

PUBLIC DISCLOSURE

August 13, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Comerica Bank
RSSD # 60143

1717 Main Street
Dallas, Texas 75201

Federal Reserve Bank of Dallas
2200 North Pearl Street
Dallas, Texas 75201

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to 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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INSTITUTION RATING

Institution Rating

Institution's CRA Rating: Comerica Bank is rated Satisfactory.

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

Table of Performance Ratings

Performance Levels	Comerica Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Non-Compliance			

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

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects adequate responsiveness to assessment areas' credit needs.
- A substantial majority of loans are made in the bank's assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of Home Mortgage Disclosure Act (HMDA) lending reflects adequate penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- An adequate record of servicing the credit needs of low-income individuals and areas and small businesses.
- Makes an adequate level of community development loans.
- Makes limited use of innovative and/or flexible lending practices in serving assessment area needs.
- Has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors.
- Exhibits adequate responsiveness to credit and community development needs.

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- Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- Provides a relatively high level of community development services.

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Institution

Description of the Institution

Business Structure

Comerica Bank (Comerica or bank), a wholly owned subsidiary of Comerica Incorporated (CMA), is a multistate commercial bank headquartered in Dallas, Texas. CMA is one of the top 40 largest bank holding companies in the United States (U.S.) and has offices throughout the country, with select businesses operating in several states, as well as in Canada and Mexico. Its banking centers are located throughout nine of the 20 most populous cities in the U.S.

As of December 31, 2017, Comerica operated 438 branch offices, 100 non-deposit taking ATMs, and 529 full-service ATMs throughout its five-state footprint. The bank's branches are located in Arizona, California, Florida, Michigan, and Texas, with approximately 94.5% of branches located in California, Michigan, and Texas. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment areas.

Comerica relies on a relationship-banking strategy. It is strategically aligned into three major business segments: the Business Bank, the Retail Bank, and Wealth Management.

- Business Bank meets the needs of middle-market businesses, multinational corporations, and governmental entities by offering various products and services, including commercial loans, deposits, treasury management, capital market products, international trade finance, letters of credit, foreign exchange, and loan syndication services.
- The Retail Bank consists of consumer lending, consumer deposit gathering, and mortgage loan origination. In addition to a full range of financial services provided to small business customers, the business segment offers a variety of consumer products, including deposit accounts, installment loans, credit cards, student loans, home equity lines of credit (HELOCs) and residential mortgage loans. Community Reinvestment Act relevant products and activities generally originate within the Retail Bank.
- Wealth Management offers products and services consisting of fiduciary services, private banking, retirement services, investment management and advisory services, and investment banking and brokerage services. This business segment also offers the sale of annuity products, as well as life, disability, and long-term care insurance products.

At the previous performance evaluation, dated June 22, 2015, the bank operated 482 branch offices and 637 ATMs inside its assessment areas. While the assessment areas have not changed in number, composition of individual assessment areas has experienced some

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small changes. For this review, the bank designated the 32 assessment areas listed below. Total deposits for the assessment areas as of June 30, 2017, were \$57.3 billion. Descriptions of the assessment areas listed below are found in the applicable assessment area sections of this report.

Arizona

- Phoenix
 - Maricopa County (portion) – part of the Phoenix-Mesa-Scottsdale Metropolitan Statistical Area (MSA)

California

- Fresno MSA
- Greater Los Angeles
 - Los Angeles County (portion) and Orange County – part of the Los Angeles-Long Beach-Anaheim MSA
 - Since previous evaluation, census tract 9304.01 has been removed from the assessment area.
- Inland Empire
 - Riverside County (portion) and San Bernardino County (portion) – part of the Riverside-San Bernardino-Ontario MSA
- Sacramento
 - Sacramento County; portions of Yolo and Placer Counties – part of the Sacramento-Arden Arcade-Roseville MSA
- Salinas
 - Monterey County (portion) – part of the Salinas MSA
- San Diego
 - San Diego County (portion) – part of the San Diego-Carlsbad-San Marcos MSA
 - As of January 1, 2018, the assessment area was expanded to include additional census tracts of 0099.01 and 0099.02.
- San Francisco Bay
 - San Francisco County; portions of San Mateo, Alameda, Contra Costa Counties – part of the San Francisco-Oakland-Hayward MSA
- San Jose
 - Santa Clara County (portion) – part of the San Jose-Sunnyvale-Santa Clara MSA
 - As of January 1, 2018, the entire county is included in the assessment area.
- Santa Cruz
 - Santa Cruz County (portion) – part of the Santa Cruz-Watsonville MSA
 - As of January 1, 2018, the entire county is included in the assessment area.
- Ventura
 - Ventura County (portion) – part of the Oxnard-Thousand Oaks-Ventura MSA

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Florida

- Fort Lauderdale-West Palm Beach
 - Broward County, Palm Beach County (portion) – part of the Miami-Fort Lauderdale-Pompano Beach MSA
 - As of January 1, 2018, the assessment area was adjusted to remove census tract 9800.00 from Broward County.
- Naples-Immokalee-Marco Island MSA
- Sarasota
 - Sarasota County (portion) – part of the North Port-Bradenton-Sarasota MSA
- Stuart
 - Martin County (portion) – part of the Port St. Lucie MSA

Michigan

- Ann Arbor MSA
- Battle Creek MSA
- Fenton
 - Genesee County (portion) – part of the Flint MSA
- Gladwin County – non-MSA
- Grand Rapids-Wyoming
 - Kent and Ottawa Counties – part of the Grand Rapids-Wyoming MSA
- Jackson MSA
- Kalamazoo-Portage
 - Kalamazoo County – part of the Kalamazoo-Portage MSA
- Lansing-East Lansing
 - Portions of Clinton, Eaton, and Ingham Counties – part of the Lansing-East Lansing MSA
 - As of January 1, 2018, the entire counties are included in the assessment area.
- Lenawee County (portion) – non-MSA
- Midland MSA
- Muskegon MSA
- Southeast Michigan
 - Lapeer County (portion); Livingston, Macomb, Oakland, and Wayne Counties – part of the Detroit-Warren-Dearborn MSA
 - As of January 1, 2018, portions of Lapeer County are no longer included in the assessment area.

Texas

- Dallas-Fort Worth (DFW) Metroplex
 - Dallas, Ellis, Rockwall, and Tarrant Counties; portions of Collin and Denton Counties – part of the Dallas-Fort Worth-Arlington MSA
- Austin

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- Travis County, Williamson County (portion) – part of the Austin-Round Rock MSA
- Houston
 - Harris and Montgomery Counties; portions of Brazoria, Fort Bend, Galveston Counties – part of the Houston-The Woodlands-Sugar Land MSA
- Kerr County – non-MSA
- San Antonio
 - Bexar and Kendall Counties – part of the San Antonio-New Braunfels MSA

Loan Portfolio

As of March 31, 2018, the bank reported total assets of approximately \$72.3 billion, gross loans of \$49.2 billion, and a net loan-to-deposit ratio of 82.6%. The following table reflects the loan portfolio mix.

Product	3/31/2018 \$(000's)	% of Loans	3/31/2015 \$(000's)	% of Loans
<u>Real Estate</u>				
1-4 Family Residential Construction Loans	309,527	0.6	222,404	0.5
Other Construction Loans & Land Development & Other	3,161,820	6.4	2,040,367	4.2
Farm Land	9,821	0.0	44,735	0.1
1-4 Family – Revolving	1,802,487	3.7	1,620,904	3.3
1-4 Family Residential Secured by First Liens	2,150,228	4.4	1,994,019	4.1
1-4 Family Residential Secured by Junior Liens	50,890	0.1	81,735	0.2
Multifamily	602,986	1.2	649,533	1.3
<u>Nonfarm Nonresidential</u>				
Loans Secured Owner-Occupied Nonfarm Nonresidential	5,288,147	10.7	5,161,543	10.5
Loans Secured by Other Nonfarm Nonresidential	2,659,672	5.4	2,170,723	4.4
Total Real Estate	16,056,651	32.6	14,000,935	28.5
Depository Institutions	13,783	0.0	3,005	0.0
Agricultural	39,304	0.1	48,613	0.1
Commercial and Industrial	26,433,049	53.8	28,626,947	58.3
Consumer	594,458	1.2	646,750	1.3
State and Political Subdivisions	166,532	0.3	12,825	0.0
Other	5,473,647	11.2	4,937,061	10.1
Lease Financing	463,778	0.9	791,817	1.6
Gross Loans	49,241,202	100.0	49,077,953	100.0

Product Offerings

A majority of the bank's business comes from its operations in California, Michigan, and Texas. Comerica offers a wide array of traditional consumer and commercial products and services. As indicated in the table above, commercial and industrial loans comprised the greatest percentage of the loan portfolio by dollar volume during the review period, followed by commercial real estate. All retail and loan products are offered in all markets.

Commercial loan products include business term loans for various purposes such as equipment purchases, facility expansion, asset acquisition, leasehold improvements,

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commercial real estate loans, Small Business Administration (SBA) loans, small business lines of credit, and equipment lease financing. This category also includes business credit cards; however, Comerica does not directly offer this product. Credit cards tend to be for smaller dollar amounts and are often needed by small businesses to meet day-to-day operating expenses. To meet this credit need, the bank has partnered with Elan Financial Services, Minneapolis, Minnesota (Elan) to provide a credit product for their customers. These loans are not reported by Comerica and are not reflected in their CRA reportable loans. Additionally, as the chart depicts, Comerica did not originate a significant volume of small farm loans during the review period; therefore, these loans are not discussed in this report.

Loans secured by residential real estate are typically reported under the HMDA. The table on page six indicates residential real estate loans represent approximately 10.0% percent of the bank's lending as of March 31, 2018. The bank's primary residential real estate loan products consist of home purchase and refinance home mortgage loans. Home improvement and multi-family loans are not primary products for the bank, even though they are offered in all markets across the bank's footprint.

Comerica also offers a variety of consumer loan products including automobile loans, installment loans, recreational vehicle loans, motorhome loans, and open-end HELOCs. The HELOCs tend to have competitive rates and flexible loan terms, which many customers find more attractive than the traditional home improvement loan. It also represents a significant percentage of the bank's overall lending activity by number of originations. In 2017, for example, Comerica originated 5,571 HELOCs compared to 1,493 HMDA loans and 8,328 CRA-reportable small business loans.

Previous Performance Evaluation

Comerica received a Satisfactory rating on its previous CRA performance evaluation dated June 22, 2015 performed by the Federal Reserve Bank of Dallas. The lending test was rated High Satisfactory, the investment test was rated Outstanding, and the service test was rated High Satisfactory.

Scope of Examination

The bank was evaluated using the Interagency Examination Procedures for Large Retail Institutions, developed by the Federal Financial Institution's Examination Council (FFIEC). All assessment areas were evaluated for lending, investment, and service performance. Full-scope reviews using the FFIEC procedures were conducted for eight of the bank's 32 assessment areas. The assessment areas were selected for full-scope reviews based on factors identified in the FFIEC procedures. These include, but are not limited to, the level of the institution's lending, investment, and service activity as well as opportunities for such in the assessment areas; comments received from community groups and the public regarding the institution's CRA performance; population density; the number of other institutions in the

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assessment areas; and the length of time since the most recent full-scope review. Overall, approximately 72.7% of lending activity (by number of loans), 74.0% of the total deposits, and 71.0% of total branches were evaluated through the full-scope reviews. Descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Arizona
 - Phoenix
- California
 - Greater Los Angeles
 - Santa Cruz
- Florida
 - Naples-Immokalee-Marco Island MSA
- Michigan
 - Kalamazoo-Portage
 - Southeast Michigan
- Texas
 - Dallas-Fort Worth Metroplex
 - Houston

The ratings for California, Michigan, and Texas were weighted more heavily in determining the overall ratings, as they contain the vast majority of the bank's lending, investment, and service activity as well as Comerica's branch locations.

Examination Review Period and Products Reviewed

Comerica opted to collect information on its HELOC loans as part of its consumer loan portfolio and optional data collected under the CRA. The bank's effectiveness in meeting the credit needs of the residents it serves is not immediately evident from a review limited to HMDA-reportable data. Therefore, an evaluation of the bank's HELOC lending was conducted in conjunction with the HMDA reportable loan activity to give a more accurate representation of Comerica's efforts in meeting the needs of its communities.

HMDA, small business, and HELOC lending data for the period January 1, 2015, through December 31, 2017, was evaluated for consistency with the years of data presented in this evaluation. Due to volume, small business lending received greater weighting than HMDA lending in determining conclusions. Unless otherwise addressed in the discussion, the bank's performance for this period was consistent with performance for the years presented.

Community development loans, investments, and service activities from January 1, 2015, through March 31, 2018, were considered during this evaluation. In addition, the evaluation also considered prior period investments.

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Examination Analysis

The evaluation of the bank's record of lending in the individual assessment areas includes the use of, and comparison to, demographic characteristics. The primary sources for the demographic information are the 2010 U.S. Census, 2015 U.S. Census estimates, and Dun & Bradstreet (D&B) data.¹ Demographic characteristics of a particular assessment area are useful in analyzing the bank's record of lending as they provide a means of estimating loan demand and identifying lending opportunities. To understand small business and small farm loan demand, self-reported data of revenue size and geographical location from business and farm entities is collected and published by D&B. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The information is used to understand the bank's performance context and evaluate the bank. Note that percentages may not total 100.0% due to rounding.

In conjunction with the assessment, contact was made outside the bank with individuals, groups, and/or organizations. Community contacts were located throughout the assessment areas and included representatives of community-based organizations and municipalities.

Conclusions With Respect to Performance Tests

Lending Test

The bank's overall Lending Test rating is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. In addition, the distribution of lending to borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

The bank is both a small business and HMDA lender. During the review period, the bank reported 28,214 small business loans compared to 3,257 HMDA loans. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment areas.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices G, H, and I.

¹ For all data sets within the report, the most recent publicly-available information was utilized. Based on the public release date for data, 2015 and 2016 lending activity were compared to 2010 census data, and 2017 lending activity was compared to 2015 census data.

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Lending Activity

The bank's lending levels reflect adequate responsiveness to assessment areas' credit needs. The following table summarizes the lending activity from January 1, 2015, through December 31, 2017. As the data indicates, the bank makes more small business loans than other types of loans.

Summary of Lending Activity January 1, 2015 through December 31, 2017				
Loan Type	#	%	\$000s	%
Home Equity	19,136	--	2,918,637	--
Total Consumer-Related	19,136	37.8	2,918,637	25.2
Home Purchase	1,572	--	633,850	--
Refinancing	1,597	--	827,413	--
Home Improvement	41	--	15,028	--
Multifamily	47	--	240,453	--
Total HMDA-Related	3,257	6.4	1,716,744	14.8
Total Small Business	28,214	55.7	6,939,846	59.9
Total Small Farm	82	0.1	16,350	0.1
Total Loans	50,689	100.0	11,591,577	100.0

The table below shows the distribution of loans inside and outside the bank's assessment areas. A substantial majority of loans are made in the bank's assessment areas.

