



PUBLIC DISCLOSURE

June 24, 2019

COMMUNITY REINVESTMENT ACT (CRA) PERFORMANCE EVALUATION

Avaska National Bank
Charter Number: 10523

248 East Capitol Street
Jackson, MS 39201

Office of the Comptroller of the Currency

400 7th Street SW
Washington, D.C. 20219

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, and should not be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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Overall CRA Rating

Bank's CRA Rating: This bank is rated Satisfactory.

The following table indicates the performance level of Avaska National Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	Avaska National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the performance across all ratings areas. The state rating areas of Alabama and Mississippi received greater weight. As discussed in the Scope of Evaluation section, these areas received greater emphasis (or weight) when arriving at the overall test rating. Weaker performance in the Memphis TN-MS MMSA and state of Texas rating areas was considered in arriving at the overall Lending Test rating, as it was significant enough to impact the rating.
- The Investment Test rating is based on the performance across all ratings areas, which was good. The bank has a significant level of qualified community development (CD) investments and grants across the rating areas.
- The Service Test rating is based on the performance across all ratings areas. The state rating areas of Alabama and Mississippi received greater weight.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment areas (AA).

The bank originated and purchased 84.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	22,526	82.3	4,838	17.7	27,364	3,932,048	83.3	789,601	16.7	4,721,650
Small Business	11,016	91.1	1,073	8.9	12,089	1,357,004	89.2	163,729	10.8	1,520,733
Small Farm	1,626	81.7	363	18.3	1,989	116,365	80.1	28,941	19.9	145,306
Total	35,168	84.9	6,274	15.1	41,442	5,405,417	84.6	982,271	15.4	6,387,689

Home mortgage loans and small business loans are considered primary products, as they have a greater direct impact and are more responsive to credit needs of all AAs, including low- and moderate-income (LMI) communities in the bank's AA. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

Description of Bank

Avaska National Bank (“TNB” or “bank”) is an interstate bank headquartered in Jackson, Mississippi, and wholly owned by the Avaska Corporation (TMC). The bank was chartered in December 1889. TMC is a one-bank holding company headquartered in Jackson, Mississippi and has several subsidiaries, including Avaska Investment Advisors, Inc., and Fisher Brown Bottrell Insurance, Inc. As of December 31, 2018, TNB had total assets of \$13.3 billion and Tier One Capital of \$1.3 billion. Affiliate activities were not considered in evaluating the bank’s performance during the evaluation period.

Southern Community Capital, LLC (SCC), a subsidiary of TNB, is a Community Development Entity (CDE) as certified through the Community Development Financial Institution (CDFI) Fund. Through a variety of investment vehicles, including New Markets Tax Credits (NMTC) and Historic Tax Credits, SCC provides below-market-cost capital to projects in underserved low-income communities that have deep and significant community impact. SCC leveraged its NMTC allocation deployment into several types of projects within its specified service areas of Mississippi and Alabama. SCC places an emphasis on projects that facilitate substantial job creation, which in turn increases individual wealth for low-income individuals.

As of December 31, 2018, total loans were \$9.1 billion representing 67.9 percent of total assets. The balance of the loan portfolio consisted of approximately 64.7 percent 1-4 family residential properties (\$5.9 billion), 17.1 percent commercial loans (\$1.6 billion), 15.7 percent other loans (\$1.4 billion), two percent consumer loans (\$183.8 million), and 0.5 percent agricultural loans (\$42.8 million).

The bank currently operates 189 full-service branch offices and 162 deposit-taking automated teller machines (ATM) across 17 AAs in five states: Alabama (AL), Florida (FL), Mississippi (MS), Tennessee (TN), and Texas (TX). In April 2017, the bank acquired Reliance Bank, along with its seven full-service branches located in Alabama. TNB opened four branches and closed 15 branches during the evaluation period.

The bank offers a variety of commercial, retail, insurance, and wealth management financial services products. Retail banking services include overdraft facilities, drive-in and night deposit services, safe deposit facilities, international banking services, and remote deposit capture. In addition to branches and ATMs, the bank’s delivery systems include 24/7 telephone banking, online banking, and mobile banking.

In addition, the bank offers an interactive teller machines (ITM) channel, myTeller, allowing customers to talk with a live teller with extended service hours, Monday through Friday. ITMs allow customers to deposit checks, cash checks, withdraw funds, transfer funds, and make loan payments. TNB introduced ITMs to customers on January 9, 2017. As of December 31, 2018, TNB employed four specialists to manage the ITMs.

During the evaluation period, the bank had five ITMs in the following AAs: two in the Memphis TN-MS MMSA, one in the Pensacola-Ferry Pass-Brent MSA branch, and two in the Jackson MSA.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. TNB's CRA performance was rated "Satisfactory" in the last public evaluation dated August 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's performance under the large bank Lending, Investment, and Service Tests. For the Lending Test, we analyzed home mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA), and small loans made to businesses and small loans to farms the bank reported under the CRA. All loan types were reviewed for the period of January 1, 2016 through December 31, 2018. Multifamily loans are not a primary loan product; therefore, we did not evaluate this product separately. However, we did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period.

The OCC compared bank loan data for all applicable years in the state rating areas to: demographic data using the U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2017 Dun and Bradstreet small business demographic data; 2017 peer mortgage loan data reported under HMDA; and 2017 peer small business data reported under CRA.

In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA, 2016, 2017, and 2018 data was analyzed separately. This was due to changes between the U.S. Census 2015 ACS and recent updates to HMDA data field collection. Analysis of data related to calendar year 2016 is based on the 2006-2010 ACS. Analysis of data related to calendar years 2017 and 2018 is based on the 2011-2015 ACS. In evaluating the geographic distribution and borrower income criteria under the Lending Test for CRA, 2016 data was analyzed separately from 2017 through 2018 data. This was due to changes of the U.S. Census 2015 ACS. Performance Tables O, P, Q, R, S, and T in appendix D include data covered by the analysis period 2016, and 2017 through 2018.

When evaluating the bank's performance under the Lending Test, we placed greater weight on the bank's performance in 2017 through 2018, as it represents the more significant analysis period within the evaluation period; this is discussed in the applicable narrative sections of the evaluation. The evaluation period for CD loans, the Investment Test, and the Service Test was January 1, 2016 through December 31, 2018. For purposes of analysis and discussion, CD loans and services and qualified investments are combined, but evaluated separately for each AA.

Small loans to farms were not a primary loan product in the states of Florida and Texas.

Bank and branch deposit data is as of June 30, 2018, based on information from the Federal Deposit Insurance Corporation (FDIC). The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same metropolitan statistical area (MSA) or multistate metropolitan statistical area (MMSA) are combined and evaluated as a single AA. Similarly, bank-delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

Refer to the “Scope” section under each State and Multistate Metropolitan Area Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state and MMSA ratings. The state ratings are based primarily on those areas that received full-scope reviews.

The state of Alabama and Mississippi rating areas carried the greatest weight in our conclusions because these areas represented the bank’s most significant market in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2018, deposits in these rating areas comprised 81.6 percent of TNB’s total deposits. Additionally, 75.7 percent of the bank’s branches were located, and 83.4 percent of reportable loan originations were generated in these states.

Additionally, when evaluating the bank’s performance under the Lending Test, we placed greater weight on the bank’s distribution of home mortgage loans than the distribution of small business loans or small farm loans. For most rating areas except the Memphis TN-MS MMSA and Texas, home mortgage loans represent the bank’s primary loan product and business focus. In addition, affordable housing is a need identified in all AAs. In reviewing the small business loans, we placed greater weight on small business loans than small farm loans due to it being the bank’s primary loan product in terms of volume and business focus; and based on the small business credit needs in all AAs. Minimal emphasis was placed on small loans to farms performance.

Generally, equal emphasis is given to the geographic distribution of loans and lending by borrower income level.

Refer to the “Scope” section under each State and MMSA section for details regarding how the areas were weighted in arriving at the respective ratings.

Other Performance

During mid-2018, TNB developed innovative and flexible loan programs. The Home Advantage and True Advantage programs are home mortgage products designed to facilitate homeownership and offer home improvements to LMI borrowers throughout its lending footprint. These programs were created in response to feedback the bank received from community organizations.

TNB offers the Home Advantage, a home purchase or refinance mortgage loan program for a single family residence. This program includes a lower down payment requirement compared to a conventional mortgage loan and does not require private mortgage insurance (PMI). Household income must be less than or equal to 80 percent of the area median income and home ownership counseling is required. The bank leveraged this program to originate 219 loans totaling over \$27.1 million in 2018 throughout the bank's AAs. The bank originated ten loans totaling over \$1.1 million in the Memphis TN-MS MMSA, 179 loans totaling over \$22.5 million in the state of Alabama, 28 loans totaling over \$3.1 million in the state of Mississippi, and two loans totaling \$291 thousand in the state of Florida.

TNB offers the True Advantage, a home improvement mortgage loan program for a single family residence. This program includes no equity requirement, no closing costs, has a maximum loan amount of \$3 thousand, and can be approved with a reduced credit score. The bank leveraged this program to originate eight loans totaling \$24 thousand in 2018 throughout the bank's AAs. The bank originated two loans totaling \$6 thousand in the Mobile MSA, four loans totaling \$12 thousand in the Jackson MSA, and two loans totaling \$6 thousand in the Memphis TN-MS MMSA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Rating

Memphis TN-MS MMSA

CRA rating for the Memphis TN-MS MMSA¹: Satisfactory

The Lending Test is rated:	Low Satisfactory	The Investment Test is rated:	Needs to Improve
rated:	High Satisfactory	The Service Test is rated:	

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs;
- The bank exhibits a poor geographic distribution of loans in its AA;
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank has made an adequate level of CD loans;
- The bank has made a significant level of qualified CD investments and grants;
- The bank's branches are unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals.
- The bank provides a few, if any, CD services.

Description of Bank's Operations in Memphis TN-MS MMSA

The Memphis TN-MS MMSA is comprised of the complete counties of Fayette and Shelby in TN and Desoto in MS.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 2.7 percent deposit market share in the AA and is ranked ninth out of 44 financial institutions doing business in the AA. The deposits accounted for 7.2 percent of the bank's total deposits. Primary competitors include First Tennessee Bank, National Association, which ranked first in deposit market share (36.3 percent) with 34 offices, Regions Bank, which ranked second in deposit market share (14.5 percent) with 41 offices, and SunTrust Bank, which ranked third in deposit market share (7.8 percent) with 24 offices.

TNB provides a full range of loan and deposit products and services in the state. The bank operates 18 full-service branches; one is located in a low-income Census Tract (CT), seven are located in middle-income CTs, and ten are located in upper-income CTs. In addition, the

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

bank has 17 deposit-taking ATMs and one ITM throughout the rating area. The branches represent 9.5 percent of the bank’s total branch network.

The bank made 5.4 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Memphis TN-MS MMSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Memphis TN-MS MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	265	24.2	20.0	21.9	31.7	2.3
Population by Geography	1,145,150	17.8	19.5	21.8	40.4	0.5
Housing Units by Geography	481,128	20.2	19.5	21.4	38.6	0.3
Owner-Occupied Units by Geography	254,919	10.8	15.6	23.2	50.3	0.1
Occupied Rental Units by Geography	167,161	28.3	23.8	20.4	27.2	0.3
Vacant Units by Geography	59,048	37.8	23.9	16.6	20.7	1.1
Businesses by Geography	63,539	12.5	15.7	22.2	48.5	1.1
Farms by Geography	1,481	7.8	11.9	27.1	52.5	0.8
Family Distribution by Income Level	275,627	24.1	15.4	17.2	43.3	0.0
Household Distribution by Income Level	422,080	25.2	15.2	16.4	43.2	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MMSA		\$58,186	Median Housing Value			\$137,855
			Median Gross Rent			\$875
			Families Below Poverty Level			14.8%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Memphis TN-MS MMSA is comprised of the complete counties of Desoto in Mississippi, Fayette and Shelby in Tennessee. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 265 CTs, of which 64 are low- income and 53 are moderate-income.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018, the unemployment rate in the Memphis TN-MS MMSA was four percent, down from 5.2 percent in January 2016. The national unemployment as of December 2018 was 3.9 percent; the

unemployment rate for the state of Tennessee was 3.3 percent and 4.7 percent for the state of Mississippi.

According to Moody's Analytics, job growth has accelerated since mid-2017 to a pace in the AA that is on a par with that in the Southern U.S. and the U.S. as a whole. An increase in professional, business and financial services employment are driving larger incomes within the AA. Despite strong labor force growth, the job market is tight, and employers are raising wages to attract workers. Average hourly earnings, which began to increase in 2017, rose approximately six percent in 2018, comfortably exceeding U.S. averages. Rising incomes are helping residential real estate sales, even though home sales have weakened as a result of higher mortgage rates and low inventories. New home construction remains historically low, which hit a new low in late 2018.

Housing Characteristics

According to the 2010 U.S. Census, 52.9 percent of the total housing units in the AA were owner occupied, and 34.7 percent were rental occupied units. Approximately, 10.8 percent of all owner occupied units and 28.6 percent of renter occupied units were located in low-income CTs; 18.5 percent of all single family (1-4 unit) homes and 29.3 percent of multifamily (five plus unit) housing units were located in low-income tracts. Approximately 15.6 percent of all owner occupied units and 23.8 percent of renter occupied units were located in moderate-income CTs; 19 percent of all single family (1-4 unit) homes and 21.7 percent of multifamily (five plus unit) housing units were located in moderate-income tracts.

The MMSA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers. According to Realtor.com data, the median housing value in the AA was \$162,300 and \$205,050 in 2016 and 2018, respectively, reflecting an increase of 26.3 percent. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$31,700 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$147,628 mortgage with a payment of \$792 per month. A moderate-income borrower making \$50,720 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$236,205 mortgage with a payment of \$1,268 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,100.

The OCC made five community contacts in the AA. A review of community contacts indicated that the following are identified needs within the community, which consists the entire AA:

- First-time homebuyer programs
- Residential Loans
- Small business training
- Small farm and business loans
- Financial Literacy

Scope of Evaluation in Memphis TN-MS MMSA

The Memphis TN-MS MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area.

The bank has a higher volume of home mortgage loans (81 percent) compared to small business loans (17.7 percent). TNB did not originate a sufficient volume of small farm loans during each analysis period to enable a meaningful analysis of the bank's performance in the rating area. Greater weight was generally given to performance compared to aggregate lenders rather than to performance relative to demographic factors in lending.

TNB offers all products in all markets but focuses on commercial loans in the Memphis TN-MS MMSA due to strong competition in the AA for home mortgage loans; TNB originates home mortgage loans as an accommodation to its business clients in this AA.

The Memphis TN-MS MMSA poses a number of challenges to banks in the rating area, including TNB.

- The low number of owner-occupied housing units can present a challenge for banks when attempting to originate home mortgages in these geographies. As such, the bank's performance in moderate-income CTs carried greater weight when coming to overall product conclusions.
- In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for low-income families somewhat impacts these borrowers' ability to purchase homes. Given the affordability issue for low-income borrowers, we placed more weight on lending to moderate-income borrowers.
- In performing our analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing institutions and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.
- In performing our analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MEMPHIS TN-MS MMSA LENDING TEST

The bank's performance under the Lending Test in the Memphis TN-MS MMSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Memphis TN-MS MMSA is adequate. We considered the factors discussed in describing the bank's operation in the MMSA above. We placed greater weight on small loans to businesses, as the bank indicated it is a strategy in the AA.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs, taking into account the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Memphis TNMS MMSA	1,538	336	24	5	1,903

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Memphis TNMS MMSA	\$ 34,355	\$ 48,700	\$ 1,967	\$ 985	\$ 86,007

According to FDIC Deposit Market Share data as of June 30, 2018, TNB had \$793 million in deposits with a deposit market share of 2.7 percent. TNB ranked ninth in total deposits out of 44 banks in the AA.

According to 2017 peer mortgage data, TNB ranked in the top four percent of lenders, 17th out of 454 lenders, originating home mortgage loans in the AA. The bank's market share of 1.6 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 25.1 percent of the market.

According to 2017 peer small business data, TNB ranked 25th out of 118 lenders originating small business loans in the AA. The bank's market share of 0.6 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 52.1 percent of the market.

According to 2017 peer small farm data, TNB ranked seventh out of 19 lenders originating small farm loans in the AA. The bank's market share of 4.3 percent and rank in loans is stronger than the bank's market share and rank in deposits. The five largest small farm lenders have captured 73.4 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Memphis TN-MS MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The distribution of the bank's home mortgage lending in 2016 was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans was significantly below the aggregate distribution in low-income geographies and exceeds the aggregate distribution in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2017 was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans was significantly below the aggregate distribution in low-income geographies and well below in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2018 was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans was well below the aggregate distribution in LMI income geographies.

Small Loans to Businesses

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table Q in the Memphis TN-MS MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses in LMI geographies was adequate. The proportion of loans was near to the percentage of businesses in low-income geographies, and was near to the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies exceeded the aggregate distribution of loans in those geographies, and was near to the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was weaker than performance in the 2017 through 2018 analysis period and was poor. Performance in 2016 had a neutral impact on the evaluation of loans.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed TNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Memphis TN-MS MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to low-income borrowers. These issues were considered in evaluating the bank's performance in the AA.

The distribution of the bank's home mortgage lending in 2016 was excellent. The proportion of loans was well below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

The distribution of the bank's home mortgage lending in 2017 was excellent. The proportion of loans was well below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

The distribution of the bank's home mortgage lending in 2018 was excellent. The proportion of loans was well below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table R in the Memphis TN-MS MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was significantly below the percentage of small businesses, and near to aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was weaker than performance in the 2017 through 2018 analysis period and was poor. Performance in 2016 had a neutral impact on the evaluation of loans.

Community Development Lending

The bank has made an adequate level of CD loans, which had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TNB originated five CD loans totaling \$985 thousand and representing 1.1 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. Loans supported affordable housing and revitalization/stabilization in the AA.

Examples of CD loans originated during the evaluation period include:

- \$170 thousand loan to an organization for the construction of a multifamily unit apartment building located in a low-income CT. All six units have two bedrooms and rental rates are considered affordable.
- \$180 thousand loan renewal to finance a 25 multifamily unit apartment complex located in a moderate-income CT, with rental rates considered affordable.
- \$635 thousand in annual loan renewals to a nonprofit organization for working capital. The purpose of this organization is to create a partnership with the City of Memphis and other interested parties, with a goal of community revitalization and redevelopment.

Product Innovation and Flexibility

The bank makes little use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

TNB works in conjunction with the Tennessee Housing Development Agency and the Mississippi Home Corporation to offer affordable housing assistance programs to first time and non-first time homebuyers. These affordable loan products are offered under the agency's programs, which may include down payment assistance, closing cost assistance, and tax credits. TNB leveraged these programs to originate 28 loans totaling \$3.7 million in the Memphis TN-MS MMSA during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test in the Memphis TN-MS MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Memphis TN-MS MMSA is good. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Memphis TN-MS MMSA	37	\$ 9,740	82	\$ 9,104	119	100.0%	\$ 18,844	100.0%	0	\$ -

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank has a significant level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$18.8 million, with current period investments of \$9.1 million, prior period investments of \$9.7 million, and qualified grants of \$79 thousand. Investments benefiting the AA during the evaluation represented 9.7 percent of allocated tier 1 capital. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$8.7 million in 36 qualifying mortgage backed securities (MBS) supporting mortgages to LMI borrowers and \$982 thousand in a qualifying CD investment activity.

All grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$15 thousand grant to a nonprofit organization that provides a variety of community services through partner organizations that primarily target LMI individuals and families.
- \$5 thousand grant to an organization that provides free food and other services to LMI individuals and families.

Regional

We considered the ongoing impact from investments made prior to the current evaluation period across Mississippi and Tennessee. The remaining balances consisted of \$542 thousand in six qualifying MBS supporting mortgages to LMI borrowers.

SERVICE TEST

The bank’s performance under the Service Test in the Memphis TN-MS MMSA is rated Needs to Improve.

Based on a full-scope review, the bank’s performance in the Memphis TN-MS MMSA is poor.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Memphis TNMS MMSA	100.0	18	100.0	5.6	0.0	38.9	55.6	17.8	19.5	21.8	40.4

The bank’s branches are unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 18 branches within the AA, with one branch in a low-income CT, and no branches in moderate-income CTs. The percentage of the bank’s branches in LMI geographies is well below the percentage of population living in the LMI geographies. The bank has 17 deposit-taking ATMs located in the AA, with one in a lowincome CT, and none in moderate-income CTs. The percentage of ATMs in LMI CTs is below the level of population in the LMI areas. ATM distribution is consistent with the bank’s branch distribution.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
0	2			+1	+1

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank closed two branches, including a branch located in a middle-income CT in 2017 and a branch located in an upper-income CT in 2018.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

TNB provides a few, if any, CD services in the Memphis TN-MS MMSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a few, if any CD services, consistent with its capacity and expertise to conduct specific activities. TNB employees from various lines of business provided technical assistance to 33 different CD organizations totaling 196 hours during the evaluation period.

Examples of some of these services:

- An employee provided technical assistance to an organization that provides homelessness prevention and intervention services, shelter and financial assistance. The organization provides resources for victims of violence, and helps stabilize families in financial crisis by providing emergency shelter, food and financial services.

State Rating

State of Alabama

CRA rating for the State of Alabama²: Satisfactory

The Lending Test is rated:	High Satisfactory	The Investment Test is
rated:	Low Satisfactory	The Service Test is rated:
Satisfactory		Low

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs;
- The bank exhibits an adequate geographic distribution of loans in its AAs;
- The bank exhibits a good distribution of loans among individuals of different income levels, and businesses and farms of different sizes;
- The bank has made a relatively high level of CD loans, which had a positive impact on lending performance;
- The bank has made an adequate level of qualified CD investments and grants;
- The bank's branches are readily accessible to geographies and individuals of different income levels in the AAs;
- The bank provides a relatively high level of CD services.

