.bizjournals.com/stlouis/print-edition/2012/06/29/scott-afb-keeps-economic-engine.html?page=all.

[^40]:    ${ }^{118}$ City of St. Louis Missouri, Community Development Administration. 2012.(accessed on November 14, 2012); accessed from http://stlouis-mo.gov/government/departments/sldc/economic-development/enhanced-enterprise-zone.cfm.
    ${ }^{119}$ St. Louis Regional Chamber \& Growth Association. "Talent: The Future of St. Louis in the Knowledge Economy." (accessed on November 15, 2012); accessed from http://www.stlrcga.org/Documents/library/Talent\%20The\%20Future\%20of\%20Metro\%20St.\%20Louis\%20in\%20the\%20Knowledge \%20Economy.pdf.

[^41]:    ${ }^{120}$ City of St. Louis Missouri, Community Development Administration. 2012. (accessed on November 14, 2012); accessed from http://stlouis-mo.gov/government/departments/community-development/index.cfm.
    ${ }^{121}$ BankOn. 2011. (accessed on November 7, 2012); available from
    http://webtools.joinbankon.org/community/profile?state=MO\&place=St.\%20Louis

[^42]:    ${ }^{122}$ CDFI Fund. 2012. (accessed on November 14, 2012); available from http://www.cdfifund.gov/.

[^43]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^44]:    ${ }^{123}$ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

[^45]:    ${ }^{124}$ Internal Revenue Service, Statistics of Income - Migration Data. Accessed through PolicyMap. (accessed January 15, 2013); available from www.policymap.com.
    ${ }^{125}$ US Census Bureau. Accessed through PolicyMap (accessed on January 15, 2013); available from www.policymap.com.

[^46]:    ${ }^{126}$ Real Estate Center at Texas A\&M University. (accessed January 15, 2013); available from http://www.recenter.tamu.edu/data/hs/hs500.asp.
    ${ }^{127}$ US Census Bureau. Accessed through PolicyMap (accessed on January 15, 2013); available from www.policymap.com.
    ${ }^{128}$ The Dallas Morning News. "Dallas Fed report: Texas' housing market is showing clear signs of sustained recovery." (accessed on January 15, 2013); available from http://bizbeatblog.dallasnews.com/2012/09/dallas-fed-report-texas-housing-market-is-showing-clearn-signs-of-a-sustained-recovery.html/.
    ${ }^{129}$ US Census Bureau. Accessed through PolicyMap (accessed on January 15, 2013); available from www.policymap.com.
    ${ }^{130}$ US Census Bureau. Accessed through PolicyMap (accessed on January 15, 2013); available from www.policymap.com.

[^47]:    ${ }^{131}$ Real Estate Center at Texas A\&M University. Market Report 2011 - Texarkana. (accessed January 15, 2013); available from www. recenter.tamu.edu/mreports/2011/Texarkana.pdf.
    ${ }^{132}$ Texarkana College. (accessed on January 15, 2013); available from https://www.texarkanacollege.edu/pages/338.asp.
    ${ }^{133}$ Texas A\&M University - Texarkana. (accessed on January 22, 2013); available from http://tamut.edu/.
    ${ }^{134}$ REIS data
    ${ }^{135}$ Texarkana Chamber of Commerce. (accessed on January 15, 2013); available from http://www.texarkana.org/.
    ${ }^{136}$ Texarkana Chamber of Commerce. (accessed on January 15, 2013); available from http://www.texarkana.org/.
    ${ }^{137}$ Real Estate Center at Texas A\&M University. Newstalk Texas. (accessed on January 15, 2013); available from http://recenter.tamu.edu/newstalk/main.asp?a=21.

[^48]:    ${ }^{138}$ Arkansas Online. (accessed on January 15, 2013); available from http://www.arkansasonline.com/news/2011/oct/28/texarkana-starts-construction-18m-convention-cente/.
    ${ }^{139}$ Real Estate Center at Texas A\&M University. Newstalk Texas. (accessed on January 15, 2013); available from http://recenter.tamu.edu/newstalk/main.asp?a=21.
    ${ }^{140}$ Bureau of Labor Statistics. (accessed on January 15, 2013); available from http://www.bls.gov/.

[^49]:    ${ }^{141}$ City of Texarkana, Texas. "2012 Consolidated Action Plan" (accessed on January 15, 2013); available from http://www.ci.texarkana.tx.us/documents/frontpage/2012_Action_Plan_DRAFT.pdf.
    ${ }^{142}$ BankOn. 2012. (accessed on January 15, 2013); available from http://webtools.joinbankon.org/community/profile?state=TX\&place=Texarkana
    ${ }^{143}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on January 15, 2013); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.
    ${ }^{144}$ State of Arkansas. "Multi-Family Housing. Low-Income Housing Tax Credit Program." (accessed on January 15, 2013); available from http://www.state.ar.us/adfa/programs/lihtcp.html.

[^50]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^51]:    ${ }^{145}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^52]:    ${ }^{146}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com

[^53]:    ${ }^{147}$ U.S. Census Bureau, 2010 American Community Survey 1-Year Estimates: S1903: Median Income In The Past 12 Months (In 2010 InflationAdjusted Dollars). (accessed on May 29, 2012)
    ${ }^{148}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{149}$ Regions Bank

[^54]:    ${ }^{150}$ Alabama Center for Real Estate, University of Alabama. August, 2012. (accessed October 23, 2012); available at: http://acre.cba.ua.edu/store/store_files/Birmingham Report-1767.pdf.
    ${ }^{151}$ Alabama Center for Real Estate, University of Alabama. August, 2012. (accessed October 23, 2012); available at: http://acre.cba.ua.edu/store/store files/Birmingham Report-1767.pdf.
    ${ }^{152}$ US Census Bureau Residential Construction Branch. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com
    ${ }^{153}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{154}$ Regions Bank
    ${ }^{155}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com

[^55]:    ${ }^{156}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Birmingham-Hoover 2012; (accessed October 29, 2012); available at: http://cber.cba.ua.edu/pdf/EconomicOutlook Metro2012/Birmingham-Hoover.pdf
    ${ }^{157}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Birmingham-Hoover, Alabama, April 2011" (accessed October 29, 2012); available at http://www.huduser.org/portal/publications/PDF/BirminghamAL_Comp.pdf.
    ${ }^{158}$ Bureau of Labor Statistics

[^56]:    ${ }^{159}$ New York Times "Debt Crisis? Bankruptcy Fears? See Jefferson County, Ala." New York Times, July 29, 2011.
    ${ }^{160}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Birmingham-Hoover 2012; (accessed October 29, 2012); available at: http://cber.cba.ua.edu/pdf/EconomicOutlook_Metro2012/BirminghamHoover.pdf
    ${ }^{161}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Birmingham-Hoover 2012; (accessed October 29, 2012); available at: http://cber.cba.ua.edu/pdf/EconomicOutlook_Metro2012/BirminghamHoover.pdf
    ${ }^{162}$ Birmingham Business Journal "HUD approves \$55M in Alabama tornado recovery plans" September 11, 2012. (accessed October 25, 2012); available at: http://www.bizjournals.com/birmingham/news/2012/09/11/hud-approves-55m-in-alabama-tornado.html.

[^57]:    ${ }^{163}$ Birmingham Business Alliance, "Blueprint Birmingham". Available at: http://blueprintbirmingham.com/bpb/Blueprint_Birmingham_Communication_Plan.pdf. Accessed on August 8, 2011. $\frac{164}{164} 2011$ FDIC National Survey of Unbanked and Underbanked Households. (accessed November 6, 2012); available at: http://economicinclusion.gov/

[^58]:    ${ }^{165}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com

[^59]:    ${ }^{166}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{167}$ Chamber of Commerce of Huntsville/Madison County. "Construction Activity." (accessed November 6, 2012); available at: http://www.huntsvillealabamausa.com/new_exp/community_data/econ_performance/construction.html.
    ${ }^{168}$ Alabama Center for Real Estate, University of Alabama. August, 2012. Available at: http://acre.cba.ua.edu/store/store_files/Statewide_Report-1889.pdf. Accessed October 23, 2012.
    ${ }^{169}$ U.S. Census Bureau Residential Construction Branch. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com

[^60]:    ${ }^{170}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{171}$ Home Mortgage Disclosure Act (HMDA) Data. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com
    ${ }^{172}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{173}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Huntsville, Alabama, October 2011" (accessed October 29, 2012); available at
    http://www.huduser.org/portal/publications/PDF/HuntsvilleAL_Comp.pdf
    ${ }^{174} 2010$ Regional Economic Information Systems.
    ${ }^{175}$ Chamber of Commerce of Huntsville/Madison County. "Leading Employers 2011." Available at: http://www.huntsvillealabamausa.com/new_exp/community_data/leading_emp/top_overall.html. Accessed on October 24, 2011.
    ${ }^{176}$ Chamber of Commerce of Huntsville/Madison County. "Huntsville/Madison County Overview." Available at: http://www.huntsvillealabamausa.com/new_exp/pics/community_overview.pdf. Accessed on October 24, 2011.
    ${ }^{177}$ Chamber of Commerce of Huntsville/Madison County. "Huntsville/Madison County Aerospace/Defense Industry Profile." Available at: http://www.huntsvillealabamausa.com/new_exp/community data/reports/aerospace2011.pdf. Accessed on October 24, 2011.
    ${ }^{178}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Huntsville Metropolitan Area 2012. (accessed November 7, 2012); available at: http://cber.cba.ua.edu/pdf/EconomicOutlook_Metro2012/Huntsville.pdf.

[^61]:    ${ }^{179}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Huntsville Metropolitan Area 2012. (accessed November 7, 2012); available at:
    http://cber.cba.ua.edu/pdf/EconomicOutlook_Metro2012 /Huntsville.pdf.
    ${ }^{180}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Updated Comparison Tables, Summer 2011. Available at: http://cber.cba.ua.edu/almetro_arch.html. Accessed on October 24, 2011.
    ${ }^{181}$ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Huntsville, Alabama, October 2011" (accessed October 29, 2012); available at http://www.huduser.org/portal/publications/ PDF/HuntsvilleAL_ Comp.pdf
    182 Chamber of Commerce of Huntsville/Madison County. "2010 New \& Expanding Industry." Available at: http://www.huntsvillealabamausa.com/new_exp/community_data/newexp_companies/newexp_2010.html. Accessed on October 24, 2011.
    ${ }^{183}$ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Huntsville, Alabama, October 2011" (accessed October 29, 2012); available at http://www.huduser.org/portal /publications/PDF/ HuntsvilleAL_Comp.pdf

[^62]:    ${ }^{184}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Birmingham-Hoover 2012; (accessed October 29, 2012); available at:
    http://cber.cba.ua.edu/pdf/EconomicOutlook_Metro2012/Birmingham-Hoover.pdf
    ${ }^{185}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Huntsville, Alabama, October 2011" (accessed October 29, 2012); available at http://www.huduser.org/portal/publications/PDF/HuntsvilleAL_Comp.pdf

[^63]:    ${ }^{186}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^64]:    ${ }^{187}$ US Census Bureau. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^65]:    ${ }^{188}$ U.S. Census Bureau, Small Area Estimates Branch. Data released November 29, 2011. (accessed on November 8, 2012); available at: http://cber.cba.ua.edu/edata/emp_inc.html
    ${ }^{189}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{190}$ Mobile Area Chamber "September 2012 Mobile Bay Area Statistical Abstract." (accessed November 6, 2012); available at: http://www.huntsvillealabamausa.com/new_exp/community_data/econ_performance/construction.html.
    ${ }^{191}$ Alabama Center for Real Estate, University of Alabama. September, 2012. (accessed on November 6, 2012); available at http://acre.cba.ua.edu/store/store_files/Mobile_Report-1891.pdf.
    ${ }^{192}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Mobile Metropolitan Area 2012. (accessed November 7, 2012); available at: http://cber.cba.ua.edu/pdf/EconomicOutlook_Metro2012/Mobile.pdf
    ${ }^{193}$ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Mobile, Alabama, July 2011" (accessed November 7, 2012); available at http://www.huduser.org/portal/publications/PDF/MobileAL_Comp.pdf