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Assessment Area Concentration								
Loan Type	Inside Assessment Area				Outside Assessment Area			
	#	%	\$000's	% of \$	#	%	\$000's	% of \$
Home Equity	18,093	94.5	2,735,267	93.7	1,043	5.5	183,370	6.3
Total Consumer-Related	18,093	94.5	2,735,267	93.7	1,043	5.5	183,370	6.3
Home Purchase – Conventional	1,198	83.4	481,938	77.9	239	16.6	136,383	22.1
Home Purchase – FHA	124	93.9	14,028	93.3	8	6.1	1,002	6.7
Home Purchase – VA	3	100.0	499	100.0	0	0.0	0	0.0
Home Improvement	39	95.1	13,879	92.4	2	4.9	1,149	7.6
Refinancing	1,439	90.1	678,189	82.0	158	9.9	149,224	18.0
Multifamily	30	63.8	121,413	50.5	17	36.2	119,040	49.5
Total HMDA-Related	2,833	87.0	1,309,946	76.3	424	13.0	406,798	23.7
Total Small Business	24,833	88.0	5,955,362	85.8	3,381	12.0	984,484	14.2
Total Small Farm	62	75.6	11,237	68.7	20	24.4	5,113	31.3
Total Loans	45,821	90.4	10,011,812	86.4	4,868	9.6	1,579,765	13.6

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

Consistent with the performance standards for a large bank, conclusions about the bank's distribution of lending within its assessment areas considers the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home mortgage loans and consumer loans to low-, moderate-, middle-, and upper-income individuals; small-business and small-farm loans to businesses and farms with gross annual revenues of \$1 million or less; and, small-business and small-farm loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. Of the eight full-scope assessment areas, five are considered adequate, two are considered good, and one is considered poor. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

The geographic distribution of loans reflects adequate penetration throughout the assessment areas. Of the eight full-scope assessment areas, four are considered

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adequate, three are considered good, and one is considered poor. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

While not innovative, the bank makes some limited use of flexible lending activities in its assessment areas including mortgage lending (the Home Affordable Refinance Program [HARP], high balance GSEs, and HomeReady), Small Business Micro Lending, the Ex-Im Bank Working Capital Guarantee, and Government Insured Loan Programs.

- Mortgage Lending – The following table exhibits the details of Comerica's participation in for the review period.
 - HARP – This program was created by the Federal Housing Finance Agency specifically to help homeowners who are current on their mortgage payments, but have little to no equity in their homes, refinance their mortgage.
 - High Balance GSE – The high-balance loan requirements apply to mortgage loans with original loan amounts meeting the high-cost area loan limits established by the Federal Housing Finance Agency. These loans must meet most standard Fannie Mae eligibility and underwriting requirements but contain a few exceptions.
 - HomeReady – This is a loan product from Fannie Mae to support affordable housing by providing low down payment options.

State	HARP		High Balance GSE		HomeReady		# in LMI Tracts	\$ in LMI Tracts	% in LMI Tracts by #	% in LMI Tracts by \$
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
California	-	-	8	4,297	-	-	2	1,125	25.0%	26.2%
Michigan	24	2,629	-	-	1	78	3	227	12.0%	8.4%
Texas	2	177	-	-	-	-	-	-	-	-
Total	26	2,806	8	4,297	1	78	5	1,352	14.3%	18.8%

In addition, the bank offers the following loan programs with the specific purpose of supporting alternative business needs.

- Ex-Im Bank Working Capital Guarantee Program - The bank participates in this government-sponsored credit support program to provide trade financing to companies that cannot use traditional sources. During this review period, the bank

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originated 32 loans totaling approximately \$115.5 million. The following table summarizes the loan originations by state.

State	#	\$ (000s)
California	10	56,401
Florida	1	2,500
Michigan	4	15,500
Texas	17	41,125
Total Loans	32	115,526

- **Micro Business Loans** - The bank offers secured business lines of credit and term loans in amounts from \$10,000 to \$250,000. The loan product uses flexible lending practices to better serve the credit needs within the bank's assessment areas. These loans address the credit needs of small business customers who bank and/or have small businesses located in low- and moderate-income geographies. The following table illustrates the micro loans extended by state during the evaluation period.

State	#	\$ (000s)	# in LMI Census Tracts	\$ in LMI Census Tracts (000s)	% in LMI Census Tracts by #	% in LMI Census Tracts by \$
Arizona	93	10,564	30	4,772	32.3%	45.2%
California	568	80,394	195	30,261	34.3%	37.6%
Florida	34	4,423	9	1,224	26.5%	27.7%
Michigan	1,442	172,623	486	92,930	33.7%	53.8%
Texas	1,016	117,503	411	48,008	40.5%	40.9%
Total	3,153	385,507	1,131	177,195	35.9%	46.0%

- **Government-Insured Loan Programs** - The bank offers a variety of government-insured loan programs to help meet the credit needs of low- and moderate-income borrowers and small businesses. The following table represents the bank's participation by state in the three primary federal loan programs in which the bank participates.

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State	FHA & VA		SBA	
	#	\$ (000s)	#	\$ (000s)
Arizona	-	-	66	7,713
California	-	-	399	102,083
Florida	14	2,081	15	1,740
Michigan	115	12,567	292	123,158
Texas	19	2,547	276	93,143
Total Loans	148	17,195	1,048	327,837

Detailed information about the bank's lending activity can be found in the individual assessment area sections of this report.

Community Development Lending

The bank makes an adequate level of community development loans. During the review period, the bank originated or renewed 401 community development loans totaling approximately \$1.2 billion. In addition, Comerica's assessment areas benefitted from \$816,680 in consortia lending.

The community development loans originated during the evaluation period were for a variety of purposes. The table below summarizes the bank's community development lending.

Community Development Lending		
Purpose	Number	\$(000s)
Affordable Housing	63	120,861
Community Services Benefitting LMI Individuals	221	409,770
Economic Development	49	144,148
Revitalize and Stabilize	68	509,723
Total	401	1,184,502

Investment Test

The bank's overall Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants, and exhibits adequate responsiveness to credit and community development needs. The table below summarizes the bank's community development investments and grants by assessment area within the state. Specific details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

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Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Assessment Area	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Full Review:								
Phoenix	28	11,277	3	5,493	72	603	103	17,373
Greater Los Angeles	9	6,051	7	5,842	369	2,157	385	14,050
Santa Cruz	-	-	1	4,261	33	221	34	4,482
Naples-Immokalee-Marco Island MSA	2	374	-	-	17	89	19	463
Kalamazoo-Portage	2	231	-	-	41	133	43	364
Southeast Michigan	30	22,314	6	15,673	830	4,532	866	42,519
Dallas-Fort Worth Metroplex	26	8,392	1	956	183	1,325	210	10,673
Houston	16	15,653	4	10,248	131	779	151	26,680
Limited Review:								
Fresno MSA	2	274	2	1,742	21	201	25	2,217
Inland Empire	14	1,943	-	-	31	164	45	2,107
Sacramento	6	964	-	-	27	312	33	1,276
Salinas	3	586	1	126	22	57	26	769
San Diego	4	590	2	2,764	87	413	93	3,767
San Francisco Bay	2	9,979	4	6,548	238	2,551	244	19,078
San Jose	3	10,182	-	-	84	414	87	10,596
Ventura	4	510	-	-	28	125	32	635
Fort Lauderdale-West Palm Beach	18	10,492	1	5,824	98	429	117	16,745
Sarasota	-	-	-	-	2	8	2	8
Stuart	-	-	-	-	1	1	1	1
Ann Arbor	6	937	1	4,004	47	125	54	5,066
Battle Creek	1	122	-	-	25	38	26	160
Fenton	-	-	-	-	8	24	8	24
Grand Rapids-Wyoming	8	3,230	1	1,955	113	300	122	5,485
Jackson MSA	2	247	-	-	24	73	26	320

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Lansing-East Lansing	2	173	5	14,791	62	152	69	15,116
Midland MSA	1	101	-	-	22	27	23	128
Muskegon MSA	1	137	-	-	33	48	34	185
Gladwin County	-	-	-	-	-	-	-	-
Lenawee County	-	-	-	-	-	-	-	-
Austin	10	1,214	-	-	28	300	38	1,514
San Antonio	7	14,398	2	4,902	22	264	31	19,564
Kerr County	-	-	-	-	13	61	13	61
Total	207	120,371	41	85,129	2,712	15,926	2,960	221,426

In addition, a total of 15 investments benefited the statewide areas, which included the bank's assessment areas, and 81 benefited multiple assessment areas which included those of the bank. These investments totaled \$3.3 million and \$282.5 million, respectively.

Furthermore, a total of 33 donations benefited the statewide areas, which included the bank's assessment areas. These donations totaled \$357,500.

Service Test

The bank's overall Service Test rating is Low Satisfactory. Comerica's performance is considered Low Satisfactory in Arizona, California, Florida, and Michigan, and High Satisfactory in Texas. Specific details of the service performance are discussed in the respective assessment area sections of this report.

Retail Services

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

In most assessment areas, the bank offers extended morning and evening hours as well as Saturday hours, and offers no- or low-cost deposit accounts. The bank also uses the following alternative delivery systems:

- **Online Banking** – This delivery system includes Web Banking, Quicken® Banking with Comerica, Quicken® for Business, QuickBooks®, Comerica Web Bill Pay, and Telephone Bill Pay.

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- **Mobile Banking** – Comerica also offers mobile banking, which includes an application for smartphone and iPad® devices. Through the application, customers can access online banking accounts to view balances, make account transfers, pay bills, deposit checks, and locate Comerica ATM and banking center locations.
- **On-the-Job Banking** – The bank enters into agreements with businesses to offer the business employees no- or low-cost personal banking products and services. Employees of these businesses receive benefits such as direct deposit of pay checks, waivers or discounts on fees, and discounted installment loans if automated payments are made from the On-the-Job Banking Checking account. Many of the businesses that choose to offer this program as a benefit to their employees are located in low- and moderate-income census tracts and/or consist of lower wage positions, qualifying their employees as low- or moderate-income individuals.
- **Credit Card Partnership** – Although Comerica does not originate consumer credit card loans, the bank partners with Elan, which originates small dollar credit card loans to small businesses on behalf of Comerica. These loans are not included in the bank's reportable small business loans for CRA purposes.

Community Development Services

The bank provides a relatively high level of community development services. Comerica's staff participated in more than 6,870 events/meetings during the review period. Approximately 4,350 of those were in the full-scope assessment areas. The level of community development services was considered relatively high in each of the five states where the bank operates.

The bank's directors, officers, and staff members are involved in numerous organizations and activities that promote affordable housing for low- and moderate-income individuals, community services for low- and moderate-income individuals, economic development, and revitalization of low- and moderate-income areas. Additionally, the bank participates in numerous financial literacy initiatives to help provide financial education to low- and moderate-income school children throughout its assessment areas.

These initiatives are particularly responsive and were often stated by community contacts as a need throughout Comerica's footprint.

Fair Lending or Other Illegal Credit Practices Review

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve System retains authority to enforce compliance with the CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Federal

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Reserve Bank of Dallas did not cite violations involving illegal discrimination or other illegal credit practices that adversely affected the evaluation of the bank's CRA performance. As of the date of this evaluation, the Federal Reserve Bank of Dallas is unaware of any violations of the Equal Credit Opportunity Act or Regulation B, or any unfair, deceptive, or abusive acts or practices identified by the CFPB.

State of Arizona

CRA Rating for Arizona: Satisfactory

The Lending Test is Rated: Low Satisfactory

The Investment Test is Rated: High Satisfactory

The Service Test is Rated: Low Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects adequate responsiveness to the assessment area's credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment area.
- The distribution of HMDA lending reflects adequate penetration among customers of different income levels.
- The distribution of small business lending reflects good penetration among businesses of different revenue sizes.
- Makes an adequate level of community development loans.
- Has an excellent level of qualified community development investments.
- Exhibits good responsiveness to credit and community development needs.
- Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.
- Provides a relatively high level of community development services.

Scope

The bank designates a single assessment area in Arizona. According to FFIEC procedures, a minimum of one assessment area from each state must be reviewed using full-scope examination procedures for interstate institutions. Therefore, the single assessment area delineated by the bank in the State of Arizona was selected for full-scope review. As Phoenix constitutes the one assessment area in Arizona, the statewide rating will be based on the CRA activity within that assessment area and any other investment or services that are provided on a broader, statewide basis. The time period and products evaluated for this state are consistent with the scope discussed in the Institution section of this report.

Description of Institution's Operations in Arizona

The bank operates 17 branch offices in Arizona, representing 3.9% of total branches. As of June 30, 2017, the bank had \$354.4 million in deposits in the state, representing 0.6% of total deposits. According to the June 30, 2017, FDIC Summary of Deposits, the bank had a deposit market share of 0.4% and ranked 20th out of 59 FDIC-insured financial institutions across the state. Of the 3,257 HMDA loans originated and purchased by the bank, 63 (1.9%) were in Arizona. Of the 28,214 small business loans originated and purchased by the bank, 527 (1.9%) were in Arizona.

For a more detailed summary of the bank's operations in Arizona, see "Description of Operations in Phoenix," below.

METROPOLITAN AREAS (Full Scope Review)

Description of Operations in Phoenix

The Phoenix Assessment Area includes a portion of Maricopa County. This county, along with Pinal County, which is excluded from the assessment area, make up the Phoenix-Mesa-Scottsdale MSA.

According to the 2010 census, the assessment area population was 3,817,117, which accounted for 54.4% of the population in the state. Based on the 2017 population of 4,307,033, the assessment area has experienced an increase of 12.8% since 2010. Phoenix, the largest city within the assessment area, accounts for 37.8% of the population in the assessment area. Other notable cities in the assessment area are Glendale, Mesa, and Scottsdale.

County	2017 Population Estimate	% Increase Since 2010	Major Municipalities
Maricopa	4,307,033	12.8	Phoenix*, Glendale, Mesa, Scottsdale

*Denotes county seat

As of December 31, 2017, the bank operated 17 branches in the assessment area representing 3.9% of its branches. There are nine branches located in middle-income census tracts, and eight branches in upper-income census tracts. Additionally, Comerica operates one loan production office (LPO) in an upper-income tract.

According to the FDIC, as of June 30, 2017, the bank had \$354.4 million in deposits in this assessment area representing 0.6% of the bank's total deposits. It also represents a deposit market share of 0.4%, which includes all other FDIC-insured deposits that are located in the assessment area. JPMorgan Chase Bank holds the largest deposit share at 26.1%, followed by Wells Fargo Bank, at 23.1%, and Bank of America, at 19.4%.

For 2016, there were 805 financial institutions that reported HMDA data in the assessment area. The bank ranked 220th in HMDA market share with less than 0.1%. Wells Fargo Bank and U S Bank dominated the market with 10.2% and 5.5% of the market share, respectively. For 2017, there were 820 financial institutions that reported HMDA data in the assessment area. The bank ranked 223rd in HMDA market share with less than 0.1%. Wells Fargo Bank and U S Bank once again dominated the market with 9.1% and 6.3% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, and it appears competition could have adversely affected the bank's ability to serve the credit needs of its assessment area,

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specifically regarding mortgage lending. However, this is not a major product for Comerica.

For 2016, there were 203 financial institutions that reported CRA small business data in the assessment area. The bank ranked 31st in market share with 0.1%. Citibank and American Express Bank dominated the market with 31.4% and 16.1% of the market share, respectively. For 2017, there were 207 financial institutions that reported CRA small business data in the assessment area. The bank ranked 34th in market share with 0.2%. American Express Bank and Chase Bank USA dominated the market with 17.1% and 15.2% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Phoenix-Mesa-Scottsdale MSA as a whole but not the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 88.9% of the total MSA population, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to census data.