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Description of Bank's Operations in Alabama

TNB has eight AAs within the state of Alabama. These AAs are comprised of the Auburn-Opelika MSA, Daphne-Fairhope-Foley MSA, Birmingham-Hoover MSA, Huntsville MSA, Mobile MSA, Montgomery MSA, AL Non-MSA, and Tuscaloosa MSA. The AAs consist of whole MSAs or counties. The non-metropolitan areas were combined for analysis purposes.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 1.6 percent deposit market share in AL and is ranked ninth out of 156 financial institutions doing business in the state. The deposits accounted for 14.9 percent of the bank's total deposits. Primary competitors include Regions Bank, which ranked first in deposit market share (21.7 percent) with 217 offices, Compass Bank which ranked second in deposit market share (14.2 percent) with 88 offices, and Wells Fargo Bank, National Association, which ranked third in deposit market share (8.5 percent) with 116 offices.

TNB provides a full-range of loan and deposit products and services in the state, a specific focus on commercial loans in the Mobile AA. The bank operates 43 full-service branches; three are located in low-income CTs, eight are located in moderate-income CTs, 19 are located in middle-income CTs, and 13 are located in upper-income CTs. In addition, the bank has 45 deposit-taking ATMs and two ITMs throughout the rating area. The branches represent 22.8 percent of the bank's total branch network.

The bank made 29.2 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state.

Mobile MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Mobile MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	114	16.7	23.7	32.5	26.3	0.9
Population by Geography	414,251	9.3	18.2	36.5	35.8	0.2
Housing Units by Geography	180,932	9.2	19.3	36.7	34.9	0.0
Owner-Occupied Units by Geography	102,608	5.7	15.0	38.5	40.9	0.0
Occupied Rental Units by Geography	51,580	13.1	24.8	33.4	28.7	0.0
Vacant Units by Geography	26,744	14.9	25.0	36.3	23.8	0.0
Businesses by Geography	22,634	7.2	20.5	31.4	40.8	0.2
Farms by Geography	499	4.2	9.2	42.5	43.9	0.2
Family Distribution by Income Level	103,554	24.0	15.6	19.0	41.4	0.0

Household Distribution by Income Level	154,188	26.5	15.0	15.9	42.5	0.0
Median Family Income MSA - 33660 Mobile, AL MSA		\$54,215	Median Housing Value			\$125,900
			Median Gross Rent			\$781
			Families Below Poverty Level			15.7%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

The Mobile MSA is comprised of the complete Mobile County in Alabama. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 114 CTs of which 19 are low- income and 27 are moderate-income.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 4.3 percent deposit market share in the AA and is ranked seventh out of 21 financial institutions doing business in the AA. The deposits accounted for 2.8 percent of the bank's total deposits. Primary competitors include Regions Bank, which ranked first in deposit market share (31 percent) with 24 offices; Compass Bank, which ranked second in deposit market share (12.7 percent) with 12 offices; Hancock Whitney Bank, which ranked third in deposit market share (12.2 percent) with six offices; PNC Bank, National Association, which ranked fourth in deposit market share (10.1 percent) with 14 offices; and Wells Fargo Bank, National Association, which ranked fifth in deposit market share (8.6 percent) with 11 offices.

The bank made 6.2 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Mobile MSA was 4.5 percent, down from 6.9 percent in January 2016. The national unemployment rate as of December 2018 was 3.9 percent, and 3.8 percent for the state of Alabama.

According to Moody's Analytics, job growth in 2018 was the strongest so far this decade and continues with strong momentum. The acceleration in hiring is concentrated entirely in private services, which added jobs faster than anywhere else in Alabama. The increase is due in part to a surge in leisure and hospitality jobs, which have grown significantly since mid-2010. The labor force is expanding faster than it is nationally and is the largest since 2011. As a result, the unemployment rate in the AA is no longer declining, but is near its cycle low.

Housing Characteristics

According to the 2010 U.S. Census, 56.7 percent of the total housing units in the AA were owner occupied, and 28.5 percent were rental occupied units. Approximately 5.7 percent of all

owner occupied units and 13.1 percent of renter occupied units were located in low-income CTs; 10.6 percent of all single family (1-4 unit) homes and 5.3 percent of multifamily (five plus unit) housing units were located in low-income tracts. Approximately 15 percent of all owner occupied units and 24.8 percent of renter occupied units were located in moderate-income CTs; 19.1 percent of all single family (1-4 unit) homes and 25.7 percent of multifamily (five plus unit) housing units were located in moderate-income tracts.

The AA is a high-cost housing area, limiting access to affordable home ownership among low-income borrowers. According to Realtor.com data, the median housing value in the AA was \$145,049 and \$169,050 in 2016 and 2018, respectively, reflecting an increase of 16.5 percent. Assuming a 30-year mortgage with a five percent interest rate, and excluding any down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,900 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$139,245 mortgage with a payment of \$747 per month. A moderate-income borrower making \$47,840 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$222,792 mortgage with a payment of \$1,196 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$907.

Economic Conditions

According to Moody's Analytics, the AA has outshined the state and the nation in manufacturing and logistics because of increased government spending and private investment. Transportation equipment manufacturing accounts for one third of factory jobs in the AA. The AA is home to the Port of Alabama, one of the ten largest ports by tonnage in the country and the only deep water port in the state, which has benefited from increased manufacturing and trade.

The AA's leisure and hospitality industries are booming, but the current rapid rate of growth is unsustainable. According to the Alabama Tourism Department, tourist spending rose eight percent in 2018 due to a six percent increase in the number of visitors.

The OCC made six community contacts in the AA. A review of community contacts indicated that the following are identified needs within the various communities:

- Affordable Housing
- First-time homebuyer programs
- Neighborhood Revitalization
- Financial Literacy
- Small dollar loans for consumers and small business

Montgomery MSA

<p>Table A – Demographic Information of the Assessment Area Assessment Area: Montgomery MSA</p>
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Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	92	12.0	22.8	34.8	29.3	1.1
Population by Geography	364,122	9.4	19.8	37.2	33.5	0.1
Housing Units by Geography	158,792	9.5	21.3	37.0	32.0	0.2
Owner-Occupied Units by Geography	89,536	6.1	16.9	38.5	38.5	0.0
Occupied Rental Units by Geography	49,043	13.4	27.2	35.3	23.7	0.4
Vacant Units by Geography	20,213	15.2	26.7	34.5	23.3	0.4
Businesses by Geography	20,813	7.0	17.5	37.7	33.8	4.0
Farms by Geography	596	3.5	13.6	44.3	38.1	0.5
Family Distribution by Income Level	91,711	24.0	16.0	18.2	41.7	0.0
Household Distribution by Income Level	138,579	24.7	15.2	17.0	43.1	0.0
Median Family Income MSA - Montgomery, AL MSA	33860	\$59,161	Median Housing Value			\$136,030
			Median Gross Rent			\$811
			Families Below Poverty Level			15.0%
<i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Montgomery MSA is comprised of the complete counties of Autauga, Elmore, and Montgomery in Alabama. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 92 CTs of which 11 are low- income and 21 are moderate-income.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 3.5 percent deposit market share in the AA and is ranked tenth out of 23 financial institutions doing business in the AA. The deposits accounted for 2.5 percent of the bank's total deposits. Primary competitors include Regions Bank, which ranked first in deposit market share (20.9 percent) with 20 offices; Compass Bank, which ranked second in deposit market share (15.8 percent) with seven offices; Branch Banking and Trust Company, which ranked third in deposit market share (10.2 percent) with nine offices; Wells Fargo Bank, National Association, which ranked fourth in deposit market share (9.1 percent) with nine offices; and Synovus Bank, which ranked fifth in deposit market share (8.6 percent) with three offices.

The bank made 5.3 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Montgomery MSA was 3.8 percent, down from 5.7 percent in January 2016. The national unemployment rate as of December 2018 was 3.9 percent, and 3.8 percent for the state of Alabama.

Housing Characteristics

According to the 2010 U.S. Census, 56.4 percent of the total housing units in the AA were owner occupied, and 30.9 percent were rental occupied units. Approximately 6.1 percent of all owner occupied units and 13.4 percent of renter occupied units were located in low-income CTs; 9.9 percent of all single family (1-4 unit) homes and 8.8 percent of multifamily (five plus unit) housing units were located in low-income tracts. Approximately 16.9 percent of all owner occupied units and 27.2 percent of renter occupied units were located in moderate-income CTs; 19.9 percent of all single family (1-4 unit) homes and 30.9 percent of multifamily (five plus unit) housing units were located in moderate-income tracts.

The AA is a high-cost housing area, limiting access to affordable home ownership among low-income borrowers. According to Realtor.com data, the median housing value in the AA was \$159,950 and \$184,950 in 2016 and 2018, respectively, reflecting an increase of 15.6 percent. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner’s insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$31,450 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$146,463 mortgage with a payment of \$786 per month. A moderate-income borrower making \$50,320 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$234,342 mortgage with a payment of \$1,258 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$992.

The OCC made six community contacts in the AA. A review of community contacts indicated that the following are identified needs within the various communities:

- Affordable Housing
- Financial Literacy
- Grants to nonprofit organizations
- Serve as nonprofit board members

AL Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: AL Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	102	2.9	27.5	49.0	18.6	2.0
Population by Geography	370,356	2.9	22.0	49.3	23.2	2.6

Housing Units by Geography	166,985	2.7	24.1	51.1	20.7	1.4
Owner-Occupied Units by Geography	86,470	1.5	17.3	51.9	28.9	0.3
Occupied Rental Units by Geography	46,695	5.2	31.8	49.4	12.0	1.6
Vacant Units by Geography	33,820	2.1	30.7	51.2	11.9	4.0
Businesses by Geography	18,418	2.9	26.9	45.3	23.3	1.7
Farms by Geography	751	0.8	13.4	59.1	26.4	0.3
Family Distribution by Income Level	87,194	24.9	16.2	17.9	40.9	0.0
Household Distribution by Income Level	133,165	27.9	14.8	15.7	41.6	0.0
Median Family Income MSA - 46220 Tuscaloosa, AL MSA	\$56,265	Median Housing Value				\$130,709
Median Family Income AL Non-MSA	\$45,334	Median Gross Rent				\$682
		Families Below Poverty Level				17.7%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AL Non-MSA is comprised of the complete counties of Barbour, Butler, Dallas, Escambia, Marengo, and Monroe in AL. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 102 CTs of which three are low- income and 28 are moderate-income.

According to the 2018 FFIEC list of distressed or underserved nonmetropolitan middle-income geographies, the AA includes 30 distressed middle-income CTs, of which the counties of Barbour had six, Butler had seven, Dallas had six, Escambia had five, Marengo had two, and Monroe had four. The six CTs in Marengo and Monroe were also considered underserved. Distressed communities are those designated by the regulatory agencies as being in distress; underserved communities are those designated as having difficulty meeting essential community needs. A particular geography could be designated as both distressed and underserved.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 22.8 percent deposit market share in the AA and is ranked first out of 28 financial institutions doing business in the AA. The deposits accounted for 5.3 percent of the bank's total deposits. Primary competitors include United Bank, which ranked second in deposit market share (11.5 percent) with six offices; Robertson Banking Company, which ranked third in deposit market share (8.1 percent) with four offices; Regions Bank, which ranked fourth in deposit market share (7.2 percent) with six offices; and the First National Bank and Trust, which ranked fifth in deposit market share (4.8 percent) with four offices.

The bank made 5.8 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Housing Characteristics

According to the 2010 U.S. Census, 51.8 percent of the total housing units in the AA were owner occupied, and 28 percent were rental occupied units. Approximately 1.5 percent of all owner occupied units and 5.2 percent of renter occupied units were located in low-income CTs; 3.4 percent of all single family (1-4 unit) homes and 1.7 percent of multifamily (five plus unit) housing units were located in low-income tracts. Approximately 17.3 percent of all owner occupied units and 31.8 percent of renter occupied units were located in moderate-income CTs; 22.9 percent of all single family (1-4 unit) homes and 35.2 percent of multifamily (five plus unit) housing units were located in moderate-income tracts.

The OCC made six community contacts in the AA. A review of community contacts indicated that the following are identified needs within the various communities:

- Affordable Housing
- First-time homebuyer programs
- Retail development
- Small business lending
- Start-up business education

Scope of Evaluation in Alabama

For the state of Alabama, we completed a full-scope review of the Mobile MSA, Montgomery MSA, and AL Non-MSA. Ratings are based primarily on results of the full-scope areas. We completed a limited-scope review of Auburn-Opelika MSA, Birmingham-Hoover MSA, DaphneFairhope-Foley MSA, Huntsville MSA, and Tuscaloosa MSA.

The Mobile MSA was selected as it ranks as TNB's second highest market for deposits (18.5 percent) and reportable loans (20.4 percent) in the state. The Montgomery MSA has not received a full-scope analysis previously, and was selected for analysis due to the sizeable percentage of deposits (16.7 percent), reportable loans (17.5 percent), and branch distribution (15.6 percent) in the state. The AL Non-MSA was selected for analysis using full-scope procedures because it had the largest percent of the bank's deposits (31.1 percent), reportable loans (20.6 percent), and branch distribution (31.1 percent) within the state. It is also the fourth largest deposit market share for the bank. In addition, the deposit market share indicates the bank is important to the AA.

Due to the higher volume of home mortgage loans (68.9 percent) compared to small business loans (28.6 percent), home mortgage loans were weighted heavier in the rating area. In Mobile, we placed greater weight on small loans to businesses, as the bank indicated it is a strategy in the AA. With the exception of the AL Non-MSA, TNB did not originate a sufficient volume of small farm loans during the evaluation period to enable a meaningful analysis of the bank's performance in the rating area. Greater weight was generally given to performance compared to aggregate lenders rather than to performance relative to demographic factors in lending.

Refer to Appendix A for more information of all AAs under review.

The state of Alabama poses a number of challenges to banks in the rating area, including TNB.

- The low number of owner-occupied housing units can present a challenge for banks when attempting to originate home mortgages in these geographies. As such, the bank's performance in moderate-income CTs carried greater weight when coming to overall product conclusions.
- In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for low-income families somewhat impacts these borrowers' ability to purchase homes. Given the affordability issue for low-income borrowers, we placed more weight on lending to moderate-income borrowers.
- In performing our analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing institutions and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.
- In performing our analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA LENDING TEST

The bank's performance under the Lending Test in Alabama is rated High Satisfactory. The state rating is based on performance in AAs receiving full-scope reviews.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Mobile MSA and Montgomery MSA is good, and in the AL Non-MSA is excellent. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
Auburn-Opelika MSA	98	116	17	3	234	2.3%	4.4%
DaphneFairhopeFoley MSA	1274	232	18	0	1524	14.9%	5.4%
Birmingham-Hoover MSA	1348	461	12	1	1822	17.8%	7.2%
Huntsville MSA	565	84	7	1	657	6.4%	11.6%
Mobile MSA	1400	680	6	14	2100	20.5%	18.5%

Montgomery MSA	1300	472	15	2	1789	17.5%	16.7%
AL Non-MSA	675	824	182	7	1688	16.5%	35.8%
Tuscaloosa MSA	369	49	0	0	418	4.1%	0.5%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
Auburn-Opelika MSA	\$ 9,931	\$ 15,514	\$ 896	\$ 24,700	\$ 51,041	7.2%	4.4%
DaphneFairhopeFoley MSA	\$ 21,738	\$ 27,591	\$ 702	\$ -	\$ 50,031	7.0%	5.4%
Birmingham-Hoover MSA	\$ 43,499	\$ 66,459	\$ 1,264	\$ 22,000	\$ 133,222	18.7%	7.2%
Huntsville MSA	\$ 7,556	\$ 14,858	\$ 434	\$ 450	\$ 23,298	3.3%	11.6%
Mobile MSA	\$ 74,762	\$ 108,753	\$ 739	\$ 35,681	\$ 219,935	30.9%	18.5%
Montgomery MSA	\$ 31,711	\$ 48,318	\$ 478	\$ 812	\$ 81,319	11.4%	16.7%
AL Non-MSA	\$ 48,339	\$ 73,906	\$ 16,860	\$ 6,243	\$ 145,348	20.4%	35.8%
Tuscaloosa MSA	\$ 3,425	\$ 5,254	\$ -	\$ -	\$ 8,679	1.2%	0.5%

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Mobile MSA

Lending levels reflect good responsiveness to AA credit needs, taking into account the number and amount of home mortgage and small business loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

According to FDIC Deposit Market Share data as of June 30, 2018, TNB had \$305 million in deposits with a deposit market share of 4.3 percent. TNB ranked seventh in total deposits out of 21 banks in the AA.

According to 2017 peer mortgage data, TNB ranked in the top two percent of lenders, fourth out of 294 lenders originating home mortgage loans in the AA. The bank's market share of 4.8 percent and rank in loans is stronger than the bank's market share and rank in deposits. The four largest mortgage lenders have captured 23.8 percent of the market.

According to 2017 peer small business data, TNB ranked 12th out of 85 lenders originating small business loans in the AA. The bank's market share of 3.1 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 45.1 percent of the market.

Montgomery MSA

Lending levels reflect good responsiveness to AA credit needs, taking into account the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

According to FDIC Deposit Market Share data as of June 30, 2018, TNB had \$275.4 million in deposits with a deposit market share of 3.5 percent. TNB ranked 10th in total deposits out of 23 banks in the AA.

According to 2017 peer mortgage data, TNB ranked in the top three percent of lenders, sixth out of 267 lenders originating home mortgage loans in the AA. The bank's market share of 4.1 percent and rank in loans is stronger than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 26.6 percent of the market.

According to 2017 peer small business data, TNB ranked 10th out of 73 lenders originating small business loans in the AA. The bank's market share of 3.4 percent and rank in loans is near to the bank's market share and rank in deposits. The five largest small business lenders have captured 47.6 percent of the market.

AL Non-MSA

Lending levels reflect excellent responsiveness to AA credit needs, taking into account the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

According to FDIC Deposit Market Share data as of June 30, 2018, TNB had \$590.7 million in deposits with a deposit market share of 22.8 percent. TNB ranked first in total deposits out of 28 banks in the AA.

According to 2017 peer mortgage data, TNB ranked in the top one percent of lenders, first out of 188 lenders originating home mortgage loans in the AA. The bank's market share of 8.4 percent in loans is weaker than the bank's market share in deposits, but equals the bank's rank in deposits. The four largest remaining mortgage lenders have captured 25.4 percent of the market.

According to 2017 peer small business data, TNB ranked in the top two percent of lenders, first out of 63 lenders originating small business loans in the AA. The bank's market share of 17.3 percent in loans is weaker than the bank's market share in deposits, but equals the bank's rank in deposits. The four largest remaining small business lenders have captured 33.6 percent of the market.

According to 2017 peer small farm data, TNB ranked in the top one percent of lenders, second out of 16 lenders originating small farm loans in the AA. The bank's market share of 27.4 percent and rank in loans is stronger than the bank's market share in deposits, but is weaker than the bank's rank in deposits. The four largest remaining small farm lenders have captured 59.8 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Mobile MSA

The geographic distribution of home mortgage loans was poor.

The distribution of the bank's home mortgage lending in 2016 was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans was well below the aggregate distribution in low-income geographies and below in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2017 was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans was significantly below the aggregate distribution in low-income geographies and below in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2018 was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans was significantly below the aggregate distribution in low-income geographies and well below in moderate-income geographies.

Montgomery MSA

The geographic distribution of home mortgage loans was adequate.

The distribution of the bank's home mortgage lending in 2016 was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans exceeds the aggregate distribution in low-income geographies and was well below the aggregate in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2017 was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and was well below in moderate-income geographies. The proportion of loans was well below the aggregate distribution in low-income geographies, and near to in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2018 was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and was well below in moderate-income geographies. The proportion of loans

was significantly below the aggregate distribution in low-income geographies, and near to in moderate-income geographies.

AL Non-MSA

The geographic distribution of home mortgage loans was good.

The distribution of the bank's home mortgage lending in 2016 was good. The proportion of loans was near to the percentage of owner-occupied housing units in low-income geographies and was well below in moderate-income geographies. The proportion of loans exceeds the aggregate distribution in LMI geographies.

The distribution of the bank's home mortgage lending in 2017 was adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and well below in moderate-income geographies. The proportion of loans exceeds the aggregate distribution in low-income geographies and is below the aggregate distribution in moderate-income geographies. Performance in the moderate-income geographies, in 2017, received more weight due to the limited owner occupied housing opportunities in low-income geographies, which declined from 3.4 percent 2016 to 1.5 percent in 2017.

The distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and exceeds the percentage of owner-occupied housing units in moderate-income geographies. The proportion of loans exceeds the aggregate distribution in LMI geographies.

Small Loans to Businesses

Refer to Table Q in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Mobile MSA

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans was near to the percentage of businesses in low-income geographies, and was below the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies exceeded the aggregate distribution of loans in those geographies, and was near to the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was good.

Montgomery MSA

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans was lower than the percentage of businesses in low-income geographies, and was near to the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was near to the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was good.

AL Non-MSA

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

During the 2017 through 2018 evaluation period, the distribution of small loans to businesses in LMI geographies was adequate. The proportion of loans was lower than the percentage of businesses in low-income geographies, and exceeded the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was near to the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was good. Performance in 2016 had a neutral impact on the evaluation of loans.

Small Loans to Farms

Refer to Table S in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

AL Non-MSA

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate

During the 2017 through 2018 evaluation period, the distribution of small loans to farms in LMI geographies was adequate. The proportion of loans was significantly below the percentage of farms in low-income geographies, and exceeded the percentage of farms in moderate-income geographies. The proportion of small loans to farms in low-income geographies was significantly below the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was weaker than the performance in the 2017 through 2018 analysis period and was poor. Performance in 2016 had a neutral impact on the evaluation of loans.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed TNB's home

mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Mobile MSA

The distribution of the bank's home mortgage loans to LMI borrowers was adequate.

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to LMI borrowers. These issues were considered in evaluating the bank's performance in the AA.

The distribution of the bank's home mortgage lending in 2016 was adequate. The proportion of loans was significantly below the percentage of low-income families and below the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution of loans to low-income families and near to the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2017 was good. The proportion of loans was significantly below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution of loans to low-income families and exceeds the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2018 was adequate. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans approximates the aggregate distribution of loans to low-income families and was near to the aggregate distribution to moderate-income families.

Montgomery MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to low-income borrowers. These issues were considered in evaluating the bank's performance in the AA.