[^66]:    ${ }^{194}$ US Census Bureau Residential Construction Branch. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com
    ${ }^{195}$ US Census Bureau. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com
    ${ }^{196}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{197}$ Home Mortgage Disclosure Act (HMDA) Data. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com
    ${ }^{198}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{199}$ Mobile Area Chamber of Commerce. "2012 An Economic Overview of the Mobile Bay Region." (accessed on November 8, 2012); available at http://www.mobilebayregion.com/files/MACC_2012 Economic_Overview_lo.pdf.
    ${ }^{200}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Mobile Metropolitan Area 2012. (accessed on November 8, 2012); available at: http://cber.cba.ua.edu/almetro_arch.html.
    ${ }^{201}$ Mobile Area Chamber of Commerce. "2012 An Economic Overview of the Mobile Bay Region." (accessed on November 8, 2012); available at http://www.mobilebayregion.com/files/MACC_2012_Economic_Overview_lo.pdf

[^67]:    ${ }^{202} 2010$ Regional Economic Information Systems.
    ${ }^{203}$ Mobile Area Chamber of Commerce. "2012 An Economic Overview of the Mobile Bay Region." (accessed on November 8, 2012); available at http://www.mobilebayregion.com/files/MACC_2012_Economic_Overview_lo.pdf.
    ${ }^{204}$ U.S. Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Mobile, Alabama, July 2011" (accessed November 7, 2012); available at http://www.huduser.org/portal/publications/PDF/MobileAL_Comp.pdf
    ${ }^{205}$ Bureau of Labor Statistics
    ${ }^{206}$ Center for Real Estate Studies at the Mitchell College of Business, University of South Alabama. Mobile Economy Watch. June 2011. (accessed November 13, 2012); available at: http://www.southalabama.edu/mcob/realestate/documents/mobilemarket/eco/mobileeconomyreportjune10.pdf.
    ${ }^{207}$ Mobile Area Chamber of Commerce. "Mobile Bay - The Place for Transportation and Distribution." (accessed November 13, 2012); available at: http://www.mobilebayregion.com/files/ED_Brochure_TransportationDistribution2011.pdf.
    ${ }^{208}$ Center for Business and Economic Research, Culverhouse College of Commerce, the University of Alabama. Alabama Economic Outlook, Mobile Metropolitan Area 2012. (accessed on November 8, 2012); available at: http://cber.cba.ua.edu/almetro_arch.html.

[^68]:    ${ }^{209}$ Mobile Area Chamber of Commerce. "Mobile Bay - The Place for Transportation and Distribution." (accessed on November 8, 2012); available at: http://www.mobilebayregion.com/files/ED_Brochure_TransportationDistribution2011.pdf.
    ${ }^{210}$ NSP 2012 Quarterly report for the State of Alabama. (accessed on November 8, 2012); available at: https://hudnsphelp.info/media/GAReports/Q_B-08-DN-01-0001_2012_Q2.pdf
    ${ }^{211}$ NSP 2012 Quarterly report for the Pritchard Housing Authority. (accessed on November 8, 2012); available at: https://hudnsphelp.info/media/GAReports/Q_B-09-LN-AL-0017_2012_Q2.pdf

[^69]:    ${ }^{212}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search
    ${ }^{213}$ FDIC Alliance for Economic Inclusion. (accessed on November 8, 2012); available at: http://www.fdic.gov/consumers/community/AEI/regional/atlanta.html\#History

[^70]:    ${ }^{214}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^71]:    ${ }^{215}$ Internal Revenue Service, Statistics of Income - Migration Data. Access through PolicyMap. (accessed July 29, 2012); available from www.policymap.com.

[^72]:    ${ }^{216}$ U.S. Census Bureau, Quick Facts. Accessed through PolicyMap (access on July 29, 2012); available from www.policymap.com.
    ${ }^{217}$ Arkansas Realtors Association. "Housing Market Reports." (accessed on January 2, 2013); available from http://www.arkansasrealtors.com/news-events/housing-market-reports.
    ${ }^{218}$ US Census Bureau. Accessed through PolicyMap (access on January 2, 2013); available from www.policymap.com.
    ${ }^{219}$ Texas A\&M University Real Estate Center. 2012. (accessed on July 29, 2012); available from
    http://recenter.tamu.edu/data/bp/bpm/msa2040.asp.

[^73]:    ${ }^{220}$ National Park Service. "NPS Annual Recreation Visits Report" (accessed January 2, 2013); available from
    https://irma.nps.gov/Stats/SSRSReports/System\%20Wide\%20Reports/5\%20Year\%20Annual\%20Report\%20By\%20Park.
    ${ }^{221}$ National Park Service. "Park Economic Benefits." (accessed January 2, 2013); available from http://www.nps.gov/hosp/parknews/park-economic-benefits.htm.
    ${ }^{222}$ National Park Community College. 2012. (accessed on January 2, 2013); available from http://www.npcc.edu/.
    ${ }^{223}$ Hot Springs Chamber of Commerce. "Top Area Employers." (accessed on January 2, 2013); available from http://www.hotspringschamber.com/resources/topemployers.asp.
    ${ }^{224}$ NBC News. "America’s Richest and Poorest Cities." (accessed January 2, 2013); available from http://www.nbcnews.com/business/tag/poorest\#/business/americas-richest-poorest-cities-1C6454601.
    ${ }^{225}$ Arkansas Business. "Hot Springs Are Enjoying Pre-Recession Growth in Jobs, Construction and Revenues." (accessed January 2, 2012); available from http://www.arkansasbusiness.com/article/85063/hot-springs-area-enjoying-pre-recession-growth-in-jobs-construction-and-revenues

[^74]:    ${ }^{226}$ City of Hot Springs, Arkansas. "FY 2010-2014 CDBG Consolidated Plan" (accessed January 3, 2013); available from http://www.cityhs.net/pdfs/planning-development/community\%20development/FY\%20201014\%20CDBG\%20CONSOLIDATED\%20PLAN.pdf
    ${ }^{227}$ BankOn. 2011. (accessed on January 3, 2013); available from http://webtools.joinbankon.org/community/profile?state=AR\& county=Garland\%20County
    ${ }^{228}$ U.S. Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{229}$ State of Arkansas. "Multi-Family Housing. Low-Income Housing Tax Credit Program." (accessed January 3, 2013); available from http://www.state.ar.us/adfa/programs/lihtcp.html.

[^75]:    ${ }^{230}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on February 4, 2013); available from www.policymap.com
    ${ }^{231}$ Internal Revenue Service, Statistics of Income - Migration Data. Accessed through PolicyMap. (accessed on February 4, 2013); available from www.policymap.com.

[^76]:    ${ }^{232}$ U.S. Census Bureau, Quick Facts. Accessed through PolicyMap (access on February 4, 2013); available from www.policymap.com.
    ${ }^{233}$ Arkansas Realtors Association. "Housing Market Reports." (accessed on February 4, 2013); available from http://www.arkansasrealtors.com/news-events/housing-market-reports.

[^77]:    ${ }^{234}$ U.S. Census Bureau. Accessed through PolicyMap (accessed on February 4, 2013); available from www.policymap.com.
    ${ }_{235}$ Texas A\&M University Real Estate Center. 2012. (accessed on February 4, 2013); available from http://recenter.tamu.edu/data/bp/bpm/msa2040.asp.
    ${ }^{236}$ REIS data
    ${ }^{237}$ Little Rock Regional Chamber of Commerce. (accessed on February 5, 2013); available from http://www.littlerockchamber.com/CWT/EXTERNAL/WcPages/economic/Military.aspx
    ${ }^{238}$ Little Rock Air Force Base. "Economic Impact Analysis." (accessed on February 4, 2013); available from http://www.littlerock.af.mil/shared/media/document/AFD-120313-014.pdf.
    ${ }^{239}$ City of Little Rock. (accessed on February 5, 2013); available from http://www.littlerock.org/citymanager/ divisions/economicdevelopment/.

[^78]:    ${ }^{240}$ Forbes. (accessed on February 5, 2013); available from http://www.forbes.com/places/ar/little-rock/.
    ${ }^{241}$ Arkansasmatters.com. (accessed on February 5, 2013); available from http://arkansasmatters.com/fulltext?nxd_id=581772.
    ${ }^{242}$ Kiplinger "Best Value Cities 2011." (accessed on February 5, 2013); available from http://www.kiplinger.com/article /business/T012-C000-S002-best-value-cities-2011-7-little-rock-ark.html.
    243 Milken Institute. "Best Performing Cities." (accessed on February 5, 2013); available from ${ }_{244}$ :/tpestcities.milkeninstitute.org/bestcities2012.taf?rankyear=2009\&type=rank200 244 Business Week. "Forty Best U.S. Metro Economies." (accessed on February 5, 2013); available from http://images.businessweek.com/ss/09/10/1022_40_strongest_us_metro_economies/5.htm.
    ${ }^{245}$ City of Little Rock. (accessed on February 5, 2013); available from http://www.littlerock.org/citymanager/ divisions/economicdevelopment/.
    246 Arkansas Economic Development Commission. (accessed on February 5, 2013); available from http://arkansasedc.com/news-and-media-resources/news/2009/jan/caterpillar-to-locate-north-american-motor-grader-production-facility-in-north-little-rock.aspx.
    ${ }^{247}$ Metro Little Rock Alliance. (accessed on February 5, 2013); available from http://customer-service. metrolittlerockalliance.com/.
    248 USA Today. "Arkansas and Elsewhere, Economy Stable." (accessed on February 5, 2013); available from http://usatoday30.usatoday.com/money/economy/2009-02-25-ark-economy_N.htm

[^79]:    ${ }^{249}$ Federal Reserve Bank of St. Louis. "Current Economic Conditions in the Eighth Federal Reserve District." (accessed February 5, 2013); available from http://research.stlouisfed.org/regecon/burgundybooks/12/06/BB0612LR.pdf.
    ${ }^{250}$ Bureau of Labor Statistics. (accessed on January 15, 2013); available from http://www.bls.gov/.

[^80]:    ${ }^{251}$ BankOn. 2011. (accessed on February 4, 2013); available from http://webtools.joinbankon.org/community/profile?state=AR\&place =Little\%20Rock
    ${ }^{252}$ U.S. Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{253}$ State of Arkansas. "Multi-Family Housing. Low-Income Housing Tax Credit Program." (accessed January 3, 2013); available from http://www.state.ar.us/adfa/programs/lihtcp.html.

[^81]:    ${ }^{254}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^82]:    ${ }^{255}$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{256}$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{257}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{258}$ Arkansas Realtors Association. "Housing Market Reports." (accessed on January 2, 2013); available from http://www.arkansasrealtors.com/news-events/housing-market-reports.
    ${ }^{259}$ Boxwood Means. Accessed through PolicyMap. (accessed on February 4, 2013); available from http://www.policymap.com
    ${ }^{260}$ US Census Bureau, Residential Construction Branch. Accessed through PolicyMap. (accessed on January 28, 2013); available from http://www.policymap.com

[^83]:    ${ }^{261}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{262}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{263}$ US Census Bureau. Accessed through PolicyMap. (accessed on February 4, 2013); available from http://www.policymap.com
    ${ }^{264}$ Ecanned.com presentation of data from US Department of Labor Bureau of Labor Statistics Quarterly Census of Employment and Wages (QCEW). (accessed on February 4, 2013); available at: http://www.ecanned.com/arkansas/418-van-buren-county-arkansas ${ }^{265}$ Arkansas Valley Alliance for Economic Development. List of Major Employers. (accessed on February 4, 2013); available at: http://www.russellville.org/major_employers.php
    ${ }^{266}$ Arkansas Tech University-Ozark Campus. (accessed on February ); available at: http://www.atu.edu/ozark/aboutozark.php

[^84]:    ${ }^{267}$ Bureau of Labor Statistics

[^85]:    ${ }^{268}$ IRS Statistics of Income - Migration Data. Accessed through PolicyMap. (accessed on August 15, 2012); available from www.irs.gov/taxstats/article/0,,id=212683,00.html.