At the 2010 census, the Phoenix assessment area was made up of 893 distinct census tracts. Of the total number of tracts, 84 (9.4%) were designated as low-income, 218 (24.4%) were designated moderate-income, 281 (31.5%) were middle-income, 302 (33.8%) were upper-income, and eight (0.9%) were designated as having an unknown-income level. As of the 2015 census estimates, 104 (11.6%) were designated as low-income, 202 (22.6%) were designated moderate-income, 279 (31.2%) were middle-income, 299 (33.5%) were upper-income, and nine (1.0%) were unknown-income.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; and the U.S. Department of Housing and Urban Development (HUD); D&B; and the Texas Workforce Commission.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses both U.S. Census 2010 data and 2015 estimated data. The following chart reflects the estimated median family income for the years 2010 and 2015 for the Phoenix-Mesa-Scottsdale MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 census, 10.1% of the families in

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the assessment area lived below the poverty level. According to the 2015 census estimates, 12.7% of the families in the assessment area lived below the poverty level.

Income Level	2010	2015
Median Income	\$64,868	\$64,257
Low-income	< \$32,434	< \$32,129
Moderate-income	\$32,434 - \$51,894	\$32,129 - \$51,406
Middle-income	\$51,895 - \$77,841	\$51,407 - \$77,108
Upper-income	≥ \$77,842	≥ \$77,109

Housing Characteristics

2010 Census

According to 2010 census data, there were 1,559,022 housing units in the Phoenix Assessment Area. Of total housing in the assessment area, 57.2% of the units were classified as owner-occupied, while 29.6% were classified as rental units and 13.2% of the available housing was vacant. Overall, 7.7% of the housing stock in the assessment area was in low-income tracts. In these census tracts, 27.1% of the housing units were owner-occupied, 54.4% were rental units, and 18.5% were vacant.

The median age of housing stock in these tracts was 36 years and the median housing value in low-income tracts for the assessment area in 2010 was \$122,998. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2010 was \$712, which is less affordable than the monthly mortgage payment of \$450 for a \$122,998 home for 30 years at 3.65% interest rate. However, 37.3% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts accounted for 26.5% of the housing stock in the assessment area. In these census tracts, 46.0% of the housing units were owner-occupied, 38.4% were rental units, and 15.7% were vacant. The median age of housing stock in these tracts was 33 years and the median housing value in moderate-income tracts for the assessment area in 2010 was \$153,387. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2010 was \$816, which is less affordable than the monthly mortgage payment of \$561 for a \$153,387 home for 30 years at 3.65% interest rate. However, 17.1% of families in moderate-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 33.1%, is in middle-income tracts. In these census tracts, 60.5% of the housing units were owner-occupied, 27.7% were rental units, and 11.8% were vacant. The median age of housing stock in these tracts

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was 22 years, and 6.9% of families in middle-income tracts had incomes below the poverty level. The median housing value in middle-income tracts for the assessment area was \$217,655.

Approximately 32.7% of the housing stock in the assessment area was in upper-income tracts. In these census tracts, 70.1% of the housing units were owner-occupied, 18.4% were rental units, and 11.5% were vacant. The median age of housing stock in these tracts was 17 years, and 3.3% of families in middle-income tracts had incomes below the poverty level. The median housing value in upper-income tracts for the assessment area was \$369,528.

2015 Census Estimates

According to 2015 census estimates, there are 1,622,387 housing units in the Phoenix Assessment Area. Of total housing in the assessment area, 52.2% of the units are classified as owner-occupied while 34.5% are classified as rental units and 13.3% of the available housing is vacant. Overall, 10.0% of the housing stock in the assessment area is in low-income tracts. In these census tracts, 24.3% of the housing units are owner-occupied, 59.5% are rental units, and 16.2% are vacant.

The median age of housing stock in these tracts is 45 years and the median housing value in low-income tracts for the assessment area in 2015 was \$76,484. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2015 was \$738, which is less affordable than the monthly mortgage payment of \$292 for a \$76,484 home for 30 years at 3.99% interest rate. However, 42.7% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts account for 23.5% of the housing stock in the assessment area. In these census tracts, 42.1% of the housing units are owner-occupied, 43.2% are rental units, and 14.7% are vacant. The median age of housing stock in these tracts is 43 years and the median housing value in moderate-income tracts for the assessment area in 2015 was \$107,111. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2015 was \$855, which is less affordable than the monthly mortgage payment of \$409 for a \$107,111 home for 30 years at 3.99% interest rate. However, 21.0% of families in moderate-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 33.2%, is in middle-income tracts. In these census tracts, 54.2% of the housing units are owner-occupied, 32.5% are rental units, and 13.2% are vacant. The median age of housing stock in these tracts is 32

years, and 9.0% of families in middle-income tracts have incomes below the poverty level. The median housing value in middle-income tracts for the assessment area was \$162,368.

Approximately 33.2% of the housing stock in the assessment area is in upper-income tracts. In these census tracts, 66.0% of the housing units are owner-occupied, 22.7% are rental units, and 11.3% are vacant. The median age of housing stock in these tracts is 26 years, and 4.0% of families in upper-income tracts have incomes below the poverty level. The median housing value in upper-income tracts for the assessment area was \$293,299.

Employment and Economic Conditions

The national average unemployment rates for 2015, 2016, and 2017 were 5.3%, 4.9%, and 4.4%, respectively. Unemployment rates for the assessment area were lower than the annual unemployment rates for Arizona and the nation, and similar to those of the entire MSA. According to the 2010 census, the unemployment rate was 10.3% in low-income tracts and 9.3% in moderate-income tracts. At the time of 2015 census estimates, the unemployment rates had increased to 12.5% and 10.3% in low- and moderate-income tracts, respectively. The high unemployment rates in LMI tracts could affect loan demand from these tracts.

The following chart shows unemployment rates relevant to the assessment area for 2015 through 2017.

Annual Average Unemployment Rate			
AREA	2015	2016	2017
Maricopa County	5.1%	4.6%	4.2%
MSA	5.2%	4.6%	4.2%
State of Arizona	6.1%	5.4%	4.9%
United States	5.3%	4.9%	4.4%

The Phoenix-Mesa-Scottsdale MSA is the economic and population center of Arizona; 66.4% of the state's population resides within the MSA. Commonly known as "the Valley of the Sun", the MSA had a real gross domestic product of \$243.0 billion in 2017, making it the 16th largest metropolitan economy in the U.S.² The MSA is also home to several Fortune 500 and Fortune 1000 companies, including PetSmart, Republic Services, and Sprouts Farmers Market.³ Banner Health, the state's largest private employer, maintains a

² U.S. Bureau of Economic Analysis. "Gross Domestic Product by Metropolitan Area, 2017." BEA.gov. https://www.bea.gov/system/files/2018-09/gdp_metro0918_0.pdf (accessed January 10, 2019)

³ Arizona Central. "Arizona Republic 100: State's largest employers." AZCentral.com <https://www.azcentral.com/story/money/business/2015/04/19/arizona-republic-100-largest-employers/25462291/> (accessed October 14, 2018)

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significant presence in the area, and due to the merger with US Airways, American Airlines employs many in the Phoenix area as well.

Community Contacts and Community Development Opportunities

As part of the evaluation of the Phoenix assessment area, two community contacts involved in community development were made. The two contacts highlighted needs for affordable housing, small dollar loans to small businesses, grants for organizations providing technical assistance, and innovative lending practices.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

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Combined Demographics Report

Assessment Area: AZ - Phoenix

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	84	9.4	61,688	6.9	22,989	37.3	187,573	21
Moderate-income	218	24.4	206,040	23.1	35,187	17.1	155,705	17.5
Middle-income	281	31.5	298,452	33.5	20,682	6.9	179,085	20.1
Upper-income	302	33.8	325,066	36.5	10,803	3.3	368,886	41.4
Unknown-income	8	0.9	3	0	0	0	0	0
Total Assessment Area	893	100.0	891,249	100.0	89,661	10.1	891,249	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	120,172	32,615	3.7	27.1	65,363	54.4	22,194	18.5
Moderate-income	413,021	189,833	21.3	46	158,493	38.4	64,695	15.7
Middle-income	515,885	312,069	35	60.5	142,847	27.7	60,969	11.8
Upper-income	509,463	357,186	40.1	70.1	93,863	18.4	58,414	11.5
Unknown-income	481	131	0	27.2	226	47	124	25.8
Total Assessment Area	1,559,022	891,834	100.0	57.2	460,792	29.6	206,396	13.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	12,714	7	10,225	6.1	2,337	17.1	152	8.3
Moderate-income	28,976	15.9	25,961	15.6	2,801	20.5	214	11.6
Middle-income	52,875	29.1	49,152	29.5	3,313	24.3	410	22.3
Upper-income	86,370	47.5	80,363	48.3	4,949	36.3	1,058	57.4
Unknown-income	987	0.5	736	0.4	243	1.8	8	0.4
Total Assessment Area	181,922	100.0	166,437	100.0	13,643	100.0	1,842	100.0
Percentage of Total Businesses:				91.5		7.5		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	43	3.4	41	3.4	2	2.6	0	0
Moderate-income	157	12.4	144	12.1	13	16.7	0	0
Middle-income	364	28.7	337	28.3	27	34.6	0	0
Upper-income	697	54.9	661	55.5	36	46.2	0	0
Unknown-income	8	0.6	8	0.7	0	0	0	0
Total Assessment Area	1,269	100.0	1,191	100.0	78	100.0	0	.0
Percentage of Total Farms:				93.9		6.1		.0

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Combined Demographics Report

Assessment Area: AZ - Phoenix

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	104	11.6	84,543	9.2	36,093	42.7	201,508	21.9
Moderate-income	202	22.6	191,843	20.9	40,277	21	154,644	16.8
Middle-income	279	31.2	293,933	32	26,334	9	175,673	19.1
Upper-income	299	33.5	347,669	37.9	13,963	4	386,376	42.1
Unknown-income	9	1	213	0	40	18.8	0	0
Total Assessment Area	893	100.0	918,201	100.0	116,707	12.7	918,201	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	162,646	39,453	4.7	24.3	96,806	59.5	26,387	16.2
Moderate-income	380,773	160,335	18.9	42.1	164,490	43.2	55,948	14.7
Middle-income	538,452	291,923	34.5	54.2	175,190	32.5	71,339	13.2
Upper-income	538,616	355,360	41.9	66	122,158	22.7	61,098	11.3
Unknown-income	1,900	135	0	7.1	1,480	77.9	285	15
Total Assessment Area	1,622,387	847,206	100.0	52.2	560,124	34.5	215,057	13.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	11,604	7.1	9,530	6.4	1,917	14.1	157	9.8
Moderate-income	27,420	16.8	24,119	16.3	3,113	22.9	188	11.7
Middle-income	46,017	28.1	42,260	28.5	3,395	25	362	22.5
Upper-income	77,627	47.5	71,810	48.4	4,926	36.3	891	55.4
Unknown-income	902	0.6	662	0.4	231	1.7	9	0.6
Total Assessment Area	163,570	100.0	148,381	100.0	13,582	100.0	1,607	100.0
	Percentage of Total Businesses:			90.7		8.3		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	37	3.2	31	2.9	6	8.1	0	0
Moderate-income	156	13.6	143	13.3	13	17.6	0	0
Middle-income	344	29.9	316	29.4	28	37.8	0	0
Upper-income	608	52.9	581	54	27	36.5	0	0
Unknown-income	4	0.3	4	0.4	0	0	0	0
Total Assessment Area	1,149	100.0	1,075	100.0	74	100.0	0	.0
	Percentage of Total Farms:			93.6		6.4		.0

Conclusions With Respect to Performance Tests

Lending Test

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

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, as its volume is more significant than its HMDA lending. During the review period, the bank reported 527 (89.3%) small business loans compared to 63 (10.7%) HMDA loans in the Phoenix assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

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

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

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, small business lending received the most weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is good. The assessment area is saturated with large national banks; therefore, competition for business loans is high in the market, which is experiencing economic growth and increased loan demand.

In 2016, the bank originated 30.8% of its loans, representing 14.3% by dollar volume, to businesses with gross annual revenue of \$1 million or less. This lags behind aggregate CRA lenders, which originated 41.4% (29.2% by dollar) to small businesses during the same period. In 2017, the bank again fell below aggregate CRA lenders by originating 31.3% of loans (18.9% by dollar) to small business while aggregate lenders originated 50.4% (33.1% by dollar) to businesses with gross revenue under \$1 million. Comerica's lending also fell

below D&B demographic data, which reports 91.5% and 90.7% of all businesses in the assessment area with gross annual revenues of \$1 million during the review period.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a majority of the bank's small business loans were made in loan amounts of \$100,000 or less. In 2016, 52.3% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 95.9% for the aggregate. In 2017, 54.6% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 94.7% for the aggregate. However, it should be noted that the bank's competition consists primarily of large multi-regional or nationwide banks.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers is good. In 2016, the bank originated 12.5% (4.1% by dollar volume) of its total HMDA loans to low-income borrowers, which was greater than the 4.1% (2.0% by dollar) of total HMDA loans originated by the aggregate to low-income borrowers. In 2017, the bank's originations to low-income borrowers fell to 5.9% (0.7% by dollar), but remained similar to aggregate lending to low-income borrowers, which represented 5.1% of total HMDA loans and 2.5% of the total dollar volume. Low-income families made up 21.0% of total families in the assessment area in 2016 and 21.9% in 2017, meaning that both the bank and aggregate lending are below demographics.

The bank's HMDA lending to moderate-income borrowers is adequate. In 2016, the bank originated 20.8% (7.9% by dollar volume) of its total HMDA-related loans to moderate-income borrowers, which was greater than the 13.3% of HMDA-related loans (8.5% by dollar) originated by the aggregate HMDA lenders. In 2017, the bank was below aggregate, originating 5.9% of HMDA-related loans (0.6% by dollar volume) to moderate-income borrowers as compared with the aggregate lenders' 14.7% of HMDA loans (9.5% by dollar) to moderate-income borrowers. Both the bank and the aggregate HMDA lenders fell below the demographics, with 17.5% and 16.8% of families in 2016 and 2017 (respectively) in the assessment area classified as moderate-income according to available data.

Home Equity Lines of Credit

HELOC lending by borrower income in the assessment area is considered adequate when compared to the demographic characteristics of the assessment area.

HELOC lending to low-income borrowers is adequate. In 2015 and 2016, Comerica originated 4.8% of its HELOCs to low-income borrowers. The bank's performance was significantly below the percentage of low-income families in the assessment area, at

21.0%. However, 37.3% of low-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 7.4% of its HELOCs to low-income borrowers. The bank's performance was significantly below the percentage of low-income families in the assessment area, at 21.9%. However, 42.7% of low-income families live below the poverty level, which might make it difficult to qualify for a HELOC. Additionally, it should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

HELOC lending to moderate-income borrowers is adequate. In 2015 and 2016, Comerica originated 12.1% of its HELOCs to moderate-income borrowers. The bank's performance was below the percentage of moderate-income families in the assessment area, at 17.5%. However, 17.1% of moderate-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 14.9% of its HELOCs to moderate-income borrowers. The bank's performance was slightly below the percentage of moderate-income families in the assessment area, at 16.8%. However, 21.0% of moderate-income families live below the poverty level, which might make it difficult to qualify for a HELOC.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects adequate penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects good penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts is excellent. The bank's small business lending by number in low-income tracts during the review period exceeded the percentage of small businesses located in these tracts as well as aggregate lending. In 2016, 16.3% of small business loans (22.4% by dollar) were originated in low-income tracts, compared to 6.1% of businesses located in those tracts and 6.5% of aggregate loans (11.8% by dollar). In 2017, 9.2% of small business loans (9.8% by dollar) were originated in low-income tracts, compared to 6.4% of businesses located in those tracts and 7.3% of aggregate loans (10.8% by dollar).