The distribution of the bank's home mortgage lending in 2016 was adequate. The proportion of loans was well below the percentage of low-income families and below the percentage of moderate-income families. The proportion of loans was near to the aggregate distribution to low-income families, and well below the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2017 was good. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was near to the aggregate distribution to low-income families, and below the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was well below the percentage of low-income families and exceed the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

AL Non-MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to low-income borrowers. These issues were considered in evaluating the bank's performance in the AA.

The distribution of the bank's home mortgage lending in 2016 was good. The proportion of loans was well below the percentage of low-income families and well below the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to lowincome families, and was below the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2017 was good. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to lowincome families, and was near to the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was well below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to lowincome families, and was well below the aggregate distribution to moderate-income families.

Small Loans to Businesses

Refer to Table R in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Mobile MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was poor.

Montgomery MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was near to the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was adequate.

AL Non-MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was near to the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was weaker than performance in the 2017 through 2018 analysis period and was adequate. Performance in 2016 had a neutral impact on the evaluation of loans.

Small Loans to Farms

Refer to Table T in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

AL Non-MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to farms by revenue was adequate. The proportion of loans was near to the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was adequate.

Community Development Lending

The bank has made a relatively high level of CD loans, which had a positive impact on lending performance.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Mobile MSA

The bank is a leader in CD loans, which had a positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA and the bank's capacity to address these needs.

TNB originated 14 CD loans totaling \$35.7 million and representing 98.9 percent of allocated tier 1 capital. CD loans originated exhibited good responsiveness to the credit and community needs in the AA. Loans primarily supported affordable housing and revitalization/stabilization in the AA.

Examples of CD loans originated during the evaluation period include:

- \$3 million loan to a nonprofit organization to fund a small business incubator and accelerator in downtown area. Firms will remain in the community, create jobs, and generate tax revenue for the city.
- \$8 million in two loans to an engineering company that leveraged a NMTC deal to revitalize vacant areas of downtown. An established tech firm will relocate to the new building, creating 65 new permanent jobs and demolish a blighted building.
- \$14 million participation in a loan made to a local organization for the construction of a 266 unit multifamily apartment complex located in a low-income CT and designated Opportunity Zone.

Montgomery MSA

The bank has made an adequate level of CD loans, which had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TNB originated two CD loans totaling \$812 thousand and representing 2.5 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. Loans supported affordable housing and community services in the AA.

Examples of CD loans originated during the evaluation period include:

- \$418 thousand loan to the City of Montgomery for the repair and installation of new sewer lines to previously unserved LMI households.
- \$394 thousand refinance loan to an organization for a 16 multifamily unit apartment complex with rental rates considered affordable.

AL Non-MSA

The bank has made a relatively high level of CD loans, which had a positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TNB originated seven CD loans totaling \$6.2 million and representing 8.9 percent of allocated tier 1 capital. CD loans originated exhibited good responsiveness to the credit and community needs in the AA. Loans supported affordable housing, community services, and economic development in the AA.

Examples of CD loans originated during the evaluation period include:

- \$22 million loan to a city's Board of Education, with a significant level of the schools have students participating in free or reduced lunch program. The loan allowed the Board to consolidate two bonds, one of which was for remodeling a high school and the other for a middle school project.
- \$1.3 million loan to construct a new restaurant, which will create approximately 20 full time jobs for LMI individuals.
- \$1.2 million loan to a city. The loan is for building and property improvements to a manufacturing facility, which will create approximately 100 jobs for LMI individuals.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative and flexible loan programs had a positive impact on the bank's lending performance in the AA. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

TNB works in conjunction with the Alabama Housing Finance Authority to offer affordable housing assistance programs to first time and non-first time homebuyers. These affordable loan products are offered under the agency's programs, which may include down payment assistance, closing cost assistance, and tax credits. TNB leveraged these programs to

originate 117 loans totaling over \$7.7 million in the state of Alabama during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Auburn-Opelika MSA is stronger than the state of Alabama overall High Satisfactory performance under the Lending Test. The performance is stronger due to the excellent level of HMDA and CRA borrower distribution. Stronger performance did impact conclusions about the bank's performance in the state.

Performance in the Birmingham-Hoover MSA, Daphne-Fairhope-Foley MSA, Huntsville MSA, and Tuscaloosa MSA is weaker than the state of Alabama performance rating. Performance differences are due to weaker geographic and borrower income distribution performances in the AAs as well as CD lending performance that had a neutral impact on lending performance in the AAs. Weaker performance had a positive impact on the conclusion about the bank's performance in the state.

Refer to Tables O through T in the state of Alabama section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Alabama is rated Low Satisfactory.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Auburn-Opelika MSA	3	\$ 437	24	\$ 911	27	6.8%	\$ 1,348	5.7%	0	\$ -
Birmingham-Hoover MSA	4	\$ 683	30	\$ 2,967	34	8.6%	\$ 3,650	15.5%	0	\$ -
Daphne-FairhopeFoley MSA	13	\$ 1,456	23	\$ 3,977	36	9.1%	\$ 5,433	23.1%	0	\$ -
Huntsville MSA	0	\$ -	56	\$ 422	56	14.1%	\$ 422	1.8%	0	\$ -
Mobile MSA	11	\$ 2,009	85	\$ 4,598	96	24.2%	\$ 6,607	28.1%	0	\$ -
Montgomery MSA	10	\$ 1,711	35	\$ 3,414	45	11.3%	\$ 5,125	21.8%	0	\$ -
AL Non-MSA	2	\$ 141	72	\$ 534	74	18.6%	\$ 675	2.9%	0	\$ -
Tuscaloosa MSA	0	\$ -	29	\$ 280	29	7.3%	\$ 280	1.2%	0	\$ -

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance is excellent in the Mobile MSA, good in the Montgomery MSA, and poor in the AL Non-MSA. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Mobile MSA

The bank has a significant level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$6.6 million, with current period investments of \$4.6 million, prior period investments of \$2 million, and qualified grants of \$44 thousand. Investments benefiting the AA during the evaluation period represented 12.7 percent of allocated tier 1 capital and were primarily MBS supporting mortgages to LMI borrowers within the AA. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$1.7 million in 10 qualifying MBS supporting mortgages to LMI borrowers and \$342 thousand in a qualifying CD investment activity.

A \$2.7 million NMTC investment that supported economic development in the AA demonstrated innovation and complexity. The investment facilitated a project to relocate and renovate facilities for a local business within the City of Mobile, designated revitalization area of downtown. This area, now known as the "Technology Corridor", was formerly comprised of abandoned and blighted buildings that previously served as Mobile's automobile hub. The project goal is to transform abandoned and underutilized space from outdated warehouses to high-tech office space. This project will be a catalyst for the future redevelopment of the area, which encompasses 10 blocks of vacant buildings.

All grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$11 thousand grant to a nonprofit organization established to improve public education outcomes in the county public school system. The initiative will look into the operations of schools to determine methods to increase more favorable scholastic outcomes, many of which are deemed failing by the state. All students in the county receive free lunch and breakfast as provided by the USDA Community Eligibility Provision.
- \$4 thousand grant to a nonprofit organization that provides free food to LMI individuals and others impacted by a personal crisis or disaster.
- \$3 thousand to a nonprofit organization that provides services to children and adults with disabilities, 85 percent of which are LMI.

Montgomery MSA

The bank has a significant level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$5.1 million, with current period investments of \$3.4 million prior period investments of \$1.7 million, and qualified grants of \$8 thousand. Investments benefiting the AA during the evaluation represented 10.5 percent of allocated tier 1 capital and consisted of MBS supporting mortgages to LMI borrowers within the AA. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$1.7 in 10 qualifying MBS supporting mortgages to LMI borrowers.

All grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$2 thousand grant to a nonprofit organization that provides free meals to LMI senior citizens.
- \$5 thousand grant to a nonprofit organization that provides LMI families with job training, marriage enrichment, and counseling, parenting, education, mentoring, and childcare support services.

AL Non-MSA

The bank has a poor level of qualified CD investments and grants, and not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$675 thousand, with current period investments of \$464 thousand, prior period investments of \$141 thousand, and qualified grants of \$70 thousand. Investments benefiting the AA during the evaluation represented only one percent of allocated tier 1 capital. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances of \$141 thousand consisted of two qualifying MBS supporting mortgages to LMI borrowers.

All grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$12 thousand grant to a nonprofit organization that serves the needs of LMI students in county schools. TNB provides office space to this organization at no charge. The grant represents three years cost of rent for the office space.
- \$48 thousand grant to a nonprofit organization whose mission is to build a stronger, healthier community by bringing together the human, financial and strategic resources necessary to deliver measurable improvements and solutions to the critical health and human services facing the communities served. All individuals and families served are LMI.
- \$4 thousand grant to a nonprofit organization that provides healthy food during weekends and school breaks to LMI students from two area schools.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Auburn-Opelika MSA, Birmingham-Hoover MSA, Daphne-Fairhope-Foley MSA, and Tuscaloosa MSA performance is consistent with the state of Alabama’s overall High Satisfactory performance under the Investment Test. Performance in the Huntsville MSA is weaker than the state’s overall Investment Test performance and is considered poor, due to limited investment or grants. Weaker performance did not impact conclusions about the bank’s performance in the state.

SERVICE TEST

The bank’s performance under the Service Test in Alabama is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the AL Non-MSA is good; performance in the Mobile MSA is adequate, and poor in the Montgomery MSA.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Auburn-Opelika MSA	4.4	2	4.7	0.0	50.0	50.0	0.0	2.4	21.4	62.7	11.3
Birmingham-Hoover MSA	5.4	4	9.3	0.0	25.0	50.0	25.0	10.7	22.0	27.1	39.7
Daphne-Fairhope-Foley MSA	7.2	4	9.3	0.0	25.0	25.0	50.0	0.0	16.4	64.6	19.0

Huntsville MSA	11.6	6	14.0	0.0	16.7	33.3	50.0	8.6	26.7	32.4	32.4
Mobile MSA	18.5	6	14.0	16.7	0.0	33.3	50.0	9.3	18.2	36.5	35.8
Montgomery MSA	16.7	7	16.3	0.0	0.0	71.4	28.6	9.4	19.8	37.2	33.5
AL Non-MSA	35.8	13	30.2	15.4	23.1	46.2	15.4	4.2	24.3	56.0	15.5
Tuscaloosa MSA	0.5	1	2.3	0.0	100.0	0.0	0.0	1.8	20.1	43.6	29.6

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Montgomery MSA		1			-1	
Mobile MSA		1				-1
Birmingham-Hoover MSA	1	1				
Tuscaloosa MSA	1			+1		
Huntsville MSA		1				-1
AL Non-MSA		3			-2	-1

Mobile MSA

TNB's branch distribution and retail service performance is poor.

The bank's branches are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has six branches within the AA, with one branch in a low-income CT, and no branches in moderate-income CTs. The percentage of the bank's branches in LMI geographies is significantly below the percentage of population living in those geographies. The bank has seven deposit-taking ATMs located in the AA, with one in a low-income CT, and none in moderate-income CTs. The percentage of ATMs in LMI CTs is below the level of population in the LMI areas. ATM distribution is consistent with the bank's branch distribution.

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank closed one branch in an upper-income geography within the AA.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Montgomery MSA

TNB's branch distribution and retail service performance is very poor.

The bank's branches are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has seven branches located within the AA, none of which are located in an LMI CT. The bank has nine deposit-taking ATMs located in the AA, none of which are located within an LMI area. ATM distribution is consistent with the bank's branch distribution.

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank closed one branch in a middle-income geography within the AA.

Business hours do not vary in a way that inconveniences portions of the AA; however, there are no branches within LMI CTs of the AA. All branches operate during traditional banking hours, with none offering Saturday hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

AL Non-MSA

TNB's branch distribution and retail service performance is excellent.

The bank's branches are readily accessible to geographies and individuals of different income levels in the AA. The bank has 13 branches located within the AA, two of which are within a low-income CT, and three are within a moderate-income CT. The percentage of branches in LMI CTs are well above the level of population in the LMI areas. The bank has 15 deposit-taking ATMs located in the AA, of which two are located within a low-income CT and two within a moderate-income CT. The percentage of ATMs in LMI CTs is near to the level of population in the LMI areas. ATM distribution is consistent with the bank's branch distribution.

The opening and closing of branches has not adversely affected the accessibility of its delivery systems. The bank closed two branches in a middle-income geography, and one within an upper-income geography within the AA.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with none offering Saturday hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile

banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The bank provides a relatively high level of CD services.

Mobile MSA

TNB provides a relatively high level of CD services in the Mobile MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

TNB employees from various lines of business provided technical assistance to 35 different CD organizations totaling 1,386 hours during the evaluation period. TNB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- An employee served on the board of a nonprofit that provides residential care and community based services for neglected, abused, or homeless children.
- An employee served on the board of a nonprofit organization which provides support in LMI communities. Through various programs and services, the organization helps overcome challenges due to disabilities or other barriers that impact economic wellbeing, self-sufficiency and quality of life.
- An employee served on the board of an organization that awards funds to nonprofits to provide vital services throughout the community.
- Several employees served on various committees for a local nonprofit organization, which serves to improve the quality of life in an LMI community.

Montgomery MSA

TNB provides a relatively high level of CD services in the Montgomery MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

TNB employees from various lines of business provided technical assistance to 26 different CD organizations totaling 859 hours during the evaluation period. TNB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- An employee served on the board of an organization that awards funds to the community. The support is provided to nonprofits that provide vital services throughout the community and to LMI individuals and families.
- An employee provided technical support to a nonprofit organization that administers a public housing program designed to assist LMI families with affordable, sustainable housing, while improving the quality of their lives and encouraging independence.
- An employee served on the board of a nonprofit whose mission is to improve quality of life of children and LMI families through education, advocacy and employment.
- An employee served on the board of a community based partnership that ensures children from LMI families develop the emotional, social, cognitive, and physical skills needed to be prepared for school.

AL Non-MSA

TNB provides an adequate level of CD services in the AL Non-MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities.

TNB employees from various lines of business provided technical assistance to 30 different CD organizations totaling 610 hours during the evaluation period. TNB staff served on boards and committees for organizations that promote affordable housing, and community services targeted to LMI individuals and families.

Examples of some of these services:

- An employee served on the board of a nonprofit organization that provides various services to LMI individuals. Services include a shelter, intervention services, life skills education, and transitional assistance to victims of domestic violence.
- An employee served on the board of an organization that builds safe, affordable housing primarily for LMI individuals.
- An employee served on the board of an organization that supports various programs in the community offered to LMI individuals and communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance in the Daphne-Fairhope-Foley MSA is stronger than the bank's state of Alabama overall Low Satisfactory performance under the Service Test. Stronger performance is due to the branch distribution in LMI CTs. The stronger performance did not impact the bank's overall Service Test performance rating for the state. Performance in the Auburn-Opelika MSA, Birmingham-Hoover MSA, and Tuscaloosa MSA is consistent with the bank's overall Low Satisfactory performance under the Service Test in the state and is considered adequate. Performance in the Huntsville MSA is weaker than the bank's overall performance in the state, and is considered poor. Weaker performance is due to branch distribution in the AA. The weaker performance did not have an impact on the bank's overall Service Test performance rating for the state.

State of Florida

CRA rating for the State of Florida³: High Satisfactory

The Lending Test is rated:	High Satisfactory	The Investment Test is rated:	High
Low Satisfactory		The Service Test is rated:	
Satisfactory			

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs;
- The bank exhibits a good geographic distribution of loans in its AAs;
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank has made a low level of CD loans;
- The bank has made an adequate level of qualified CD investments and grants;
- The bank's branches are accessible to geographies and individuals of different income levels;
- The bank provides an adequate level of CD services.

Description of Bank's Operations in Florida

TNB has three AAs within the state of Florida. These AAs are comprised of the Crestview-Fort Walton Beach-Destin MSA, Panama City MSA, and Pensacola-Ferry Pass-Brent MSA. The AAs consist of whole MSAs or counties. The Pensacola-Ferry Pass-Brent MSA was added to the bank's footprint in 2018 due to the opening of a branch.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 0.1 percent deposit market share in FL and is ranked 54th out of 212 financial institutions doing business in the state. The deposits accounted for 7.1 percent of the bank's total deposits. Primary competitors include Bank of America, National Association, which ranked first in deposit market share (19 percent) with 551 offices, Wells Fargo Bank, National Association, which ranked second in deposit market share (13.5 percent) with 607 offices, and SunTrust Bank, which ranked third in deposit market share (8.6 percent) with 426 offices.

TNB provides a full-range of loan and deposit products and services in the state. The bank operates 15 full-service branches; four are located in moderate-income CTs, seven are located in middle-income CTs, and four are located in upper-income CTs. In addition, the bank has 13

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

deposit-taking ATMs and one ITM throughout the rating area. The branches represent 7.9 percent of the bank’s total branch network.

During the evaluation period, the bank opened one loan production office (LPO) within the Pensacola-Ferry Pass-Brent MSA. The LPO’s staff supports the community in offering the bank’s standard mortgage loan products.

The bank made 8.2 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state.

Panama City MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Panama City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	18.6	53.5	25.6	0.0
Population by Geography	175,353	2.7	15.0	54.1	28.3	0.0
Housing Units by Geography	100,109	2.4	12.7	56.0	28.9	0.0
Owner-Occupied Units by Geography	41,737	1.7	11.9	53.6	32.8	0.0
Occupied Rental Units by Geography	26,185	4.3	20.6	52.7	22.4	0.0
Vacant Units by Geography	32,187	1.7	7.3	61.8	29.2	0.0
Businesses by Geography	16,780	2.6	17.0	54.8	25.6	0.0
Farms by Geography	413	2.4	11.9	55.9	29.8	0.0
Family Distribution by Income Level	43,485	21.1	17.7	19.9	41.3	0.0
Household Distribution by Income Level	67,922	22.4	16.7	19.1	41.8	0.0
Median Family Income MSA - 37460 Panama City, FL MSA		\$56,988	Median Housing Value			\$160,962
			Median Gross Rent			\$958
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Panama City MSA is comprised of the complete Bay County in Florida. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 43 CTs, one of which is low- income and eight are moderate-income.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 14 percent deposit market share in the AA and is ranked second out of 17 financial institutions doing business in the AA. The deposits accounted for 3.7 percent of the bank's total deposits. Primary competitors include Regions Bank, which ranked first in deposit market share (20.9 percent) with nine offices; Hancock Whitney Bank, which ranked third in deposit market share (11.7 percent) with three offices; Summit Bank, National Association, which ranked fourth in deposit market share (9.7 percent) with two offices; and Centennial Bank, which ranked fifth in deposit market share (8.8 percent) with five offices.

The bank made 3.6 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Panama City MSA was 5.6 percent, up from 4.6 percent in January 2016. The national unemployment rate as of December 2018 was 3.9 percent, and 3.3 percent for the state of Florida.

Housing Characteristics

According to the 2010 U.S. Census, 41.7 percent of the total housing units in the AA were owner occupied, and 26.2 percent were rental occupied units. Approximately 1.8 percent of all owner occupied units and 4.3 percent of renter occupied units were located in low-income CTs; 2.3 percent of all single family (1-4 unit) homes and 3.9 percent of multifamily (five plus unit) housing units were located in low-income tracts. Approximately 11.9 percent of all owner occupied units and 20.6 percent of renter occupied units were located in moderate-income CTs; 15.9 percent of all single family (1-4 unit) homes and 6.9 percent of multifamily (five plus unit) housing units were located in moderate-income tracts.

The AA is a high-cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers. According to Realtor.com data, the median housing value in the AA was \$259,950 and \$349,950 in 2016 and 2018, respectively, reflecting an increase of 34.6. Assuming a 30-year mortgage with a five percent interest rate, and excluding any down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$31,150 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$145,066 mortgage with a payment of \$778 per month. A moderate-income borrower making \$49,840 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$232,106 mortgage with a payment of \$1,246 per month. This illustrates that both low-income borrowers and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,878.

According to Moody's Analytics, the state's strict building codes will slow rebuilding and hurt affordability. A large share of the homes damaged or destroyed in 2018 by Hurricane Michael were older or mobile homes. The share of housing stock that was damaged by the storm is still

uncertain, but higher building costs tied to the strict requirements and diminished inventories will boost house prices. It may price out some residents as affordability slips to a decade low.

Economic Conditions

According to Moody's Analytics, the AA is still feeling the effects from Hurricane Michael. The hardest-hit industries were retail, healthcare and local government, as the storm battered stores, medical facilities and schools. Military jobs are also likely down, as damage to Tyndall Air Force Base led to evacuations and reassignments.

The AA suffered the brunt of the storm, which brought category four winds and a 15 foot storm surge. Power outages and school closings lasted up to two weeks in some areas, hurting local output as some residents were unable to return to work. Insured losses in Florida totaled \$4.7 billion, with most claims filed in Bay County, as the storm leveled homes and commercial properties. Bay Medical Center, the AA's largest healthcare employer, faced significant destruction and announced that it will lay off 600 employees while it rebuilds.

State and federal aid have helped the AA recover, but delays in federal aid have significantly hampered the recovery. Congress included a federal aid package in its spending bill, but political gridlock prevented passage.

The OCC made a community contact in the AA. A review of community contact indicated that the following are identified needs within the community:

- Retail development
- Small business lending

Scope of Evaluation in Florida

For the state of Florida, we completed a full-scope review of the Panama City MSA. Ratings are based primarily on results of the full-scope areas. The Panama City MSA received a fullscope review due to the high percentage of deposits (51.9 percent), reportable loans (44.4 percent), and branch distribution (50 percent) in the state. We completed a limited-scope review of the Crestview-Fort Walton Beach-Destin MSA and Pensacola-Ferry Pass-Brent MSA which were selected due to the bank's limited presence in the AAs.

Due to the higher volume of home mortgage loans (72.8 percent) compared to small business loans (27 percent), home mortgage loans were weighted heavier in the rating area. TNB did not originate a sufficient volume of small farm loans during the evaluation period to enable a meaningful analysis of the bank's performance in the rating area. Greater weight was generally given to performance compared to aggregate lenders rather than to performance relative to demographic factors in lending.

Refer to Appendix A for more information of all AAs under review.