[^86]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^87]:    269 Florida Times-Union. "Food stamps now help 1 in 5 in Jacksonville." www.jacksonville.com/news/metro/2011-01-25/story/food-stamps-now-help-1-5-jacksonville
    270 Florida Realtors Association. Home Sale Statistics. (accessed on December 12, 2011); available at: http://www.floridarealtors.org/Research/index.cfm.
    ${ }^{271}$ http://www.nefar.com/filebin/2011MktStatsAnnlRpt.pdf
    ${ }^{272}$ Florida Realtors Association, Home Sale Statistics. (accessed on December 12, 2011); available at http://www.floridarealtors.org/Research/index.cfm.

[^88]:    ${ }^{273}$ Real Estate Center at Texas A\&M University. Building Permits: Jacksonville, FL MSA. (accessed on October 20, 2011); available at http://recenter.tamu.edu/data/bp/bpm/msa3600.asp.
    ${ }^{274}$ RealtyTrac. "2010 Foreclosure Activity Down in Hardest Hit Markets But Increases in 72 Percent of Major Metros." (accessed on December 6, 2011); available from http://www.realtytrac.com/content/foreclosure-market-report/2010-year-end-us-metro-foreclosure-report-6317.
    ${ }^{275}$ US Department of Housing and Urban Development. "Market at a Glance, Jacksonville FL CBSA." (accessed on December 14, 2011); available from http://www.huduser.org/portal/MCCharts/MsasCharts.html?msaID=122726,27260\&msaName=Jacksonville, FL CBSA\&dt=December 14, 2011.
    ${ }^{276}$ Florida Housing Data Clearinghouse.
    http://flhousingdata.shimberg.ufl.edu/a/ahna_taic?years=2010\&vars=tenure_id\&vars=cost_burden_id\&action=results\&nid=1500\&go. $x=12 \&$ go. $y=18$
    ${ }^{277}$ City of Jacksonville, Business Development Department. "Jacksonville's Military Presence." Available at: http://www.coj.net/Departments/Jacksonville-Economic-Development-Commission/Business-Development/Jacksonville\%E2\%80\%99s-MilitaryPresence.aspx. Accessed: December 12, 2011.

[^89]:    ${ }^{278}$ Jacksonville Port Authority. "About JAXPORT—Economic Impacts" Available at: http://www.jaxport.com/about-jaxport/overview/economicimpacts. Accessed December 13, 2011.
    ${ }^{279} 2008$ Regional Economic Information Systems.
    ${ }^{280}$ Brookings Institute Metro Monitor.
    ${ }^{281}$ University of Central Florida, Institute for Economic Competitiveness. "Florida and Metro Forecast 2011." Available at: http://iec.ucf.edu/page/Forecasts.aspx. Accessed December 13, 2011.

[^90]:    ${ }^{282}$ The Florida Times-Union. Jacksonville.com. "Regaining Northeast Florida Jobs Lost during Recession will take Four Years." Available at: http://jacksonville.com/news/metro/2011-10-21/story/regaining-northeast-florida-jobs-lost-recession-will-take-more-4-years. Accessed December 13, 2011.
    ${ }^{283}$ JAXUSA Partnership. "Target Industries." Available http://www.jaxusa.org/Biz_Enviro/Target Industries.aspx. Accessed December 14, 2011.
    ${ }^{284}$ City of Jacksonville. Available at: http://www.coj.net/Departments/Jacksonville-Economic-Development-Commission/Business-Development/Jacksonville\%e2\%80\%99s-Military-Presence.aspx. Accessed December 13, 2011.
    ${ }^{285} \mathrm{http}: / / \mathrm{www} . h u d u s e r . o r g /$ portal/MCCharts/MsasCharts.html?msaID=122726,27260\&msaName=Jacksonville, FL CBSA\&dt=December 14, 2011

[^91]:    ${ }^{286}$ US Department of Housing and Development, Neighborhood Stabilization Program, NSP Grantees. Available: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults. Accessed December 5, 2011.
    ${ }^{287}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^92]:    ${ }^{288}$ Shimberg Center. Florida Housing Data Clearinghouse. (accessed November 6, 2012); available at http://flhousingdata.shimberg.ufl.edu/a/profiles?action=results\&nid=4800\&image. $x=23 \& i m a g e . y=6$.
    ${ }^{289}$ US Census Bureau. Accessed through Policy Map. (accessed on September 5, 2012); available from www.policymap.com.
    ${ }^{290}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{291}$ FFIEC. Home Mortgage Disclosure Act. (accessed on September 5, 2012); available from http://www.ffiec.gov/hmda/.
    ${ }^{292}$ Metro Orlando Economic Development Commission. 2012. (accessed on November 7, 2012); available from http://www.orlandoedc.com/Data-Center/economy.shtml.
    ${ }^{293}$ UCFToday. 2012. (accessed on November 13, 2012); available from http://today.ucf.edu/quality-growth-ucf-is-nations-secondlargest/.

[^93]:    ${ }^{294}$ University of Central Florida, Institute for Economic Competitiveness. 2012. (accessed on November 13, 2012); available from http://iec.ucf.edu/file.axd?file=2012\%2f10\%2fflforecast-oct-2012-s.pdf.
    ${ }^{295}$ University of Central Florida, Institute for Economic Competitiveness. 2012. (accessed November 13, 2012); available from http://iec.ucf.edu/file.axd?file=2012\%2f10\%2fflforecast-oct-2012-s.pdf.
    ${ }^{296}$ Orlando Business Journal. "Orlando Short of Pre-Recession Job Levels" (accessed November 14, 2012); available from http://www.bizjournals.com/orlando/news/2012/11/13/orlando-still-short-of-pre-recession.html.
    ${ }^{297}$ REIS

[^94]:    ${ }^{298}$ GrowFL. 2012. (accessed on November 7, 2012); available from http://www.growfl.com/downloads/GrowFL-facts.pdf
    ${ }^{299}$ BankOn. 2011. (accessed on November 7, 2012); available from http://webtools.joinbankon.org/community/profile? state=FL\&place=St. percent20Petersburg.
    ${ }^{300}$ U.S. Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.

[^95]:    ${ }^{301}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^96]:    ${ }^{302}$ Internal Revenue Service, Statistics of Income - Migration Data. Access through PolicyMap. (accessed July 29, 2012); available from www.policymap.com.

[^97]:    ${ }^{303}$ US Census Bureau, Quick Facts. Accessed through PolicyMap (access on July 29, 2012); available from www.policymap.com.
    ${ }^{304}$ Florida Housing Data Clearinghouse. (accessed November 6, 2012); available at http:///flhousingdata.shimberg.ufl.edu/a/profiles?action=results\&nid=4800\&image. $x=23 \&$ \&image. $y=6$.
    ${ }^{305}$ US Census Bureau. Accessed through Policy Map. (accessed on September 5, 2012); available from www.policymap.com.

[^98]:    ${ }^{306}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{307}$ FFIEC. Home Mortgage Disclosure Act. (accessed on September 5, 2012); available from http://www.ffiec.gov/hmda/.
    ${ }^{308}$ US Navy. 2010 AICUZ Study. (access November 8, 2012); available from
    http://agenda.myescambia.com/docs/2011/COW/20110512_272/831_2010\%20AICUZ.pdf.
    ${ }^{309}$ Pensacola News Journal. (accessed November 8, 2012); available from http://www.pnj.com/apps/pbcs.dll/article?AID=/99999999/NEWCOMERS/906260317.
    ${ }^{310}$ Pensacola Bay Area Chamber of Commerce. "Tourism." (accessed October 20, 2011); available from http://pensacolachamber.com/Tourism/.
    ${ }^{311}$ Crane, Charlotte. Florida Trend. "Fueling a Downturn in Northwest Florida." July 1, 2010. (accessed October 20, 2011); available from http://uwf.edu/OEDE/news/floridatrend_Fueling_A_Downturn_in_NW_FL_07012010.pdf.
    ${ }^{312}$ Florida Enterprise Zones. (accessed November 7, 2012); available from
    http://floridaenterprisezones.com/PageView.asp?PageType=R\&edit_id=1

[^99]:    ${ }^{313}$ University of Central Florida, Institute for Economic Competitiveness. 2012. (accessed on November 13, 2012); available from http://iec.ucf.edu/file.axd?file=2012\%2f10\%2fflforecast-oct-2012-s.pdf.
    ${ }^{314}$ University of Central Florida, Institute for Economic Competitiveness. 2012. (accessed November 13, 2012); available from http://iec.ucf.edu/file.axd?file=2012\%2f10\%2fflforecast-oct-2012-s.pdf.
    ${ }^{315}$ Greater Pensacola Chamber of Commerce. Vision 2015. (accessed on November 8, 2012); available from http://pensacolachamber.com/wp-content/uploads/2012/05/Strategic-Plan.pdf.

[^100]:    ${ }^{316}$ BankOn. 2011. (accessed on November 7, 2012); available from http://webtools.joinbankon.org/community/profile? state=FL\&place=St. percent20Petersburg.
    ${ }^{317}$ U.S. Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{318}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^101]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^102]:    ${ }^{319}$ US Census Bureau. Accessed through PolicyMap. (accessed on November 7, 2012); available from www.policymap.com.

[^103]:    ${ }^{320}$ Texas A\&M Real Estate Center. (accessed on November 7, 2012); available from http://recenter.tamu.edu/data/bp/.
    ${ }^{321}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{322}$ FFIEC. Home Mortgage Disclosure Act. (accessed on September 5, 2012); available from http://www.ffiec.gov/hmda/.
    ${ }^{323}$ Florida Enterprise Zones. (accessed November 7, 2012); available from
    http://floridaenterprisezones.com/PageView.asp?PageType=R\&edit_id=1

[^104]:    ${ }^{324}$ University of Central Florida, Institute for Economic Competitiveness. 2012. (accessed on November 13, 2012); available from http://iec.ucf.edu/file.axd?file=2012\%2f10\%2fflforecast-oct-2012-s.pdf.
    ${ }^{325}$ University of Central Florida, Institute for Economic Competitiveness. 2012. (accessed on November 13, 2012); available from http://iec.ucf.edu/file.axd?file=2012\%2f10\%2fflforecast-oct-2012-s.pdf.
    ${ }^{326}$ REIS

[^105]:    ${ }^{327}$ BankOn St. Pete. (accessed on November 7, 2012); available from http://www.bankonstpete.org/.
    ${ }^{328}$ BankOn. 2011. (accessed on November 7, 2012); available from http://webtools.joinbankon.org/community/profile?state=FL\&place=St. percent20Petersburg.
    ${ }^{329}$ US Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{330}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^106]:    ${ }^{331}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^107]:    ${ }^{332}$ Atlanta Regional Commission. "Regional Snapshot, State of the Atlanta Region: 2011" November/December, 2011. (accessed on May 30, 2012). Available from: http://www.atlantaregional.com/info-center/state-of-the-region-update
    ${ }^{333}$ US Census data provided by the Atlanta Regional Commission. (accessed on November 5, 2012). Available http://www.atlantaregional.com/info-center/arc-newsletters/regional-snapshots
    ${ }^{334}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{335}$ Atlanta Regional Commission. "Regional Snapshot, State of the Atlanta Region: 2011" November/December, 2011. (accessed on May 30, 2012). Available from: http://www.atlantaregional.com/info-center/state-of-the-region-update
    ${ }^{336}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com

[^108]:    ${ }^{337}$ Atlanta Business Journal. "CoreLogic: Atlanta home prices dropped 9\% in '11" February 2, 2012. (accessed on May 29, 2012); Available from: http://www.bizjournals.com/atlanta/news/2012/02/02/corelogic-atlanta-home-prices-dropped.html.
    ${ }_{339}^{338}$ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic
    ${ }^{339}$ National Association of Realtors. "Metropolitan Median Area Prices and Affordability" (accessed on November 5, 2012); available from: http://www.realtor.org/sites/default/files/reports/2012/embargoes/2012-q1-metro-home-prices-
    49bc10b1efdc1b8cc3eb66dbcdad55f7/metro-home-prices-q1-single-family-2012-05-09.pdf
    ${ }^{340}$ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic
    ${ }^{341}$ US Department of Housing and Urban Development. "Spotlight on the Housing Market in Atlanta-Sandy Springs-Marietta, GA, November 2011" (accessed on May 29, 2012); .available from
    http://portal.hud.gov/hudportal/documents/huddoc?id=HUD445AtlScorecard.pdf.
    ${ }^{342}$ Federal Reserve Bank of Atlanta calculations of data from US Census Bureau (BOC): Building Permits-Form C404
    ${ }^{343}$ Federal Reserve Bank of Atlanta calculations of data provided by MetroStudy.
    ${ }^{344}$ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic
    ${ }^{345}$ Atlanta Business Journal. "CoreLogic: Atlanta underwater properties up in Q4." March 1, 2012. (Accessed on May 29, 2012); available from: http://www.bizjournals.com/atlanta/news/2012/03/01/corelogic-atlanta-underwater.html.
    ${ }^{346}$ US Census Bureau. Accessed through PolicyMap. (accessed on November 5, 2012); available at: http://www.policymap.com
    ${ }^{347}$ US Census Bureau. Accessed through PolicyMap. (accessed on November 5, 2012); available at: http://www.policymap.com
    ${ }^{348}$ US Census Bureau. Accessed through PolicyMap. Available at: http://www.policymap.com. Accessed on May 29, 2012.

