



PUBLIC DISCLOSURE

June 25, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Commerce Bank, National Association
Charter Number 24456

400 Highway 27 North Bypass
Bremen, GA 30110

Office of the Comptroller of the Currency

Three Ravinia Drive
Suite 1950
Atlanta, GA 30346

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

- The average loan-to-deposit ratio is more than reasonable given the bank's size, financial condition, and assessment areas (AA) credit needs and exceeds the standards for satisfactory performance.
- The majority of loans to borrowers is located outside the AAs and does not meet the standard for reasonable performance during the evaluation period.
- The penetration of loans to businesses of different sizes is reasonable and meets the standards for satisfactory performance.
- The geographic distribution of loans reflects a reasonable dispersion and meets the standards for satisfactory performance.
- There were no complaints regarding ACB's CRA performance.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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: 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.

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

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) 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 One 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.

Description of Institution

American Commerce Bank, NA (ACB) is a nationally chartered multi-state community bank wholly owned by American Commerce Bancshares, a one-bank holding company. ACB opened in October 2004 and operated as Peoples Community National Bank. In February 2015 the bank's name was changed to "better personify the bank's mission to cater to the needs of owner managed businesses". Both the bank and holding company are headquartered in Bremen, Haralson County, Georgia. In addition to the main office, ACB operates two full service branches. One branch is in Johns Creek, Fulton County, Georgia and the other branch is in Tallahassee, Leon County, Florida. In June 2015, ACB purchased Pro Bank in Tallahassee, Florida. The purchase included acquisition of Pro Bank's two branches which were in close proximity of each other. Management closed one branch shortly after acquisition. In October 2015, management purchased the Johns Creek location from Branch Banking and Trust Company (BB&T). ACB has one ATM located at the Haralson County branch.

The bank delineates two Assessment Areas (AA). The Haralson-Carroll-Fulton AA in Georgia, and the Leon AA in Florida. As of March 31, 2018, ACB reported assets of \$269 million and Tier One Capital of \$28.8 million. ACB's net loan to deposit ratio as of March 31, 2018 was 86 percent, and the majority of loans are secured by commercial real estate. The bank offers a full range of traditional deposit and loan products and services. One-to-four family real estate loans and consumer loans were 19 percent and 2 percent, respectively, of net loans as of March 31, 2018. ACB's CRA Public File is available at each location and provides relevant information relating to loan and deposit services and products, locations, and the most recent Public Evaluation. There are no legal or financial impediments to ACB's ability to meet the credit needs of its AA. The previous CRA evaluation, as of November 12, 2012, rated the bank's performance as "Satisfactory".

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC conducted this CRA performance review to evaluate ACB's record of meeting the credit needs of the communities where the bank operates. Examiners performed this review using the Small Bank (SB) CRA procedures, which include a lending test to evaluate the distribution of the bank's primary loan products among geographies and borrower characteristics. The evaluation period of the lending test is January 1, 2015 through December 31, 2017. During the evaluation period, home and business loan originations and purchases represented the largest portion of the loan portfolio in both dollars and number of loans. Business loans accounted for 59 percent of number of loans. Home loans totaled 27 percent of the number of loans. To evaluate the bank's business lending performance, we selected a random sample of 40 business loan originations. We evaluated the bank's home loan performance using the Home Mortgage Disclosure Act (HMDA) data.

Data Integrity

ACB reports data under the requirements of the HMDA. The HMDA data was tested and found to be reliable.

Selection of Areas for Full-Scope Review

Examiners conducted full-scope reviews of the Haralson-Carroll-Fulton, and Leon County AAs. There are no limited-scope areas. *For more information regarding the scope of this examination, see Appendix A: Scope of Evaluation.*

Ratings

The bank's overall rating is based primarily on the full-scope review of the Haralson-Carroll-Fulton AA. A majority of the bank's deposits, and sixty-five percent of the bank's loan originations and purchases were in this AA.