Phoenix

The bank's small business lending in moderate-income census tracts is adequate. In 2016, 12.2% of small business loans (12.9% by dollar) were originated in moderate-income tracts, compared to 15.6% of businesses located in those tracts and 14.5% of aggregate loans (16.3% by dollar). In 2017, the bank's performance improved, as 15.3% of small business loans (14.6% by dollar) were originated in moderate-income tracts, compared to 16.3% of businesses located in those tracts and 16.8% of aggregate loans (19.6% by dollar).

The bank's small business lending in middle-income tracts was higher than the percentage of small businesses in these tracts in 2017, and slightly lower than the percentage of small businesses in these tracts in 2015 and 2016; the bank originated more loans in those tracts than aggregate lenders. The bank's small business lending in upper-income tracts was slightly lower than the percentage of small businesses in these tracts, and the bank originated fewer loans in those tracts than aggregate lenders.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects a poor penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank makes very few home improvement and multifamily loans, these were not significant product lines and were not analyzed separately.

Home Purchase Lending

Home purchase lending in low-income census tracts is poor. The bank originated no home purchase loans in these tracts during the review period. While aggregate lending overall was somewhat low, lenders were able to originate loans in these tract types. In 2016, aggregate lenders originated 2.3% of home purchase loans (1.5% by dollar) in low-income census tracts; in 2017, aggregate lenders originated 4.4% of loans (2.7% by dollar) in low-income census tracts. Additionally, in 2016 and 2017, 3.7% and 4.7% of owner-occupied units in the assessment area, respectively, were located in low-income tracts.

Home purchase lending in moderate-income tracts is adequate. In 2016, the bank originated 20.0% of its home purchase loans in moderate-income census tracts (6.2% by dollar); in 2017, Comerica originated no loans. Aggregate lenders originated 16.4% of home purchase loans each year (11.0% and 11.6% by dollar in 2016 and 2017, respectively). Additionally, in 2016 and 2017, 21.3% and 18.9% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts. Although it appears that the bank exceeded the aggregate in 2016, the bank only originated two loans in a moderate-income tract.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. While the bank originated no home refinance loans in these tracts during the review period, aggregate lenders also struggled to originate loans in 2016 before slightly improving performance in 2017. In 2016, aggregate lenders originated only 1.3% of loans in low-income areas; in 2017, aggregate lenders originated 3.1% of loans in low-income areas. Additionally, in 2016 and 2017, 3.7% and 4.7% of owner-occupied units in the assessment area, respectively, were located in low-income tracts.

Home refinance lending in moderate-income tracts is poor. Bank performance was below both the percentage of owner-occupied units (21.3% in 2016 and 18.9% in 2017) as well as aggregate lending levels. In both 2016 and 2017, Comerica originated only one home refinance loan in a moderate-income census tract, representing 7.1% and 8.3% by number and 1.2% and 0.7% by dollar, respectively. In contrast, aggregate lenders originated 11.7% of refinance loans in moderate-income tracts in 2016 and 14.8% in 2017.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Equity Lines of Credit

Considering the percentage of owner-occupied units, the geographic distribution of Comerica's HELOC lending is adequate.

Comerica's HELOC lending in low-income census tracts is adequate. In 2015 and 2016, the bank originated 1.1% of its HELOCs in low-income tracts. This performance was comparable to the percentage of owner-occupied units in these tracts, at 3.7%. In 2017, the bank originated 2.7% of its HELOCs in low-income tracts, which was comparable to the percentage of owner-occupied units in these tracts, at 4.7%.

Comerica's HELOC lending in moderate-income census tracts is poor. In 2015 and 2016, the bank originated 9.9% of its HELOCs in moderate-income tracts. This performance was below the percentage of owner-occupied units in these tracts, at 21.3%. In 2017, the bank originated 10.8% of its HELOCs in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts, at 18.9%.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Community Development Lending

The bank makes an adequate level of community development loans in the assessment area given its low deposit and lending market shares. The amount of community development loans totaled \$8.6 million. The bank's commitment to making qualified community development loans demonstrates an adequate responsiveness to meeting community needs.

The table below provides a breakdown of the types of community development loans the bank originated during the review period. All community development loans were for the purpose of community services directed to assist LMI individuals.

Community Development Lending		
Purpose	#	\$000s
Community Services	7	8,633
Totals	7	8,633

A large portion of the loans (\$3.6 million) was to Take Charge America, a nonprofit that provides credit counseling, housing counseling, and financial education to help address financial hardships. Another \$1.1 million loan financed low-cost healthcare to underserved, LMI areas in central Phoenix.

Further, Comerica provided \$58,746 in consortia loans through Community or Economic Development Corporations in the assessment area. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts.

Investment Test

The Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants and exhibits good responsiveness to credit and community development needs. The bank's investments were primarily focused on affordable housing.

The total amount of investments and contributions, at \$17.4 million, has increased 81.3% from the previous evaluation.

Phoenix

Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Affordable Housing	28	11,277	3	5,493	4	19	35	16,789
Community Services	-	-	-	-	61	464	61	464
Economic Development	-	-	-	-	7	120	7	120
Total	28	11,277	3	5,493	72	603	103	17,373

One way the bank demonstrated its responsiveness to needs in the assessment area was through its grants to ACCION. Comerica provided approximately \$120,000 in grants to this nonprofit organization, which is dedicated to providing the tools entrepreneurs need to operate, grow, or start their businesses. Technical assistance of this type was mentioned as a need by a contact in the assessment area.

In addition, seven investments benefitting multiple assessment areas provided \$10.8 million to affordable housing efforts in Phoenix.

Service Test

The bank's Service Test performance is Low Satisfactory. Its retail and community development services reflect adequate responsiveness to the needs of the Phoenix assessment area. Delivery systems are reasonably accessible to all portions of the assessment area. The bank's branch hours are reasonable and services do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. The bank provides a relatively high level of community development services. Bank officers and employees actively support organizations dedicated to community development initiatives.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 17 branch offices and 21 ATMs as of December 31, 2017, was compared to the distribution of households and businesses among the tract categories within the assessment area. While no branches are located in low- or moderate-income tracts, 11 are in close proximity and can reasonably serve these tracts. The table below summarizes the bank's retail locations in the Phoenix assessment area.

Phoenix

Tract Income	% of Geographies	% of Population	Branches		Full Service ATMs		Cash Only ATMS	
			#	%	#	%	#	%
Low	11.7	11.3	-	-	-	-	-	-
Moderate	22.6	23.0	-	-	-	-	-	-
Middle	31.2	31.2	9	52.9	9	42.9	-	-
Upper	33.5	34.3	8	47.1	12	57.1	-	-
Unknown	1.0	0.2	-	-	-	-	-	-
Total	100.0	100.0	17	100.0	21	100.0	-	-

The bank opened one branch (in an upper-income census tract) and closed two branches (both in upper-income census tracts) in the assessment area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are essentially the same throughout the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in many various capacities, including boards of directors and in other leadership roles, for 18 community development financial organizations offering community development services that focused on community services targeting LMI individuals. The table below shows the number of events by type of involvement. Employees participated in 631 events or meetings during the review period.

Purpose	# Events / Meetings
Community Services Benefitting LMI Individuals/Geographies	631
Total	631

The bank actively supports LMI students in the area through involvement in Boys and Girls Clubs as well as Arizona Council on Economic Education, an organization dedicated to improving economic and personal financial literacy in Arizona. Bank personnel also serve extensively with Trellis, which promotes homeownership counseling, financial access, and neighborhood development.

State of California

CRA Rating for California: Satisfactory

The Lending Test is Rated: Low Satisfactory

The Investment Test is Rated: High Satisfactory

The Service Test is Rated: Low Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects adequate responsiveness to the assessment areas' credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of HMDA lending reflects poor penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Makes an adequate level of community development loans.
- Has an excellent level of qualified community development investments.
- Exhibits adequate responsiveness to credit and community development needs.
- Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- Provides a relatively high level of community development services.

Scope

The assessment areas were selected for full-scope reviews based on factors identified in the FFIEC procedures. These include, but are not limited to, the level of the institution's lending, investment, and service activity as well as opportunities for such in the assessment areas; population density; the number of other institutions in the assessment areas; and the length of time since the most recent full-scope review. Additionally, examiner knowledge of the assessment areas was considered when determining the full-scope assessment areas;

Los Angeles County and Santa Cruz County had the highest and second-highest poverty rates in the state when cost of living was taken into account.⁴

Overall, approximately 46.2% of lending activity (by number of loans), 40.5% of the total deposits, and 45.4% of total branches within California were evaluated through the full-scope reviews. Descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Greater Los Angeles
- Santa Cruz

In addition, limited scope reviews were conducted for the remaining eight assessment areas, including:

- Fresno MSA
- Inland Empire
- Sacramento
- Salinas
- San Diego
- San Francisco Bay
- San Jose
- Ventura

The time period, products, and affiliates evaluated for this state are consistent with the scope discussed in the Institution section of this report. The bank's performance in the Greater Los Angeles assessment area was given greater consideration due to the level of lending, branching, and deposit activity.

Description of Institution's Operations in California

The bank operates 97 branch offices in its assessment areas in California, representing 22.1% of total branches. As of June 30, 2017, the bank had \$17.7 billion in deposits in the state, representing 30.8% of total deposits. According to the June 30, 2017, FDIC Summary of Deposits, the bank had a deposit market share of 1.3% and ranked 14th out of 217 FDIC-insured financial institutions across the state. Of the 3,257 HMDA loans originated and purchased by the bank, 416 (16.0%) were in the California assessment areas. Of the 28,214 small business loans originated and purchased by the bank, 5,433 (19.3%) were in the California assessment areas.

⁴ KION 5/46 News Channel. "Study says Santa Cruz County has second highest poverty rate in the state." KION546.com.
<https://www.kion546.com/news/study-says-santa-cruz-county-has-second-highest-poverty-rate-in-the-state/775692263>

Conclusions with Respect to Performance Tests in California

Lending Test

In California, the bank's overall Lending Test rating is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of lending to borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

The bank is both a small business and HMDA lender. During the review period, the bank reported 5,433 (92.9%) small business loans compared to 416 (7.1%) HMDA loans in the state. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in California.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices G, H, and I.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

Consistent with the performance standards for a large bank, conclusions about the bank's distribution of lending within its assessment areas consider the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home mortgage loans and consumer loans to low-, moderate-, middle-, and upper-income individuals; small-business loans to businesses with gross annual revenues of \$1 million or less; and, small-business loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. Of the two full-scope assessment areas, both are considered adequate. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

The geographic distribution of loans reflects adequate penetration throughout the assessment areas. Of the two full-scope assessment areas, both are considered adequate. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Lending

In California, the bank makes an adequate level of community development loans. During the review period, the bank originated 140 community development loans for \$364.1 million in California representing 34.9% of the bank's total community development loans by number and 30.7% by total dollar amount. Of the two full-scope assessment areas, Greater Los Angeles' performance exceeded that of Santa Cruz, as a low level of community development loans were originated within the Santa Cruz assessment area. Greater Los Angeles had the greatest impact in terms of community development lending.

The community development loans originated during the evaluation period were for a variety of purposes. The table below summarizes the bank's community development lending.

Community Development Lending		
Purpose	Number	\$('000s)
Affordable Housing	44	65,098
Community Services Benefitting LMI Individuals	60	151,294
Economic Development	32	103,155
Revitalize and Stabilize	4	44,575
Total	140	364,122

Further, Comerica provided \$554,814 in consortia loans through Community or Economic Development Corporations in the state. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts.

Investment Test

In California, the bank's overall Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants and exhibits adequate responsiveness to credit and community development needs. The table below summarizes the bank's community development investments and grants by assessment area within the state. Specific details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Assessment Area	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Full Review:								
Greater Los Angeles	9	6,051	7	5,842	369	2,791	385	14,684
Santa Cruz	-	-	1	4,261	33	221	34	4,482
Limited Review:								
Fresno MSA	2	274	2	1,742	21	201	25	2,217
Inland Empire	14	1,943	-	-	31	164	45	2,107
Sacramento	6	964	-	-	27	312	33	1,276
Salinas	3	586	1	126	22	57	26	769
San Diego	4	590	2	2,764	87	413	93	3,767
San Francisco Bay	2	9,979	4	6,548	238	2,551	244	19,078
San Jose	3	10,182	-	-	84	414	87	10,596
Ventura	4	510	-	-	28	125	32	635
Total	47	31,079	17	21,283	940	7,249	1,004	59,611

In addition, a total of two investments benefited the statewide area, which included the bank's assessment areas, and 48 benefited multiple assessment areas which included those in California. These investments totaled \$5,433 and \$128.7 million, respectively.

Furthermore, a total of nine donations benefited the statewide area, which included the bank's assessment areas. These donations totaled \$15,000.

Service Test

In California, the bank's overall Service Test rating is Low Satisfactory.

Retail Services

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

While delivery systems are reasonably accessible to the bank's assessment areas overall, two limited-scope assessment areas were deemed to have branches that were

unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in its AAs. The ratings of both Inland Empire as well as Ventura were lowered to reflect this inaccessibility to all populations.

Community Development Services

Overall, the bank provides a relatively high level of community development services. In both full-scope assessment areas, Comerica provided a relatively high level of community development services. Staff provided community development services to approximately 118 organizations and participated in more than 1,600 events. Particularly noteworthy is the bank's participation in financial literacy initiatives. The bank participated in the following financial literacy initiatives throughout the state:

- Operation Hope - Comerica's California Market provides funding and volunteers for the Operation Hope program, specifically for schools with LMI children. During the review period, Comerica sponsored numerous schools.
- Junior Achievement - During the review period, Comerica sponsored and provided financial education to several schools across the state.

An analysis of the community development services delivered in each assessment area is provided in the following pages.

Greater Los Angeles

METROPOLITAN AREAS (Full Scope Review)

Description of Operations in Greater Los Angeles

The Greater Los Angeles Assessment Area includes Orange County and portions of Los Angeles County. These two counties make up the Los Angeles-Long Beach-Anaheim MSA.

According to the 2010 census, the assessment area population was 12,828,837, which accounts for 34.4% of the population in the state. Based on the 2017 population of 13,353,907, the assessment area has experienced an increase of 4.1% since 2010. Los Angeles, the largest city within the assessment area, accounts for 30.0% of the population in the assessment area. Other notable cities in the assessment area are Long Beach, Glendale, Santa Ana, Anaheim, and Irvine.

County	2017 Population Estimate	% Increase Since 2010	Major Municipalities
Los Angeles	10,163,507	3.5	Los Angeles*, Long Beach, Glendale
Orange	3,190,400	6.0	Santa Ana*, Anaheim, Irvine

*Denotes county seat

As of December 31, 2017, the bank operated 38 branches in the assessment area representing 8.7% of its branches. There is one branch located in a low-income census tract, six branches in moderate-income census tracts, four in middle-income census tracts, and 24 branches in upper-income census tracts. Additionally, there are three branches in unknown-income tracts.