[^109]:    ${ }^{349}$ Metro Atlanta Chamber. "Metro Atlanta Economic Briefing, Year-End 2011" (accessed on May 30, 2012); available from: http://metroatlantachamber.com/content/IntPage.aspx?Id=168\&SId=6.
    ${ }^{350}$ Metro Atlanta Chamber. "Metro Atlanta Overview" (accessed on May 30, 2012). Available from: http://metroatlantachamber.com/content/IntPage.aspx?Id=169\&SId=6
    ${ }^{351}$ Georgia Department of Labor. (accessed on November 5, 2012); available at: http://explorer.dol.state.ga.us $/ \mathrm{mis} /$ profiles.htm
    ${ }^{352}$ US Department of Housing and Urban Development. "Spotlight on the Housing Market in Atlanta-Sandy Springs-Marietta, GA, November 2011" (accessed on May 29, 2012); .available from http://portal.hud.gov/hudportal/documents/huddoc?id=HUD445AtlScorecard.pdf.
    ${ }^{353}$ Atlanta Regional Commission and Piece by Piece. "A Region Responds, the Neighborhood Stabilization Program" (accessed on May 31, 2012); available from http://atlantaregionalhousing.org/pbp/docs/NSPReport_PBP_ARC.pdf
    ${ }^{354}$ US Department of Housing and Urban Development. "Spotlight on the Housing Market in Atlanta-Sandy Springs-Marietta, GA, November 2011" (accessed on May 29, 2012); .available from http://portal.hud.gov/hudportal/documents/huddoc?id=HUD445AtlScorecard.pdf.
    ${ }^{355}$ Bureau of Economic Analysis, Regional Economic Information Services. April 2012.
    ${ }^{356}$ US Bureau of Labor Statistics, May 2012. Local Area Unemployment Statistics. Tables: Labor force data by County 2009-2012. Not seasonally adjusted.

[^110]:    ${ }^{357}$ Metro Atlanta Chamber. "Metro Atlanta Economic Briefing, Year-End 2011" (accessed on May 30, 2012); available from: http://metroatlantachamber.com/content/IntPage.aspx?Id=168\&SId=6.
    ${ }^{358}$ Metro Atlanta Chamber. "2011 Metro Atlanta Rankings" (accessed on May 30, 2012); available from http://www.metroatlantachamber.com/files/file/2011\%20Metro\%20Atlanta\%20Rankings.pdf
    ${ }^{359}$ US Census Bureau. Accessed through PolicyMap. (accessed on November 5, 2012); available at: http://www.policymap.com
    ${ }^{360} 2011$ FDIC National Survey of Unbanked and Underbanked Households. (accessed November 6, 2012); available at: http://economicinclusion.gov/
    ${ }^{361}$ The index draws on data in five categories, including employment, housing, credit, household budgeting, and net worth. CredAbility. Consumer Distress Index, Atlanta, 2012 Q1. Available at: http://www.credability.org/assets/cdi/msa/2012Q1MSAatlanta.pdf. Accessed on May 24, 2012.
    ${ }^{362}$ Atlanta Regional Commission and Piece by Piece. "A Region Responds, the Neighborhood Stabilization Program" (accessed on May 31, 2012); available from http://atlantaregionalhousing.org/pbp/docs/NSPReport_PBP_ARC.pdf

[^111]:    ${ }^{363}$ US Census Bureau. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^112]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^113]:    ${ }^{364}$ US Census Bureau. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{365}$ US Census Bureau. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{366}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{367}$ Boxwood Means. Accessed through PolicyMap. (accessed on January 8, 2013); available at: http://www.policymap.com

[^114]:    ${ }^{368}$ Boxwood Means. Accessed through PolicyMap. (accessed on January 8, 2013); available at: http://www.policymap.com
    ${ }^{369}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{370}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{371}$ Georgia Trend, Our State, Northeast Georgia. Various articles. (accessed on January 24, 2013); available at: http://www.georgiatrend.com/OurState/Northeast/
    ${ }^{372}$ Atlanta Business Journal. "Jackson County is big winner in Ga. jobs race" February 2, 2012. (accessed on January 24, 2013); available at: http://www.bizjournals.com/atlanta/print-edition/2012/02/03/jackson-county-is-big-winner-in-ga.html?page=all
    ${ }^{373}$ Georgia Connector: Fall 2012. "Land of Opportunity" (accessed on January 24, 2013); available at: http://www.georgiaconnector.com/

[^115]:    ${ }^{374}$ Georgia Trend, Our State, Northeast Georgia. Various articles. (accessed on January 24, 2013); available at: http://www.georgiatrend.com/Our-State/Northeast/
    ${ }^{375}$ Georgia Trend, Our State, Northeast Georgia. Various articles. (accessed on January 24, 2013); available at: http://www.georgiatrend.com/Our-State/Northeast/
    ${ }^{376}$ Georgia Trend. April 2012. "Rabun County: Changing The Game" (accessed on January 24, 2013); available at: http://www.georgiatrend.com/April-2012/Rabun-County-Changing-The-Game/
    ${ }^{377}$ Regional Economic Information Systems.
    ${ }^{378}$ Georgia Mountains Regional Commission. (accessed on January 24, 2013); available at: http://www.gmrc.ga.gov
    ${ }^{379}$ The Alliance for Economic Development, Jackson County. (accessed on January 24, 2013); available at: http://www.jacksonalliance.com/Jackson-County-Top-Employers.818.0.html

[^116]:    ${ }^{380}$ Bureau of Labor Statistics

[^117]:    ${ }^{381}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^118]:    ${ }^{382}$ Internal Revenue Service, Statistics of Income - Migration Data. Access through PolicyMap. (accessed July 29, 2012); available from www.policymap.com.

[^119]:    Based on 2010 D\&B information according to 2000 Census Boundaries

[^120]:    ${ }^{383}$ US Census Bureau, Quick Facts. Accessed through PolicyMap (access on July 29, 2012); available from www.policymap.com.
    ${ }^{384}$ Illinois Association of Realtors, Market Stats. (accessed on July 29, 2012); available from http://www.illinoisrealtor.org/marketstats/archives.
    ${ }^{385}$ Texas A\&M University Real Estate Center. 2012. (accessed on July 29, 2012); available from http://recenter.tamu.edu/data/bp/bpm/msa2040.asp.

[^121]:    ${ }^{386}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{387}$ Economic Corporation of Decatur and Macon County. 2010. (accessed on July 30, 2012); available from www.decaturedc.com/index.html.
    ${ }^{388}$ Macon County, IL. 2012. (accessed on July 30, 2012); available from www.co.macon.il.us/.
    ${ }^{389}$ Greater Decatur Chamber of Commerce. 2012. (accessed on July 29, 2012); available from www.decaturchamber.com/faqs/.
    ${ }^{390}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS
    ${ }^{391}$ The Huffington Post. 2012. (accessed on August 28, 2012); available from www.huffingtonpost.com/2012/01/11/archer-danielsmidland_n_1199708.html.
    ${ }^{392}$ Herald-Review.com. 2012. (accessed on August 28, 2012); available from www.herald-review.com/article_1e772654-0849-544a-a0cf-8033414cba53.html.
    ${ }^{393}$ Caterpillar. 2012. Caterpillar Announces Additional Layoffs for Employees at Three Illinois Facilities. (accessed on November 8, 2012); available from http://www.cat.com/cda/layout?m=167201\&x=7\&id=1321143.
    ${ }^{394}$ Herald-Review.com. 2012. (accessed on August 28, 2012); available from www.herald-review.com/news/local/grow-decatur-lays-out-vision-for-improving-decatur-to-community/article_0be065be-53aa-11e1-a4c7-001871e3ce6c.html.

[^122]:    ${ }^{395}$ US Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{396}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^123]:    397 IRS Statistics of Income. Accessed through PolicyMap. (accessed on August 29, 2012); available from http://www.irs.gov/taxstats/article/0,,id=212683,00.html.

[^124]:    ${ }^{398}$ US Census’ Small Area Income and Poverty Estimates. Accessed through Policy Map. (accessed on August 29, 20120); available from http://www.census.gov/hhes/www/saipe/.
    ${ }^{399}$ Illinois Association of Realtors, Market Stats. (accessed August 28, 2012); available from http://www.illinoisrealtor.org/marketstats/archives.
    ${ }^{400}$ Texas A\&M University Real Estate Center. 2012. (accessed on August 28, 2012); available from http://recenter.tamu.edu/data/bp/bpm/msa2040.asp.

[^125]:    ${ }^{401}$ Caterpillar. 2012. (accessed on August 29, 2012); available from http://www.cat.com/about-the-company.
    ${ }^{402}$ Federal Reserve Bank of Atlanta calculation of data provided by LPS.
    ${ }^{403}$ City of Peoria, Illinois Enterprise Zone. 2011. (accessed on August 29, 2012); available from http://www.ci.peoria.il.us/enterprisezone.
    ${ }^{404}$ Economic Development Council of Central Illinois. September 2007. (accessed on August 28, 2012); available from http://www.centralillinois.org/sites/default/files/504_CEDS\%201st\%20Draft\%208\%2028\%202007.pdf.
    ${ }^{405}$ BankOn. 2011. (accessed on November 7, 2012); available from http://webtools.joinbankon.org/community/profile?state=FL\&place=St. percent20Petersburg.

[^126]:    ${ }^{406}$ CDFI Fund. "Certified CDFIs and Native CDFIs - Sortable List." (accessed on August 29, 2012); available from http://www.cdfifund.gov/what_we_do/programs_id.asp?programID=9.
    ${ }^{407}$ Novogradac and Company LLP. "Affordable Housing Resource Center." (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^127]:    ${ }^{408}$ IRS Statistics of Income, Migration Data. Accessed through PolicyMap. (accessed on November 5, 2012); available from www.policymap.com

[^128]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^129]:    ${ }^{409}$ US Census Bureau. Accessed through PolicyMap (accessed on October 5, 2012); available from www.policymap.com.
    ${ }^{410}$ Real Estate Center at Texas A\&M University. Building Permits: Indianapolis, IN MSA. (accessed on October 20, 2012); available at: http://recenter.tamu.edu/data/bp/bpm/msa3480.asp.