The state of Florida possesses a number of challenges to banks in the rating area, including TNB.

- The low number of low-income CTs and owner-occupied housing units can present a challenge for banks when attempting to originate home mortgages in these geographies. As such, the bank’s performance in moderate-income CTs carried greater weight when coming to overall product conclusions.
- In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for LMI families somewhat impacts these borrowers’ ability to purchase homes.
- In performing our analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing institutions and dominance from the top five lenders somewhat affects the bank’s ability to make small loans to businesses.
- In performing our analysis of investments, competition in the AA is moderate, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA LENDING TEST

The bank’s performance under the Lending Test in Florida is rated High Satisfactory. The state rating is based on performance in the AA receiving full-scope review.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Panama City MSA is good. We considered the factors discussed in describing the bank’s operation in the state above.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
Crestview-Fort Walton Beach-Destin MSA	741	325	1	1	1,068	37.3%	47.6%
Panama City MSA	1,308	419	5	1	1,733	60.5%	51.9%
PensacolaFerry Pass-Brent MSA	0	29	0	0	29	2.2%	0.5%

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits

Crestview-Fort Walton Beach- Destin MSA	\$ 30,380	\$ 45,829	\$ 15	\$ 354	\$ 76,578	44.2%	47.6%
Panama City MSA	\$ 35,853	\$ 56,234	\$ 285	\$ 271	\$ 92,643	53.4%	51.9%
PensacolaFerry Pass- Brent MSA	\$ -	\$ 4,211	\$ -	\$ -	\$ 4,211	2.4%	0.5%

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Panama City

Lending levels reflect good responsiveness to AA credit needs, taking into account the number and amount of home mortgage and small business loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

According to FDIC Deposit Market Share data as of June 30, 2018, TNB had \$409.9 million in deposits with a deposit market share of 14.2 percent. TNB ranked second in total deposits out of 17 banks in the AA.

According to 2017 peer mortgage data, TNB ranked in the top one percent of lenders, second out of 417 lenders originating home mortgage loans in the AA. The bank's market share of 6.6 percent in loans is weaker than the bank's market share in deposits, but equals the bank's rank in deposits. The five largest mortgage lenders have captured 29.3 percent of the market.

According to 2017 peer small business data, TNB ranked 11th out of 70 lenders originating small business loans in the AA. The bank's market share of 2.9 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 54.1 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Panama City MSA

The geographic distribution of home mortgage loans was good.

Performance in moderate-income geographies received the most weight due to the limited owner occupied housing opportunities in the AA's one low-income CT.

The distribution of the bank's home mortgage lending in 2016 was good. The proportion of loans was below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans exceeds the aggregate distribution in LMI geographies.

The distribution of the bank's home mortgage lending in 2017 was good. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and below the percentage in moderate-income geographies. The proportion of loans was significantly below the aggregate distribution in low-income geographies and exceeds the aggregate distribution in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and well below the percentage in moderate-income geographies. The proportion of loans was significantly below the aggregate distribution in low-income geographies and exceeds the aggregate distribution in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Panama City MSA

The geographic distribution of the bank's originations and purchases of small loans to businesses was adequate.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses in LMI geographies was adequate. The proportion of loans is significantly below the percentage of businesses in low-income geographies, and exceeded the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was significantly below the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was stronger than performance in the 2017 through 2018 analysis period and was good. Performance in 2016 had a neutral impact on the evaluation of loans.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed TNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Panama City MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

The distribution of the bank's home mortgage lending in 2016 was excellent. The proportion of loans was below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

The distribution of the bank's home mortgage lending in 2017 was excellent. The proportion of loans was well below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

The distribution of the bank's home mortgage lending in 2018 was good. The proportion of loans was well below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

Small Loans to Businesses

Panama City MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was lower than the percentage of small businesses, but equal to the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was weaker than performance in the 2017 through 2018 analysis period and was poor. Performance in 2016 had a neutral impact on the evaluation of loans.

Community Development Lending

Panama City MSA

The bank made a low level of CD loans, which had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank’s capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section for the information and data used to evaluate the bank’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TNB originated one loan totaling \$271 thousand and representing 0.6 percent of allocated tier 1 capital. CD loans originated exhibited poor responsiveness to the credit and community needs in the AA. The one loan supported a 12 unit apartment complex for affordable housing in the AA.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

TNB works in conjunction with the Florida Housing Finance Corporation to offer affordable housing assistance programs to first time and non-first time homebuyers. These affordable loan products are offered under the agency’s programs, which may include down payment assistance, closing cost assistance, and tax credits. TNB leveraged this program to originate 162 loans totaling over \$11.7 million in the state of Florida during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Crestview-Fort Walton Beach-Destin MSA and PensacolaFerry Pass MSA is weaker than the state of Florida’s overall High Satisfactory performance under the Lending Test. Performance differences are due to weaker geographic and borrower income distribution performances in the AAs as well as CD lending performance that had a neutral impact on lending performance in the AAs. Weaker performance did not impact conclusions about the bank’s performance in the state.

Refer to Tables O through T in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in the state of Florida is rated Low Satisfactory.

Qualified Investments				
	Prior Period*	Current Period	Total	Unfunded Commitments**

Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Crestview-Fort Walton Beach-Destin MSA	25	\$ 2,910	47	\$ 5,516	72	50.0%	\$ 8,425	59.1%	0	\$ -
Panama City MSA	18	\$ 3,931	49	\$ 1,883	67	46.5%	\$ 5,814	40.8%	0	\$ -
Pensacola-Ferry Pass MSA	0	\$ -	5	\$ 5	5	3.5%	\$ 5	0.0%	0	\$ -

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Panama City MSA is adequate. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Panama City MSA

The bank has an adequate level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$5.8 million, with current period investments of \$1.8 million, prior period investments of \$3.9 million, and qualified grants of \$54 thousand. Investments benefiting the AA during the evaluation represented 3.9 percent of allocated tier 1 capital and consisted of MBS supporting mortgages to LMI borrowers within the AA. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$2.9 million in 17 qualifying MBS supporting mortgages to LMI borrowers and a \$1 million qualifying CD investment activity.

All grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$5 thousand grant to a nonprofit organization whose mission is to reduce high school dropouts and provide college preparation programs for financially at-risk LMI students.
- \$17.5 thousand grant to a nonprofit organization that provides a variety of community services targeted to LMI individuals and families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Crestview-Fort Walton Beach-Destin MSA performance is stronger than the state of Florida's overall Low Satisfactory performance under the Investment Test. The performance is stronger due to higher levels of current period and outstanding prior period investments relative to deposits. Stronger performance did impact conclusions about the bank's performance in the state. Performance in the Pensacola-Ferry Pass MSA is weaker than the state's overall Investment Test performance due to limited investment or grants, and is considered poor. Weaker performance did not impact conclusions about the bank's performance in the state.

SERVICE TEST

The bank's performance under the Service Test in Florida is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Panama City MSA is good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Crestview-Fort Walton Beach-Destin MSA	47.6	7	46.7	0.0	14.3	42.9	42.9	0.0	14.8	63.3	21.8
Panama City MSA	51.9	7	46.7	0.0	42.9	42.9	14.3	2.7	15.0	54.1	28.3
Pensacola-Ferry Pass-Brent MSA	0.5	1	6.7	0.0	0.0	100.0	0.0	3.9	24.6	53.8	17.7

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Crestview-Fort Walton Beach-Destin MSA						
Panama City MSA	1	1		+1	-1	
Pensacola-Ferry Pass-Brent MSA	1				+1	

Panama City MSA

TNB's branch distribution and retail service performance is good.

The bank's branches are accessible to geographies and individuals of different income levels in the AA. The bank has seven branches within the AA with none located within a low-income CT, and three branches in moderate-income CTs. The percentage of the bank's branches in LMI geographies is near to the percentage of population living in those geographies. The bank has six deposit-taking ATMs located in the AA, with none in low-income CTs, and two ATMs in moderate-income CTs. The percentage of ATMs in LMI CTs is above the level of population in the LMI areas. ATM distribution is consistent with the bank's branch distribution.

The opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in a middle-income geography of the AA and opened one **branch** within a moderate-income geography.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with some offering Saturday hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Other Performances

The bank established an LPO in the Pensacola, FL MSA in 2016. At the time of establishment, the LPO was located in a moderate-income CT. In 2017, the CT was categorized as a middleincome.

Community Development Services

TNB provides an adequate level of CD services in the Panama City MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities and the bank's length of time in the area.

TNB employees from various lines of business provided technical assistance to six different CD organizations totaling 236 hours during the evaluation period. TNB staff served on boards and committees for organizations that promote community services targeted to LMI individuals and families.

Examples of some of these services:

- An employee served on the board of a nonprofit that provides general services to LMI individuals. Programs consist of emergency shelter, transitional living, family

counseling, street outreach, group home care and case management services to abused, neglected and homeless youth in the community.

- An employee provided technical expertise to a state agency that serves incarcerated individuals. The employee, through a transitional program, taught financial literacy education to the participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited scope review, the bank’s performance in Crestview-Fort Walton BeachDestin MSA is consistent with the bank’s overall High Satisfactory performance under the Service Test. Performance in the Pensacola-Ferry Pass-Brent MSA is weaker than the bank’s overall performance in the state and is considered adequate. Weaker performance is due to the bank’s branch distribution in LMI CTs. The weaker performance did not have an impact on the bank’s overall Service Test performance rating for the state.

State of Mississippi

CRA rating for the State of Mississippi⁴: High Satisfactory

The Lending Test is rated:	High Satisfactory	The Investment Test is rated:	Low
High Satisfactory		The Service Test is rated:	
Satisfactory			

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs;
- The bank exhibits an adequate geographic distribution of loans in its AAs;
- The bank exhibits an excellent distribution of loans among individuals of different income levels, and businesses and farms of different sizes;
- The bank has made a relatively high level of CD loans, which had a significantly positive impact on lending performance in the AA;
- The bank has made a significant level of qualified CD investments and grants;
- The bank’s branches are readily accessible to geographies and individuals of different income levels in the AA;
- The bank provides an adequate level of CD services.

Description of Bank’s Operations in Mississippi

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

TNB has four AAs within the state of Mississippi. These are comprised of the Gulfport-BiloxiPascagoula MSA, Hattiesburg MSA, Jackson MSA, and MS Non-MSA. The AAs consist of whole MSAs or counties. The non-metropolitan areas were combined for analysis purposes.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 14.1 percent deposit market share in MS and is ranked first out of 94 financial institutions doing business in the state. The deposits accounted for 66.8 percent of the bank's total deposits. Primary competitors include Regions Bank, which ranked second in deposit market share (12.9 percent) with 126 offices, Bancorp South Bank, which ranked third in deposit market share (10 percent) with 97 offices, and Renasant Bank, which ranked fourth in deposit market share (7.4 percent) with 72 offices.

TNB provides a full-range of loan and deposit products and services in the state. The bank operates 101 full-service branches; 10 are located in low-income CTs, 23 are located in moderate-income CTs, 38 are located in middle-income CTs, and 27 are located in upperincome CTs. In addition, the bank has 77 deposit-taking ATMs throughout the rating area. The branches represent 53.4 percent of the bank's total branch network.

The bank made 54.8 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state.

Hattiesburg MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hattiesburg MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	14.3	17.9	50.0	17.9	0.0
Population by Geography	147,339	11.7	11.1	50.9	26.3	0.0
Housing Units by Geography	62,203	11.8	12.2	51.8	24.2	0.0
Owner-Occupied Units by Geography	33,650	4.0	11.1	54.1	30.8	0.0
Occupied Rental Units by Geography	20,590	22.2	12.9	48.5	16.4	0.0
Vacant Units by Geography	7,963	17.5	15.3	51.0	16.3	0.0
Businesses by Geography	8,674	10.8	8.8	57.2	23.1	0.0
Farms by Geography	228	2.2	7.9	55.3	34.6	0.0
Family Distribution by Income Level	36,447	24.5	15.0	19.0	41.5	0.0
Household Distribution by Income Level	54,240	27.2	13.9	15.4	43.4	0.0
Median Family Income MSA - 25620 Hattiesburg, MS MSA		\$53,263	Median Housing Value			\$125,952
			Median Gross Rent			\$764

	Families Below Poverty Level	16.6%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>		

The Hattiesburg MSA is comprised of the complete counties of Forrest, Lamar, and Perry in Mississippi. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 28 CTs of which four are low-income and five are moderate-income.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 16.9 percent deposit market share in the AA and is ranked second out of 17 financial institutions doing business in the AA. The deposits accounted for 4.5 percent of the bank's total deposits. Primary competitors include Bancorp South Bank, which ranked first in deposit market share (19.9 percent) with nine offices; Hancock Whitney Bank, which ranked third in deposit market share (13.2 percent) with six offices; Regions Bank, which ranked fourth in deposit market share (13.1 percent) with six offices; and The First, a National Banking Association, which ranked fifth in deposit market share (9.9 percent) with four offices.

The bank made 3.8 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Hattiesburg MSA was 4.1 percent, down from 5.5 percent in January 2016. The national unemployment rate as of December 2018 was 3.9 percent, and 4.7 percent for the state of Mississippi.

Housing Characteristics

According to the 2010 U.S. Census, 54.1 percent of the total housing units in the AA were owner occupied, and 33.1 percent were rental occupied units. Approximately four percent of all owner occupied units and 22.2 percent of renter occupied units were located in low-income CTs; nine percent of all single family (1-4 unit) homes and 34.2 percent of multifamily (five plus unit) housing units were located in low-income tracts. Approximately 11.1 percent of all owner occupied units and 12.9 percent of renter occupied units were located in moderate-income CTs; 11.2 percent of all single family (1-4 unit) homes and 10.8 percent of multifamily (five plus unit) housing units were located in moderate-income tracts.

The AA is a high-cost housing area, limiting access to affordable home ownership among low-income borrowers. According to Realtor.com data, the median housing value in the AA was \$158,050 and \$180,000 in 2016 and 2018, respectively, reflecting an increase of 13.9 percent. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,100 per year (or less than 50 percent of the 2018 FFIEC

adjusted median family income in the AA) could afford a \$135,519 mortgage with a payment of \$727 per month. A moderate-income borrower making \$46,560 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$216,831 mortgage with a payment of \$1,164 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$966.

Economic Conditions

According to Moody's Analytics, the economy in the AA is expanding at its fastest pace in over five years. The labor force has improved since early 2018, although progress halted towards the end of the year. Sales of existing single family homes are the lowest in over two decades. Although the labor force has taken steps in the right direction, the city will need to do more to retain graduates and expand high skill industries. During 2018, the AA created 1,500 jobs in lower income positions, compared with 200 in higher income earning positions.

The OCC made two community contacts in the AA. A review of community contacts indicated that the following are identified needs within the community:

- Affordable Housing
- Financial Literacy
- First-time homebuyer programs

Jackson MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Jackson MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	123	13.0	31.7	26.8	27.6	0.8
Population by Geography	549,159	8.7	26.5	31.7	32.3	0.8
Housing Units by Geography	226,229	9.0	27.7	32.0	31.3	0.0
Owner-Occupied Units by Geography	134,476	4.5	21.8	33.7	40.0	0.0
Occupied Rental Units by Geography	64,652	14.8	35.0	31.2	19.0	0.0
Vacant Units by Geography	27,101	17.3	39.8	25.0	17.8	0.1
Businesses by Geography	38,933	6.5	25.1	30.0	38.3	0.1
Farms by Geography	1,135	1.3	17.6	36.7	44.3	0.0
Family Distribution by Income Level	137,410	22.8	16.9	17.7	42.6	0.0
Household Distribution by Income Level	199,128	24.8	15.3	16.3	43.6	0.0
Median Family Income MSA - 27140 Jackson, MS MSA		\$56,700	Median Housing Value			\$131,543

	Median Gross Rent	\$806
	Families Below Poverty Level	14.4%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>		

The Jackson MSA is comprised of the complete counties of Copiah, Hinds, Madison, Rankin, and Simpson in Mississippi. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 123 CTs of which 16 are low- income and 39 are moderate-income.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 32.5 percent deposit market share in the AA and is ranked first out of 28 financial institutions doing business in the AA. The deposits accounted for 39.1 percent of the bank's total deposits. Primary competitors include Regions Bank, which ranked second in deposit market share (21.5 percent) with 33 offices; Bank Plus, which ranked third in deposit market share (11 percent) with 26 offices; Bancorp South Bank, which ranked fourth in deposit market share (7.8 percent) with 18 offices; and Community Bank of Mississippi, which ranked fifth in deposit market share (4.6 percent) with eight offices.

The bank made 27.8 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Jackson MSA was 4.1 percent, down from 5.1 percent in January 2016. The national unemployment rate as of December 2018 was 3.9 percent, and 4.7 percent for the state of Mississippi.

Housing Characteristics

According to the 2010 U.S. Census, 59.4 percent of the total housing units in the AA were owner occupied, and 28.6 percent were rental occupied units. Approximately 4.5 percent of all owner occupied units and 14.8 percent of renter occupied units were located in low-income CTs; 8.7 percent of all single family (1-4 unit) homes and 15.1 percent of multifamily (five plus unit) housing units were located in low-income tracts. Approximately 21.8 percent of all owner occupied units and 35 percent of renter occupied units were located in moderate-income CTs; 25.9 percent of all single family (1-4 unit) homes and 33.5 percent of multifamily (five plus unit) housing units were located in moderate-income tracts.

The AA is a high-cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers. According to Realtor.com data, the median housing value in the AA was \$188,450 and \$234,750 in 2016 and 2018, respectively, reflecting an increase of 24.6 percent. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional

monthly expenses, a low-income borrower making \$30,350 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$141,341 mortgage with a payment of \$758 per month. A moderate-income borrower making \$48,560 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$226,145 mortgage with a payment of \$1,214 per month. This illustrates that both low-income borrowers and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,260.

Economic Conditions

According to Moody's Analytics, population losses are a drag on spending and are also the reason the labor force is losing ground. Stagnant wages coupled with minimal job gains are hampering wage income, which is rising at its slowest rate since 2010.

Strong demand for temporary workers will yield gains in business services, and an expected revival in homebuilding will boost demand for professional services such as engineering and architecture as well as real estate and leasing. Employment in the public sector is near its lowest level since 2007.

The OCC made two community contacts in the AA. A review of community contacts indicated that the following are identified needs within the community:

- First time homebuyer programs
- Residential lending
- Loans to small businesses
- Neighborhood Revitalization

Scope of Evaluation in Mississippi

For the state of Mississippi, we completed a full-scope review of the Hattiesburg MSA and Jackson MSA. Ratings are based primarily on results of the full-scope areas. The Hattiesburg MSA has not received a full-scope analysis previously; and was selected due to the percentage of deposits (4.5 percent) and reportable loans (6.9 percent) in the state. The Jackson MSA was selected for analysis using full-scope procedures because it had the largest percent of the bank's deposits (39.1 percent), reportable loans (50.4 percent), and second largest branch distribution (41.9 percent) within the state. These factors indicate the bank is important to the AA.

We completed a limited-scope review of the Gulfport-Biloxi-Pascagoula MSA and MS NonMSA. The Gulfport-Biloxi-Pascagoula MSA was selected due to the bank's limited presence in the AAs. The MS Non-MSA is comprised of counties that are delineated within the same state and are combined, analyzed, and presented as one AA for purposes of this evaluation.

Due to the higher volume of home mortgage loans (59.2 percent) compared to small business loans (33.9 percent), home mortgage loans were weighted heavier in the rating area. Greater

weight was generally given to performance compared to aggregate lenders rather than to performance relative to demographic factors in lending.

Refer to Appendix A for more information of all AAs under review.

The state of Mississippi poses a number of challenges to banks in the rating area, including TNB.

- The low number of owner-occupied housing units can present a challenge for banks when attempting to originate home mortgages in LMI geographies. As such, the bank's performance in moderate-income CTs carried greater weight when reaching overall product conclusions.
- In performing our analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for low-income families somewhat impacts these borrowers' ability to purchase homes. Given the affordability issue for low-income borrowers, we placed more weight on lending to moderate-income borrowers.
- In performing our analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing institutions and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.
- In performing our analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI LENDING TEST

The bank's performance under the Lending Test in Mississippi is rated High Satisfactory. The state rating is based on performance in AAs receiving full-scope reviews.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Hattiesburg MSA is good, and performance in the Jackson MSA is excellent. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
GulfportBiloxi-Pascagoula MSA	453	143	0	0	596	3.1%	1.1%

Hattiesburg MSA	886	382	61	4	1,333	6.9%	6.7%
Jackson MSA	6,201	3,073	376	23	9,673	50.4%	58.5%
MS Non-MSA	3,795	2,892	895	23	7,605	39.6%	33.7%

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
GulfportBiloxi-Pascagoula MSA	\$ 13,274	\$ 20,376	\$ -	\$ -	\$ 33,650	2.3%	1.1%
Hattiesburg MSA	\$ 33,125	\$ 47,913	\$ 5,920	\$ 9,213	\$ 96,171	6.7%	6.7%
Jackson MSA	\$ 267,769	\$ 399,053	\$ 31,148	\$ 119,834	\$ 817,804	57.0%	58.5%
MS Non-MSA	\$ 163,419	\$ 243,250	\$ 54,038	\$ 25,381	\$ 486,088	33.9%	33.7%

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Hattiesburg MSA

Lending levels reflect good responsiveness to AA credit needs, taking into account the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

According to FDIC Deposit Market Share data as of June 30, 2018, TNB had \$498.2 million in deposits with a deposit market share of 16.9 percent. TNB ranked second in total deposits out of 17 banks in the AA.

According to 2017 peer mortgage data, TNB ranked in the top two percent of lenders, third out of 159 lenders originating home mortgage loans in the AA. The bank's market share of 7.2 percent of loans is well below the bank's deposit market share and rank in loans is near to the rank in deposits. The four largest remaining mortgage lenders have captured 24.8 percent of the market.

According to 2017 peer small business data, TNB ranked sixth out of 59 lenders originating small business loans in the AA. The bank's market share of 5.9 percent of loans is well below the bank's deposit market share and rank in loans is near to the bank's rank in deposits. The five largest small business lenders have captured 53.4 percent of the market.