According to the FDIC, as of June 30, 2017, the bank had \$6.3 billion in deposits in this assessment area representing 10.9% of the bank's total deposits. It also represents a deposit market share of 1.2%, which includes all other FDIC-insured deposits that are located in the assessment area. Bank of America holds the largest deposit share at 18.6%, followed by Wells Fargo Bank, at 15.2%, and JPMorgan Chase Bank, at 12.0%.

For 2016, there were 932 financial institutions that reported HMDA data in the assessment area. The bank ranked 265th in HMDA market share with less than 0.1%. Wells Fargo Bank and JPMorgan Chase Bank dominated the market with 9.7% and 6.4% of the market share, respectively. For 2017, there were 866 financial institutions that reported HMDA data in the assessment area. The bank ranked 258th in HMDA market share with less than 0.1%. Once again, Wells Fargo Bank and JPMorgan Chase Bank dominated the market with 9.6% and 6.6% of the market share, respectively. Many of the

Greater Los Angeles

bank's competitors are statewide, multi-regional, and national banks, and it appears competition could have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding mortgage lending. However, this is not a major product for Comerica.

For 2016, there were 221 financial institutions that reported CRA small business data in the assessment area. The bank ranked 35th in market share with 0.1%. Citibank and American Express Bank dominated the market with 27.0% and 21.0% of the market share, respectively. For 2017, there were 245 financial institutions that reported CRA small business data in the assessment area. The bank ranked 36th in market share with 0.2%. American Express Bank and Chase Bank USA dominated the market with 23.8% and 14.3% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Los Angeles-Long Beach-Anaheim MSA as a whole, but not the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 94.9% of the total MSA population, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to census data.

At the 2010 census, the Greater Los Angeles assessment area was made up of 2,775 distinct census tracts. Of the total tracts, 239 (8.6%) were designated as low-income, 798 (28.8%) were designated moderate-income, 784 (28.3%) were middle-income, 921 (33.2%) were upper-income, and 33 (1.2%) were designated as having an unknown-income level. As of the 2015 census estimates, 257 (9.3%) were designated as low-income, 792 (28.5%) were designated moderate-income, 720 (25.9%) were middle-income, 960 (34.6%) were upper-income, and 46 (1.7%) were designated as having an unknown-income level.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; HUD; D&B; and the Texas Workforce Commission.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses both U.S. census 2010 data and 2015 estimated data. The following chart reflects the estimated median family income for the years 2010 and 2015 for the Los Angeles-Long Beach-Anaheim MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 census, 11.3% of the families

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in the assessment area lived below the poverty level. According to the 2015 census estimates, 13.0% of the families in the assessment area lived below the poverty level.

Income Level	2010	2015
Median Income	\$65,791	\$67,513
Low-income	< \$32,896	< \$33,757
Moderate-income	\$32,896 - \$52,632	\$33,757 - \$54,010
Middle-income	\$52,633 - \$78,949	\$54,011 - \$81,015
Upper-income	≥ \$78,950	≥ \$81,016

Housing Characteristics

2010 Census

According to 2010 census data, there were 4,257,906 housing units in the Greater Los Angeles Assessment Area. Of total housing in the assessment area, 47.3% of the units were classified as owner-occupied while 46.8% were classified as rental units and 5.8% of the available housing was vacant. Overall, 7.2% of the housing stock in the assessment area was in low-income tracts. In these census tracts, 16.3% of the housing units were owner-occupied, 76.0% were rental units, and 7.7% were vacant.

The median age of housing stock in these tracts was 52 years and the median housing value in low-income tracts for the assessment area in 2010 was \$362,964. Mortgage payments on homes in these areas might not be considered affordable for a low-income family. The median gross monthly rental payment in low-income tracts in 2010 was \$898, which is more affordable than the monthly mortgage payment of \$1,328 for a \$362,964 home for 30 years at 3.65% interest rate. Additionally, 33.6% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts accounted for 26.6% of the housing stock in the assessment area. In these census tracts, 31.3% of the housing units were owner-occupied, 62.7% were rental units, and 6.1% were vacant. The median age of housing stock in these tracts was 49 years and the median housing value in moderate-income tracts for the assessment area in 2010 was \$401,566. Mortgage payments on homes in these areas might not be considered affordable for a moderate-income family. The median gross monthly rental payment in moderate-income tracts in 2010 was \$1,048, which is more affordable than the monthly mortgage payment of \$1,470 for a \$401,566 home for 30 years at 3.65% interest rate. Additionally, 18.6% of families in moderate-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 28.7%, was in middle-income tracts. In these census tracts, 49.8% of the housing units were owner-occupied, 45.0% were rental units, and 5.2% were vacant. The median age of housing stock in these tracts was 47 years and 8.5% of families in middle-income tracts had incomes

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below the poverty level. The median housing value in middle-income tracts for the assessment area in 2010 was \$473,297.

The majority of the housing stock in the assessment area, at 37.5%, was in upper-income tracts. In these census tracts, 62.8% of the housing units were owner-occupied, 31.4% were rental units, and 5.8% were vacant. The median age of housing stock in these tracts was 44 years and only 3.7% of families in upper-income tracts had incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2010 was \$691,000.

2015 Census Estimates

According to 2015 census estimates, there are 4,322,426 housing units in the Greater Los Angeles Assessment Area. Of total housing in the assessment area, 45.1% of the units are classified as owner-occupied while 49.0% are classified as rental units and 5.9% of the available housing is vacant. Overall, 7.6% of the housing stock in the assessment area is in low-income tracts. In these census tracts, 16.3% of the housing units are owner-occupied, 77.7% are rental units, and 6.1% are vacant.

The median age of housing stock in these tracts is 60 years and the median housing value in low-income tracts for the assessment area in 2015 was \$300,953. Mortgage payments on homes in these areas might not be considered affordable for a low-income family. The median gross monthly rental payment in low-income tracts in 2015 was \$993, which is more affordable than the monthly mortgage payment of \$1,148 for a \$300,953 home for 30 years at 3.99% interest rate. Additionally, 35.1% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts account for 26.0% of the housing stock in the assessment area. In these census tracts, 30.5% of the housing units are owner-occupied, 63.9% are rental units, and 5.5% are vacant. The median age of housing stock in these tracts is 58 years and the median housing value in moderate-income tracts for the assessment area in 2015 was \$337,198. Mortgage payments on homes in these areas might not be considered affordable for a moderate-income family. The median gross monthly rental payment in moderate-income tracts in 2015 was \$1,147, which is more affordable than the monthly mortgage payment of \$1,286 for a \$337,198 home for 30 years at 3.99% interest rate. Additionally, 21.3% of families in moderate-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 26.2%, is in middle-income tracts. In these census tracts, 47.6% of the housing units are owner-occupied, 47.0% are rental units, and 5.3% are vacant. The median age of housing stock in these tracts is 56 years and 10.3% of families in middle-income tracts have incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2015 was \$402,304.

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Approximately 39.8% of the housing stock in the assessment area is in upper-income tracts. In these census tracts, 58.9% of the housing units are owner-occupied, 34.8% are rental units, and 6.3% are vacant. The median age of housing stock in these tracts is 53 years and only 4.5% of families in upper-income tracts have incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2015 was \$648,508.

Employment and Economic Conditions

The national average unemployment rates for 2015, 2016, and 2017 were 5.3%, 4.9%, and 4.4%, respectively. Unemployment rates for the Los Angeles County were similar to those of the MSA, California, and the nation. Orange County's unemployment rates were lower than the annual unemployment rates for the MSA, California, and the nation. According to the 2010 census, the unemployment rate was 11.2% in low-income tracts and 10.0% in moderate-income tracts. At the time of 2015 census estimates, the unemployment rates had increased to 12.3% and 11.2% in low- and moderate-income tracts, respectively. The high unemployment rates in LMI tracts could affect loan demand from these tracts.

The following chart shows unemployment rates relevant to the assessment area for 2015 through 2017.

Annual Average Unemployment Rate			
AREA	2015	2016	2017
Los Angeles County	6.6%	5.3%	4.7%
Orange County	4.5%	4.0%	3.5%
MSA	6.1%	5.0%	4.4%
State of California	6.2%	5.5%	4.8%
United States	5.3%	4.9%	4.4%

The Los Angeles-Long Beach-Anaheim MSA is one of the population centers of California; 34.2% of the state's population resides within the MSA, and Los Angeles County and Orange County are the 1st and 3rd most populous counties in the state, respectively. Further, Los Angeles County is the most populous in the U.S. The MSA had a real gross domestic product of \$1.0 trillion in 2017, making it the 2nd largest metropolitan economy in the U.S.⁵ and similar to the economic output of countries such as Indonesia⁶. The city of Los Angeles is the 3rd largest city by GDP in the world.

⁵ U.S. Bureau of Economic Analysis. "Gross Domestic Product by Metropolitan Area, 2017." BEA.gov. https://www.bea.gov/system/files/2018-09/gdp_metro0918_0.pdf (accessed October 10, 2018)

⁶ Country Economy. "GDP: Gross Domestic Product." CountryEconomy.com <https://countryeconomy.com/gdp> (accessed October 10, 2018)

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The MSA is also home to several Fortune 500 companies, including real estate services firm CBRE Group Inc., Reliance Steel & Aluminum Co., and engineering firm AECOM.⁷ Other notable companies headquartered in the area include American Apparel, 20th Century Fox, Univision, and Paramount Pictures. The economy of the metro area is famously based on the entertainment industry. The Port of Los Angeles is the largest seaport in the Western Hemisphere; about 40% of all containerized goods entering the U.S. pass through Los Angeles. Los Angeles County is the largest manufacturing center in the country, with more manufacturing jobs than the State of Michigan.⁸

Community Contacts and Community Development Opportunities

As part of the evaluation of the Greater Los Angeles assessment area, two community contacts involved in small business development and community services were made. The two contacts highlighted needs for small dollar loans for small business startups, grants for community programs, financial literacy, and affordable housing, specifically down payment assistance and closing cost assistance.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

⁷ Fortune. "Fortune 500: Who made the list?" Fortune.com
<http://fortune.com/fortune500/list/> (accessed October 12, 2018)

⁸ Los Angeles Economic and Workforce Development Department. "L.A.'s Economy and Key Assets." EWDDLACity.com.
<http://ewddlacity.com/index.php/the-l-a-economy> (accessed October 10, 2018)

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Combined Demographics Report

Assessment Area: CA - Greater Los Angeles

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	239	8.6	188,796	6.9	63,438	33.6	648,827	23.8
Moderate-income	798	28.8	757,160	27.8	140,520	18.6	456,655	16.8
Middle-income	784	28.3	793,078	29.1	67,404	8.5	493,022	18.1
Upper-income	921	33.2	981,717	36.1	36,382	3.7	1,122,329	41.2
Unknown-income	33	1.2	82	0	0	0	0	0
Total Assessment Area	2,775	100.0	2,720,833	100.0	307,744	11.3	2,720,83	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	304,770	49,780	2.5	16.3	231,481	76	23,509	7.7
Moderate-income	1,132,703	354,309	17.6	31.3	709,831	62.7	68,563	6.1
Middle-income	1,221,441	608,605	30.2	49.8	549,109	45	63,727	5.2
Upper-income	1,596,783	1,002,712	49.7	62.8	501,359	31.4	92,712	5.8
Unknown-income	2,209	115	0	5.2	1,830	82.8	264	12
Total Assessment Area	4,257,906	2,015,521	100.0	47.3	1,993,610	46.8	248,775	5.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	36,239	6	31,505	5.7	4,615	8.3	119	4.5
Moderate-income	125,152	20.6	111,842	20.4	12,867	23.2	443	16.7
Middle-income	169,289	27.9	151,664	27.7	16,936	30.5	689	26
Upper-income	269,037	44.4	248,497	45.3	19,203	34.6	1,337	50.4
Unknown-income	6,872	1.1	4,882	0.9	1,927	3.5	63	2.4
Total Assessment Area	606,589	100.0	548,390	100.0	55,548	100.0	2,651	100.0
	Percentage of Total Businesses:			90.4		9.2		.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	61	3.7	57	3.7	4	5.1	0	0
Moderate-income	231	14.1	218	14	13	16.7	0	0
Middle-income	398	24.4	374	24.1	24	30.8	0	0
Upper-income	929	56.9	892	57.4	36	46.2	1	100
Unknown-income	15	0.9	14	0.9	1	1.3	0	0
Total Assessment Area	1,634	100.0	1,555	100.0	78	100.0	1	100.0
	Percentage of Total Farms:			95.2		4.8		.1

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Combined Demographics Report

Assessment Area: CA - Greater Los Angeles

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	257	9.3	215,097	7.8	75,605	35.1	678,977	24.6
Moderate-income	792	28.5	753,178	27.3	160,387	21.3	451,769	16.4
Middle-income	720	25.9	734,875	26.6	75,971	10.3	469,773	17
Upper-income	960	34.6	1,051,937	38.1	47,378	4.5	1,157,762	42
Unknown-income	46	1.7	3,194	0.1	605	18.9	0	0
Total Assessment Area	2,775	100.0	2,758,281	100.0	359,946	13.0	2,758,28	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	327,904	53,390	2.7	16.3	254,632	77.7	19,882	6.1
Moderate-income	1,122,042	342,640	17.6	30.5	717,233	63.9	62,169	5.5
Middle-income	1,131,161	538,963	27.6	47.6	532,134	47	60,064	5.3
Upper-income	1,722,181	1,013,949	52	58.9	599,432	34.8	108,800	6.3
Unknown-income	19,138	1,398	0.1	7.3	15,572	81.4	2,168	11.3
Total Assessment Area	4,322,426	1,950,340	100.0	45.1	2,119,003	49.0	253,083	5.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	27,373	5	23,814	4.9	3,452	6.2	107	4.5
Moderate-income	107,952	19.8	95,157	19.5	12,428	22.5	367	15.3
Middle-income	140,948	25.9	124,089	25.5	16,297	29.5	562	23.4
Upper-income	258,849	47.5	236,905	48.6	20,671	37.4	1,273	53.1
Unknown-income	9,761	1.8	7,263	1.5	2,409	4.4	89	3.7
Total Assessment Area	544,883	100.0	487,228	100.0	55,257	100.0	2,398	100.0
	Percentage of Total Businesses:			89.4		10.1		.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	25	1.7	24	1.7	1	1.3	0	0
Moderate-income	226	15.1	207	14.5	19	25	0	0
Middle-income	358	23.9	337	23.7	21	27.6	0	0
Upper-income	875	58.3	840	59	34	44.7	1	100
Unknown-income	16	1.1	15	1.1	1	1.3	0	0
Total Assessment Area	1,500	100.0	1,423	100.0	76	100.0	1	100.0
	Percentage of Total Farms:			94.9		5.1		.1

Conclusions With Respect to Performance Tests

Lending Test

The bank's lending performance is Low Satisfactory. Lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. In addition, the distribution of lending to borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, as its volume is more significant than its HMDA lending. During the review period, the bank reported 2,144 (91.4%) small business loans compared to 203 (8.6%) HMDA loans in the Greater Los Angeles assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

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

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

The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, small business lending received the most weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The assessment area is saturated with large national banks; therefore, competition for business loans is high in the market, which is experiencing economic growth and increased loan demand.