[^130]:    ${ }^{411}$ Forbes. America’s Best Housing Markets. (accessed on August 23, 2012); available from http://www.forbes.com/2010/02/19/best-housing-prices-personal-finance-real-estate-affordable-homes.html.
    ${ }^{412}$ Indy Partnership. Market Overview 2012. (accessed on August 30, 2012.); available from http://www.developindy.com/files/documents/Market\%201.pdf.
    ${ }^{413}$ City of Indianapolis and Marion County, Annual Action Plan. (accessed August 30, 2012); available from http://www.indy.gov/eGov/City/DMD/Community/Documents/2010\%20Final.pdf.
    414 Indianapolis Business Journal. "Layoffs" (accessed on August 30, 2012); available from http://www.ibj.com/keyword/111 /Layoffs/RPARAMS/taxonomyId/306?index=1.

[^131]:    415 Indy Partnership. "Market Overview 2012" (accessed on August 30, 2012); available from http://www.developindy.com/ files/documents/Market\%201.pdf.

[^132]:    ${ }^{416}$ U.S. Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{417}$ CDFI Fund. "Certified CDFIs and Native CDFIs - Sortable List" (accessed on August 29, 2012); available from:
    http://www.cdfifund.gov/what_we_do/programs_id.asp?programID=9.
    ${ }^{418}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^133]:    ${ }^{419}$ Internal Revenue Service, Statistics of Income - Migration Data. Access through PolicyMap. (accessed January 15, 2013); available from www.policymap.com.

[^134]:    ${ }^{420}$ National Association of Realtors (accessed January 23, 2013); available from http://www.realtor.org/.
    ${ }^{421}$ Iowa Association of Realtors. (accessed on January 23, 2013); available from http://www.iowarealtors.com/news/housing-trends.
    ${ }^{422}$ US Census Bureau. Accessed through PolicyMap (access January 23, 2013); available from www.policymap.com.
    ${ }^{423}$ US Census Bureau. Accessed through PolicyMap (access on January 23, 2013); available from www.policymap.com.

[^135]:    ${ }^{424}$ HUD. "Comprehensive Housing Market Analysis - Des Moines, Iowa." (accessed January 23, 2013); available from http://www.huduser.org/portal/publications/PDF/CMAR_DesMoinesIA_09.pdf.
    ${ }^{425}$ REIS data
    ${ }^{426}$ The Greater Des Moines Partnership. "Employers." (accessed on January 23, 2013); available from http://www.desmoinesmetro.com/
    ${ }^{427}$ John Deere. "Deere \& Company Confirms Expansion Plans for Des Moines Works." (accessed on January 23, 2013); available from http://www.deere.com/wps/dcom/en_US/corporate/our_company/news_and_media/press_releases/2011/corporate/2011dec19_corporaterelease.page. ${ }^{428}$ The Greater Des Moines Partnership. "Hewlett-Packard Expands Operation In Des Moines." (accessed on January 23, 2013); available from http://www.desmoinesmetro.com/
    ${ }^{429}$ USMEPCOM. (accessed on January 23, 2013); available from http://www.mepcom.army.mil/meps/desmoines/index.html.

[^136]:    ${ }^{430}$ Drake University. (accessed on January 23, 2013); available from http://www.drake.edu/,
    ${ }^{431}$ Des Moines Area Community College. (accessed on January 23, 2013); available from http://www.dmacc.edu/.
    ${ }^{432}$ Forbes.com. "Best Places to For Business and Careers." (accessed on January 23, 2013); available from http://www.forbes.com/lists/2010/1/business-places-10_Des-Moines-IA_2493.html.
    ${ }^{433}$ Forbes.com. "America's Best Cities for Young Professionals." (accessed on January 23, 2013); available from http://www.forbes.com/sites/morganbrennan/2011/07/12/americas-best-cities-for-young-professionals/.
    ${ }^{434}$ Kiplinger. "Best Cities 2010: Des Moines, Iowa." (accessed on January 23, 2013); available from http://www.kiplinger.com/article/business/T012-C000-S002-best-cities-2010-des-moines-iowa.html.
    ${ }^{435}$ The Greater Des Moines Partnership. "Economic Indicators." (accessed on January 23, 2013); available from http://www.desmoinesmetro.com/
    ${ }^{436}$ Bureau of Labor Statistics. (accessed on January 15, 2013); available from http://www.bls.gov/.

[^137]:    ${ }^{437}$ BankOn. 2012. (accessed on January 15, 2013); available from http://webtools.joinbankon.org/community/profile?state =IA\&place=Des\%20Moines

[^138]:    ${ }^{438}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^139]:    ${ }^{439}$ Internal Revenue Service, Statistics of Income - Migration Data. Access through PolicyMap. (accessed February 12, 2013); available from www.policymap.com.

[^140]:    ${ }^{440}$ National Association of Realtors (accessed January 23, 2013); available from http://www.realtor.org/.
    ${ }^{441}$ Iowa Association of Realtors. (accessed on January 23, 2013); available from http://www.iowarealtors.com/news/housing-trends.
    ${ }^{442}$ US Census Bureau. Accessed through PolicyMap (access February 12, 2013); available from www.policymap.com.
    ${ }^{443}$ US Census Bureau. Accessed through PolicyMap (access on February 12, 2013); available from www.policymap.com.

[^141]:    ${ }^{444}$ REIS data
    ${ }^{445}$ City of Waterloo Economic Development. (accessed on February 12, 2013); available from http://www.waterlooida.org/aboutwaterloo
    446 Forbes.com. "Best Small Places for Business and Careers." (accessed on February 12, 2013); available from http://www.forbes.com/lists/2010/5/business-places-10_Waterloo-IA_6150.html.
    ${ }^{447}$ Forbes.com. "Best Small Places for Business and Careers." (accessed on February 12, 2013); available from http://www.forbes.com/best-places-for-business/list/small/.
    ${ }^{448}$ Iowa Northland Regional Council of Governments. "Comprehensive Economic Development Strategy." (accessed on February 12, 2013); available from http://www.inrcog.org/pdf/2012_CEDS.pdf.
    ${ }^{449}$ Iowa Northland Regional Council of Governments. "Comprehensive Economic Development Strategy." (accessed on February 12, 2013); available from http://www.inrcog.org/pdf/2012_CEDS.pdf.

[^142]:    ${ }^{450}$ Iowa Northland Regional Council of Governments. "Comprehensive Economic Development Strategy." (accessed on February 12, 2013); available from http://www.inrcog.org/pdf/2012_CEDS.pdf.
    ${ }^{451}$ Bureau of Labor Statistics. (accessed on January 15, 2013); available from http://www.bls.gov/.
    ${ }^{452}$ BankOn. 2012. (accessed on February 12, 2013); available from http://webtools.joinbankon.org/community/profile?stat e=IA\&place=Waterloo

[^143]:    ${ }^{453}$ Innovation Incubator. (accessed on February 12, 2013); available from http://www.uniincubator.com/
    ${ }^{454}$ City of Waterloo, Community Planning and Development. "Housing Needs Assessment, Fall 2011" (accessed on February 12, 2013); available from
    http://www.cityofwaterlooiowa.com/images/CommDevelopment/HousingNeedsAssessmentWaterlooFall2011.pdf
    ${ }^{455}$ WCFCourier. "Waterloo Community Development Board Proposes Spending Plan" (accessed February 12, 2013); available from http://wcfcourier.com/news/local/govt-and-politics/waterloo-community-development-board-proposes-spending-
    plan/article_dc692c98-a3f3-58ee-9497-19f469e7f2ca.html.
    ${ }^{456}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on February 12, 2013); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^144]:    ${ }^{457}$ US. Census Bureau. Accessed through PolicyMap. (accessed January 10, 2013); available from http://www.policymap.com

[^145]:    ${ }^{458}$ US. Census Bureau. Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    ${ }^{459}$ US. Census Bureau, Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    ${ }^{460}$ US. Census Bureau. Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    ${ }^{461}$ Kentucky Association of Realtors, 2011 Housing Statistics. (accessed on January 11, 2013); available at: http://www.kar.com/site/media-center/housing-statistics.html
    ${ }^{462}$ U.S.. Census Bureau, Residential Construction Bureau. Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com

[^146]:    ${ }^{463}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{464}$ U.S.. Census Bureau, Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    465 Kentucky Housing Corporation, "State of Housing in Kentucky, March 2012." (accessed on January 11, 2013); available at: http://www.kyhousing.org/uploadedFiles/Data_Library/Publications_and_Reports/HousingStudyBroch906.pdf?n=2719
    466 "Purchase Future: An Economic Strategy for the Purchase Region of Western Kentucky." Prepared for the Western Kentucky Workforce Investment Board and the Purchase Area Development District, June 2010. (accessed January 14, 2013); available: http://www.purchaseadd.org/files/PDF/WIA/Purchase_Region_FINAL_2010-11-11.pdf
    ${ }^{467}$ Paducah Economic Development. (accessed on January 14, 2013); available: http://www.epaducah.com/community-data/commonly-asked-rfiquestions/
    468 "Purchase Future: An Economic Strategy for the Purchase Region of Western Kentucky." Prepared for the Western Kentucky Workforce Investment Board and the Purchase Area Development District, June 2010. (accessed January 14, 2013); available: http://www.purchaseadd.org/files/PDF/WIA/Purchase_Region_FINAL_2010-11-11.pdf

[^147]:    ${ }^{469}$ Purchase Future: An Economic Strategy for the Purchase Region of Western Kentucky." Prepared for the Western Kentucky Workforce Investment Board and the Purchase Area Development District, June 2010. (accessed January 14, 2013); available: http://www.purchaseadd.org/files/PDF/WIA/Purchase_Region_FINAL_2010-11-11.pdf
    470
    ${ }^{471}$ Kentucky Youth Advocates and Annie E. Casey KIDS COUNT data. (accessed on January 14, 2013); available at: http://datacenter.kidscount.org/data/bystate/stateprofile.aspx?state=KY\&loc=2996

[^148]:    ${ }^{472}$ Kentucky Housing Corporation. "State of Housing in Kentucky, 2012." (accessed on January 14, 2013); available at; http://www.kyhousing.org/page.aspx?id=1649
    ${ }^{473}$ Kentucky Youth Advocates and Annie E. Casey KIDS COUNT data. (accessed on January 14, 2013); available at: http://datacenter.kidscount.org/data/bystate/stateprofile.aspx?state=KY\&loc=2996
    ${ }^{474}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^149]:    ${ }^{475}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^150]:    ${ }^{476}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{477}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{478}$ National Association of REALTORS®. Median Sales Price of Existing Single-Family Homes for Metropolitan Areas, $3^{\text {rd }}$ Quarter 2012. (accessed on December 6, 2012); available at: http://www.realtor.org/topics/metropolitan-median-area-prices-and-affordability/data
    ${ }^{479}$ Federal Reserve Bank of Atlanta calculations of data provided by Corelogic.
    ${ }^{480}$ US Census Bureau and Real Estate Center at Texas A\&M University. (accessed December 6, 2012); available at http://recenter.tamu.edu/data/bp/.
    ${ }^{481}$ Baton Rouge Trends. 2011 Residential Trends. (accessed on December 6, 2012); available at:
    http://www.batonrougetrends.com/historic/2011/default.htm
    ${ }^{482}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{483}$ US Census Bureau. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com

[^151]:    ${ }^{484}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{485}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Baton Rouge, Louisiana, January 2010" (accessed October 29, 2012); available at http://www.huduser.org/portal/publications/PDF/CMAR BatonRougeLA 10.pdf
    ${ }^{486}$ Baton Rouge Area Chamber. "2013 Economic Outlook" (accessed on December 6, 2012); available at: http://www.brac.org/ecocomp/ecoanalysis_research.asp
    ${ }^{487}$ Bureau of Labor Statistics