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 assessment area 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 institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution'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.

Conclusions with Respect to Performance Criteria

ACB's performance under the small bank test is satisfactory. The overall rating is based on the bank's performance in the Haralson-Carroll-Fulton and Leon AAs.

Loan-to-Deposit Ratio

ACB's loan-to-deposit (LTD) ratio is more than reasonable and meets the standards for outstanding performance. The bank's quarterly LTD ratio averaged 103 percent over the 22 quarters since the last CRA evaluation. This ratio exceeds those of seven similarly situated banks near and in ACB's AAs. Comparable institutions were selected based on level of deposits, assets, branches, and location within the Atlanta MSA. The LTD ratio for these seven banks averaged 74 percent with a high average of 101 percent.

Lending in Assessment Areas

ACB originates a majority of its loans to borrowers located outside its AAs and does not meet the standard for reasonable performance during the evaluation period. Eighty-five percent of home loans and sixty-eight percent of business loans were located outside the bank's AAs. While loan originations and purchases did not fall within the bank's designated AAs, a majority of these originated loans are located in thirteen other counties included in the Atlanta-Sandy Springs-Roswell MSA.

Table D - 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	64	15.1	361	84.9	425	18,187	16.1	94,627	83.9	112,814
Small Business	19	31.7	41	68.3	60	6,570	15.8	35,088	84.2	41,658
Total	83	17.1	402	82.9	485	24,757	16.0	129,715	84.0	154,472

Source: 01/01/2015-12/31/2017 HMDA and Bank Data

State Rating

State of Georgia

CRA Rating: Satisfactory:

This CRA rating is based on the following:

- A reasonable penetration of lending to borrowers of different incomes and businesses of different income levels;
- A reasonable dispersion of loans by income category of the geography;
- There were no complaints regarding ACB's performance; and,
- Examiners did not identify discriminatory or other illegal credit practices at this institution.

Description of Institution's Operations in Georgia

ACB designates one AA in Georgia consisting of Haralson County, Carroll County, and portions of Fulton County. Haralson and Carroll counties are contiguous. The Johns Creek branch and reasonably delineated boundaries are located in Fulton County. All three counties are included in the twenty-nine counties that comprise the Atlanta-Sandy Springs-Roswell MSA. The AA has 45 census tracts (CTs) consisting of 1 low-, 14 moderate-, 7 middle-, and 23 upper income geographies.

Based on 2010 U.S. Census data, Haralson County has a population of 28,565, the average median family income was \$52,742. The unemployment rate was 6.98 percent, and 2,072 households live below the poverty level. Carroll County has a population of 112,595, with the average median family income of \$52,655. The unemployment rate was 7.39 percent, and 7,943 households live below the poverty level. The total population of Johns Creek AA – 23 census tracts in north Fulton County - in 2010 was 156,691, and the average median family income was \$121,693. The unemployment rate was 4.88 percent, and 2,716 households lived below the poverty level. According to the 2010 U.S. Census, the median family income of the Atlanta-Sandy Springs-Roswell MSA was \$67,322 and the 2017 HUD adjusted median family income was \$69,200.

ACB encounters strong competition from community, regional, and large banks in the Georgia AA. As of June 30, 2017, ACB had 31.6 percent of the deposit market share in Haralson County. ACB had less than 1 percent of deposit market share in Carroll and Fulton Counties.

In conducting this assessment of the bank's performance, we contacted a local community organization. The Community contact identified significant needs for affordable housing and economic development assistance in the AAs.

Scope of Evaluation in Georgia

Examiners conducted a full-scope review of the Haralson-Carroll-Fulton AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Georgia

LENDING TEST

The bank's lending test performance in Georgia is satisfactory.

AA Distribution of loans by Income Category of the Borrower and Business

The bank's performance in lending to individuals of different income levels and businesses of different sizes reflects a reasonable penetration and meets the standards for satisfactory performance.