In 2016, the bank originated 18.5% of its loans, representing 10.4% by dollar volume, to businesses with gross annual revenue of \$1 million or less. This lags behind aggregate CRA lenders, which originated 44.3% (30.5% by dollar) to small businesses during the same period. In 2017, the bank again fell below aggregate CRA lenders by originating 17.4% of loans (11.5% by dollar) to small business while aggregate lenders originated 53.1% (33.7%)

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to businesses with gross revenue under \$1 million. Comerica's lending also fell below D&B demographic data, which reported 90.4% and 89.4% of all businesses in the assessment area with gross annual revenues of \$1 million during the review period.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a large percentage of the bank's small business loans were made in loan amounts of \$100,000 or less. In 2016, 47.9% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 96.4% for the aggregate. In 2017, 44.1% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 95.8% for the aggregate. However, it should be noted that the bank's competition consists primarily of large multi-regional or nationwide banks.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered poor when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers is adequate. In 2016, the bank originated one loan to a low-income borrower, representing 1.4% of its home mortgage loans (0.1% by dollar). However, aggregate lenders also struggled to originate loans to low-income borrowers, which represented only 1.6% (0.7% by dollar) of total mortgage loans. In 2017, the bank originated no loans to low-income borrowers. However, once again, aggregate lending levels were minimal; only 2.2% of loans (0.8% by dollar volume) were originated to low-income borrowers, which may indicate limited loan demand. Low-income families made up 23.8% of total families in the assessment area in 2016 and 24.6% in 2017, meaning that both the bank and aggregate lending are below demographics.

The bank's HMDA lending to moderate-income borrowers is poor. Comerica originated no loans to moderate-income borrowers in either 2016 or 2017. In contrast, aggregate lenders originated 5.8% of home mortgage loans to moderate-income borrowers (2.6% by dollar) in 2016. In 2017, aggregate lenders originated 6.3% of loans (2.3% by dollar) to moderate-income borrowers. Both the bank and the aggregate HMDA lenders fell below the demographics, with 16.8% and 16.4% of families in 2016 and 2017 (respectively) in the assessment area classified as moderate-income according to available data.

Home Equity Lines of Credit

HELOC lending by borrower income in the assessment area is considered adequate when compared to the demographic characteristics of the assessment area.

HELOC lending to low-income borrowers is adequate. In 2015 and 2016, Comerica originated 1.7% of its HELOCs to low-income borrowers. The bank's performance was significantly below the percentage of low-income families in the assessment area, at

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23.8%. However, 33.6% of low-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 1.1% of its HELOCs to low-income borrowers. The bank's performance was significantly below the percentage of low-income families in the assessment area, at 24.6%. However, 35.1% of low-income families live below the poverty level, which might make it difficult to qualify for a HELOC. Additionally, it should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

HELOC lending to moderate-income borrowers is adequate. In 2015 and 2016, Comerica originated 2.7% of its HELOCs to moderate-income borrowers. The bank's performance was below the percentage of moderate-income families in the assessment area, at 16.8%. However, 18.6% of moderate-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 2.6% of its HELOCs to moderate-income borrowers. The bank's performance was below the percentage of moderate-income families in the assessment area, at 16.4%. However, 21.3% of moderate-income families live below the poverty level, which might make it difficult to qualify for a HELOC.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects adequate penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects good penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts is good. The bank's small business lending by number in low-income tracts during the review period was comparable to or exceeded the percentage of small businesses located in these tracts as well as aggregate lending. In 2016, 6.8% of small business loans (8.2% by dollar) were originated in low-income tracts, compared to 5.7% of businesses located in those tracts and 5.2% of aggregate loans (7.0% by dollar). In 2017, 4.6% of small business loans (4.6% by dollar) were originated in low-income tracts, compared to 4.9% of businesses located in those tracts and 4.7% of aggregate loans (5.2% by dollar).

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The bank's small business lending in moderate-income census tracts is adequate. In 2016, 20.7% of small business loans (21.2% by dollar) were originated in moderate-income tracts, compared to 20.4% of businesses located in those tracts and 18.8% of aggregate loans (20.4% by dollar). In 2017, 18.7% of small business loans (22.2% by dollar) were originated in moderate-income tracts, compared to 19.5% of businesses located in those tracts and 19.6% of aggregate loans (20.2% by dollar).

The bank's small business lending in middle- and upper-income tracts was comparable to the percentage of small businesses in these tracts. When compared to the aggregate by percentage, the bank originated a similar number of loans in middle- and upper-income tracts as the aggregate.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects a poor penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank makes very few home improvement and multifamily loans, these were not significant product lines and were not analyzed separately.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. While the bank originated no home purchase loans in these tracts during the review period, aggregate lenders struggled to lend as well. In 2016, aggregate lenders originated 2.7% of home purchase loans (1.9% by dollar) in low-income census tracts; in 2017, aggregate lenders originated 3.3% of loans (2.7% by dollar) in low-income census tracts. Additionally, in 2016 and 2017, only 2.5% and 2.7% of owner-occupied units in the assessment area, respectively, were located in low-income tracts, which may indicate limited lending opportunities.

Home purchase lending in moderate-income tracts is poor. In 2016, the bank originated 14.3% of its home purchase loans in moderate-income census tracts (10.6% by dollar), compared to aggregate lending levels of 18.8% (13.1% by dollar); 17.6% of units were owner-occupied. In 2017, Comerica originated only 3.7% of home purchase loans (0.4% by dollar) in moderate-income census tracts, compared to aggregate lending levels of 18.5% (13.2% by dollar); 17.6% of units were owner-occupied.

Additionally, lending within middle- and upper-income tracts is skewed to the detriment of middle-income lending. In 2016, 76.2% of home purchase loans were originated in upper-income tracts, while only 9.5% were originated in middle-income tracts. This percentage is much lower than the percentage of owner-occupied units in middle-income tracts, at 30.2%. In 2017, 85.2% of home purchase loans were originated in upper-income tracts, while only 7.4% were originated in middle-income tracts. This percentage is much lower than the percentage of owner-occupied units in middle-income tracts, at 27.6%.

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Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. While the bank originated no home refinance loans in these tracts during the review period, aggregate lenders also struggled to originate loans in 2016 before slightly improving performance in 2017. In 2016, aggregate lenders originated only 1.9% of loans in low-income areas; in 2017, aggregate lenders originated 2.9% of loans in low-income areas. Additionally, in 2016 and 2017, 2.5% and 2.7% of owner-occupied units in the assessment area, respectively, were located in low-income tracts, which may indicate limited lending opportunities.

Home refinance lending in moderate-income tracts is poor. Bank performance was below both the percentage of owner-occupied units (17.6% in both 2016 and 2017) as well as aggregate lending levels. In 2016, Comerica originated 4.1% of home refinance loans (1.4% by dollar) in moderate-income census tracts; in 2017, this fell to 3.3% (0.2% by dollar). In contrast, aggregate lenders originated 16.1% of refinance loans in moderate-income tracts in 2016 and 18.8% in 2017.

Additionally, lending within middle- and upper-income tracts is skewed to the detriment of middle-income lending. In 2016, 81.6% of home refinance loans were originated in upper-income tracts, while only 14.3% were originated in middle-income tracts. This percentage is much lower than the percentage of owner-occupied units in middle-income tracts, at 30.2%. In 2017, 93.3% of home refinance loans were originated in upper-income tracts, while only 3.3% were originated in middle-income tracts. This percentage is much lower than the percentage of owner-occupied units in middle-income tracts, at 27.6%.

Home Equity Lines of Credit

Considering the percentage of owner-occupied units, the geographic distribution of Comerica's HELOC lending is adequate.

Comerica's HELOC lending in low-income census tracts is adequate. In 2015 and 2016, the bank originated 1.0% of its HELOCs in low-income tracts. This performance was comparable to the percentage of owner-occupied units in these tracts, at 2.5%. In 2017, the bank originated 1.1% of its HELOCs in low-income tracts, which was comparable to the percentage of owner-occupied units in these tracts, at 2.7%.

Comerica's HELOC lending in moderate-income census tracts is adequate, considering the relatively low owner-occupancy rates in this tract type. In 2015 and 2016, the bank originated 6.2% of its HELOCs in moderate-income tracts. This performance was below the percentage of owner-occupied units in these tracts, at 17.6%. In 2017, the bank originated 8.3% of its HELOCs in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts, at 17.6%.

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The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Community Development Lending

The bank makes a relatively high level of community development loans in the assessment area. The bank originated 62 community development loans in the Greater Los Angeles Assessment Area totaling approximately \$138.4 million during the review period. The bank's commitment to making qualified community development loans demonstrates a good responsiveness to meeting community needs. The table below provides a breakdown of the types of community development loans the bank originated during the review period.

Community Development Lending		
Purpose	#	\$000s
Affordable Housing	36	59,281
Community Services	12	35,694
Economic Development	14	43,462
Totals	62	138,437

Of the total community development lending, \$2.4 million was to construct 161 affordable housing units, and \$43.5 million provided funds for SBA loans; both of these were identified by the contacts as needs within the assessment area. The majority of the community services loans served to address healthcare needs of the LMI population.

Funds totaling \$9.8 million went to serve Think Together, an organization that provides after-school and tutoring programs to students K-12 from low-to-moderate income households. Think Together is one of the largest after-school program providers in Southern California, serving at over 400 locations in Los Angeles, Orange, Riverside, Sacramento, San Bernardino, and San Diego counties. Approximately 83% of the students served by the organization are from low-moderate-income households.

Investment Test

The Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants and exhibits good responsiveness to credit and community development needs. The bank's investments were primarily focused on affordable housing.

The total amount of investments and contributions, at \$14.7 million, has increased approximately 47.0% from the previous evaluation.

Greater Los Angeles

Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Affordable Housing	9	6,051	6	5,742	31	173	46	11,966
Community Services	-	-	-	-	323	2,157	323	2,157
Economic Development	-	-	1	100	9	393	10	493
Revitalization and Stabilization	-	-	-	-	6	68	6	68
Total	9	6,051	7	5,842	369	2,791	385	14,684

One way the bank demonstrated responsiveness to needs in the assessment area was through its economic development grants. These totaled \$393,000 and supported small business and/or micro lending in the assessment area. This type of support was noted by contacts as a need within the assessment area, as was affordable housing.

In addition, 27 investments benefitting multiple assessment areas provided \$40.6 million to affordable housing efforts in Greater Los Angeles.

Service Test

The bank's Service Test performance is Low Satisfactory. Its retail and community development services reflect adequate responsiveness to the needs of the Greater Los Angeles assessment area. Delivery systems are reasonably accessible to all portions of the assessment area. The bank's branch hours are reasonable and services do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. The bank provides a relatively high level of community development services. Bank officers and employees actively support organizations dedicated to community development initiatives.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 38 branch offices and 37 ATMs as of December 31, 2017, was compared to the distribution of households and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Greater Los Angeles assessment area.

Greater Los Angeles

Tract Income	% of Geographies	% of Population	Branches		Full Service ATMs		Cash Only ATMS	
			#	%	#	%	#	%
Low	9.3	8.8	1	2.6	1	2.7	-	-
Moderate	28.5	29.2	6	15.8	6	16.2	-	-
Middle	25.9	27.0	4	10.5	4	10.8	-	-
Upper	34.6	34.5	24	63.2	23	62.2	-	-
Unknown	1.7	0.5	3	7.9	3	8.1	-	-
Total	100.0	100.0	38	100.0	37	100.0	-	-

The bank closed three branches (one in a middle-income and two in upper-income census tracts) in the assessment area, and did not open any during the review period. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are essentially the same throughout the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in many various capacities, including boards of directors and in other leadership roles, for 42 community development organizations offering community development services that focused on community services targeting LMI individuals, as well as affordable housing and economic development. The table below shows the number of events by type of involvement. Employees participated in 834 events or meetings during the review period.

Purpose	# Events / Meetings
Affordable Housing	10
Community Services Benefitting LMI Individuals/Geographies	809
Economic Development	15
Total	834

The bank actively supports LMI students in the area through involvement in Boys and Girls Clubs as well as Junior Achievement of Southern California.

Santa Cruz

Description of Operations in Santa Cruz

The Santa Cruz Assessment Area includes portions of Santa Cruz County. This county comprises the Santa Cruz-Watsonville MSA.

According to the 2010 census, the assessment area population was 234,904 which accounted for 0.6% of the population in the state. Based on the 2017 population of 241,578, the assessment area has experienced an increase of 2.8% since 2010. Santa Cruz, the largest city within the assessment area, accounts for 23.6% of the population in the assessment area. Other notable cities in the assessment area are Watsonville and Live Oak.

County	2017 Population Estimate	% Increase Since 2010	Major Municipalities
Santa Cruz	1,938,153	8.8	Santa Cruz*, Watsonville, Live Oak

*Denotes county seat

As of December 31, 2017, the bank operated six branches in the assessment area representing 1.4% of its branches. There is one branch located in a low-income census tract, four in middle-income census tracts, and one branch located in an upper-income census tract. Additionally, Comerica operates one LPO in a middle-income tract.

According to the FDIC, as of June 30, 2017, the bank had \$904.1 million in deposits in this assessment area representing 1.6% of the bank's total deposits. It also represents a deposit market share of 14.7%, which includes all other FDIC-insured deposits that are located in the assessment area. Wells Fargo Bank holds the largest deposit share at 25.6%, followed by Bank of America, at 16.0%, and Comerica Bank.

For 2016, there were 336 financial institutions that reported HMDA data in the assessment area. The bank ranked 56th in HMDA market share with 0.1%. Wells Fargo Bank and JPMorgan Chase dominated the market with 13.6% and 6.8% of the market share, respectively. For 2017, there were 314 financial institutions that reported HMDA data in the assessment area. The bank ranked 57th in HMDA market share with 0.1%. Wells Fargo Bank and JPMorgan Chase once again dominated the market with 13.6% and 7.2% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding mortgage lending.

For 2016, there were 64 financial institutions that reported CRA small business data in the assessment area. The bank ranked 9th in market share with 1.1%. Citibank and American Express Bank dominated the market with 44.2% and 14.0% of the market share,

Santa Cruz

respectively. For 2017, there were 71 financial institutions that reported CRA small business data in the assessment area. The bank ranked 9th in market share with 2.0%. American Express Bank and Citibank again dominated the market with 15.5% and 15.5% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Santa Cruz-Watsonville MSA as a whole, but not the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 89.7% of the total MSA population, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to census data.

At the 2010 census, the Santa Cruz assessment area was made up of 46 distinct census tracts. Of the total tracts, one (2.2%) was designated as low-income, 15 (32.6%) were designated moderate-income, 18 (39.1%) were middle-income, and 12 (26.1%) were upper-income. As of the 2015 census estimates, two (4.3%) were designated as low-income, 11 (23.9%) were designated moderate-income, 19 (41.3%) were middle-income, and 14 (30.4%) were upper-income.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; HUD; D&B; and the Texas Workforce Commission.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses both U.S. Census 2010 data and 2015 estimated data. The following chart reflects the estimated median family income for the years 2010 and 2015 for the Santa Cruz-Watsonville MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 census, 8.1% of the families in the assessment area lived below the poverty level. According to the 2015 census estimates, 9.3% of the families in the assessment area lived below the poverty level.