[^152]:    ${ }^{488}$ Baton Rouge Area Chamber. "2013 Economic Outlook" (accessed on December 6, 2012); available at: http://www.brac.org/ecocomp/ecoanalysis_research.asp
    ${ }^{489}$ City Parish Planning Commission. FUTUREEBR Plan. (accessed on December 6, 2012); available at: http://brgov.com/dept/planning/cpElements.htm
    ${ }^{490}$ City Parish Planning Commission. FUTUREEBR Plan. (accessed on December 6, 2012); available at: http://brgov.com/dept/planning/cpElements.htm

[^153]:    ${ }^{491}$ East Baton Rouge Redevelopment Authority. (accessed on December 7, 2012): available at: www.ebrra.org/
    ${ }^{492}$ Louisiana Housing Corporation. "Louisiana Housing Needs Assessment 2010" (accessed on November 12, 2012); available at: http://www.lhc.la.gov/downloads/gcr/LHFA_2010_FULLREPORT_f3_14Dec10.pdf
    ${ }^{493}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^154]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^155]:    ${ }^{494}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{495}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{496}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com

[^156]:    ${ }^{497}$ University of Louisiana at Monroe, Center for Business and Economic Research. "2011 Business Outlook Summit" (accessed on November 9, 2012); available at: http://cba.ulm.edu/cber/2011summit.html
    ${ }^{498}$ University of Louisiana at Monroe, Center for Business and Economic Research. "2011 Business Outlook Summit" (accessed on November 9, 2012); available at: http://cba.ulm.edu/cber/2011summit.html
    ${ }^{499}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{500}$ US Census Bureau. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com
    ${ }^{501}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }_{502} 2010$ Regional Economic Information Systems.
    ${ }^{503}$ Monroe Chamber of Commerce. "Economy of Monroe, Ouachita Parish" (accessed on November 9, 2012); available at: http://www.monroe.org/economy-of-ouachita-parish.htm

[^157]:    ${ }^{504}$ Bureau of Labor Statistics
    ${ }^{505}$ University of Louisiana at Monroe, College of Business Administration. "Business and Economic Climate of Monroe and Northeast Louisiana: 2011" (accessed on November 11, 2012); available at: http://cba.ulm.edu/cber/files/2011FactBook.pdf
    ${ }^{506}$ University of Louisiana at Monroe, Center for Business and Economic Research. "2011 Business Outlook Summit" (accessed on November 9, 2012); available at: http://cba.ulm.edu/cber/2011summit.html
    ${ }^{507}$ Louisiana Housing Corporation. "Louisiana Housing Needs Assessment 2010" (accessed on November 12, 2012); available at: http://www.lhc.la.gov/downloads/gcr/LHFA_2010_FULLREPORT_f3_14Dec10.pdf
    ${ }^{508}$ The Hayride. "Louisiana’s next V-Vehicle?" (accessed on November 12, 2012); available at: http://thehayride.com/2011/11/louisianas-next-v-vehicle/

[^158]:    ${ }^{509}$ Louisiana Housing Corporation. "Louisiana Housing Needs Assessment 2010" (accessed on November 12, 2012); available at: http://www.lhc.la.gov/downloads/gcr/LHFA_2010_FULLREPORT_f3_14Dec10.pdf
    ${ }^{510}$ NSP 2012 Quarterly report for the State of Louisiana. (accessed on November 8, 2012); available at: https://hudnsphelp.info/media/GAReports/Q_B-08-DN-22-0001_2012_Q1.pdf

[^159]:    ${ }^{511}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^160]:    ${ }^{512}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{513}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^161]:    ${ }^{514}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Comprehensive Housing Market Analysis, Shreveport-Bossier City, Louisiana, April 2012" (accessed December 13, 2012); available at http://www.huduser.org/portal/publications/PDF/ShreveportLA_comp_12.pdf
    ${ }^{515}$ US Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{516}$ National Association of REALTORS®. Median Sales Price of Existing Single-Family Homes for Metropolitan Areas, $3^{\text {rd }}$ Quarter 2012. (accessed on December 6, 2012); available at: http://www.realtor.org/topics/metropolitan-median-area-prices-andaffordability/data
    ${ }^{517}$ National Association of REALTORS®. "Shreveport-Bossier City Area, Local Market Report, Second Quarter 2012." (accessed on December 20, 2012); available at: http://www.realtor.org/sites/default/files/reports/2012/local-market-reports-2012-q2/local-market-reports-2012-q2-la-shreveport.pdf
    ${ }^{518}$ LSU Shreveport, Center for Business and Economic Research. "Residential Real Estate Trends." (accessed on December 20, 2012); available at: http://www.lsus.edu/offices-and-services/center-for-business-and-economic-research/economic-data/current-monthly-reports
    ${ }^{519}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{520}$ US Census Bureau. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com

[^162]:    ${ }^{521}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{522}$ North Louisiana Economic Partnership. (accessed on December 20, 2012); available at: http://www.nlep.org/North-Louisiana-Advantages-Regional-Diversity-.aspx
    ${ }^{523}$ Bureau of Economic Analysis, Regional Economic Information Systems. April 2012.
    ${ }^{524}$ LSU Shreveport, Center for Business and Economic Research. "A Look at Current Employment Statistics, 2011 and 2012" (accessed on December 20, 2012); available at: http://www.lsus.edu/offices-and-services/center-for-business-and-economic-research/economic-data/current-monthly-reports
    ${ }^{525}$ Bureau of Labor Statistics

[^163]:    ${ }^{526}$ Louisiana Housing Corporation. "Louisiana Housing Needs Assessment 2010" (accessed on November 12, 2012); available at: http://www.lhc.la.gov/downloads/gcr/LHFA_2010_FULLREPORT_f3_14Dec10.pdf
    ${ }^{527}$ Louisiana Housing Corporation. "Louisiana Housing Needs Assessment 2010" (accessed on November 12, 2012); available at: http://www.lhc.la.gov/downloads/gcr/LHFA_2010_FULLREPORT_f3_14Dec10.pdf

[^164]:    ${ }^{528}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^165]:    ${ }^{529}$ US Census Bureau. Accessed through PolicyMap. (accessed January 10, 2013); available from http://www.policymap.com
    ${ }^{530}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com

[^166]:    ${ }^{531}$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    ${ }_{532}^{532}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    ${ }^{533}$ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic.
    ${ }^{534}$ US Census Bureau, Residential Construction Bureau. Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    ${ }^{535}$ US Census Bureau. Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    ${ }_{537}^{536}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{537}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^167]:    ${ }^{538}$ Acadiana Regional Development Distrist. Economic Development Assessment and Evaluation of Iberia and St. Mary Parish, August 2010. (accessed on January 10, 2013); available at: http://www.ardd.org/LIBRARY/TOPICSdisaster.html
    ${ }^{539}$ Acadiana Regional Development District. Economic Development Assessment and Evaluation of Iberia and St. Mary Parish, August 2010. (accessed on January 10, 2013); available at: http://www.ardd.org/LIBRARY/TOPICSdisaster.html
    ${ }^{540}$ Bureau of Labor Statistics

[^168]:    ${ }^{541}$ Louisiana Housing Corporation. "Louisiana Housing Needs Assessment 2010" (accessed on November 12, 2012); available at: http://www.lhc.la.gov/downloads/gcr/LHFA_2010_FULLREPORT_f3_14Dec10.pdf
    ${ }^{542}$ Louisiana Housing Corporation. "Louisiana Housing Needs Assessment 2010" (accessed on November 12, 2012); available at: http://www.lhc.la.gov/downloads/gcr/LHFA_2010_FULLREPORT_f3_14Dec10.pdf
    ${ }^{543}$ Acadiana Regional Development District. Economic Development Assessment and Evaluation of Iberia and St. Mary’s Parish, August 2010. (accessed on January 10, 2013); available at: http://www.ardd.org/LIBRARY/TOPICSdisaster.html

[^169]:    ${ }^{544}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^170]:    ${ }^{545}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^171]:    ${ }^{546}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^172]:    ${ }^{547}$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    548 Jackson Association of Realtors, "2011 and 2012 Annual Report on Jackson's 7-County Regional Housing Market." (accessed on January 16, 20130; available at: http://jacksonrealtor.com/members/resources/frequently-requested-documents.aspx

[^173]:    ${ }^{549}$ US Census Bureau, Residential Construction Bureau. Accessed through PolicyMap. (accessed on January 10, 2013); available from http://www.policymap.com
    ${ }^{550}$ Jackson Association of Realtors, "2011 and 2012 Annual Report on Jackson's 7-County Regional Housing Market." (accessed on January 16, 20130; available at: http://jacksonrealtor.com/members/resources/frequently-requested-documents.aspx
    ${ }^{551}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{552}$ City of Jackson , Planning Services. "NSP Application and Quarterly Reports." (accessed on January 16, 2013); available at: http://www.jacksonms.gov/government/planning/planning
    ${ }^{553}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{554}$ Greater Jackson Alliance. (accessed on January 17, 2013); available at: http://www.greaterjacksonms.com/index.php/industry_information/business_lists

[^174]:    ${ }^{555}$ Nissan-Canton. "Quick Facts" (accessed on January 17, 2013); available at: http://www.nissan-canton.com/newscenter.html\#quickfacts
    ${ }^{556}$ Greater Jackson Alliance. WARN Reports (closures and layoffs). (accessed on January 17, 2013); available at: http://www.greaterjacksonms.com/index.php/industry_information/business_lists

[^175]:    ${ }^{557}$ Mississippi Economic Policy Center. (accessed on January 17, 2013); available at: http://mepconline.org/category/policy-areas/income-working-families

[^176]:    ${ }^{558}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^177]:    ${ }^{559}$ Internal Revenue Service. Statistics of Income - Migration Data. (accessed July 29, 2012); available from http://www.irs.gov/taxstats/article/0,,id=212683,00.html..

[^178]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^179]:    ${ }^{560}$ US Census Bureau. Quick Facts. (accessed on July 29, 2012.); available from http://quickfacts.census.gov/qfd/index.html.
    ${ }^{561}$ National Center for Education Statistics. Common Core Data. (accessed on September 5, 2012); available from http://nces.ed.gov/ccd/.
    ${ }^{562}$ US Census. Accessed via Policy Map. (accessed on September 5, 2012); available from www.policymap.com

[^180]:    ${ }^{563}$ US Census Bureau. Census Manufacturing, Mining and Construction Statistics. (accessed on September 5, 2012); available from http://www.census.gov/const/www/permitsindex.html.
    ${ }^{564}$ FFIEC. Home Mortgage Disclosure Act. (accessed on September 5, 2012.); available from http://www.ffiec.gov/hmda/.
    ${ }^{565}$ Blueprint Mississippi. Blueprint Mississippi 2011 Report. (accessed on September 5, 2012.); available from http://www.msmec.com/index.php/activities/blueprint-mississippi.
    ${ }^{566}$ SBA.Gov. SBA Mississippi HUBZone Program. (accessed on September 5, 2012): available from http://www.sba.gov/content/sba-mississippi-hubzone-program-outreach-event.

[^181]:    ${ }^{567}$ Mississippi Power. Facts and FAQs. (accessed on September 5, 2012); available from http://www.mississippipower.com/kemper/facts-and-faqs.asp. .
    ${ }^{568}$ REIS
    ${ }^{569}$ Delta Farm Press. In East Mississippi, Irrigation and Cotton Acres on the Increase. (accessed on September 5, 2012.); available from http://deltafarmpress.com/cotton/east-mississippi-irrigation-and-cotton-acres-increase.
    ${ }^{570}$ Forbes.com. The Weekly Layoff Report: Mississippi Blues. (accessed on September 5, 2012); available from http://www.forbes.com/2009/10/02/layoff-tracker-unemployment-careers-leadership-report.html.

[^182]:    ${ }^{571}$ US Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{572}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^183]:    ${ }^{573}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^184]:    ${ }^{574}$ Internal Revenue Service. "Statistics of Income - Migration Data." Accessed through PolicyMap. (accessed July 29, 2012); available from www.policymap.com

[^185]:    ${ }^{575}$ US Census Bureau. Accessed through PolicyMap. (accessed on September 1, 2012); available at www.policymap.com.
    ${ }^{576}$ US Census Bureau. Accessed through Policy Map. (accessed on September 5, 2012); available from www.policymap.com.
    ${ }^{577}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.