Home Loans

During 2015 and 2016, in the Haralson-Carroll-Fulton AA, the percent of home loans made to low-income borrowers was close to the number of families that reside in these areas. The bank had no loan originations to moderate-income borrowers compared to the 15 percent of families residing in these geographies. This is reasonable considering that only 29 percent of the housing units are owner-occupied. In addition, a significant percentage of rental units and vacant housing, 37 percent and 47 percent, respectively, are located in the AA.

In 2017, home loans made to low-income borrowers was near the percent of families that reported low income. The percent of home loans made to moderate-income borrowers exceeded the percent of families residing in moderate income CTs. In 2017, two CTs in Carroll County changed from middle-income to moderate-income.

Refer to Table P in Appendix C-3.

Business Loans

Per Dunn and Bradstreet data, during the three-year evaluation period, 86 percent of businesses reported annual revenues of less than \$1 million in the Haralson-Carroll-Fulton AA. The percent of loans the bank originated was lower at 65 percent, and exceeded the aggregate distribution of 51 percent.

Refer to Table R in Appendix C-4.

AA Distribution of loans by Income Category of the Geography

The bank's geographic distribution of home and business loans reflects a reasonable dispersion and meets the standard for satisfactory performance.

Home Loans

During the three-year evaluation period, in the Harlason-Carroll-Fulton AA, ACB's record of originating home loans in moderate-income CTs was higher than the percent of owner-occupied housing units, and exceeded the aggregate.

Refer to Table O in Appendix C-2.

Business Loans

The geographic distribution of loans to small businesses reflects a reasonable dispersion in moderate-income CTs. In moderate-income geographies, the percent of bank loans exceeded the percent of businesses in these geographies. Twenty-one percent of small businesses were located in moderate-income areas compared to 83 percent of the bank's loan originations in these areas.

Refer to Table Q in Appendix C-4.

Responses to Complaints

Neither, ACB nor the OCC received complaints related to the bank's CRA performance since the prior CRA examination.

State Rating

State of Florida

CRA Rating: Satisfactory:

This CRA rating is based on the following:

- A reasonable distribution of home mortgage and small business loans by income of the borrower;
- An excellent dispersion of loans by income category of the geography;
- There were no complaints regarding ACB's performance; and,
- No discriminatory or other illegal credit practices have been identified at this institution.

Description of Institution's Operations in Florida

ACB operates a single full service branch in Tallahassee, Florida and designates Leon County as the AA in this state. The Leon AA comprises 68 geographies. Thirteen low-, 16 moderate-, 18 middle-, and 19 upper-income CTs. Two of the CTs have no income designation. Leon County is part of the Tallahassee MSA. In addition to Leon County, the MSA encompasses Gadsden, Jefferson, and Wakulla Counties.

According to the 2010 U.S. Census data, Leon County has a population of 282,940. The average median family income was \$72,804. The unemployment rate was 7.11 percent, and 23,496 households live below the poverty level. The median family income of the Tallahassee MSA was \$64,055 and the 2017 HUD adjusted median family income was \$68,500.

ACB encounters high competition from community, regional, and large banks in the Leon AA. As of June 30, 2017, ACB had less than 1 percent of the deposit market share of the county.

A local community organization noted affordable housing and rehabilitation lending programs are a need throughout the AA.

Scope of Evaluation in Florida

Examiners conducted a full-review of the Leon AA. *See Appendix A for more information.*

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Florida

LENDING TEST

The bank's lending test performance in Florida is satisfactory.

AA Distribution of loans by Income Category of the Borrower and Business

The bank's performance in lending to individuals of different income levels and businesses of different sizes reflects a reasonable penetration and meets the standards for satisfactory performance.