Income Level	2010	2015
Median Income	\$76,166	\$78,423
Low-income	< \$38,083	< \$39,212
Moderate-income	\$38,083 - 60,932	\$39,212 - \$62,738
Middle-income	\$60,933 - \$91,398	\$62,739 - \$94,107
Upper-income	≥ \$91,399	≥ \$94,108

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Housing Characteristics

2010 Census

According to 2010 census data, there were 91,533 housing units in the Santa Cruz Assessment Area. Of total housing in the assessment area, 51.7% of the units were classified as owner-occupied while 38.4% were classified as rental units and 9.8% of the available housing was vacant. Overall, 2.0% of the housing stock in the assessment area were in low-income tracts. In these census tracts, 14.0% of the housing units were owner-occupied, 80.4% were rental units, and 5.5% were vacant.

The median age of housing stock in these tracts was 61 years and the median housing value in low-income tracts for the assessment area in 2010 was \$463,889. Mortgage payments on homes in these areas might not be considered affordable for a low-income family. The median gross monthly rental payment in low-income tracts in 2010 was \$1,032, which is more affordable than the monthly mortgage payment of \$1,698 for a \$463,889 home for 30 years at 3.65% interest rate. Additionally, 35.5% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts accounted for 29.4% of the housing stock in the assessment area. In these census tracts, 46.4% of the housing units were owner-occupied, 47.5% were rental units, and 6.1% were vacant. The median age of housing stock in these tracts was 37 years and the median housing value in moderate-income tracts for the assessment area in 2010 was \$467,066. Mortgage payments on homes in these areas might not be considered affordable for a moderate-income family. The median gross monthly rental payment in moderate-income tracts in 2010 was \$1,113, which is more affordable than the monthly mortgage payment of \$1,709 for a \$467,066 home for 30 years at 3.65% interest rate. Additionally, 12.7% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 43.3%, was in middle-income tracts. In these census tracts, 47.8% of the housing units were owner-occupied, 39.3% were rental units, and 12.9% were vacant. The median age of housing stock in these tracts was 42 years and 5.5% of families in middle-income tracts had incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2010 was \$687,082.

Approximately 25.3% of the housing stock in the assessment area was in upper-income tracts. In these census tracts, 67.6% of the housing units were owner-occupied, 23.0% were rental units, and 9.3% were vacant. The median age of housing stock in these tracts was 38 years and only 3.3% of families in upper-income tracts had incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2010 was \$789,007.

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2015 Census Estimates

According to 2015 census estimates, there are 92,225 housing units in the Santa Cruz Assessment Area. Of total housing in the assessment area, 49.9% of the units are classified as owner-occupied while 40.7% are classified as rental units and 9.4% of the available housing is vacant. Overall, 6.6% of the housing stock in the assessment area is in low-income tracts. In these census tracts, 22.8% of the housing units are owner-occupied, 70.1% are rental units, and 7.1% are vacant.

The median age of housing stock in these tracts is 47 years and the median housing value in low-income tracts for the assessment area in 2015 was \$393,805. Mortgage payments on homes in these areas might not be considered affordable for a low-income family. The median gross monthly rental payment in low-income tracts in 2015 was \$1,324, which is more affordable than the monthly mortgage payment of \$1,502 for a \$393,805 home for 30 years at 3.99% interest rate. Additionally, 25.7% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts account for 22.8% of the housing stock in the assessment area. In these census tracts, 44.8% of the housing units are owner-occupied, 49.8% are rental units, and 5.4% are vacant. The median age of housing stock in these tracts is 48 years and the median housing value in moderate-income tracts for the assessment area in 2015 was \$370,630. Mortgage payments on homes in these areas might not be considered affordable for a moderate-income family. The median gross monthly rental payment in moderate-income tracts in 2015 was \$1,259, which is more affordable than the monthly mortgage payment of \$1,414 for a \$370,630 home for 30 years at 3.99% interest rate. Additionally, 14.9% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 44.0%, is in middle-income tracts. In these census tracts, 46.7% of the housing units are owner-occupied, 40.0% are rental units, and 13.3% are vacant. The median age of housing stock in these tracts is 50 years and 7.7% of families in middle-income tracts have incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2015 was \$596,011.

Approximately 26.6% of the housing stock in the assessment area is in upper-income tracts. In these census tracts, 66.2% of the housing units are owner-occupied, 26.9% are rental units, and 6.9% are vacant. The median age of housing stock in these tracts is 47 years and only 3.2% of families in upper-income tracts have incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2015 was \$730,363.

Santa Cruz

Employment and Economic Conditions

The national average unemployment rates for 2015, 2016, and 2017 were 5.3%, 4.9%, and 4.4%, respectively. Unemployment rates for Santa Cruz County were higher than those of California and the nation. According to the 2010 census, the unemployment rate was 15.0% in low-income tracts and 11.8% in moderate-income tracts. At the time of 2015 census estimates, the unemployment rates had decreased to 8.5% and 8.3% in low- and moderate-income tracts, respectively. However, these remain relatively high, and high unemployment rates in LMI tracts could affect loan demand from these tracts.

The following chart shows unemployment rates relevant to the assessment area for 2015 through 2017.

Annual Average Unemployment Rate			
AREA	2015	2016	2017
Santa Cruz County	7.5%	7.0%	5.7%
State of California	6.2%	5.5%	4.8%
United States	5.3%	4.9%	4.4%

For many years, Santa Cruz City and Watsonville have been named as surplus labor areas by the U.S. Department of Labor.⁹ A surplus labor area is defined as an area with an unemployment rate 20.0% higher than national unemployment.¹⁰ Agriculture plays an important role in the local economy; one of eight local workers is employed in agriculture.¹¹

Major employment industries include office and administrative support, food preparation and serving, and sales. Food preparation and serving accounts for 12.1% of local area employment, which is significantly higher than the share nationally.¹² The top employers in the MSA are the University of California, Santa Cruz; the Pajaro Valley Unified School District; the County of Santa Cruz; the Dominican Hospital; and the Santa Cruz Beach Boardwalk.¹³

⁹ United States Department of Labor. "2017 LSA List." DOLETA.gov.

https://www.doleta.gov/programs/pdf/2017_LSA_List.xlsx (accessed September 30, 2018)

¹⁰ Bureau of Labor Statistics. "Administrative Uses of Local Area Unemployment Statistics." BLS.gov.

<https://www.bls.gov/lau/lauadminuses.pdf> (accessed September 30, 2018)

¹¹ Santa Cruz Chamber of Commerce. "Agriculture." SantaCruzChamber.org

<http://www.santacruzchamber.org/agriculture.html> (accessed September 30, 2018)

¹² Santa Cruz Human Services. "Workforce Innovation and Opportunity Act Regional Plan."

SantaCruzHumanServices.org.

<https://santacruzhumanservices.org/Portals/0/wib/wioa-plans/WIOA-4Yr-Regional-Planning-Unit-Related-Local-Plans-PY-2017-2020.pdf> (accessed September 29, 2018)

¹³ County of Santa Cruz. "Comprehensive Annual Financial Report 2017." co.santa-cruz.ca.us

http://www.co.santa-cruz.ca.us/Portals/0/County/auditor/cafr17/CAFR_2017.pdf (accessed September 30, 2018)

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Community Contacts and Community Development Opportunities

As part of the evaluation of the Santa Cruz assessment area, two community contacts involved in economic development and community services were made. The two contacts both highlighted needs for affordable housing.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

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Combined Demographics Report

Assessment Area: CA - Santa Cruz

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.2	1,334	2.6	474	35.5	13,040	25.2
Moderate-income	15	32.6	17,447	33.7	2,222	12.7	9,138	17.6
Middle-income	18	39.1	19,002	36.7	1,045	5.5	9,416	18.2
Upper-income	12	26.1	14,000	27	459	3.3	20,189	39
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	46	100.0	51,783	100.0	4,200	8.1	51,783	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,859	261	0.6	14	1,495	80.4	103	5.5
Moderate-income	26,865	12,475	26.3	46.4	12,749	47.5	1,641	6.1
Middle-income	39,660	18,952	40	47.8	15,604	39.3	5,104	12.9
Upper-income	23,149	15,659	33.1	67.6	5,326	23	2,164	9.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	91,533	47,347	100.0	51.7	35,174	38.4	9,012	9.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	261	2	243	2	15	1.6	3	6.5
Moderate-income	2,876	22.2	2,575	21.5	292	31.4	9	19.6
Middle-income	6,249	48.3	5,815	48.6	414	44.6	20	43.5
Upper-income	3,564	27.5	3,342	27.9	208	22.4	14	30.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	12,950	100.0	11,975	100.0	929	100.0	46	100.0
	Percentage of Total Businesses:			92.5	7.2			.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	7	2.3	6	2.3	1	2.6	0	0
Moderate-income	107	35.9	84	32.3	23	60.5	0	0
Middle-income	113	37.9	100	38.5	13	34.2	0	0
Upper-income	71	23.8	70	26.9	1	2.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	298	100.0	260	100.0	38	100.0	0	.0
	Percentage of Total Farms:			87.2		12.8		.0

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Combined Demographics Report

Assessment Area: CA - Santa Cruz

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.3	2,495	4.7	640	25.7	12,863	24.5
Moderate-income	11	23.9	14,713	28	2,199	14.9	9,035	17.2
Middle-income	19	41.3	20,264	38.5	1,563	7.7	9,403	17.9
Upper-income	14	30.4	15,131	28.8	480	3.2	21,302	40.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	46	100.0	52,603	100.0	4,882	9.3	52,603	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	6,113	1,393	3	22.8	4,288	70.1	432	7.1
Moderate-income	21,021	9,412	20.5	44.8	10,467	49.8	1,142	5.4
Middle-income	40,586	18,966	41.2	46.7	16,239	40	5,381	13.3
Upper-income	24,505	16,223	35.3	66.2	6,584	26.9	1,698	6.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	92,225	45,994	100.0	49.9	37,578	40.7	8,653	9.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	539	4.6	471	4.4	66	7	2	4.8
Moderate-income	1,984	16.9	1,777	16.5	200	21.3	7	16.7
Middle-income	5,648	48	5,194	48.1	434	46.3	20	47.6
Upper-income	3,602	30.6	3,351	31	238	25.4	13	31
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	11,773	100.0	10,793	100.0	938	100.0	42	100.0
	Percentage of Total Businesses:			91.7		8.0		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	9	3.3	8	3.4	1	2.6	0	0
Moderate-income	70	25.4	54	22.7	16	42.1	0	0
Middle-income	130	47.1	115	48.3	15	39.5	0	0
Upper-income	67	24.3	61	25.6	6	15.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	276	100.0	238	100.0	38	100.0	0	.0
	Percentage of Total Farms:			86.2		13.8		.0

Conclusions With Respect to Performance Tests

Lending Test

The bank's lending performance is Low Satisfactory. The geographic distribution of loans reflects adequate penetration throughout the assessment area. In addition, the distribution of lending to borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. However, the bank makes a low level of community development loans, and lending activity reflects poor responsiveness to assessment area credit needs.

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, as its volume is more significant than its HMDA lending. During the review period, the bank reported 331 (92.7%) small business loans compared to 26 (7.3%) HMDA loans in the Santa Cruz assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

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

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

The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, small business lending received the most weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is good.

In 2016, the bank originated 33.0% of its loans, representing 22.1% by dollar volume, to businesses with gross annual revenue of \$1 million or less. This lags behind aggregate CRA lenders, which originated 39.0% (33.8% by dollar) to small businesses during the same period. In 2017, the bank again fell below aggregate CRA lenders by originating 33.6% of loans (23.4% by dollar) to small business while aggregate lenders originated 54.1% (40.9% by dollar) to businesses with gross revenue under \$1 million. Comerica's lending also fell below D&B demographic data, which in 2016 and 2017 reported 92.5% and 91.7%,

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respectively, of all businesses in the assessment area with gross annual revenues of \$1 million during the review period.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a large percentage of the bank's small business loans were made in loan amounts of \$100,000 or less. In 2016, 60.4% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 98.1% for the aggregate. In 2017, 53.3% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 96.9% for the aggregate. However, it should be noted that the bank's competition consists primarily of large multi-regional or nationwide banks.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers is adequate. While the bank did not originate any home mortgage loans to low-income borrowers in 2016, aggregate lenders also struggled to originate loans to low-income borrowers. Only 2.3% of aggregate loans (1.0% by dollar) were originated to low-income borrowers in 2016. In 2017, Comerica originated 20.0% of its home mortgage loans (2.9% by dollar) to low-income borrowers, which was greater than the 2.6% (1.2% by dollar) of total HMDA loans originated by the aggregate to low-income borrowers. While the 2017 percentages compare favorably to aggregate data, Comerica's overall lending levels were low, as only five home mortgage loans were originated during that time period. Low-income families made up 25.2% of total families in the assessment area in 2016 and 24.5% in 2017, meaning that both the bank and aggregate lending are below demographics.

The bank's HMDA lending to moderate-income borrowers is adequate. In 2016, the bank originated 9.1% (5.0% by dollar volume) of its total HMDA-related loans to moderate-income borrowers, which was greater than the 8.4% of HMDA-related loans (4.5% by dollar) originated by the aggregate HMDA lenders. In 2017, the bank also exceeded aggregate, originating 20.0% of HMDA-related loans (5.0% by dollar volume) to moderate-income borrowers as compared with the aggregate lenders' 7.6% of HMDA loans (3.5% by dollar) to moderate-income borrowers. While the percentages compare favorably to aggregate data, Comerica's overall lending levels were low, as only 11 home mortgage loans were originated by the bank in 2016 and five in 2017. Moderate-income families made up 17.6% of total families in the assessment area in 2016 and 17.2% in 2017.

Home Equity Lines of Credit

HELOC lending by borrower income in the assessment area is considered poor when compared to the demographic characteristics of the assessment area.

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HELOC lending to low-income borrowers is adequate. In 2015 and 2016, Comerica originated 5.1% of its HELOCs to low-income borrowers. The bank's performance was below the percentage of low-income families in the assessment area, at 25.2%. However, 35.5% of low-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated no HELOCs to low-income borrowers. The bank's performance was below the percentage of low-income families in the assessment area, at 24.5%. Of note, 25.7% of low-income families live below the poverty level, which might make it difficult to qualify for a HELOC. Additionally, it should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

HELOC lending to moderate-income borrowers is poor. In 2015 and 2016, Comerica originated 14.6% of its HELOCs to moderate-income borrowers. The bank's performance was slightly below the percentage of moderate-income families in the assessment area, at 17.6%. In 2017, the bank originated 4.0% of its HELOCs to moderate-income borrowers. The bank's performance was below the percentage of moderate-income families in the assessment area, at 17.2%. While 14.9% of moderate-income families live below the poverty level, it seems there may be additional lending opportunities to moderate-income borrowers.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects adequate penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects good penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts is adequate. The bank's small business lending by number in low-income tracts during the review period was comparable to, or only slightly less than, the percentage of small businesses located in these tracts as well as aggregate lending. In 2016, 0.9% of small business loans (3.7% by dollar) were originated in low-income tracts, compared to 2.0% of businesses located in those tracts and 1.2% of aggregate loans (0.7% by dollar). In 2017, 3.7% of small business loans

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(1.0% by dollar) were originated in low-income tracts, compared to 4.4% of businesses located in those tracts and 4.1% of aggregate loans (4.3% by dollar).