[^186]:    ${ }^{578}$ SE MO Regional Planning and Economic Development Commission. 2007. (accessed on November 6, 2012); available from http://semorpc.org/assets/econ_dev/2007\%20CEDS\%20Report.pdf.
    ${ }^{579}$ Southeast Missourian. June 2010. (accessed on November 11, 2012); available from http://www.semissourian.com/story/1644245.html.
    ${ }^{580}$ Kennett, Missouri Chamber of Commerce. 2012. (accessed on November 13, 2012); available from http://4cdgtest.com/kennettmo/workforce.html.

[^187]:    ${ }^{581}$ BankOn. 2011. (accessed on November 7, 2012); available from http://webtools.joinbankon.org/community/profile?state=MO\&place=Ste.\%20Genevieve
    ${ }^{582}$ US Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{583}$ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on November 7, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

[^188]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^189]:    ${ }^{584}$ Internal Revenue Service. "Statistics of Income - Migration Data." Accessed through PolicyMap. (accessed July 29, 2012); available from www.policymap.com

[^190]:    ${ }^{585}$ US Census Bureau. Accessed through PolicyMap. (accessed September 5, 2012); available from www.policymap.com.
    ${ }^{586}$ National Center for Education Statistics. Common Core Data. (accessed on September 5, 2012); available at: www.nces.ed.gov/ccd/.

[^191]:    ${ }^{587}$ US Census Bureau. Accessed through PolicyMap. (accessed on September 1, 2012); available at www.policymap.com.
    ${ }^{588}$ US Census Bureau. Accessed through Policy Map. (accessed on September 5, 2012); available from www.policymap.com.
    ${ }^{589}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{590}$ FFIEC. Home Mortgage Disclosure Act. (accessed on September 5, 2012); available from http://www.ffiec.gov/hmda/.
    ${ }^{591}$ SE MO Regional Planning and Economic Development Commission. 2007. (accessed on November 6, 2012); available from http://semorpc.org/assets/econ_dev/2007\%20CEDS\%20Report.pdf.

[^192]:    ${ }^{592}$ Southeast Missourian. June 2010. (accessed on November 11, 2012); available from http://www.semissourian.com/story/1644245.html.
    ${ }^{593}$ Missouri Department of Economic Development. 2012 (accessed on November 6, 2012); available from http://www.ded.mo.gov/Programs.aspx.

[^193]:    ${ }^{594}$ US Census Bureau. Quick Facts. Available at: http://quickfacts.census.gov/qfd/index.html. Accessed November 6, 2012.
    ${ }^{595}$ US Census Bureau. Quick Facts. Available at: http://quickfacts.census.gov/qfd/index.html. Accessed July 17, 2012.

[^194]:    ${ }^{596}$ National Association of REALTORS. Pricing Data: Single Family ${ }^{\text {st }}$ Quarter 2012. Available at: http://www.realtor.org/topics/metropolitan-median-area-prices-and-affordability. Accessed July 17, 2012.
    ${ }^{597}$ Boxwood Means. Accessed through PolicyMap. Available at: www.policymap.com. Accessed on July 17, 2012.
    ${ }^{598}$ US Census Bureau, Residential Construction Branch. Accessed through PolicyMap. Available at: www.policymap.com. Accessed July 16, 2012.

[^195]:    ${ }^{599}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{600}$ Bureau of Labor Statistics (BLS). Economy at a Glance. Charlotte-Gastonia-Rock Hill, NC-SC. Available at: http://www.bls.gov/eag/. Accessed November 6, 2012.

[^196]:    ${ }^{601}$ U.S. Census Bureau. American Community Survey Data (2006-2010) through Quick Facts. Available at: http://quickfacts.census.gov/qfd/index.html. Accessed November 7, 2012.
    ${ }^{602}$ U.S. Census' Small Area Income \& Poverty Estimates. Accessed through PolicyMap. Available at: www.policymap.com. Accessed July 17, 2012.
    ${ }^{603}$ CDFI Fund. Certified CDFIs and Native CDFIs - Sortable List. Available at:
    http://www.cdfifund.gov/what_we_do/programs_id.asp?programID=9. Accessed July 17, 2012.
    ${ }^{604}$ US Department of Housing and Development, Neighborhood Stabilization Program, NSP Grantees. Available: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults. Accessed July 13, 2012.

[^197]:    ${ }^{605}$ Bank On. 2009 FDIC National Survey of Unbanked and Underbanked Households data through Research Your Community: Mecklenburg County, NC. Available: http://webtools.joinbankon.org/community/search. Accessed November 7, 2012.

[^198]:    ${ }^{606}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^199]:    ${ }^{607}$ US Census. Accessed through PolicyMap. Available at: www.policymap.com. Accessed on July 13, 2012.
    ${ }^{608}$ US Census Bureau. Quick Facts. Available at: http://quickfacts.census.gov/qfd/index.html. Accessed on July 13, 2012.

[^200]:    ${ }^{609}$ Boxwood Means. Accessed through PolicyMap. Available at: www.policymap.com. Accessed on July 13, 2012.
    ${ }^{610}$ US Census Bureau, Residential Construction Branch. Accessed through PolicyMap. Available at: www.policymap.com. Accessed on July 16, 2012.
    ${ }^{611}$ National Association of REALTORS. Pricing Data: Single Family 1 ${ }^{\text {st }}$ Quarter 2012. Available at:
    http://www.realtor.org/topics/metropolitan-median-area-prices-and-affordability. Accessed on July 13, 2012.
    ${ }^{612}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{613}$ US Department of Housing and Urban Development. "Comprehensive Housing Market Analysis: Columbia, South Carolina." November 8, 2012. Available at: http://www.huduser.org/portal/publications/econdev/mkt_analysis.html. Accessed on July 13, 2012. ${ }^{614} 2010$ Regional Economic Information Systems.

[^201]:    ${ }^{615}$ Bureau of Labor Statistics (BLS). Economy at a Glance. Columbia, SC. Available at: http://www.bls.gov/eag/. Accessed November 7, 2012.
    ${ }^{616}$ CDFI Fund. Certified CDFIs and Native CDFIs - Sortable List. Available at: http://www.cdfifund.gov/what_we_do/programs_id.asp?programID=9. Accessed July 16, 2012.

[^202]:    ${ }^{617}$ U.S. Census' Small Area Income \& Poverty Estimates. Accessed through PolicyMap. Available at: www.policymap.com. Accessed on July 13, 2012.
    ${ }^{618}$ U.S. Census Bureau. Quick Facts. Available at: http://quickfacts.census.gov/qfd/index.html. Accessed on July 13, 2012.
    619 U.S. Department of Housing and Development, Neighborhood Stabilization Program, NSP Grantees. Available at: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults. Accessed July 13, 2012.
    ${ }^{620}$ Bank On. 2009 FDIC National Survey of Unbanked and Underbanked Households Data through Research Your Community: Richland County and Lexington County, SC. Available: http://webtools.joinbankon.org/community/search. Accessed November 7, 2012.

[^203]:    ${ }^{621}$ Internal Revenue Service, Statistics of Income - Migration Data. Access through PolicyMap. (accessed July 29, 2012); available from www.policymap.com.
    ${ }^{622}$ US Census Bureau, Quick Facts. Accessed through PolicyMap (access on July 29, 2012); available from www.policymap.com.

[^204]:    ${ }^{623}$ Islandpacket.com. "Hilton Head tourism up slightly, bucking trend among competing venues; real estate to lag" (accessed January 8, 2013); available from http://www.islandpacket.com/2009/08/10/930697/hilton-head-tourism-up-slightly.html.
    ${ }^{624}$ US Census Bureau. Accessed through PolicyMap (access on January 7, 2013); available from www.policymap.com
    ${ }^{625}$ US Census Bureau. Accessed through PolicyMap (access on January 7, 2013); available from www.policymap.com.
    ${ }^{626}$ Texas A\&M University Real Estate Center. 2012. (accessed on July 29, 2012); available from http://recenter.tamu.edu/data/bp/bpm/msa2040.asp.
    ${ }^{627}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.

[^205]:    ${ }^{628}$ South Carolina Employment Security Commission. "Beaufort County South Carolina Profile" (accessed January 7, 2013);
    available from http://www.lowcountryhighlights.com/articles/beaufortcountyprofile.pdf.
    ${ }^{629}$ REIS data
    ${ }^{630}$ University of South Carolina Beaufort. (accessed on January 8, 2013); available from http://www.uscb.edu/admissions/index.php.
    ${ }^{631}$ Jasper County, SC. (accessed January 8, 2013); available from http://www.jaspercountysc.org/secondary.aspx?pageID=137.
    ${ }^{632}$ Lowcountry Council of Governments. "Comprehensive Economic Development Strategy" (accessed January 8, 2013); available from
    http://www.lowcountrycog.sc.gov/SiteCollectionDocuments/Community\%20and\%20Economic\%20Development\%20Document\%20 Library/09-30-11\%20-\%20CEDS.pdf.
    ${ }^{633}$ Hiltonheadislander.com. "Hilton Head Island Economy" (accessed January 7, 2013); available from http://www.hiltonheadislander.com/hilton-head-economy.asp.

[^206]:    ${ }^{634}$ Mayor’s Task Force for the Island’s Future. "Vision 2025" (accessed January 8, 2013); available from http://www.hiltonheadislandsc.gov/publications/reports/MayorsTaskForce-FinalReport.pdf.
    ${ }_{635}$ Marine Corps Recruit Depot. (accessed on January 7, 2013); available from https://www.mcrdpi.usmc.mil/SitePages/Home.aspx.
    ${ }^{636}$ Business Wire. "Fitch Affirms Beaufort County SC GOs at ‘AA;' Outlook Stable" (accessed January 7, 2013); available from http://www.businesswire.com/news/home/20120906006706/en/Fitch-Affirms-Beaufort-County-South-Carolinas-GOs.
    ${ }^{637}$ Bureau of Labor Statistics. (accessed on January 8, 2013); available from http://www.bls.gov/home.htm.

[^207]:    ${ }^{638}$ Bank On. 2011. (accessed on January 3, 2013); available from
    http://webtools.joinbankon.org/community/profile?state=SC\&place=Beaufort
    ${ }^{639}$ Beaufort County, SC. "Comprehensive Plan" (accessed on January 8, 2013); available from http://www.bcgov.net/departments/administrative/beaufort-county-council/comprehensive-plan/2010-comprehensive-plan.php.
    ${ }^{640}$ US Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults.
    ${ }^{641}$ SC State Housing. (accessed on January 8, 2013); available from http://www.schousing.com/Housing_Partners/Tax_Credits.

[^208]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^209]:    ${ }^{642}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^210]:    ${ }^{643}$ US Census Bureau. Accessed through PolicyMap. (accessed on January 25, 2013); available at: http://www.policymap.com.
    ${ }^{644}$ US Census Bureau. Accessed through PolicyMap. (accessed on January 25, 2013); available at: http://www.policymap.com.

[^211]:    ${ }^{645}$ Data includes all assessment area counties, except Cannon County, which is outside the service area of the Greater Nashville Association of Realtors.
    ${ }^{646}$ Greater Nashville Association of Realtors "Area Home Sales Information." (accessed on September 4, 2012); available from : http://gnar.org.s157661.gridserver.com/area-home-sales
    ${ }^{647}$ Greater Nashville Association of Realtors "Area Home Sales Information." (accessed on September 4, 2012); available from : http://gnar.org.s157661.gridserver.com/area-home-sales
    ${ }^{648}$ US Census Bureau Residential Construction Branch. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com

[^212]:    ${ }^{649}$ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic
    ${ }^{650}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on September 4, 2012); available from http://www.policymap.com
    ${ }^{651}$ Nashville Area Chamber of Commerce. "Regional Profile" (accessed on September 6, 2012); available from: http://www.nashvillechamber.com/Libraries/Economic_Development_Brochures/2012_Regional_Profile.sflb.ashx
    ${ }^{652}$ BLS, 2010 Regional Economic Information Services data.