Home Loans

During the evaluation period, the percent of bank loans to low-income borrowers was significantly lower than the number of families residing in these geographies and did not meet the standard for satisfactory performance. In 2015-2016, 22 percent of families resided in low-income CTs. Only 5 percent of the bank's home loans were originated or purchased to low-income individuals. In 2017, 21 percent of families resided in low-income CTs, while 17 percent of home loans were to low-income individuals. The bank did not originate or purchase loans to moderate-income borrowers. Fifteen percent of families reported moderate income and the AA includes 16 moderate-income CTs. Forty-percent of the bank's home loans were made to middle- or upper-income borrowers.

Refer to Table P in Appendix C-6.

Business Loans

Lending to businesses of different sizes reflects a reasonable penetration with performance near or lower than the AA demographics. Per Dunn and Bradstreet data, during the evaluation period, 85 percent of businesses reported annual revenues of less than \$1 million. ACB's loan originations were near this ratio with 70 percent of loans to small businesses, and was below the aggregate of 49 percent. Twelve percent of businesses did not report revenues.

Refer to Table R in Appendix C-7.

AA Distribution of loans by Income Category of the Geography

The bank's geographic distribution of home and business loans reflects an excellent dispersion and exceeds the standard for satisfactory performance.

Home Loans

During the evaluation period, the percent of home loans in low- and moderate-income CTs is higher than the percent of owner-occupied housing units in the Leon County AA. In 2015-2016, the bank originated or purchased 35 percent of home loans in low- and moderate income CTs compared to the 22 percent of owner-occupied housing units. In 2017, the bank originated and purchased 67 percent of loans in low- and moderate-income CTs, 19 percent of owner-occupied housing units were located in these geographies.

Refer to Table O in Appendix C-5.

Business Loans

The geographic distribution of small business loans in low- and moderate-income CTs exceeds the percent of small businesses in these geographies. Eight percent of small businesses were located in low-income CTs, while 20 percent of the bank's loans were originated to small businesses in these geographies. Twenty-one percent of businesses were located in moderate-income areas, while 30 percent of the bank's small business loans were originated in these areas.

Refer to Table Q in Appendix C-7.

Responses to Complaints

Neither, ACB nor the OCC received complaints related to the bank's CRA performance since the prior CRA examination.

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 metropolitan and nonmetropolitan areas 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	Lending Test: 01/01/2015 to 12/31/2017 Investment and Service Tests and CD Loans: NA	
Financial Institution	Products Reviewed	
American Commerce Bank, NA Bremen, Georgia	Home and small business loans.	
Affiliate(s): NA	Affiliate Relationship: NA	Products Reviewed: NA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Haralson-Carroll-Fulton AA Leon AA	Full scope Full scope	AA is part of the Atlanta-Sandy Springs-Roswell MSA AA is located in the Tallahassee MSA

Appendix B: Summary of Multistate Ratings

State of Georgia

Haralson-Carroll-Fulton AA (Atlanta-Sandy Springs-Roswell MSA)

Demographic Information of the Haralson-Carroll-Fulton AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	45	2.2	31.1	15.6	51.1	0.0
Population by Geography	297,851	1.0	30.9	15.4	52.6	0.0
Housing Units by Geography	113,583	1.1	32.4	16.5	49.9	0.0
Owner-Occupied Units by Geography	71,758	0.2	28.7	16.7	54.4	0.0
Occupied Rental Units by Geography	32,879	2.8	36.8	15.5	44.9	0.0
Vacant Units by Geography	8,946	2.6	46.6	19.0	31.8	0.0
Businesses by Geography	24,535	0.8	21.2	10.9	67.2	0.0
Farms by Geography	459	0.2	42.7	20.7	36.4	0.0
Family Distribution by Income Level	76,148	18.6	14.3	16.4	50.8	0.0
Household Distribution by Income Level	104,637	21.3	14.5	15.1	49.1	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		\$67,322	Median Housing Value			\$231,786
			Median Gross Rent			\$962
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS Census and 2017 D&B Data Due to rounding, totals may not equal 100.0</i> (*) The NA category consists of geographies that have not been assigned an income classification.						