According to 2017 peer small farm data, TNB ranked first out of 11 lenders originating small farm loans in the AA. The bank's market share of 35.2 percent and rank in loans is stronger than the bank's market share and rank in deposits. The four largest remaining small farm lenders have captured 46.3 percent of the market.

Jackson MSA

Lending levels reflect excellent responsiveness to AA credit needs, taking into account the number and amount of home mortgage, small business, and small farm loans in the AA. We

considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

According to FDIC Deposit Market Share data as of June 30, 2018, TNB had \$4.3 billion in deposits with a deposit market share of 32.5 percent. TNB ranked first in total deposits out of 28 banks in the AA.

According to 2017 peer mortgage data, TNB ranked first out of 262 lenders originating home mortgage loans in the AA. The bank's market share of 13 percent is weaker than the bank's market share of deposits, but equals the bank's rank in deposits. The four largest remaining mortgage lenders have captured 26.8 percent of the market.

According to 2017 peer small business data, TNB ranked in the top three percent of lenders, second out of 85 lenders originating small business loans in the AA. The bank's market share of 9.6 percent and rank in loans is weaker than the bank's market share and rank in deposits. The four largest remaining small business lenders have captured 40.9 percent of the market.

According to 2017 peer small farm data, TNB ranked first out of 19 lenders originating small farm loans in the AA. The bank's market share of 37.4 percent and rank in loans is stronger than the bank's market share in deposits and equals the bank's rank in deposits. The four largest remaining small farm lenders have captured 50 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Hattiesburg MSA

The geographic distribution of home mortgage loans was adequate.

The distribution of the bank's home mortgage lending in 2016 was excellent. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and near to in moderate-income geographies. The proportion of loans exceeds the aggregate distribution in LMI geographies.

The distribution of the bank's home mortgage lending in 2017 was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and well below in moderate-income geographies. The proportion of loans was significantly below the aggregate distribution in low-income geographies, and exceeds the aggregate distribution in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2018 was adequate. The proportion of loans was well below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans exceeds the aggregate distribution in LMI geographies.

Jackson MSA

The geographic distribution of home mortgage loans was adequate.

The distribution of the bank's home mortgage lending in 2016 was excellent. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans exceeds the aggregate distribution in low-income geographies and was near to the aggregate distribution in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2017 was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans exceeds the aggregate distribution in low-income geographies and was well below the aggregate distribution in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2018 was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans was near to the aggregate distribution in low-income geographies and was below the aggregate distribution in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Hattiesburg MSA

The geographic distribution of the bank's originations and purchases of small loans to businesses was excellent.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses in LMI geographies was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies, and was near to the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in LMI geographies exceeded the aggregate distribution of loans in those geographies. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was excellent.

Jackson MSA

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans was near to the percentage of businesses in low-income geographies, and was near to the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in LMI geographies exceeded the aggregate distribution of loans in those geographies. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was good.

Small Loans to Farms

Refer to Table S in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Hattiesburg MSA

The geographic distribution of the bank's originations and purchases of small loans to farms was poor.

During the 2017 through 2018 evaluation period, the distribution of small loans to farms in LMI geographies was poor. The proportion of loans was significantly below the percentage of farms in low-income geographies, and exceeded the percentage of farms in moderate-income geographies. The proportion of small loans to farms in low-income geographies was significantly below the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was poor.

Jackson MSA

The geographic distribution of the bank's originations and purchases of small loans to farms was adequate.

During the 2017 through 2018 evaluation period, the distribution of small loans to farms in LMI geographies was adequate. The proportion of loans was significantly below the percentage of farms in low-income geographies, and exceeded the percentage of farms in moderate-income geographies. The proportion of small loans to farms in low-income geographies was significantly below the aggregate distribution of loans in those geographies, and exceeded the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was stronger than performance in the 2017 through 2018 analysis period and was good. Performance in 2016 had a neutral impact on the evaluation of loans.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed TNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Hattiesburg MSA

The distribution of the bank's home mortgage loans to LMI borrowers was good.

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to low-income borrowers. These issues were considered in evaluating the bank's performance in the AA.

The distribution of the bank's home mortgage lending in 2016 was excellent. The proportion of loans was well below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

The distribution of the bank's home mortgage lending in 2017 was good. The proportion of loans was significantly below the percentage of low-income families and near to the percentage of moderate-income families. The proportion of loans was below the aggregate distribution to low-income families and exceeds the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2018 was excellent. The proportion of loans was well below the percentage of low-income families and exceeds the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

Jackson MSA

The distribution of the bank's home mortgage loans to LMI borrowers was excellent.

The distribution of the bank's home mortgage lending in 2016 was excellent. The proportion of loans was well below the percentage of low-income families and met the percentage of moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

The distribution of the bank's home mortgage lending in 2017 was excellent. The proportion of loans was well below the percentage of low-income families and exceeds the percentage of

moderate-income families. The proportion of loans exceeds the aggregate distribution to LMI families.

The distribution of the bank's home mortgage lending in 2018 was excellent. The proportion of loans was well below the percentage of low-income families and was near to the percentage of moderate-income families. The proportion of loans was below the aggregate distribution to low-income families, and was near to the aggregate distribution to moderate-income families.

Small Loans to Businesses

Refer to Table R in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Hattiesburg MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was good.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was near to the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was poor.

Jackson MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was good.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to businesses by revenue was good. The proportion of loans was near to the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was good.

Small Loans to Farms

Refer to Table T in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Hattiesburg MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was poor.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to farms by revenue was poor. The proportion of loans was well below the percentage of small businesses, but near to the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was very poor. Performance in 2016 had a neutral impact on the evaluation of loans.

Jackson MSA

The borrower distribution of the bank's originations and purchases of small loans to businesses was good.

During the 2017 through 2018 analysis period, the distribution of the bank's small loans to farms by revenue was good. The proportion of loans was below the percentage of small businesses, but exceeded the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was good.

Community Development Lending

The bank has made a relatively high level of CD loans, which had a positive impact on lending performance in the AA.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Hattiesburg MSA

The bank has made a relatively high level of CD loans, which had a positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TNB originated four CD loans totaling \$9.2 million and representing 15.6 percent of allocated tier 1 capital. CD loans originated exhibited adequate responsiveness to the credit and community needs in the AA. Loans supported community services in the AA.

Examples of CD loans originated during the evaluation period include:

- \$2 million loan to the county school district to make capital improvements and purchase school buses and other transportation equipment. A significant level of the students in this school district participate in the free or reduced lunch program.

- \$38 thousand loan to an organization whose purpose is to promote and provide comprehensive information, resources, and services to LMI individuals living with major health conditions.

Jackson MSA

The bank is a leader in making CD loans, which had a significantly positive impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TNB originated 23 CD loans totaling \$119.8 million and representing 23.4 percent of allocated tier 1 capital. CD loans originated exhibited excellent responsiveness to the credit and community needs in the AA. Loans primarily supported affordable housing and community services in the AA.

Examples of CD loans originated during the evaluation period include:

- \$25 million participation loan to the state of Mississippi to provide funding to the Mississippi Development Authority for a large project. A company will locate a new commercial vehicle tire manufacturing plant, which will create 2,500 new jobs. The majority will be for LMI individuals.
- \$1.5 million line of credit to a nonprofit affordable housing organization, in which TNB showed leadership by being the co-lead of an 11-bank participation.
- Three loans totaling \$60 million to the Public School District. Loan funds helped to offset various operating expenses in anticipation of the district's ad valorem tax collections. A significant percentage of the students in the district are eligible for the free or reduced lunch program.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Innovative and flexible loan programs had a positive impact on the bank's lending performance in the AA. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

TNB works in conjunction with the Mississippi Home Corporation to offer affordable housing assistance programs to first time and non-first time homebuyers. These affordable loan products are offered under the agency's programs, which may include down payment assistance, closing cost assistance, and tax credits. TNB leveraged these programs to originate 180 loans totaling \$18.3 million in the state of Mississippi during the evaluation period.

Federal Home Loan Bank (FHLB) of Dallas

In partnership with the FHLB of Dallas, TNB offers a variety of programs intended to meet the needs of LMI borrowers throughout its lending footprint.

TNB offers the Homebuyer Equity Leverage Partnership (HELP) program. HELP assists low-income-qualified, first-time homebuyers with down payment assistance and closing costs. TNB leveraged this program to originate seven loans totaling over \$52 thousand during the evaluation period throughout the state of Mississippi. The bank originated two loans totaling over \$15 thousand in the Jackson MSA, and five loans totaling \$37 thousand in the MS NonMSA.

TNB offers the Special Needs Assistance Rehabilitation Program (SNAP). The SNAP provides grant funds for the repair and rehabilitation of owner-occupied housing of eligible, specialneeds individuals. The maximum SNAP program award per household may be up to \$7,000. TNB leveraged this program to originate 33 loans totaling over \$170 thousand during the evaluation period throughout the state of Mississippi. The bank originated 16 loans totaling over \$83 thousand in the Jackson MSA and 17 loans totaling over \$86 thousand in the MS Non-MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the MS Non-MSA is consistent with the bank's overall High Satisfactory performance under the Lending Test. Performance in the Gulfport-Biloxi-Pascagoula MSA is weaker than the state of Mississippi rating. Performance differences are due to weaker geographic and borrower income distribution performances in the AA as well as CD lending performance that had a neutral impact on lending performance in the AA. Weaker performance did not impact conclusions about the bank's performance in the state.

Refer to Tables O through T in the state of Mississippi section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the State of Mississippi is rated High Satisfactory.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Gulfport-Biloxi-Pascagoula MSA	12	\$ 1,206	20	\$ 851	32	3.3%	\$ 2,057	3.2%	0	\$ -
Hattiesburg MSA	16	\$ 1,416	60	\$ 2,407	76	7.9%	\$ 3,823	6.0%	0	\$ -
Jackson MSA	51	\$ 13,974	355	\$ 23,375	406	42.2%	\$ 37,349	58.2%	0	\$ -
MS Non-MSA	33	\$ 11,245	416	\$ 9,683	449	46.6%	\$ 20,928	32.6%	0	\$ -

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Jackson MSA and Hattiesburg MSA is good. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Hattiesburg MSA

The bank has an adequate level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$3.8 million, with current period investments totaling \$2.3 million, prior period investments of \$1.4 million, and qualified grants of \$73 thousand. Investments benefiting the AA during the evaluation period represented 4.1 percent of allocated tier 1 capital and consisted of 14 MBS supporting mortgages to LMI borrowers within the AA. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$1.4 million in 16 qualifying MBS supporting mortgages to LMI borrowers within the AA.

All grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$5 thousand grant to a nonprofit food pantry that provides emergency food to thousands of LMI households every month.
- \$4 thousand grant to a high school to support a social service program, with a majority of the students receiving a free or reduced lunch.

Jackson MSA

The bank has an adequate level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$37.3 million, with current period investments of \$21.9 million, prior period investments of \$14 million, and qualified grants of \$1.4 million. Investments benefiting the AA during the evaluation period represented 4.6 percent of allocated tier 1 capital and

consisted of 56 MBS supporting mortgages to LMI borrowers within the AA. There were no unfunded commitments at the end of the evaluation period.

The bank made a \$2.3 million complex investment and had a lead role in the related initiative. That investment was a partnership with the American Cancer Society that involved the use of Federal and State NMTC to meet a significant community service need. The initiative was to develop a facility to provide services to a majority of LMI families who must travel at least 40 miles from their homes for treatment. The project meets a significant community need, as Jackson is a health care hub for the region, and many patients and caregivers must travel to Jackson to access needed treatment and facilities.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$8.9 million in 46 qualifying MBS supporting mortgages to LMI borrowers and \$5 million in five other qualifying CD investments.

All grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$49 thousand grant to a nonprofit organization that partners with low-income families to provide safe, affordable, and environmentally responsible homes and the educational tools needed to achieve fiscal stability.
- \$277 thousand grant to a health care organization that serves children from LMI families covered by Medicaid.

Other Performance

In partnership with the FHLB of Dallas, TNB offers the Partnership Grant Program (PGP). The PGP provides a match of the bank's contribution to provide grants up to \$12 thousand that help promote and strengthen relationships with community-based organizations. PGP may be used for various purposes which include organizational capacity building; assistance in applying for grants and other funding sources; research and studies; and legal, accounting, and administrative services.

TNB leveraged this program to originate three grants totaling over \$6 thousand during the evaluation period throughout the state of Mississippi. The bank originated two grants totaling over \$2 thousand in the Jackson MSA and one grant totaling \$4 thousand in the MS Non-MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Gulfport-Biloxi-Pascagoula MSA and MS Non-MSA performance is consistent with the state of Mississippi's overall High Satisfactory performance under the Investment Test. The majority of investments were in MBS comprised of mortgages to LMI individuals and families within the AAs.

SERVICE TEST

The bank's performance under the Service Test in Mississippi is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Hattiesburg MSA is good, and adequate in the Jackson MSA.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Gulfport-Biloxi-Pascagoula MSA	1.1	2	2.0	0.0	0.0	100.0	0.0	8.9	11.6	66.4	13.0
Hattiesburg MSA	6.7	9	8.9	11.1	22.2	55.6	11.1	11.7	11.1	50.9	26.3
Jackson MSA	58.5	39	38.6	10.3	23.1	28.2	38.5	8.7	26.5	31.7	32.3
MS Non-MSA	33.7	51	50.5	9.8	23.5	39.2	21.6	5.0	15.3	48.0	30.9

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Gulfport-Biloxi-Pascagoula MSA						
Hattiesburg MSA						
Jackson MSA		1			-1	
MS Non-MSA		4			-2	-2

Hattiesburg MSA

TNB's branch distribution and retail service performance is excellent.

The bank's branches are readily accessible to geographies and individuals of different income levels in the AA. The bank has nine branches located within the AA, one located within a low-income CT, and two within a moderate-income CT. The percentage of the bank's branches in LMI geographies is well above the percentage of population living in those geographies. The bank has five deposit-taking ATMs located in the AA, with no ATMs in low-income CTs, and one ATM in a moderate-income CT. The percentage of ATMs in LMI CTs is near to the level of population in the LMI areas. ATM distribution is consistent with the bank's branch distribution.

The opening and closing of branches have generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed four branches in the AA, two within an upper-income geography, and two within a middle-income geography.

Business hours vary in a way that inconveniences the AA, particularly LMI geographies and/or individuals. The majority of branches operate during traditional banking hours; however, the two middle-income branches are closed for a lunch hour. Also, one of the middle-income branches closes at midday on Wednesdays, and the other closes an hour earlier on Fridays. No other branches in this AA operate with these variances in hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Jackson MSA

TNB's branch distribution and retail service performance is good.

The bank's branches are accessible to geographies and individuals of different income levels in the AA. The bank has 39 branches within the AA, with four branches in low-income CTs, and nine branches in moderate-income CTs. The percentage of the bank's branches in LMI geographies is near to the percentage of population living in those geographies. The bank has 36 deposit-taking ATMs located in the AA, with five ATMs in low-income CTs, and nine ATMs in moderate-income CTs. The percentage of ATMs in LMI CTs is well above the level of population in the LMI areas. ATM distribution is consistent with the bank's branch distribution.

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed one branch in a middle-income geography of the AA.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. Branch hours vary, but mainly operate during traditional banking hours, with some offering Saturday hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The bank provides an adequate level of CD services.

Hattiesburg MSA

TNB provides an adequate level of CD services in the Hattiesburg MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate level of CD services, consistent with its capacity and expertise to conduct specific activities.

TNB employees from various lines of business provided technical assistance to 12 different CD organizations totaling 395 hours during the evaluation period. TNB staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- An employee served on the board of a nonprofit organization dedicated to job creation, business creation and expansion, and support of non-traditional small business loan seekers.
- An employee provided technical assistance to an organization dedicated to improving the quality of life for citizens of the AA through community and economic development.
- Several employees provided financial education in partnership with several affordable housing agencies at first time homebuyer workshops targeted to LMI individuals and families.
- Various employees provided a financial literacy curriculum to several local schools with a majority LMI students.

Jackson MSA

TNB provides a low level of CD services in the Jackson MSA.

CD services were effective and responsive in helping the bank address community needs. However, the bank conducted or supported a limited level of CD services, inconsistent with its capacity and expertise to conduct specific activities.

TNB employees from various lines of business provided technical assistance to 44 different CD organizations totaling 1,849 hours during the evaluation period. TNB staff served on boards and committees for organizations that provide affordable housing and community services targeted to LMI individuals and families.

Examples of some of these services:

- An employee served on the board of a coalition whose mission is to coordinate, promote and expand personal financial education, economic inclusion, and consumer protection for individuals and families throughout the state. One of its primary services is a five week financial literacy boot camp targeted to LMI individuals.
- An employee served on the board of an organization dedicated to the revitalization and stabilization of neighborhoods, primarily in the city of Jackson, through rehabilitation, and financing and development of housing targeted for low- to moderate-income families.

Mississippi Statewide

TNB partnered with Everfi, a company that provides financial literacy through an online format that uses video, animations, and interactive activities to bring complex financial concepts to life. During the evaluation period, TNB provided funding for this program to 225 eligible schools throughout Mississippi, where the majority of the students participated in a free and reduced lunch program. The program reached over 15 thousand students. This financial literacy program was provided in the following AAs: Gulfport-Biloxi-Pascagoula MSA, Hattiesburg MSA, Jackson MSA, and MS Non-MSA, and the Memphis TN-MS MMSA (only for the counties within the state of MI).

In partnership with the FHLB of Dallas, TNB participated in technical assistance related to their specialized grants and advances that finance affordable housing and economic development in the communities. In 2017 through 2018, the bank supported four organizations in facilitating applications for the FHLB's Affordable Housing Program (AHP) Grant.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the MS Non-MSA is stronger than the bank's overall Low Satisfactory under the Service Test. Stronger performance is due to the branch distribution in LMI CTs. The stronger performance did not have an impact on the bank's overall Service Test performance for the state. Performance in the Gulfport-Biloxi-Pascagoula MSA is weaker than the bank's overall performance in the state and is considered very poor. Weaker performance is due to the bank's branch distribution in the AA. The weaker performance did not have an impact on the bank's overall Service Test performance for the state.

State of Texas

CRA rating for the State of Texas⁵:	Satisfactory	
The Lending Test is rated:	Low Satisfactory	
The Investment Test is rated:	High Satisfactory	The Service Test
is rated:	Low Satisfactory	

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs;
- The bank exhibits a poor geographic distribution of loans in its AA;
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- The bank has made an adequate level of CD loans;
- The bank has made a significant level of qualified CD investments and grants;
- The bank's branches are reasonably accessible to portions of the AA, particularly LMI geographies and/or LMI individuals;
- The bank provides an adequate level of CD services.

Description of Bank's Operations in Texas

TNB has one AA within the state of Texas, which is comprised of the Houston-The WoodlandsSugar Land MSA.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had less than 0.1 percent deposit market share in Texas and is ranked 139th out of 524 financial institutions doing business in the state. The deposits accounted for 4.1 percent of the bank's total deposits. Primary competitors include JPMorgan Chase Bank, National Association, which ranked first in deposit market share (21.5 percent) with 574 offices, Bank of America, National Association, which ranked second in deposit market share (14.4 percent) with 369 offices, and USAA Federal Savings Bank, which ranked third in deposit market share (8.7 percent) with one office.

TNB provides a full-range of loan and deposit products and services in the rating area through 12 full-service branches; three are located in moderate-income CTs, three are located in middle-income CTs, and six are located in upper-income CTs. In addition, the bank has 10

⁵ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

deposit-taking ATMs throughout the rating area. The branches represent 6.4 percent of the bank's total branch network.

The bank made 2.3 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the state.

Houston-The Woodlands-Sugar Land MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Houston-The Woodlands-Sugar Land MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	792	18.6	31.8	21.3	27.4	0.9
Population by Geography	4,402,209	15.6	30.8	25.4	27.7	0.5
Housing Units by Geography	1,676,270	16.3	29.2	24.3	29.8	0.4
Owner-Occupied Units by Geography	833,256	7.4	26.0	28.1	38.5	0.1
Occupied Rental Units by Geography	680,209	24.9	32.5	21.1	20.7	0.7
Vacant Units by Geography	162,805	26.0	31.9	18.8	22.9	0.4
Businesses by Geography	334,226	13.2	22.5	21.5	42.5	0.3
Farms by Geography	4,676	8.1	20.5	25.7	45.6	0.1
Family Distribution by Income Level	1,035,157	27.7	17.1	17.0	38.1	0.0
Household Distribution by Income Level	1,513,465	27.2	17.0	17.0	38.8	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$69,373	Median Housing Value			\$170,737
			Median Gross Rent			\$953
			Families Below Poverty Level			14.9%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Houston-The Woodlands-Sugar Land MSA is comprised of the complete counties of Fort Bend (2017-2018), Harris, and Waller in Texas. During 2016, the bank delineated 31 CTs in Fort Bend County as the AA. In 2017, the full county of Fort Bend was incorporated as part of the AA. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 792 CTs of which 147 are low-income and 252 are moderate-income.

Based on FDIC Deposit Market Share data as of June 30, 2018, TNB had a 0.2 percent deposit market share in the AA and is ranked 33rd out of 81 financial institutions doing business in the AA. The deposits accounted for 43.8 percent of the bank's total deposits.

Primary competitors include JPMorgan Chase, National Association, which ranked first in deposit market share (45.1 percent) with 169 offices; Wells Fargo Bank, National Association, which ranked second in deposit market share (10.1 percent) with 153 offices; Bank of America, National Association, which ranked third in deposit market share (9.1 percent) with 97 offices; Compass Bank, which ranked fourth in deposit market share (6.1 percent) with 53 offices; and ZB, National Association, which ranked fifth in deposit market share (four percent) with 44 offices.

The bank made 2.3 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Houston-The Woodlands-Sugar Land MSA was 4.1 percent, down from 4.8 percent in January 2016. The national unemployment rate as of December 2018 was 3.9 percent, and 3.7 percent for the state of Texas.