[^213]:    ${ }^{653}$ New York Times. "Old Saturn Plant Could Get a Second Chance." September 22, 2011. (accessed on September 6, 2012); available from http://www.nytimes.com/2011/09/23/business/gms-former-saturn-plant-in-spring-hill-tenn-mayreopen.html?pagewanted=all
    ${ }^{654}$ Nashville Area Chamber of Commerce. 2011-2012 Relocations and Expansions. (accessed on January 25, 2013); available at: http://www.nashvilleareainfo.com/homepage/relocation-expansion/recent-relocations-and-expansions
    ${ }^{655}$ Bureau of Labor Statistics
    ${ }^{656}$ Bureau of Labor Statistics

[^214]:    ${ }^{657}$ US Department of Housing and Urban Development, Office of Policy Development and Research. "Nashville-Davidson-Murfreesboro-Franklin, Tennessee" (accessed January 25, 2013); available at:
    http://www.huduser.org/portal/publications/PDF/NashvilleTN_comp_12.pdf
    ${ }^{658}$ KnoxNews.com. "Knoxville economy 15th on metro recovery index" (accessed on January 25, 2013); available at: http://blogs.knoxnews.com/harris/2012/06/knoxville-economy-15th-on-metro-recovery-index.html

[^215]:    ${ }^{659}$ Calculations by CFED of data from 2009 FDIC National Survey of Unbanked and Underbanked Households. (accessed on November 7, 2012); available at: http://webtools.joinbankon.org/community/search

[^216]:    ${ }^{660}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{661}$ US Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com

[^217]:    ${ }_{663} 66$ U.S. Census Bureau, Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{663}$ U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 23, 2012); available from http://www.policymap.com
    ${ }^{664}$ TN Housing Development Agency calculations of data provided by Property Assessment Division, Office of the Comptroller, State of Tennessee. (accessed on January 28, 2013); available at: http://tn-tennesseehda.civicplus.com/index.aspx?NID=178
    ${ }^{665}$ TN Housing Development Agency calculations of data provided by Property Assessment Division, Office of the Comptroller, State of Tennessee. (accessed on January 28, 2013); available at: http://tn-tennesseehda.civicplus.com/index.aspx?NID=178
    ${ }^{666}$ US Census Bureau, Residential Construction Branch. Accessed through PolicyMap. (accessed on January 28, 2013); available from http://www.policymap.com
    ${ }^{667}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.

[^218]:    ${ }^{668}$ US Census Bureau and HUD. Accessed through PolicyMap. (accessed on November 7, 2012); available from http://www.policymap.com
    ${ }^{669}$ Southeast Industrial Development Association (www.seida.info/www/docs/122/tennessee-county-profile-demographic-data/); The Cookeville Chamber of Commerce (http://www.cookevillechamber.com/Economic-
    Development/site_selection_assistance/majoremployers.php); Crossville Chamber of Commerce (http://www.crossvillechamber.com/docs/2013.pdf) (accessed on January 29, 2013)
    ${ }^{670}$ Bureau of Labor Statistics, 2010 Regional Economic Information Systems
    ${ }^{671}$ The Roane Alliance. (accessed on January 29, 2013); available at: http://www.roanealliance.org/economic_development.aspx
    ${ }^{672}$ State of Tennessee, Retire Tennessee. (accessed on January 29, 2013); available at: http://www.retiretennessee.org/Communities.html
    ${ }^{673}$ Bureau of Labor Statistics

[^219]:    ${ }^{674}$ East Tennessee Development District. "Comprehensive Economic Development Strategy, 2012-2013." (accessed on January 29, 2013); available at: http://www.etdd.org/PDF/2012-2013\%20CEDS\%20document.pdf

[^220]:    ${ }^{675}$ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

[^221]:    ${ }^{676}$ Austin Chamber. 2012. (Accessed on November 26, 2012); available from http://www.austinchamber.com/do-business/regionalprofile/counties/.
    ${ }^{677}$ Internal Revenue Service, Statistics of Income - Migration Data. Accessed through PolicyMap. (accessed July 29, 2012); available from www.policymap.com.

[^222]:    ${ }^{678}$ HUD. Housing Market Profile, Austin-Round Rock-San Marco, TX. (accessed December 19, 2012); available from http://www.huduser.org/portal/periodicals/USHMC/reg/USHMC\%20Regional\%20Reports\%20Q2\%202011/06\%20Southwest\%20regi on/Austin_Round_2q11.pdf.
    ${ }^{679}$ Travis County Plan and Consolidated Plan. (accessed on November 26, 2012); available from http://www.co.travis.tx.us/health_human_services/CDBG/pdfs/consolidated_plans/consolidated_plan_2011-13_final.pdf.

[^223]:    ${ }^{680}$ Travis County Plan and Consolidated Plan. (accessed on November 26, 2012); available from http://www.co.travis.tx.us/health_human_services/CDBG/pdfs/consolidated_plans/consolidated_plan_2011-13_final.pdf.
    ${ }^{681}$ 2009-2013 Consolidated Plan and 2009 Action Plan for Williamson County, Tx. (accessed on December 19, 2012); available from http://www.wilco.org/Portals/0/Departments/HUD/8-7-09\%20final\%20Strategic\%20Plan.pdf.
    ${ }^{682}$ US Census Bureau. Accessed through Policy Map. (accessed on September 5, 2012); available from www.policymap.com.
    ${ }^{683}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{684}$ FFIEC. Home Mortgage Disclosure Act. (accessed on September 5, 2012); available from http://www.ffiec.gov/hmda/.
    ${ }^{685}$ REIS data

[^224]:    ${ }^{686}$ Austin Chamber. 2012. (accessed on November 26, 2012); available from http://www.austinchamber.com/austin/work/employers.php.
    ${ }^{687}$ The Texas Economy. 2012. (accessed on December 19, 2012); available from http://www.thetexaseconomy.org/economicoutlook/.
    ${ }^{688}$ Forbes. "The Best Cities for Jobs." (accessed December 19, 2012); available from http://www.forbes.com/sites/joelkotkin/2012/05/01/the-best-cities-for-jobs-2/.
    ${ }^{689}$ Austin Business Journal. "Study: Austin No. 5 Strongest Economy." (accessed on November 26, 2012); available from http://www.bizjournals.com/austin/news/2012/05/31/study-austin-no-5-strongest-economy.html?surround=.
    ${ }^{690}$ CNN Money. "America’s Most Recession-Proof Cities." (accessed on December 19, 2012); available from http://money.cnn.com/2010/06/22/news/economy/recession_proof_cities/index.htm.
    ${ }^{691}$ Austin Chamber. 2012. (accessed on November 26, 2012); available from http://www.austinchamber.com/austin/work/employers.php.
    ${ }^{692}$ Campus Explorer. 2012. (accessed on November 26, 2012); available from http://www.campusexplorer.com/colleges/in/Texas/5958D4A9/Austin/.

[^225]:    ${ }^{693}$ BankOn. 2012. (accessed on November 7, 2012); available from http://webtools.joinbankon.org/community/profile?state= TX\&place=Austin
    ${ }^{694}$ BankOn. 2012. (accessed on January 3, 2012); available from http://joinbankon.org/programs/central_texas.

[^226]:    ${ }^{695}$ HUD. 2012. (accessed on December 26, 2012); available from https://hudnsphelp.info/media/GAReports/A_B-08-DN-480001.pdf.

[^227]:    Based on 2010 D\&B information according to 2000 Census Boundaries.

[^228]:    ${ }^{696}$ Greater Houston Partnership. "Houston Area Profile." Available at: http://www.houston.org/pdf/research/02CW001.pdf. Accessed November 8, 2012.
    ${ }^{697}$ US Census. Accessed through PolicyMap. Available at: www.policymap.com. Accessed on November 8, 2012.

[^229]:    ${ }^{698}$ Peterson, D’Ann and Laila Assanie. Federal Reserve Bank of Dallas. "Texas Dodges Worst of Foreclosure Woes." 4 ${ }^{\text {th }}$ Quarter 2009. Available at: http://www.dallasfed.org/research/economy/constr.cfm. Accessed November 8, 2012.
    ${ }^{699}$ Real Estate Center at Texas A\&M University. "Housing Activity and Affordability for Texas Areas." Available at: http://recenter.tamu.edu/data/hs/. Accessed November 8, 2012.
    ${ }^{700}$ Real Estate Center at Texas A\&M University. Building Permits: Houston, TX MSA. Available at: http://recenter.tamu.edu/data/bp/bpm/msa3360.asp. Accessed November 8, 2012.
    ${ }^{701}$ Federal Reserve Bank of Atlanta calculations of data provided by LPS.
    ${ }^{702}$ Harris County Neighborhood Stabilization Program I Plan. Available at: http://hudnsphelp.info/media/GAReports/A B-08-UN-48-0401.pdf. Accessed December 7, 2011.

[^230]:    ${ }^{703}$ Greater Houston Partnership, Energy Industry Overview. Available at: http://www.houston.org/economic-development/about-us/basic-fact-sheets/index.aspx. Accessed December 6, 2011.
    ${ }^{704}$ Greater Houston Partnership. "Corporate Headquarters." Available at: http://www.houston.org/pdf/research/14AW001.pdf. Accessed: December 6, 2011.
    ${ }^{705} 2008$ Regional Economic Information Systems.
    ${ }^{706}$ US Department of Housing and Urban Development. "Comprehensive Housing Market Analysis, Houston, TX, 2010" Available: http://www.huduser.org/portal/publications/econdev/mkt analysis.html. Accessed November 8, 2012.
    ${ }^{707}$ Levy, Francesca. Forbes, "Cities Where the Recession is Easing." March 8, 2010. Available at:
    http://www.governorperry.com/blog/forbes-if-one-state-poster-child-economic-recovery-its-texas/. Accessed November 8, 2012.
    ${ }^{708}$ Greater Houston Partnership. "Greater Houston Partnership 2012 Employment Forecast." December 2011. Available at: http://www.houston.org/pdf/research/EconomicForecast.pdf. Accessed November 8, 2012.

[^231]:    709 Greater Houston Partnership. "Greater Houston Partnership 2012 Employment Forecast." December 2011. Available at: http://www.houston.org/pdf/research/EconomicForecast.pdf. Accessed November 8, 2012.
    ${ }^{710}$ US Department of Housing and Urban Development. "Comprehensive Housing Market Analysis, Houston, TX, 2010" Available: http://www.huduser.org/portal/publications/PDF/CMAR_HoustonTX_10.pdf. Accessed November 8, 2012.
    ${ }^{711}$ Greater Houston Partnership. "Greater Houston Partnership 2012 Employment Forecast." December 2011. Available at: http://www.houston.org/pdf/research/EconomicForecast.pdf. Accessed November 8, 2012.
    ${ }^{712}$ Greater Houston Partnership. Available: http://www.houston.org/economic-development/industry-sectors/index.aspx. Accessed: November 8, 2012.

[^232]:    ${ }^{713}$ Federal Reserve Bank of Dallas. "Community Outlook Survey, Fourth Quarter 2011." Available: http://www.dallasfed.org/cd/cos/index.cfm. Accessed: November 8, 2012.
    ${ }^{714}$ US Department of Housing and Development, Neighborhood Stabilization Program, NSP Grantees. Available: http://hudnsphelp.info/index.cfm?do=viewGranteeAreaResults. Accessed November 13, 2012.

[^233]:    * Aggregate data is unavailable for loans to businesses w ith revenue over $\$ 1$ milion or revenue unknow $n$, and for loan size by revenue category.

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[^234]:    * Aggregate data is unavailable for loans to businesses w ith revenue over $\$ 1$ million or revenue unknow $n$, and for loan size by revenue category.

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