State of Florida

Leon AA (Tallahassee MSA)

Demographic Information of the Leon Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	68	19.1	23.5	26.5	27.9	2.9
Population by Geography	282,940	16.4	20.6	26.4	31.8	4.8
Housing Units by Geography	125,915	17.7	20.8	28.7	29.7	3.1
Owner-Occupied Units by Geography	58,008	5.0	14.3	30.7	49.2	0.8
Occupied Rental Units by Geography	52,826	29.1	26.3	26.9	12.1	5.6
Vacant Units by Geography	15,081	26.2	27.0	27.4	16.7	2.7
Businesses by Geography	30,183	8.1	20.1	33.4	37.0	1.5
Farms by Geography	787	5.6	16.3	31.0	46.6	0.5
Family Distribution by Income Level	60,921	21.1	15.6	18.4	45.0	0.0
Household Distribution by Income Level	110,834	25.1	14.4	16.6	43.9	0.0
Median Family Income MSA - 45220 Tallahassee, FL MSA		\$64,055	Median Housing Value			\$163,333
			Median Gross Rent			\$923
			Families Below Poverty Level			10.9%
<i>Source: 2015 ACS Census and 2017 D&B Data 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>						

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. 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. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 upper-income 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 upper-income borrowers to the percentage distribution of families by income level in each MA/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 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) throughout those geographies. Because 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 (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-2016

AA	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
Haralson Carroll Fulton	24	9,019	100.0	0.3	0.0	0.0	27.1	66.7	17.4	20.2	33.3	17.8	52.4	0.0	64.7	0.0	0.0	0.0
Total	24	9,019	100.0	0.3	0.0	0.0	27.1	66.7	17.4	20.2	33.3	17.8	52.4	0.0	64.7	0.0	0.0	0.0

Source: 2010 US Census: 01/01/15 – 12/31/16 Bank Data, 2016 HNMDA Aggregate Data, "-"data not available. 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

AA	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
Haralson Carroll Fulton	14	1,459	100.0	0.2	0.0	0.2	28.7	85.7	26.4	16.7	7.1	16.9	54.4	7.1	56.6	0.0	0.0	0.0
Total	14	1,459	100.0	0.2	0.0	0.2	28.7	85.7	26.4	16.7	7.1	16.9	54.4	7.1	56.6	0.0	0.0	0.0

Source: 2010 US Census: 01/01/17 – 12/31/17 Bank Data, 2016 HNMDA Aggregate Data, "-"data not available. Due to rounding, totals may not equal 100.0.

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower
2015-2016

AA	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
Haralson Carroll Fulton	12	7,182	100.0	18.4	16.7	5.6	15.0	0.0	11.8	17.1	8.3	14.7	49.5	41.7	49.1	0.0	33.3	18.7
Total	12	7,182	100.0	18.4	16.7	5.6	15.0	0.0	11.8	17.1	8.3	14.7	49.5	41.7	49.1	0.0	33.3	18.7

Source: 2010 US Census: 01/01/15 – 12/31/16 Bank Data, 2016 HNMDA Aggregate Data, "-"data not available. Due to rounding, totals may not equal 100.0.

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower

AA	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
Haralson Carroll Fulton	14	1,459	100.0	18.6	14.3	5.0	14.3	28.6	13.6	16.4	14.3	17.4	50.8	21.4	48.3	0.0	21.4	15.6
Total	14	1,459	100.0	18.6	14.3	5.0	14.3	28.6	13.6	16.4	14.3	17.4	50.8	21.4	48.3	0.0	21.4	15.6

Source: 2015 ACS Census: 01/01/17 – 12/31/17 Bank Data, 2016 HNMDA Aggregate Data, "-"data not available. Due to rounding, totals may not equal 100.0.