Housing Characteristics

According to the 2010 U.S. Census, 49.7 percent of the total housing units in the AA were owner occupied, and 40.6 percent were rental occupied units. Approximately 7.4 percent of all owner occupied units and 24.9 percent of renter occupied units were located in low-income CTs; 10.4 percent of all single family (1-4 unit) homes and 28.5 percent of multifamily (five plus unit) housing units were located in low-income tracts. Approximately 26 percent of all owner occupied units and 32.5 percent of renter occupied units were located in moderate-income CTs; 28.7 percent of all single family (1-4 unit) homes and 29.1 percent of multifamily (five plus unit) housing units were located in moderate-income tracts.

According to Moody's Analytics, single-family and multifamily permits increased to the 40 thousand range in early 2018, which illustrates that developers are encouraged to build. Despite a decline later in the year, residential permits remain elevated. Several factors have kept housing steady, including low interest rates, above average population growth, and relatively high affordability for such a large metro area.

The AA is a high-cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers. According to Realtor.com data, the median housing value in the AA was \$320,040 and \$307,640 in 2016 and 2018, respectively, reflecting a decline of -0.9 percent. Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,800 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$176,036 mortgage with a payment of \$945 per month. A moderate-income borrower making \$60,480 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$281,657 mortgage with a payment of \$1,512 per month. This illustrates that both low-income borrowers and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,651.

Economic Conditions

According to Moody's Analytics, the AA advanced steadily over the course of 2018, with job growth at twice the national average. Goods producing industries led the way, contributing nearly two-fifths of the total job gains, but private services also outperformed their national counterparts, especially professional services and distribution. High wage jobs are rising at twice the national rate, and as a result, average hourly earnings have accelerated.

The OCC made one community contact in the AA. The community contact indicated that the following are identified needs within the communities:

- Small dollar loans
- Foreclosure assistance
- Residential financing
- Financial Literacy

Scope of Evaluation in Texas

For the state of Texas, we completed a full-scope review of the Houston-The Woodlands-Sugar Land MSA. The Houston-The Woodlands-Sugar Land MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

Due to the higher volume of small business loans (54.7 percent) compared to the home mortgage loans (44.4 percent), small business loans were weighted heavier than other states and MMSA rating areas. The bank did not originate or purchase a sufficient volume of small farm loans during the evaluation period to perform a meaningful analysis. Greater weight was generally given to performance compared to aggregate lenders than to performance relative to demographic factors in lending.

TNB offers all products in all markets, but focuses on commercial loans in Texas due to strong competition in the AA for home mortgage loans; TNB only originates home mortgage loans as an accommodation to its business clients in this AA.

Refer to Appendix A for more information of all AAs under review.

The state of Texas poses a number of challenges to banks in the rating area, including TNB.

- The low number of owner-occupied housing units can present a challenge for banks when attempting to originate home mortgages in LMI geographies. As such, the bank's performance in moderate-income CTs carried greater weight when coming to overall product conclusions.
- In performing our analysis of investments, competition in the AA is high, with large interstate, regional savings, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS LENDING TEST

The bank's performance under the Lending Test in Texas is rated Low Satisfactory. The state rating is based on performance in the AA receiving a full-scope review.

We placed greater weight on small loans to businesses, as the bank indicated it is a strategy in the AA.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Houston-The Woodlands-Sugar Land MSA is adequate. We considered the factors discussed in describing the bank's operation in the state above.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
Houston-The WoodlandsSugar Land MSA	378	469	7	2	856	100.0%	100.0%

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans*	%State Deposits
Houston-The WoodlandsSugar Land MSA	\$ 87,588	\$ 124,941	\$ 1,619	\$ 5,227	\$ 219,375	100.0%	100.0%

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Lending levels reflect adequate responsiveness to AA credit needs, taking into account the number and amount of home mortgage, small business, and small farm loans in the AA. We considered the lending volume in the AA relative to its capacity based on deposits, competition, and market presence.

According to FDIC Deposit Market Share data as of June 30, 2018, TNB had \$453.1 million in deposits with a deposit market share of 0.2 percent. TNB ranked 33rd in total deposits out of 81 banks in the AA.

According to 2017 peer mortgage data, TNB ranked 179th out of 799 lenders originating home mortgage loans in the AA. The bank's market share of 0.1 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest mortgage lenders have captured 26.5 percent of the market.

According to 2017 peer small business data, TNB ranked 48 out of 204 lenders originating small business loans in the AA. The bank's market share of 0.1 percent and rank in loans is weaker than the bank's market share and rank in deposits. The five largest small business lenders have captured 61.2 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Houston-The Woodlands-Sugar Land MSA

The geographic distribution of home mortgage loans was poor.

The distribution of the bank's home mortgage lending in 2016 was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in LMI geographies. The proportion of loans was well below the aggregate distribution in low-income geographies and below in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2017 was adequate. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and below in moderate-income geographies. The proportion of loans exceeds the aggregate distribution in low-income geographies and was well below the aggregate distribution in moderate-income geographies.

The distribution of the bank's home mortgage lending in 2018 was poor. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and significantly below the percentage in moderate-income geographies. The proportion of loans was near to the aggregate distribution in low-income geographies and was well below the aggregate distribution in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Houston-The Woodlands-Sugar Land MSA

The geographic distribution of the bank's originations and purchases of small loans to businesses was good.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses in LMI geographies was good. The proportion of loans was near to the percentage of businesses in LMI geographies, and was near to the percentage of businesses in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was near to the aggregate distribution of loans in those geographies, and near to the distribution of loans in moderate-income geographies. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was good.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed TNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Houston-The Woodlands-Sugar Land MSA

The distribution of the bank's home mortgage loans to LMI borrowers was poor.

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to LMI borrowers. These issues were considered in evaluating the bank's performance in the AA.

The distribution of the bank's home mortgage lending in 2016 was poor. The proportion of loans was significantly below the percentage of low-income families and well below the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution to low-income families and near to the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2017 was poor. The proportion of loans was significantly below the percentage of low-income families and well below the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution to low-income families and well below the aggregate distribution to moderate-income families.

The distribution of the bank's home mortgage lending in 2018 was poor. The proportion of loans was significantly below the percentage of low-income families and below the percentage of moderate-income families. The proportion of loans was significantly below the aggregate distribution to low-income families and well below the aggregate distribution to moderate income families.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses was adequate.

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Houston-The Woodlands-Sugar Land MSA

During the 2017 through 2018 evaluation period, the distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was significantly below the percentage of small businesses, but near to the aggregate distribution of loans to those businesses. Performance in the 2016 analysis period was consistent with performance in the 2017 through 2018 analysis period and was adequate.

Community Development Lending

The bank made an adequate level of CD loans, which had a neutral impact on lending performance in the AA. We considered the lending opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TNB originated two loans totaling \$5.2 million and representing 9.8 percent of allocated tier 1 capital. CD loans originated exhibited poor responsiveness to the credit and community needs in the AA. Loans supported community services in the AA.

CD loans originated during the evaluation period include:

- \$4.6 million loan to an organization for the expansion of charter schools, serving primarily low-income students.
- \$586 thousand loan to a healthcare organization that provides care exclusively to the homeless.

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank’s performance under the Investment Test in the State of Texas is rated High Satisfactory.

Assessment Area	Qualified Investments									
	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Houston-The Woodlands-Sugar Land MSA	23	\$ 7,819	38	\$ 6,222	61	100.0%	\$ 14,041	100.0%	0	\$ -

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Houston-The Woodlands-Sugar Land MSA is good. We considered the investment opportunities with direct benefit within the AA and the bank’s capacity to address those needs.

The bank has a significant level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$14 million, with current period investments totaling \$6.2 million, prior period investments of \$7.8 million, and qualified grants of \$57 thousand. Investments benefiting the AA during the evaluation represented 11.6 percent of allocated tier 1 capital and were primarily MBS supporting mortgages to LMI borrowers within the AA. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments prior to the current evaluation period within the AA. The remaining balances consisted of \$7.8 million in 23 qualifying MBS supporting mortgages to LMI borrowers within the AA.

All grants were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$15 thousand grant to a nonprofit organization that provides community service to low-income students. The organization offers after-school, preschool, and summer learning programs, and a resource center for adult learners. The organization also offers scholarships to help low-income students attend a local private school.

- \$13 thousand donation to a nonprofit organization that provides mentoring services to children from LMI families.

SERVICE TEST

The bank’s performance under the Service Test in Texas is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Houston-The Woodlands-Sugar Land MSA is poor.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Houston-The WoodlandsSugar Land MSA	100.0	12	100.0	0.0	25.0	25.0	50.0	13.8	27.9	25.7	32.0

TNB’s branch distribution and retail service performance is adequate.

The bank’s branches are reasonably accessible to portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 12 branches within the AA, none located within low-income CTs, and with three branches in moderate-income CTs. The percentage of the bank’s branches in low-income geographies is significantly below the percentage of population living in those geographies, and near to the moderate-income geographies. The bank has 10 deposit-taking ATMs located in the AA, with none in low-income CTs, and two in moderate-income CTs. The percentage of ATMs in LMI CTs is below the level of population in the LMI areas. ATM distribution is consistent with the bank’s branch distribution.

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. No branches were opened or closed in the AA during the assessment period.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with none offering Saturday hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

TNB provides an adequate level of CD services in the Houston-The Woodlands-Sugar Land MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate level of CD services, consistent with its capacity and expertise to conduct specific activities.

TNB employees from various lines of business provided technical assistance to 10 different CD organizations totaling 825 hours during the evaluation period. TNB staff served on boards and committees for organizations that provide community services targeted to LMI individuals and families.

Examples of some of these services:

- Several employees taught financial literacy classes in partnership with a nonprofit organization. The organization introduces students to personal finance and career explorations through classroom instruction, in which they apply learned concepts in a lifelike community.
- An employee served on the board of an organization whose mission is to provide housing for LMI residents. The organization facilitates housing through issuance of single family mortgage revenue bonds and private activity bonds for multifamily housing.
- An employee served on the board of an organization that offers academic, emotional, cultural, and social enrichment for at-risk children and their families, primarily in LMI communities.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Home mortgage, small business, small farm, community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Southern Community Capital (SCC)	Subsidiary	Qualified investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
Memphis TN-MS MMSA	Full-scope	Counties of Desoto in MS and Fayette and Shelby in TN
State of Alabama		
AL Non-MSA	Full-scope	Counties of Barbour, Butler, Dallas, Escambia, Marengo, and Monroe
Auburn-Opelika MSA	Limited-scope	Lee County
Birmingham-Hoover MSA	Limited-scope	Baldwin County
Daphne-Fairhope-Foley MSA	Limited-scope	Counties of Bibb, Jefferson, and Shelby.
Huntsville MSA	Limited-scope	Counties of Limestone and Madison*
Mobile MSA	Full-scope	Mobile County
Montgomery MSA	Full-scope	Counties of Autauga, Elmore, and Montgomery
Tuscaloosa MSA	Limited-scope	Tuscaloosa County
State of Florida		
Crestview-Fort Walton Beach-Destin MSA	Limited-scope	Counties of Okaloosa and Walton
Panama City MSA	Full-scope	Bay County
Pensacola-Ferry Pass-Brent MSA	Limited-scope	Escambia County**
State of Mississippi		
Gulfport-Biloxi-Pascagoula MSA	Limited-scope	Harrison County
Hattiesburg MSA	Full-scope	Counties of Forrest, Lamar, and Perry
Jackson MSA	Full-scope	Counties of Copiah, Hinds, Madison, Rankin, and Simpson
MS Non-MSA	Limited-scope	Counties of Alcorn, Amite, Itawamba, Jones, Lafayette, Lauderdale, Leake, Lee, Leflore, Lincoln, Lowndes, Marion, Neshoba, Oktibbeha, Pike, Smith, Walthall, Warren, and Washington
State of Texas		
Houston-The Woodlands-Sugar Land MSA	Full-scope	Counties of Fort Bend***, Harris and Waller

* Entered the AA in 2017.

** Entered the AA in 2018.
*** Partial County in 2016.

Appendix A-1

Appendix B: Summary of MMSA and State Ratings

RATINGS AVASKA NATIONAL BANK				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank Rating
Avaska National Bank	Satisfactory	Satisfactory	Satisfactory	Satisfactory
MMSA or State:				
Memphis TN-MS MMSA	Low Satisfactory	High Satisfactory	Need to Improve	Satisfactory
State of Alabama	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Florida	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Mississippi	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Texas	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

* The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, 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 non-relatives living with the family. Families are classified by type as either a marriedcouple 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 (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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 (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the bank as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 CD.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For a bank with domestic branches in only one state, the bank's CRA rating would be the state rating. If a bank maintains domestic branches in more than one state, the bank will receive a rating for each state in which those branches are located. If a bank maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the bank will receive a rating for the multi-state metropolitan statistical 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) 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.

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.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upperincome geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upperincome borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage

distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Memphis TN-MS

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Memphis TN-MS MMSA	576	92,389	100.0	33,753	8.2	0.7	2.0	16.2	6.9	6.7	27.6	26.7	23.8	48.0	65.6	67.6	0.0	0.0	0.0
Total	576	92,389	100.0	33,753	8.2	0.7	2.0	16.2	6.9	6.7	27.6	26.7	23.8	48.0	65.6	67.6	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Memphis TN-MS MMSA	505	85,637	100.0	31,923	10.8	0.4	3.5	15.6	5.0	9.3	23.2	31.1	22.1	50.3	63.6	65.2	0.1	0.0	0.0
Total	505	85,637	100.0	31,923	10.8	0.4	3.5	15.6	5.0	9.3	23.2	31.1	22.1	50.3	63.6	65.2	0.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2018	
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	
Memphis TN-MS MMSA	457	69,531	100.0	10.8	2.0	3.5	15.6	5.3	9.3	23.2	33.9	22.1	50.3	58.9	66.2	0.1	0.0	0.0	
Total	457	69,531	100.0	10.8	2.0	3.5	15.6	5.3	9.3	23.2	33.9	22.1	50.3	58.9	66.2	0.1	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2016	
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Memphis TN-MS MMSA	576	92,389	100.0	33,753	23.3	6.1	3.3	15.8	21.4	11.8	17.4	23.4	16.6	43.5	44.6	40.8	0.0	4.5	27.4
Total	576	92,389	100.0	33,753	23.3	6.1	3.3	15.8	21.4	11.8	17.4	23.4	16.6	43.5	44.6	40.8	0.0	4.5	27.4

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Memphis TN-MS MMSA	505	85,637	100.0	31,923	24.1	7.1	3.6	15.4	20.4	11.6	17.2	26.9	17.4	43.3	39.8	43.7	0.0	5.7	23.8
Total	505	85,637	100.0	31,923	24.1	7.1	3.6	15.4	20.4	11.6	17.2	26.9	17.4	43.3	39.8	43.7	0.0	5.7	23.8

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Memphis TNMS MMSA	457	69,531	100.0	24.1	4.8	3.6	15.4	20.1	11.6	17.2	24.1	17.4	43.3	46.6	43.7	0.0	4.4	23.8	
Total	457	69,531	100.0	24.1	4.8	3.6	15.4	20.1	11.6	17.2	24.1	17.4	43.3	46.6	43.7	0.0	4.4	23.8	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Memphis TN-MS MMSA	129	21,006	3.5	17,714	9.2	3.9	6.8	17.3	10.9	14.7	25.5	23.3	21.6	47.2	59.7	56.2	0.9	2.3	0.7
Total	129	21,006	3.5	17,714	9.2	3.9	6.8	17.3	10.9	14.7	25.5	23.3	21.6	47.2	59.7	56.2	0.9	2.3	0.7

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Memphis TN-MS MMSA	207	55,388	50.0	16,057	12.5	10.6	9.9	15.7	9.7	15.3	22.2	26.1	19.9	48.4	51.7	53.6	1.1	1.9	1.3
Total	207	27,694	50.0	16,057	12.5	10.6	9.9	15.7	9.7	15.3	22.2	26.1	19.9	48.4	51.7	53.6	1.1	1.9	1.3

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Memphis TN-MS MMSA	129	21,006	100.0	17,714	79.7	34.9	44.0	7.0	48.8	13.3	16.3	
Total	129	21,006	100.0	17,714	79.7	34.9	44.0	7.0	48.8	13.3	16.3	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Memphis TN-MS MMSA	207	55,388	100.0	16,057	80.0	43.5	47.4	6.9	38.2	13.1	18.4	
Total	207	27,694	100.0	16,057	80.0	43.5	47.4	6.9	38.2	13.1	18.4	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
Due to rounding, totals may not equal 100.0*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate

Memphis TN-MS MMSA	7	351	100.0	139	5.7	0.0	1.4	11.7	0.0	3.6	30.3	71.4	45.3	52.0	28.6	49.6	0.4	0.0	0.0
Total	7	351	100.0	139	5.7	0.0	1.4	11.7	0.0	3.6	30.3	71.4	45.3	52.0	28.6	49.6	0.4	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Memphis TN-MS MMSA	17	3,232	50.0	138	7.7	0.0	0.7	11.5	0.0	2.9	27.9	94.1	56.5	52.0	5.9	39.9	0.8	0.0	0.0
Total	17	1,616	50.0	138	7.7	0.0	0.7	11.5	0.0	2.9	27.9	94.1	56.5	52.0	5.9	39.9	0.8	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Memphis TN-MS MMSA	7	351	100.0	139	93.3	100.0	47.5	3.8	0.0	2.8	0.0
Total	7	351	100.0	139	93.3	100.0	47.5	3.8	0.0	2.8	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Memphis TN-MS MMSA	17	3,232	100.0	138	93.9	82.4	49.3	3.7	9.1	2.4	18.2
Total	17	1,616	100.0	138	93.9	82.4	49.3	3.7	9.1	2.4	18.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

State of Alabama

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
AuburnOpelika MSA	25	3,233	1.2	5,318	4.4	4.0	1.9	15.7	36.0	17.8	57.2	48.0	55.6	22.7	12.0	24.7	0.0	0.0	0.0
Birmingham-Hoover MSA	487	106,880	22.5	28,692	5.5	0.2	1.2	15.2	4.3	6.4	35.0	23.2	30.3	44.3	72.3	62.1	0.0	0.0	0.0
DaphneFairhopeFoley MSA	445	101,868	20.5	9,650	0.0	0.0	0.0	15.1	5.6	8.0	60.1	55.3	59.1	24.8	39.1	32.9	0.0	0.0	0.0

Mobile MSA	444	80,649	20.5	9,677	4.0	0.5	0.8	19.6	7.7	10.4	40.7	37.2	40.2	35.6	54.7	48.5	0.0	0.0	0.0
Montgomery MSA	382	67,009	17.6	10,681	5.8	1.6	1.5	15.3	4.2	7.5	41.9	35.9	40.2	37.0	58.4	50.7	0.0	0.0	0.0
Non-MSA AL	236	20,831	10.9	2,050	2.8	3.0	1.0	29.6	21.6	20.4	43.3	36.4	43.6	24.3	39.0	35.1	0.0	0.0	0.0
Tuscaloosa MSA	150	29,141	6.9	6,138	4.1	0.7	1.7	12.9	8.0	8.3	41.6	40.7	36.4	41.4	50.7	53.7	0.0	0.0	0.0
Total	2,169	409,611	100.0	72,206	4.5	0.8	1.1	16.9	7.7	8.7	41.5	37.8	39.7	37.1	53.6	50.5	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
AuburnOpelika MSA	19	3,660	0.9	4,922	1.8	0.0	0.7	12.5	5.3	13.8	70.9	84.2	69.8	14.3	10.5	14.9	0.5	0.0	0.9
Birmingham-Hoover MSA	371	81,296	17.3	25,648	6.3	1.9	2.1	18.9	6.5	10.9	28.8	19.9	27.9	45.9	71.7	59.1	0.0	0.0	0.0
DaphneFairhopeFoley MSA	408	96,748	19.0	9,836	0.0	0.0	0.0	14.9	5.9	15.2	65.0	61.0	59.8	20.1	33.1	25.0	0.0	0.0	0.0
Huntsville MSA	214	49,581	10.0	17,982	4.0	0.0	2.4	24.5	10.7	19.0	33.8	39.7	35.5	37.7	49.5	43.2	0.0	0.0	0.0
Mobile MSA	439	72,266	20.4	9,421	5.7	0.5	1.5	15.0	6.8	8.3	38.5	26.9	36.5	40.9	65.8	53.7	0.0	0.0	0.0
Montgomery MSA	384	67,350	17.9	9,611	6.1	0.8	1.6	16.9	9.1	10.2	38.5	39.8	36.7	38.5	50.0	51.3	0.0	0.3	0.1

Non-MSA AL	199	16,771	9.3	2,143	1.9	1.5	0.4	22.0	16.1	18.5	57.1	47.7	56.3	18.9	34.7	24.8	0.0	0.0	0.0
Tuscaloosa MSA	113	22,078	5.3	5,980	1.2	0.0	0.3	12.8	12.4	9.2	46.9	34.5	44.1	38.5	51.3	45.3	0.5	1.8	1.1
Total	2,147	409,750	100.0	85,543	4.6	0.7	1.5	18.2	8.5	13.0	39.8	38.6	39.4	37.4	52.0	46.0	0.1	0.1	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Auburn-Opelika MSA	54	12,010	2.0	1.8	0.0	0.7	12.5	20.4	13.8	70.9	50.0	69.8	14.3	25.9	14.9	0.5	3.7	0.9
Birmingham-Hoover MSA	416	94,251	15.3	6.3	0.0	2.1	18.9	6.7	10.9	28.8	22.4	27.9	45.9	70.9	59.1	0.0	0.0	0.0
Daphne-Fairhope-Foley MSA	495	114,760	18.2	0.0	0.0	0.0	14.9	7.3	15.2	65.0	57.8	59.8	20.1	34.9	25.0	0.0	0.0	0.0
Huntsville MSA	351	69,834	12.9	4.0	1.1	--	24.5	14.2	--	33.8	32.5	--	37.7	52.1	--	0.0	0.0	--
Mobile MSA	517	90,524	19.1	5.7	0.4	1.5	15.0	4.6	8.3	38.5	29.4	36.5	40.9	65.6	53.7	0.0	0.0	0.0
Montgomery MSA	534	95,397	19.7	6.1	0.6	1.6	16.9	9.0	10.2	38.5	36.5	36.7	38.5	53.7	51.3	0.0	0.2	0.1
Non-MSA AL	240	20,387	8.8	1.9	1.3	0.4	22.0	23.3	18.5	57.1	49.6	56.3	18.9	25.8	24.8	0.0	0.0	0.0
Tuscaloosa MSA	106	18,757	3.9	1.2	0.0	0.3	12.8	2.8	9.2	46.9	46.2	44.1	38.5	50.9	45.3	0.5	0.0	1.1
Total	2,713	515,920	100.0	4.6	0.4	1.3	18.2	9.4	11.4	39.8	38.2	40.4	37.4	51.9	46.7	0.1	0.1	0.2

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
AuburnOpelika MSA	25	3,233	1.2	5,318	23.1	12.0	4.3	16.3	12.0	12.7	20.8	0.0	18.9	39.7	28.0	42.4	0.0	48.0	21.7
Birmingham-Hoover MSA	487	106,880	22.5	28,692	21.1	4.7	5.6	16.4	13.3	14.3	18.8	21.4	18.5	43.6	51.5	38.7	0.0	9.0	22.8
DaphneFairhopeFoley MSA	445	101,868	20.5	9,650	19.4	3.1	4.0	18.6	11.7	12.8	21.5	19.8	18.0	40.4	53.3	43.6	0.0	12.1	21.7
Mobile MSA	444	80,649	20.5	9,677	23.2	2.9	4.4	16.7	12.8	14.9	19.5	22.1	20.5	40.6	56.5	37.0	0.0	5.6	23.2
Montgomery MSA	382	67,009	17.6	10,681	23.0	6.8	7.1	16.3	12.8	15.8	18.6	16.2	19.0	42.0	49.2	31.9	0.0	14.9	26.2
Non-MSA AL	236	20,831	10.9	2,050	28.1	11.9	6.7	16.7	14.8	14.5	17.4	20.8	20.4	37.9	48.7	41.4	0.0	3.8	16.9
Tuscaloosa MSA	150	29,141	6.9	6,138	19.8	6.0	3.4	16.1	13.3	14.6	19.8	20.7	17.7	44.2	52.0	34.6	0.0	8.0	29.7
Total	2,169	409,611	100.0	72,206	22.2	5.3	5.2	16.6	13.0	14.3	19.2	19.9	18.8	42.0	52.0	38.1	0.0	9.8	23.6

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
AuburnOpelika MSA	19	3,660	0.9	4,922	24.8	0.0	3.4	15.2	5.3	13.7	18.6	0.0	19.4	41.4	31.6	45.5	0.0	63.2	18.0
Birmingham-Hoover MSA	371	81,296	17.3	25,648	23.2	4.3	5.0	15.2	12.4	16.0	17.6	20.5	18.9	43.9	60.6	40.3	0.0	2.2	19.8
DaphneFairhopeFoley MSA	408	96,748	19.0	9,836	20.6	4.4	4.3	17.7	12.3	14.1	20.9	19.4	19.7	40.9	59.8	45.5	0.0	4.2	16.4
Huntsville MSA	214	49,581	10.0	17,982	23.8	4.7	13.0	16.9	22.9	18.2	17.3	26.6	18.6	41.9	40.7	29.5	0.0	5.1	20.6
Mobile MSA	439	72,266	20.4	9,421	24.0	2.5	5.4	15.6	19.4	16.3	19.0	23.5	22.5	41.4	50.8	35.5	0.0	3.9	20.3
Montgomery MSA	384	67,350	17.9	9,611	24.0	5.2	5.7	16.0	15.4	16.5	18.2	26.0	20.3	41.7	45.8	35.8	0.0	7.6	21.6
Non-MSA AL	199	16,771	9.3	2,143	27.9	7.0	4.4	17.2	15.1	16.0	18.2	23.1	20.3	36.7	45.2	43.4	0.0	9.5	15.9
Tuscaloosa MSA	113	22,078	5.3	5,980	22.3	9.7	4.5	15.4	12.4	15.8	17.6	15.9	18.7	44.7	56.6	36.5	0.0	5.3	24.5
Total	2,147	409,750	100.0	85,543	23.6	4.7	6.6	16.0	15.6	16.2	18.2	22.3	19.5	42.2	51.9	37.7	0.0	5.5	20.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2018**

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Auburn-Opelika MSA	54	12,010	2.0	24.8	1.9	3.4	15.2	18.5	13.7	18.6	16.7	19.4	41.4	35.2	45.5	0.0	27.8	18.0
Birmingham-Hoover MSA	416	94,251	15.3	23.2	5.3	5.0	15.2	14.4	16.0	17.6	21.6	18.9	43.9	57.2	40.3	0.0	1.4	19.8
DaphneFairhopeFoley MSA	495	114,760	18.2	20.6	4.0	4.3	17.7	15.8	14.1	20.9	18.8	19.7	40.9	55.8	45.5	0.0	5.7	16.4
Huntsville MSA	351	69,834	12.9	23.8	7.1	--	16.9	20.8	--	17.3	22.2	--	41.9	43.0	--	0.0	6.8	--
Mobile MSA	517	90,524	19.1	24.0	5.4	5.4	15.6	13.9	16.3	19.0	23.8	22.5	41.4	50.3	35.5	0.0	6.2	20.3
Montgomery MSA	534	95,397	19.7	24.0	6.4	5.7	16.0	20.8	16.5	18.2	22.1	20.3	41.7	48.9	35.8	0.0	1.9	21.6
Non-MSA AL	240	20,387	8.8	27.9	7.9	4.4	17.2	9.6	16.0	18.2	20.4	20.3	36.7	51.7	43.4	0.0	10.0	15.9
Tuscaloosa MSA	106	18,757	3.9	22.3	0.9	4.5	15.4	21.7	15.8	17.6	24.5	18.7	44.7	50.0	36.5	0.0	2.8	24.5
Total	2,713	515,920	100.0	23.6	5.5	4.9	16.0	16.6	15.6	18.2	21.6	19.8	42.2	50.9	39.9	0.0	5.2	19.8

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography						2016
Total Loans to Small Businesses	Low-Income Tracts	Moderate-Income Tracts	Middle-Income Tracts	Upper-Income Tracts	Not Available-Income Tracts	

Assessment Area:	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Auburn-Opelika MSA	38	4,734	4.1	2,034	3.9	2.6	2.8	17.7	28.9	14.9	59.2	39.5	59.3	19.3	28.9	23.0	0.0	0.0	0.0
Birmingham-Hoover MSA	72	9,249	7.8	17,900	9.3	9.7	7.9	16.8	40.3	13.1	28.6	38.9	25.2	45.3	11.1	53.8	0.0	0.0	0.0
Daphne-Fairhope-Foley MSA	152	21,097	16.4	4,641	0.0	0.0	0.0	9.8	11.8	9.3	69.4	62.5	65.7	20.8	25.7	25.1	0.0	0.0	0.0
Mobile MSA	231	37,187	24.9	7,501	6.5	9.5	6.8	21.5	15.6	19.3	33.8	21.2	31.1	38.0	53.7	42.8	0.2	0.0	0.1
Montgomery MSA	152	15,304	16.4	5,707	15.7	15.1	12.4	14.7	7.9	12.4	31.8	30.3	27.3	37.8	46.7	47.9	0.0	0.0	0.0
Non-MSA AL	265	22,975	28.6	1,505	7.4	6.0	6.6	28.0	21.1	25.2	36.4	38.9	41.5	28.1	34.0	26.8	0.0	0.0	0.0
Tuscaloosa MSA	16	1,979	1.7	2,886	8.0	25.0	6.3	23.6	37.5	24.2	36.6	12.5	33.9	31.8	25.0	35.6	0.0	0.0	0.0
Total	926	112,525	100.0	42,174	8.4	7.9	7.0	17.8	18.1	14.9	36.5	36.5	33.8	37.2	37.5	44.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Auburn-Opelika MSA	78	21,560	2.0	2,270	1.9	2.6	1.1	33.6	20.5	26.1	51.9	59.0	57.5	11.4	17.9	14.1	1.2	0.0	1.3

Birmingham-Hoover MSA	160	36,684	7.8	16,720	8.3	0.6	8.3	19.0	45.0	15.7	26.6	36.9	24.7	44.6	17.5	50.4	1.5	0.0	0.9
Daphne-Fairhope-Foley MSA	309	90,724	7.8	4,943	0.0	0.0	0.0	19.4	11.0	17.8	60.2	65.4	58.1	20.4	23.6	24.1	0.0	0.0	0.0
Huntsville MSA	84	29,716	2.1	6,621	10.5	6.0	12.2	26.4	25.0	21.2	29.9	34.5	29.5	33.1	34.5	37.1	0.0	0.0	0.0
Mobile MSA	449	143,132	11.3	7,698	7.2	7.1	7.0	20.2	15.8	17.9	31.5	18.9	31.2	40.9	58.1	43.8	0.2	0.0	0.1
Montgomery MSA	320	66,028	8.0	5,016	7.0	4.7	6.8	17.6	15.9	14.9	37.7	31.6	33.2	33.8	45.6	41.4	3.9	2.2	3.6
Non-MSA AL	559	101,862	14.0	1,613	4.8	1.4	2.3	27.1	27.7	25.0	48.7	46.2	52.7	19.5	24.7	20.0	0.0	0.0	0.0
Tuscaloosa MSA	33	6,550	1.7	2,953	1.5	0.0	1.3	26.8	57.6	25.9	42.6	36.4	44.2	26.2	6.1	27.3	2.9	0.0	1.3
Total	1,992	248,128	50.0	47,834	6.7	3.2	6.6	21.7	22.0	18.4	35.3	39.8	34.5	35.0	34.7	39.7	1.3	0.4	0.8

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Auburn-Opelika MSA	38	4,734	4.1	2,034	80.2	50.0	49.2	5.5	34.2	14.3	15.8
Birmingham-Hoover MSA	72	9,249	7.8	17,900	79.6	44.4	45.9	7.6	37.5	12.8	18.1
Daphne-Fairhope-Foley MSA	152	21,097	16.4	4,641	83.4	36.8	48.7	5.1	44.1	11.4	19.1
Mobile MSA	231	37,187	24.9	7,501	78.3	49.4	44.3	7.2	33.8	14.5	16.9
Montgomery MSA	152	15,304	16.4	5,707	78.4	58.6	46.4	6.4	30.9	15.2	10.5
Non-MSA AL	265	22,975	28.6	1,505	76.4	55.1	46.2	5.4	24.9	18.2	20.0
Tuscaloosa MSA	16	1,979	1.7	2,886	81.4	75.0	45.4	6.2	12.5	12.4	12.5
Total	926	112,525	100.0	42,174	79.6	50.5	46.1	6.8	32.4	13.7	17.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Auburn-Opelika MSA	78	21,560	2.0	2,270	81.0	57.7	46.9	5.1	28.2	13.9	14.1
Birmingham-Hoover MSA	160	36,684	4.0	16,720	80.1	46.3	46.9	7.3	22.5	12.6	31.3
Daphne-Fairhope-Foley MSA	309	90,724	7.8	4,943	84.4	45.6	50.5	4.9	37.9	10.7	16.5
Huntsville MSA	84	29,716	2.1	6,621	81.8	41.7	51.4	5.8	17.9	12.4	40.5
Mobile MSA	449	143,132	11.3	7,698	78.9	43.7	43.2	7.1	37.9	14.0	18.5
Montgomery MSA	320	66,028	8.0	5,016	78.2	49.1	48.0	6.4	37.2	15.4	13.8
Non-MSA AL	559	101,862	14.0	1,613	74.8	56.7	41.0	5.7	27.4	19.5	15.9
Tuscaloosa MSA	33	6,550	0.8	2,953	80.9	54.5	43.3	6.5	39.4	12.7	15.4
Total	1,992	248,128	50.0	47,834	80.2	49.3	47.0	6.5	32.4	13.3	18.3

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Auburn-Opelika MSA	6	277	6.7	28	2.3	0.0	0.0	19.5	50.0	28.6	60.5	50.0	67.9	17.7	0.0	3.6	0.0	0.0	0.0
Birmingham-Hoover MSA	8	392	9.0	55	4.0	0.0	1.8	11.9	75.0	25.5	32.0	12.5	41.8	52.0	12.5	30.9	0.1	0.0	0.0

DaphneFairhopeFoley MSA	4	361	4.5	57	0.0	0.0	0.0	22.5	25.0	36.8	61.0	75.0	50.9	16.5	0.0	12.3	0.0	0.0	0.0
Mobile MSA	1	133	1.1	32	3.5	0.0	0.0	14.2	0.0	9.4	43.5	0.0	50.0	38.5	100.0	40.6	0.2	0.0	0.0
Montgomery MSA	6	237	6.7	69	3.2	0.0	1.4	9.8	0.0	10.1	50.4	33.3	59.4	36.7	66.7	29.0	0.0	0.0	0.0
Non-MSA AL	6	5,304	71.9	171	2.5	1.6	0.6	25.0	12.5	24.6	47.9	40.6	49.7	24.6	45.3	25.1	0.0	0.0	0.0
Tuscaloosa MSA	0	0	0.0	23	1.3	0.0	0.0	14.2	0.0	30.4	39.5	0.0	30.4	45.0	0.0	39.1	0.0	0.0	0.0
Total	8	6,709	100.0	435	2.7	1.1	0.7	15.7	20.2	23.4	44.7	39.3	50.6	36.8	39.3	25.3	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
AuburnOpelika MSA	11	1,238	3.5	26	1.8	0.0	0.0	22.0	0.0	11.5	62.4	81.8	73.1	13.8	18.2	15.4	0.0	0.0	0.0
Birmingham-Hoover MSA	10	620	3.6	62	4.0	0.0	6.5	14.3	90.0	11.3	27.0	10.0	30.6	54.3	0.0	51.6	0.4	0.0	0.0
DaphneFairhopeFoley MSA	8	1,806	2.4	73	0.0	0.0	0.0	20.2	62.5	34.2	62.8	37.5	49.3	17.0	0.0	16.4	0.0	0.0	0.0
Huntsville MSA	7	868	3.6	162	5.4	0.0	1.2	29.8	42.9	48.8	38.1	57.1	34.0	26.7	0.0	16.0	0.0	0.0	0.0
Mobile MSA	5	1,212	1.8	38	4.3	0.0	0.0	9.8	0.0	2.6	42.7	20.0	44.7	43.0	80.0	52.6	0.2	0.0	0.0
Montgomery MSA	9	482	2.9	80	3.6	0.0	5.0	13.5	11.1	13.8	44.8	55.6	55.0	37.6	33.3	26.3	0.5	0.0	0.0

Non-MSA AL	118	23,112	35.1	219	0.9	0.0	0.5	14.0	33.1	19.6	67.6	47.5	66.2	17.5	19.5	13.7	0.0	0.0	0.0
Tuscaloosa MSA	0	0	0.0	27	0.6	0.0	0.0	13.2	0.0	25.9	48.3	0.0	51.9	37.6	0.0	22.2	0.3	0.0	0.0
Total	168	14,669	50.0	687	3.2	0.0	1.6	17.6	33.9	25.6	44.2	47.0	50.8	34.8	19.0	22.0	0.2	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Auburn-Opelika MSA	6	277	6.7	28	95.0	100.0	39.3	2.3	0.0	2.7	0.0
Birmingham-Hoover MSA	8	392	9.0	55	94.1	75.0	41.8	3.6	0.0	2.2	25.0
Daphne-Fairhope-Foley MSA	4	361	4.5	57	93.9	25.0	17.5	4.0	0.0	2.1	75.0
Mobile MSA	1	133	1.1	32	95.2	0.0	34.4	4.0	0.0	0.8	100.0
Montgomery MSA	6	237	6.7	69	94.7	83.3	60.9	3.4	16.7	2.0	0.0
Non-MSA AL	64	5,304	71.9	171	95.4	60.9	42.1	1.9	21.9	2.7	17.2
Tuscaloosa MSA	0	0	0.0	23	97.4	0.0	47.8	1.6	0.0	1.0	0.0
Total	89	6,704	100.0	435	94.8	64.0	41.4	3.2	16.9	2.0	19.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans

Auburn-Opelika MSA	11	1,238	3.3	26	94.2	100.0	53.8	2.2	0.0	3.6	0.0
Birmingham-Hoover MSA	10	620	3.6	62	94.0	50.0	38.7	3.6	25.0	2.4	60.0
Daphne-Fairhope-Foley MSA	8	1,806	3.5	73	93.7	75.0	38.4	3.7	0.0	2.6	33.3
Huntsville MSA	7	868	3.6	162	94.8	71.4	45.1	2.9	0.0	2.3	33.3
Mobile MSA	5	1,212	1.5	38	94.0	40.0	42.1	4.4	0.0	1.6	60.0
Montgomery MSA	9	482	2.9	80	94.3	77.8	42.5	3.2	20.0	2.5	25.0
Non-MSA AL	118	23,112	35.1	219	95.2	57.6	32.0	1.6	24.6	3.2	17.8
Tuscaloosa MSA	0	0	0.0	27	96.8	0.0	37.0	1.9	0.0	1.3	0.0
Total	168	14,669	50.0	687	94.5	60.7	39.2	3.1	18.5	2.4	20.8

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

State of Florida

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
CrestviewFort Walton BeachDestin MSA	236	72,029	32.8	13,244	0.0	0.0	0.0	16.6	3.4	7.7	57.7	51.7	55.3	25.7	44.9	36.9	0.0	0.0	0.0
Panama City MSA	483	79,038	67.2	6,225	1.3	1.0	0.4	16.3	12.4	9.8	58.4	55.1	59.0	24.0	31.5	30.8	0.0	0.0	0.0
Total	719	151,067	100.0	19,469	0.5	0.7	0.1	16.5	9.5	8.4	58.0	54.0	56.5	25.0	35.9	35.0	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Crestview-Fort Walton Beach-Destin MSA	225	59,887	33.5	13,639	0.0	0.0	0.0	12.2	4.9	4.9	62.3	29.8	60.7	25.5	65.3	34.4	0.0	0.0	0.0
Panama City MSA	446	77,802	66.5	6,849	1.7	0.4	0.9	11.9	8.5	6.4	53.6	54.3	54.9	32.8	36.8	37.7	0.0	0.0	0.0
Total	671	137,689	100.0	20,488	0.7	0.3	0.3	12.1	7.3	5.4	58.9	46.1	58.8	28.3	46.3	35.5	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Crestview-Fort Walton Beach-Destin MSA	280	81,319	40.3	0.0	0.0	0.0	12.2	5.7	4.9	62.3	22.1	60.7	25.5	72.1	34.4	0.0	0.0	0.0
Panama City MSA	379	72,655	54.6	1.7	0.3	0.9	11.9	6.6	6.4	53.6	55.1	54.9	32.8	38.0	37.7	0.0	0.0	0.0

Pensacola-Ferry Pass-Brent MSA	35	8,393	5.0	2.6	2.9	--	20.4	17.1	--	53.8	25.7	--	23.1	54.3	--	0.0	0.0	--
Total	694	162,366	100.0	1.5	0.3	--	15.4	6.8	--	56.9	40.3	--	26.3	52.6	--	0.0	0.0	--

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
CrestviewFort Walton BeachDestin MSA	236	72,029	32.8	13,244	19.6	3.8	3.3	18.0	8.5	11.4	23.0	13.6	17.3	39.5	67.8	46.8	0.0	6.4	21.2
Panama City MSA	483	79,038	67.2	6,225	19.3	7.0	3.2	18.3	24.2	11.5	21.6	24.0	17.9	40.9	42.0	49.3	0.0	2.7	18.1
Total	719	151,067	100.0	19,469	19.5	6.0	3.3	18.1	19.1	11.4	22.4	20.6	17.5	40.1	50.5	47.6	0.0	3.9	20.2

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
CrestviewFort Walton BeachDestin MSA	225	59,887	33.5	13,639	20.3	2.7	3.7	17.9	9.8	12.4	21.5	17.8	19.0	40.3	63.6	45.8	0.0	6.2	19.1
Panama City MSA	446	77,802	66.5	6,849	21.1	4.7	3.0	17.7	23.5	11.3	19.9	21.1	19.2	41.3	48.4	49.7	0.0	2.2	16.8
Total	671	137,689	100.0	20,488	20.6	4.0	3.5	17.8	18.9	12.0	20.9	20.0	19.1	40.7	53.5	47.1	0.0	3.6	18.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
CrestviewFort Walton Beach-Destin MSA	280	81,319	40.3	20.3	1.4	3.7	17.9	6.1	12.4	21.5	10.7	19.0	40.3	73.2	45.8	0.0	8.6	19.1	
Panama City MSA	379	72,655	54.6	21.1	5.3	3.0	17.7	17.9	11.3	19.9	25.3	19.2	41.3	47.2	49.7	0.0	4.2	16.8	
PensacolaFerry Pass-Brent MSA	35	8,393	5.0	20.3	5.7	--	20.5	5.7	--	22.7	11.4	--	36.5	60.0	--	0.0	17.1	--	

Total	694	162,366	100.0	20.5	3.7	--	18.8	12.5	--	21.6	18.7	--	39.1	58.4	--	0.0	6.6	--
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Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CrestviewFort Walton Beach-Destin MSA	138	18,501	47.4	6,473	0.0	0.0	0.0	15.2	8.7	13.6	54.1	54.3	51.3	30.8	37.0	35.1	0.0	0.0	0.0
Panama City MSA	153	18,352	52.6	3,888	3.3	7.2	2.6	15.1	11.8	14.1	54.0	61.4	53.9	27.6	19.6	29.3	0.0	0.0	0.0
Total	291	36,853	100.0	10,361	1.2	3.8	1.0	15.1	10.3	13.8	54.0	58.1	52.3	29.6	27.8	33.0	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CrestviewFort Walton Beach-Destin MSA	88	11,879	67.1	7,116	0.0	0.0	0.0	10.4	12.5	9.6	53.4	26.1	50.1	36.1	61.4	40.3	0.0	0.0	0.0
Panama City MSA	121	17,501	32.9	4,102	2.5	0.0	1.8	17.0	27.3	16.5	54.8	55.4	53.7	25.8	17.4	28.1	0.0	0.0	0.0