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2017

AA	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available- Income Tracts	
	#	\$ (000)	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Haralson, Carroll, Fulton	40	15,154	100.0	0.8	0.0	21.1	82.5	11.2	17.5	66.9	0.0	0.0	0.0
Total	40	15,154	100.0	0.8	0.0	21.1	82.5	11.2	17.5	66.9	0.0	0.0	0.0

Source: 2017 D&B Data; 01/01/2015 - 12/31/2017 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Haralson, Carroll,	40	15,154	100.0	8,747	86.0	65.0	50.7	4.1	30.0	10.0	15.0
Total	40	15,154	100.0	8,747	86.0	65.0	50.7	4.1	30.0	10.0	15.0

Source: 2017 D&B Data; 01/01/2015 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data"--" data not available. Due to rounding, totals may not equal 100.0.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2015-2016**

AA	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
Leon	20	5,716	100.0	4.6	10.0	3.9	17.7	25.0	13.7	28.9	30.0	26.0	48.9	35.0	56.4	0.0	0.0	0.0
Total	20	5,716	100.0	4.6	10.0	3.9	17.7	25.0	13.7	28.9	30.0	26.0	48.9	35.0	56.4	0.0	0.0	0.0

Source: 2010 US Census: 01/01/15 – 12/31/16 Bank Data, 2017 HMDA Aggregate Data, "-"data not available. Due to rounding, totals may not equal 100.0.

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

AA	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
Leon	6	1,993	100.0	5.0	33.3	3.8	14.3	33.3	12.0	30.7	0.0	31.8	49.2	33.3	51.2	0.8	0.0	1.2
Total	6	1,993	100.0	5.0	33.3	3.8	14.3	33.3	12.0	30.7	0.0	31.8	49.2	33.3	51.2	0.8	0.0	1.2

Source: 2010 US Census: 01/01/17 – 12/31/17 Bank Data, 2017 HMDA Aggregate Data, "-"data not available. Due to rounding, totals may not equal 100.0.

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																		
2015-2016																		
AA	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
Leon	20	5,716	100.0	21.9	5.0	5.7	15.5	0.0	15.7	17.3	10.0	19.2	45.3	30.0	43.1	0.0	55.0	16.3
Total	20	5,716	100.0	21.9	5.0	5.7	15.5	0.0	15.7	17.3	10.0	19.2	45.3	30.0	43.1	0.0	55.0	16.3

Source: 2010 US Census: 01/01/15 – 12/31/16 Bank Data, 2017 HMDA Aggregate Data, "-"data not available. Due to rounding, totals may not equal 100.0.

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower																		
2017																		
AA	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
Leon	6	1,993	100.0	21.1	16.7	6.1	15.6	0.0	16.8	18.4	16.7	20.0	45.0	16.7	39.6	0.0	50.0	17.4
Total	6	1,993	100.0	21.1	16.7	6.1	15.6	0.0	16.8	18.4	16.7	20.0	45.0	16.7	39.6	0.0	50.0	17.4

Source: 2010 US Census: 01/01/17 – 12/31/17 Bank Data, 2017 HMDA Aggregate Data, "-"data not available. Due to rounding, totals may not equal 100.0.

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography 2015-2017

AA	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available- Income Tracts	
	#	\$ (000)	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Leon	20	8,972	100.0	8.2	20.0	21.1	30.0	29.5	30.0	40.3	20.0	0.9	0.0
Total	20	8,972	100.0	8.2	20.0	21.1	30.0	29.5	30.0	40.3	20.0	0.9	0.0

Source: 2017 D&B Data; 01/01/2015 - 12/31/2017 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-2017

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Leon County	20	8,972	100.00	6,164	84.7	70.0	49.1	3.7	20.0	11.6	10.0
Total	20	8,972	100.00	6,164	84.7	70.0	49.1	3.7	20.0	11.6	10.0

Source: 2017 D&B Data; 01/01/2015 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data "--" data not available. Due to rounding, totals may not equal 100.0