Total	209	53,138	100.00	11,218	1.25	0	0.9	13.7	19.9	13.05	54.1	40.75	51.9	30.95	39.4	34.2	0	0	0
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Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CrestviewFort Walton Beach-Destin MSA	99	15,449	62.1	7,116	0.0	0.0	0.0	10.5	14.1	9.6	53.4	31.3	50.1	36.0	54.5	40.3	0.0	0.0	0.0
Panama City MSA	145	20,381	30.5	4,102	2.6	0.0	1.8	17.0	22.8	16.5	54.8	57.9	53.7	25.6	19.3	28.1	0.0	0.0	0.0
PensacolaFerry Pass-Brent MSA	29	4,211	7.3	5,766	3.3	3.4	3.2	26.9	20.7	26.5	50.6	58.6	50.3	19.2	17.2	20.0	0.0	0.0	0.0
Total	238	57,349	100.00	11,218	1.9	1.1	0.9	18.1	20.2	13.1	52.9	46.7	51.9	27.0	32.0	34.2	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Crestview-Fort Walton BeachDestin MSA	138	18,501	47.4	6,473	87.9	41.3	46.0	3.3	21.7	8.8	37.0
Panama City MSA	153	18,352	52.6	3,888	86.3	33.3	44.4	3.9	29.4	9.8	37.3
Total	291	36,853	100.0	10,361	87.3	37.1	45.4	3.5	25.8	9.2	37.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Crestview-Fort Walton BeachDestin MSA	88	11,879	42.1	7,116	88.3	47.7	45.9	3.3	25.0	8.4	27.3
Panama City MSA	121	17,501	57.9	4,102	86.4	44.6	43.9	4.1	27.3	9.5	28.1
Total	209	29,380	100.0	11,218	87.6	45.9	45.2	3.6	26.3	8.8	27.8

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Crestview-Fort Walton BeachDestin MSA	99	15,449	36.3	7,116	88.2	52.5	45.9	3.4	28.3	8.5	19.2
Panama City MSA	145	20,381	53.1	4,102	86.2	38.6	43.9	4.1	27.6	9.7	33.8
Pensacola-Ferry Pass-Brent MSA	29	4,211	10.6	5,766	87.4	31.0	44.3	4.2	58.6	8.4	10.3
Total	273	40,041	100.0	16,984	87.4	42.9	44.8	3.9	31.1	8.7	26.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
CrestviewFort Walton BeachDestin MSA	0	0	0.0	23	0.0	0.0	0.0	18.9	0.0	30.4	62.6	0.0	60.9	18.5	0.0	8.7	0.0	0.0	0.0
Panama City MSA	0	0	0.0	8	1.1	0.0	0.0	12.6	0.0	25.0	61.9	0.0	62.5	24.4	0.0	12.5	0.0	0.0	0.0
Total	0	0	0.0	31	0.4	0.0	0.0	16.8	0.0	29.0	62.4	0.0	61.3	20.4	0.0	9.7	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
CrestviewFort Walton BeachDestin MSA	1	15	25.0	33	0.0	0.0	0.0	15.9	0.0	42.4	61.2	0.0	24.2	22.9	100.0	33.3	0.0	0.0	0.0
Panama City MSA	3	238	75.0	20	2.5	0.0	0.0	11.6	33.3	5.0	57.2	66.7	65.0	28.6	0.0	30.0	0.0	0.0	0.0
Total	4	253	100.0	53	0.9	0.0	0.0	14.4	25.0	28.3	59.9	50.0	39.6	24.8	25.0	32.1	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
CrestviewFort Walton BeachDestin MSA	0	0	0.0	33	0.0	0.0	0.0	15.8	0.0	42.4	61.0	0.0	24.2	23.2	0.0	33.3	0.0	0.0	0.0
Panama City MSA	2	47	100.0	20	2.4	0.0	0.0	11.9	50.0	5.0	55.9	50.0	65.0	29.8	0.0	30.0	0.0	0.0	0.0
PensacolaFerry Pass-Brent MSA	0	0	0.0	29	3.0	0.0	0.0	20.5	0.0	6.9	59.3	0.0	82.8	17.2	0.0	10.3	0.0	0.0	0.0
Total	2	47	100.0	82	1.8	0.0	0.0	17.1	50.0	20.7	59.3	50.0	54.9	21.9	0.0	24.4	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Crestview-Fort Walton BeachDestin MSA	0	0	0.0	23	97.1	0.0	17.4	1.6	0.0	1.2	0.0
Panama City MSA	0	0	0.0	8	98.0	0.0	87.5	0.8	0.0	1.1	0.0
Total	0	0	0.0	31	97.4	0.0	35.5	1.4	0.0	1.2	0.0
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data Due to rounding, totals may not equal 100.0</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Crestview-Fort Walton BeachDestin MSA	1	15	25.0	33	96.7	100.0	36.4	1.7	0.0	1.6	0.0
Panama City MSA	3	238	75.0	20	97.7	33.3	60.0	1.0	33.3	1.3	33.3
Total	4	253	100.0	53	97.1	50.0	45.3	1.5	25.0	1.5	25.0
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0</i>											

State of Mississippi

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography											2016
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Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	169	23,955	3.9	4,963	3.6	2.4	1.4	11.7	7.1	6.8	59.7	62.7	62.2	25.1	27.8	29.6	0.0	0.0	0.0
Hattiesburg MSA	294	41,548	6.9	3,986	5.6	3.1	2.8	13.9	13.3	10.1	41.2	29.3	34.3	39.4	54.4	52.9	0.0	0.0	0.0
Jackson MSA	2,442	435,678	56.9	15,870	5.2	1.5	1.2	15.0	5.2	6.1	44.3	31.9	36.0	35.5	61.4	56.8	0.0	0.0	0.0
Non-MSA MS	1,385	191,344	32.3	14,585	3.2	1.2	1.4	9.7	7.2	6.2	46.2	33.8	39.3	40.8	57.8	53.1	0.0	0.0	0.0
Total	4,290	692,525	100.0	39,404	4.1	1.5	1.4	12.0	6.5	6.6	46.6	33.5	40.3	37.3	58.5	51.6	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	141	20,962	4.3	4,781	5.9	2.1	2.3	7.9	8.5	7.7	72.0	73.1	73.5	14.1	16.3	16.4	0.1	0.0	0.0

Hattiesburg MSA	253	42,176	7.7	3,696	4.0	0.8	1.8	11.1	5.5	4.2	54.1	49.0	52.1	30.8	44.7	41.9	0.0	0.0	0.0
Jackson MSA	1,789	301,663	54.5	14,568	4.5	1.8	1.2	21.8	8.7	10.5	33.7	28.1	30.8	40.0	61.4	57.5	0.0	0.0	0.0
Non-MSA MS	1,102	139,990	33.5	13,942	2.8	2.5	1.7	11.8	8.5	8.4	51.5	39.8	46.1	33.9	49.2	43.7	0.0	0.0	0.1
Total	3,285	504,791	100.0	36,987	3.8	1.9	1.6	14.6	8.4	8.7	48.0	35.6	44.2	33.5	54.1	45.4	0.0	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	143	21,516	3.8	5.9	2.1	2.3	7.9	4.9	7.7	72.0	75.5	73.5	14.1	17.5	16.4	0.1	0.0	0.0
Hattiesburg MSA	339	46,513	9.0	4.0	2.1	1.8	11.1	6.8	4.2	54.1	51.3	52.1	30.8	39.8	41.9	0.0	0.0	0.0
Jackson MSA	1,970	318,709	52.4	4.5	1.2	1.2	21.8	9.8	10.5	33.7	27.4	30.8	40.0	61.6	57.5	0.0	0.0	0.0
Non-MSA MS	1,308	156,889	34.8	2.8	1.5	1.7	11.8	8.0	8.4	51.5	45.3	46.1	33.9	45.3	43.7	0.0	0.0	0.1
Total	3,760	543,627	100.0	3.8	1.4	1.6	14.6	8.7	8.7	48.0	37.6	44.2	33.5	52.3	45.4	0.0	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	169	23,955	3.9	4,963	22.7	5.3	3.9	16.9	15.4	12.6	20.1	22.5	20.2	40.3	43.8	38.8	0.0	13.0	24.4
Hattiesburg MSA	294	41,548	6.9	3,986	24.2	4.4	4.4	16.6	19.7	14.6	17.5	24.8	18.1	41.7	43.5	40.8	0.0	7.5	22.2
Jackson MSA	2,442	435,678	56.9	15,870	22.9	4.8	3.9	16.2	16.0	12.6	18.2	21.4	17.3	42.6	46.4	39.1	0.0	11.5	27.1
Non-MSA MS	1,385	191,344	32.3	14,585	22.7	4.6	3.3	15.6	10.1	9.2	16.6	19.5	16.8	45.2	57.1	51.8	0.0	8.7	18.8
Total	4,290	692,525	100.0	39,404	22.9	4.7	3.8	16.0	14.3	11.5	17.6	21.1	17.6	43.5	49.5	43.9	0.0	10.4	23.2

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate

Gulfport-Biloxi-Pascagoula MSA	141	20,962	4.3	4,781	25.7	4.3	3.7	16.9	22.7	13.0	19.2	22.0	20.9	38.3	39.7	42.8	0.0	11.3	19.6
Hattiesburg MSA	253	42,176	7.7	3,696	24.5	2.4	3.3	15.0	13.8	12.3	19.0	22.1	18.2	41.5	50.6	43.5	0.0	11.1	22.7
Jackson MSA	1,789	301,663	54.5	14,568	22.8	6.9	5.3	16.9	17.8	17.1	17.7	21.5	19.8	42.6	43.0	37.9	0.0	10.8	20.0
Non-MSA MS	1,102	139,990	33.5	13,942	23.0	3.5	3.2	15.5	12.4	10.7	16.9	20.3	17.4	44.6	53.2	51.3	0.0	10.5	17.5
Total	3,285	504,791	100.0	36,987	23.4	5.3	4.1	16.1	15.9	13.7	17.6	21.2	18.9	42.9	46.8	44.1	0.0	10.8	19.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	143	21,516	3.8	25.7	3.5	3.7	16.9	18.9	13.0	19.2	18.9	20.9	38.3	46.2	42.8	0.0	12.6	19.6
Hattiesburg MSA	339	46,513	9.0	24.5	5.6	3.3	15.0	18.3	12.3	19.0	24.2	18.2	41.5	38.6	43.5	0.0	13.3	22.7
Jackson MSA	1,970	318,709	52.4	22.8	4.2	5.3	16.9	15.8	17.1	17.7	20.6	19.8	42.6	46.3	37.9	0.0	13.2	20.0
Non-MSA MS	1,308	156,889	34.8	23.0	3.1	3.2	15.5	11.2	10.7	16.9	17.6	17.4	44.6	58.2	51.3	0.0	9.9	17.5
Total	3,760	543,627	100.0	23.4	3.9	4.1	16.1	14.5	13.7	17.6	19.8	18.9	42.9	49.7	44.1	0.0	12.0	19.2

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the 2016 Geography

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	40	5,518	1.8	3,550	5.3	2.5	4.2	24.8	30.0	23.3	52.7	60.0	51.9	17.0	7.5	20.7	0.1	0.0	0.0
Hattiesburg MSA	125	16,573	5.7	2,139	10.8	10.4	10.1	25.0	16.8	19.2	31.4	36.8	32.3	32.8	36.0	38.4	0.0	0.0	0.0
Jackson MSA	1,048	134,898	47.7	9,880	10.7	8.8	7.8	13.7	13.9	10.1	40.5	39.2	38.4	35.1	38.1	43.7	0.0	0.0	0.0
Non-MSA MS	983	82,576	44.8	10,191	4.9	3.8	2.9	15.1	22.3	12.3	43.4	41.1	43.9	36.4	32.9	40.8	0.1	0.0	0.1
Total	2,196	239,565	100.0	25,760	7.6	6.5	5.6	16.5	18.1	13.5	42.3	40.3	41.9	33.5	35.1	38.9	0.0	0.0	0.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the 2017-18 Geography

	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
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Assessment Area:	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	103	29,716	1.2	3,435	12.5	6.8	13.3	13.4	4.9	11.3	63.5	77.7	64.0	10.0	10.7	11.0	0.6	0.0	0.4
Hattiesburg MSA	257	62,680	3.0	2,141	10.8	11.3	9.2	9.0	7.8	6.8	57.0	55.3	55.2	23.2	25.7	28.8	0.0	0.0	0.0
Jackson MSA	2,025	528,310	23.6	10,280	6.7	5.0	4.8	25.5	23.7	20.6	29.9	32.4	28.6	37.8	38.9	46.0	0.1	0.0	0.0
Non-MSA MS	1,909	321,348	22.2	9,963	6.0	3.8	4.6	18.3	26.8	17.3	44.3	44.2	44.5	30.9	25.2	33.3	0.5	0.0	0.3
Total	4,294	471,027	50.0	25,819	7.4	4.9	6.2	19.7	23.7	17.0	42.1	40.1	41.6	30.6	31.3	35.0	0.3	0.0	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Gulfport-Biloxi-Pascagoula MSA	40	5,518	1.8	3,550	79.3	15.0	38.4	5.1	50.0	15.6	35.0
Hattiesburg MSA	125	16,573	5.7	2,139	79.6	52.0	45.4	5.1	38.4	15.3	9.6
Jackson MSA	1,048	134,898	47.7	9,880	82.1	48.9	47.4	5.5	38.6	12.4	12.5
Non-MSA MS	983	82,576	44.8	10,191	78.9	52.6	46.6	5.4	33.4	15.7	14.0
Total	2,196	239,565	100.0	25,760	80.2	50.1	45.7	5.4	36.5	14.4	13.4

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Gulfport-Biloxi-Pascagoula MSA	103	29,716	1.2	3,435	80.1	18.4	40.7	5.0	45.6	14.9	35.9
Hattiesburg MSA	257	62,680	3.0	2,141	80.4	44.7	43.2	5.1	35.8	14.4	19.5
Jackson MSA	2,025	528,310	23.6	10,280	82.7	48.0	47.8	5.5	36.6	11.8	15.4
Non-MSA MS	1,909	321,348	22.2	9,963	78.7	58.1	46.2	5.7	27.4	15.6	14.5
Total	4,294	471,027	50.0	25,819	80.5	51.6	45.9	5.5	32.7	14.0	15.7

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	0	0	0.0	6	1.4	0.0	0.0	16.7	0.0	33.3	56.7	0.0	33.3	25.1	0.0	33.3	0.0	0.0	0.0
Hattiesburg MSA	28	1,857	6.5	64	5.3	0.0	1.6	13.1	3.6	12.5	35.0	92.9	65.6	46.6	3.6	20.3	0.0	0.0	0.0
Jackson MSA	123	9,203	28.6	306	3.2	2.4	1.6	13.4	23.6	19.6	46.1	62.6	50.3	37.2	11.4	28.4	0.0	0.0	0.0
Non-MSA MS	279	18,877	64.9	777	4.3	0.0	1.3	13.3	9.0	10.8	47.5	57.7	49.3	34.9	33.3	38.6	0.0	0.0	0.0
Total	430	29,937	100.0	1,153	3.8	0.7	1.4	13.6	12.8	13.4	46.9	61.4	50.4	35.8	25.1	34.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Gulfport-Biloxi-Pascagoula MSA	0	0	0.0	10	7.3	0.0	10.0	6.7	0.0	10.0	73.0	0.0	50.0	13.1	0.0	30.0	0.0	0.0	0.0
Hattiesburg MSA	33	8,126	2.2	54	2.4	0.0	1.9	7.9	3.0	11.1	55.9	84.8	74.1	33.8	12.1	13.0	0.0	0.0	0.0
Jackson MSA	253	43,890	14.0	326	1.6	0.0	0.6	17.7	49.0	28.5	36.5	33.6	36.2	44.2	17.4	34.7	0.0	0.0	0.0
Non-MSA MS	616	70,322	34.1	878	3.0	0.0	0.2	16.7	12.2	14.8	52.0	62.2	56.7	28.1	25.6	28.2	0.2	0.0	0.0
Total	902	61,169	50.0	1,268	2.8	0.0	0.5	15.8	22.2	18.1	48.6	55.0	52.1	32.8	22.8	29.3	0.1	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans

Gulfport-Biloxi-Pascagoula MSA	0	0	0.0	6	94.9	0.0	83.3	1.4	0.0	3.7	0.0
Hattiesburg MSA	28	1,857	6.5	64	95.1	25.0	48.4	2.9	10.7	1.9	64.3
Jackson MSA	123	9,203	28.6	306	96.3	78.9	72.2	1.0	11.4	2.7	9.8
Non-MSA MS	279	18,877	64.9	777	95.4	76.7	62.2	2.3	15.1	2.3	8.2
Total	430	29,937	100.0	1,153	95.7	74.0	64.2	1.8	13.7	2.5	12.3

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Gulfport-Biloxi-Pascagoula MSA	0	0	0.0	10	96.4	0.0	70.0	1.2	0.0	2.4	0.0
Hattiesburg MSA	33	8,126	1.8	54	94.7	42.4	59.3	2.2	18.2	3.1	39.4
Jackson MSA	253	43,890	14.0	326	95.9	74.7	66.0	1.4	14.2	2.6	11.1
Non-MSA MS	616	70,322	34.1	878	95.2	76.1	59.0	2.3	16.1	2.5	7.8
Total	902	61,169	50.0	1,268	95.5	74.5	60.9	1.9	15.6	2.6	9.9

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

State of Texas

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Total Home Mortgage Loans	Low-Income Tracts	Moderate-Income Tracts	Middle-Income Tracts	Upper-Income Tracts	Not Available-Income Tracts
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Assessment Area:	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Houston MSA	146	43,946	100.0	121,665	5.3	1.4	2.3	24.4	10.3	12.8	28.1	28.8	30.0	42.2	59.6	54.9	0.0	0.0	0.0
Total	146	43,946	100.0	121,665	5.3	1.4	2.3	24.4	10.3	12.8	28.1	28.8	30.0	42.2	59.6	54.9	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Houston MSA	94	34,890	100.0	125,957	6.3	3.2	3.1	22.9	8.5	14.4	27.6	16.0	28.5	43.1	72.3	54.0	0.1	0.0	0.1
Total	94	34,890	100.0	125,957	6.3	3.2	3.1	22.9	8.5	14.4	27.6	16.0	28.5	43.1	72.3	54.0	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate	% of Owner Occupied Housing Units	% Bank Loans	Aggregate
Houston MSA	138	45,904	100.0	6.3	3.6	3.1	22.9	10.1	14.4	27.6	17.4	28.5	43.1	68.8	54.0	0.1	0.0	0.1
Total	138	45,904	100.0	6.3	3.6	3.1	22.9	10.1	14.4	27.6	17.4	28.5	43.1	68.8	54.0	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Houston MSA	146	43,946	100.0	121,665	25.8	0.0	2.7	17.0	11.6	11.8	17.2	17.8	17.5	39.9	68.5	49.1	0.0	2.1	18.9
Total	146	43,946	100.0	121,665	25.8	0.0	2.7	17.0	11.6	11.8	17.2	17.8	17.5	39.9	68.5	49.1	0.0	2.1	18.9

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Houston MSA	94	34,890	100.0	125,957	25.7	2.1	3.7	16.4	9.6	12.9	16.9	17.0	19.0	41.0	69.1	19.0	0.0	2.1	18.8	
Total	94	34,890	100.0	125,957	25.7	2.1	3.7	16.4	9.6	12.9	16.9	17.0	19.0	41.0	69.1	19.0	0.0	2.1	18.8	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2018
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Houston MSA	138	45,904	100.0	25.7	1.4	3.7	16.4	8.0	12.9	16.9	17.4	19.0	41.0	62.3	19.0	0.0	10.9	18.8		
Total	138	45,904	100.0	25.7	1.4	3.7	16.4	8.0	12.9	16.9	17.4	19.0	41.0	62.3	19.0	0.0	10.9	18.8		

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the 2016 Geography

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Houston MSA	164	45,563	100.0	119,465	9.8	7.9	9.3	21.1	11.0	20.2	23.8	34.1	24.0	45.3	47.0	46.4	0.1	0.0	0.0
Total	164	45,563	100.0	119,465	9.8	7.9	9.3	21.1	11.0	20.2	23.8	34.1	24.0	45.3	47.0	46.4	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the 2017-18 Geography

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Houston MSA	305	158,756	50.0	122,371	11.6	5.9	11.7	20.2	22.3	20.0	21.8	30.5	22.3	46.2	41.3	45.9	0.2	0.0	0.2
Total	305	79,378	50.0	122,371	11.6	5.9	11.7	20.2	22.3	20.0	21.8	30.5	22.3	46.2	41.3	45.9	0.2	0.0	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Houston MSA	164	45,563	100.0	119,465	84.6	35.4	40.2	6.3	48.8	9.0	15.9
Total	164	45,563	100.0	119,465	84.6	35.4	40.2	6.3	48.8	9.0	15.9

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Houston MSA	305	158,756	50.0	122,371	85.2	33.4	45.6	6.1	51.1	8.8	15.4
Total	305	79,378	50.0	122,371	85.2	33.4	45.6	6.1	51.1	8.8	15.4

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
 Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Houston MSA	2	394	100.0	321	6.3	0.0	3.7	19.7	0.0	23.4	27.6	50.0	28.0	46.3	50.0	44.9	0.0	0.0	0.0

Total	2	394	100.0	321	6.3	0.0	3.7	19.7	0.0	23.4	27.6	50.0	28.0	46.3	50.0	44.9	0.0	0.0	0.0
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Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Houston MSA	5	2,450	50.0	520	7.1	0.0	4.4	18.7	40.0	16.9	26.4	60.0	30.2	47.7	0.0	48.3	0.1	0.0	0.2
Total	5	1,225	50.0	520	7.1	0.0	4.4	18.7	40.0	16.9	26.4	60.0	30.2	47.7	0.0	48.3	0.1	0.0	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Houston MSA	2	394	100.0	321	94.5	50.0	43.9	3.3	50.0	2.2	0.0
Total	2	394	100.0	321	94.5	50.0	43.9	3.3	50.0	2.2	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Houston MSA	5	2,450	50.0	520	94.2	0.0	56.9	3.2	40.0	2.6	60.0
Total	5	1,225	50.0	520	94.2	0.0	56.9	3.2	40.0	2.6	60.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data Due to rounding, totals may not equal 100.0</i>											