The bank's small business lending in moderate-income census tracts is excellent. Small business lending during the review period exceeded both the percentage of small businesses located in these tracts as well as aggregate lending. In 2016, 27.4% of small business loans (22.3% by dollar) were originated in moderate-income tracts, compared to 21.5% of businesses located in those tracts and 21.8% of aggregate loans (23.0% by dollar). In 2017, the bank's performance improved, as 23.4% of small business loans (18.0% by dollar) were originated in moderate-income tracts, compared to 16.5% of businesses located in those tracts and 18.5% of aggregate loans (15.6% by dollar).

The bank's small business lending in middle- and upper-income tracts was comparable to the percentage of small businesses in these tracts. When compared to the aggregate by percentage, the bank originated a similar percentage of loans in middle- and upper-income tracts.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank makes very few home improvement and multifamily loans, these were not significant product lines and were not analyzed separately.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. While the bank originated no home purchase loans in these tracts during the review period, aggregate lenders struggled to originate loans during the review period as well. In 2016, aggregate lenders originated 0.5% of home purchase loans (0.4% by dollar) in low-income census tracts; in 2017, aggregate lenders originated 3.9% of loans (3.1% by dollar) in low-income census tracts. Additionally, in 2016 and 2017, only 0.6% and 3.0% of owner-occupied units in the assessment area, respectively, were located in low-income tracts.

Home purchase lending in moderate-income tracts is poor. In 2016, the bank originated 100.0% of its home purchase loans in moderate-income census tracts; however, this represented only one loan. In 2017, Comerica originated no loans. Aggregate lenders originated 26.9% and 20.7% of home purchase loans in moderate-income tracts in 2016 and 2017, respectively. Additionally, in 2016 and 2017, 26.3% and 20.5% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts.

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The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI income geographies.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. While the bank originated no home refinance loans in these tracts during the review period, aggregate lenders also struggled to originate loans in 2016 before slightly improving performance in 2017. In 2016, aggregate lenders originated only 0.3% of loans in low-income areas; in 2017, aggregate lenders originated 4.1% of loans in low-income areas. Additionally, in 2016 and 2017, only 0.6% and 3.0% of owner-occupied units in the assessment area, respectively, were located in low-income tracts, which may make it difficult to originate loans in these tracts.

Home refinance lending in moderate-income tracts is adequate. While the bank originated no home refinance loans in these tracts in 2017, it originated 70.0% of its 2016 loans (58.6% by dollar) in moderate-income tracts, exceeding both demographic data and aggregate lending. In 2016, aggregate lenders originated 23.8% of loans in these tracts (18.2% by dollar); 26.3% of owner-occupied units are located in moderate-income tracts. In 2017, aggregate originated 20.4% of home refinance loans in moderate-income tracts (30.0% by dollar) compared to 20.5% of owner-occupied units located in those tracts.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Equity Lines of Credit

Considering the percentage of owner-occupied units, the geographic distribution of Comerica's HELOC lending is poor.

Comerica's HELOC lending in low-income census tracts is adequate. In 2015 and 2016, the bank originated no HELOCs in low-income tracts. This performance was comparable to the percentage of owner-occupied units in these tracts, at 0.6%. In 2017, the bank originated no HELOCs in low-income tracts; however, owner-occupancy was again low, at 3.0% which may signify limited lending opportunities in low-income tracts.

Comerica's HELOC lending in moderate-income census tracts is poor. In 2015 and 2016, the bank originated 15.4% of its HELOCs in moderate-income tracts. This performance was below the percentage of owner-occupied units in these tracts, at 26.3%. In 2017, the bank originated 16.0% of its HELOCs in moderate-income tracts, which was slightly below the percentage of owner-occupied units in these tracts, at 20.5%.

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The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Community Development Lending

The bank makes a low level of community development loans in the assessment area. The bank originated ten community development loans in the Santa Cruz Assessment Area totaling approximately \$3.5 million during the review period. The bank's commitment to making qualified community development loans demonstrates a poor responsiveness to meeting community needs. The table below provides a breakdown of the types of community development loans the bank originated during the review period.

Community Development Lending		
Purpose	#	\$000s
Affordable Housing	2	200
Community Services	8	3,250
Totals	10	3,450

All community services loans provided funding for healthcare services for LMI individuals. While two loans were originated to support affordable housing, the overall amount dedicated to this need (as identified by contacts in the assessment area) is low. Furthermore, according to the deposit market share, there are few financial institutions serving this assessment area, which should indicate limited competition for loans.

Investment Test

The Investment Test rating is Low Satisfactory. The bank has an excellent level of qualified community development investments and grants based on the amount of deposits in the assessment area, but exhibits poor responsiveness to credit and community development needs. While the bank's investments were primarily focused on affordable housing, the majority of these funds come from only one prior period investment; based on needs identified by community contacts, further opportunities for investment were available.

The total amount of investments and contributions, at \$4.5 million, has increased substantially from the previous evaluation.

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Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Affordable Housing	-	-	1	4,261	5	25	6	4,286
Community Services	-	-	-	-	27	171	27	171
Economic Development	-	-	-	-	1	25	1	25
Total	-	-	1	4,261	33	221	34	4,482

Although the majority of investments and grants were focused on affordable housing, which was a need identified by multiple contacts in the assessment area, the bulk of these funds comes from only one prior period investment. As of June 30, 2017, the bank ranked 3rd of 12 institutions in terms of deposit market share. Given the market share of the bank in this assessment area, as well as opportunities identified by contacts, opportunities for further responsiveness exist.

One investment benefitting multiple assessment areas provided \$206,153 to affordable housing efforts in Santa Cruz.

Service Test

The bank's Service Test performance is Low Satisfactory. Its retail and community development services reflect adequate responsiveness to the needs of the Santa Cruz assessment area. Delivery systems are reasonably accessible to all portions of the assessment area. The bank's branch hours are reasonable and services do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. The bank provides a relatively high level of community development services. Bank officers and employees actively support organizations dedicated to community development initiatives.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's six branch offices and 12 ATMs as of December 31, 2017, was compared to the distribution of households and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Santa Cruz assessment area.

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Tract Income	% of Geographies	% of Population	Branches		Full Service ATMs		Cash Only ATMs	
			#	%	#	%	#	%
Low	4.3	6.2	1	16.7	2	25.0	-	-
Moderate	23.9	28.3	-	-	-	-	-	-
Middle	41.4	40.0	4	66.6	5	62.5	3	75.0
Upper	30.4	25.5	1	16.7	1	12.5	1	25.0
Unknown	-	-	-	-	-	-	-	-
Total	100.0	100.0	6	100.0	8	100.0	4	100.0

The bank closed one branch (in a middle-income census tract) in the assessment area, and did not open any branches during the review period. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are essentially the same throughout the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and in other leadership roles, for seven community development financial organizations offering community development services that focused on community services targeting LMI individuals. The table below shows the number of events by type of involvement. Employees participated in 101 events or meetings during the review period.

Purpose	# Events / Meetings
Community Services Benefitting LMI Individuals/Geographies	101
Total	101

The bank supports LMI students in the area through involvement in Boys and Girls Club of Santa Cruz. Bank personnel also serve with California FarmLink, a CDFI which supports beginning, limited-resource, and other underserved farmers. The organization partners with farm training programs, government agencies, impact investors, and other nonprofits to help farmers access land and financing.

METROPOLITAN AREAS (Limited Scope Review)

Description of Institution's Operations

- **Fresno MSA**

- As of December 31, 2017, the bank operated zero branches in the assessment area.
- As of June 30, 2017, the bank had no deposits in this assessment area.
- Little weight was given to this assessment area given the lack of branching and deposits.

- **Inland Empire Assessment Area**

- As of December 31, 2017, the bank operated three branches in the assessment area, representing 0.7% of its branches.
- As of June 30, 2017, the bank had \$49.0 million in deposits in this assessment area, representing a market share of 0.1%. The \$49.0 million also represents 0.1% of the bank's total deposits.

- **Sacramento Assessment Area**

- As of December 31, 2017, the bank operated zero branches in the assessment area.
- As of June 30, 2017, the bank had no deposits in this assessment area.
- Little weight was given to this assessment area given the lack of branching and deposits.

- **Salinas Assessment Area**

- As of December 31, 2017, the bank operated four branches in the assessment area, representing 0.9% of its branches.
- As of June 30, 2017, the bank had \$246.5 million in deposits in this assessment area, representing a market share of 2.8%. The \$246.5 million also represents 0.4% of the bank's total deposits.

- **San Diego Assessment Area**

- As of December 31, 2017, the bank operated 14 branches in the assessment area, representing 3.2% of its branches.
- As of June 30, 2017, the bank had \$588.8 million in deposits in this assessment area, representing a market share of 0.7%. The \$588.8 million also represents 1.0% of the bank's total deposits.

- **San Francisco Bay Assessment Area**

- As of December 31, 2017, the bank operated 17 branches in the assessment area, representing 3.9% of its branches.
- As of June 30, 2017, the bank had \$2.5 billion in deposits in this assessment area, representing a market share of 0.7%. The \$2.5 billion also represents 4.4% of the bank's total deposits.

- **San Jose Assessment Area**

- As of December 31, 2017, the bank operated 14 branches in the assessment area, representing 3.2% of its branches.

- As of June 30, 2017, the bank had \$7.0 billion in deposits in this assessment area, representing a market share of 5.2%. The \$7.0 billion also represents 12.3% of the bank's total deposits.
- **Ventura Assessment Area**
 - As of December 31, 2017, the bank operated one branch in the assessment area, representing 0.2% of its branches.
 - As of June 30, 2017, the bank had \$53.4 million in deposits in this assessment area, representing a market share of 0.3%. The \$53.4 million also represents 0.1% of the bank's total deposits.

Conclusions With Respect to Performance Tests

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with the bank's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix H for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited scope assessment areas can be found in Appendices E and H, respectively.

Assessment Area	Lending Test	Investment Test	Service Test
Fresno MSA	Below	Consistent	Below
Inland Empire	Consistent	Consistent	Below
Sacramento	Consistent	Consistent	Below
Salinas	Consistent	Consistent	Below
San Diego	Consistent	Consistent	Consistent
San Francisco Bay	Exceeds	Exceeds	Consistent
San Jose	Exceeds	Below	Below
Ventura	Consistent	Consistent	Below

The performance in the limited-scope assessment areas did not change the bank's overall rating.

State of Florida

CRA Rating for Florida: Needs to Improve

The Lending Test is Rated: Needs to Improve

The Investment Test is Rated: Low Satisfactory

The Service Test is Rated: Low Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects poor responsiveness to the assessment areas' credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of HMDA lending reflects adequate penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Makes a low level of community development loans. Although no community development loans were originated in the full-scope assessment area, performance in the limited scope assessment areas exceeded that of the full-scope assessment area.
- Has an excellent level of qualified community development investments.
- Exhibits poor responsiveness to credit and community development needs.
- Delivery systems are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in the assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- Provides a relatively high level of community development services.

Scope

The assessment areas were selected for full-scope reviews based on factors identified in the FFIEC procedures. These include, but are not limited to, the level of the institution's lending, investment, and service activity as well as opportunities for such in the assessment areas; population density; the number of other institutions in the assessment areas; and the length of time since the most recent full-scope review. Overall, approximately 12.7% of lending activity (by number of loans), 11.9% of the total deposits, and 14.3% of total

branches within Florida were evaluated through the full-scope reviews. While these percentages are smaller than for other states' full scope assessment areas, examiners identified specific needs within the Naples-Immokalee-Marco Island MSA. Further details as well as descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Naples-Immokalee-Marco Island MSA

In addition, limited scope reviews were conducted for the remaining three assessment areas, including:

- Fort Lauderdale-West Palm Beach
- Sarasota
- Stuart

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

Description of Institution's Operations in Florida

The bank operates seven branch offices in its assessment areas in Florida, representing 1.6% of total branches. As of June 30, 2017, the bank had \$307.2 million in deposits in the state, representing 0.5% of total deposits. According to the June 30, 2017 FDIC Summary of Deposits, the bank had a deposit market share of 0.1% and ranked 108th out of 228 FDIC-insured financial institutions across the state. Of the 3,257 HMDA loans originated and purchased by the bank, 172 (5.3%) were in the Florida assessment areas. Of the 28,214 small business loans originated and purchased by the bank, 221 (0.8%) were in the Florida assessment areas.

Conclusions with Respect to Performance Tests in Florida

Lending Test

In Florida, the bank's overall Lending Test rating is Needs to Improve. The bank makes a low level of community development loans, and lending activity reflects poor responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment areas, considering performance in the limited-scope assessment areas. In addition, the distribution of lending to borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes, considering performance in the limited-scope assessment areas.

The bank is both a small business and HMDA lender. During the review period, the bank reported 221 (56.2%) small business loans compared to 172 (43.8%) HMDA loans.

Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices G, H, and I.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

Consistent with the performance standards for a large bank, conclusions about the bank's distribution of lending within its assessment areas considers the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home mortgage loans and consumer loans to low-, moderate-, middle-, and upper-income individuals; small-business loans to businesses with gross annual revenues of \$1 million or less; and, small-business loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. Naples, the only full-scope assessment area in the state, was considered to reflect poor penetration among individuals of different income levels and businesses of different revenue sizes. However, performance in the limited scope assessment areas was considered in determining, and affected, the overall statewide rating. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

The geographic distribution of loans reflects adequate penetration throughout the assessment areas. Naples, the only full-scope assessment area in the state, was considered to reflect poor penetration throughout the assessment area. However, performance in the limited scope assessment areas was considered in determining, and affected, the overall statewide rating. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Lending

In Florida, the bank makes a low level of community development loans. During the review period, the bank originated seven community development loans for \$4.1 million in Florida representing 1.7% of the bank's total community development loans by number and 0.3% by total dollar amount. All of these loans were in the Fort Lauderdale-West Palm Beach assessment area; no community development loans were originated in the Naples, Sarasota, or Stuart assessment areas.

The community development loans originated during the evaluation period were for a variety of purposes. The table below summarizes the bank's community development lending.

Community Development Lending		
Purpose	Number	\$('000s)
Affordable Housing	4	3,800
Revitalize and Stabilize	3	300
Total	7	4,100

In addition, a total of three loans benefited the statewide area, which included the bank's assessment areas. One loan for \$500,000 assisted with economic development within the state, and two loans totaling \$2.0 million went toward revitalizing and stabilizing areas within the state.

Investment Test

In Florida, the bank's overall Investment Test rating is Low Satisfactory. The bank has an excellent level of qualified community development investments and grants, but exhibits poor responsiveness to credit and community development needs. The table below summarizes the bank's community development investments and grants by assessment area within the state. Specific details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Investments								
Assessment Area	Current Period Investments		Prior Period Investments		Donations		Total	
	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Full Review:								
Naples MSA	2	374	-	-	17	89	19	463
Limited Review:								
Fort Lauderdale – West Palm Beach	18	10,492	1	5,824	98	429	117	16,745
Sarasota	-	-	-	-	2	8	2	8
Stuart	-	-	-	-	1	1	1	1
Total	20	10,866	1	5,824	118	527	139	17,217

In addition, one investment benefited the statewide area, which included the bank's assessment areas, and eight benefited multiple assessment areas which included those in Florida. These investments totaled \$35,419 and \$9.5 million, respectively.

Furthermore, a total of 14 donations benefited the statewide area, which included the bank's assessment areas. These donations totaled \$33,250.

Service Test

In Florida, the bank's overall Service Test rating is Low Satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are unreasonably inaccessible to portions of the bank's assessment areas and individuals of different income levels based on the single branch location in the Naples assessment area and the tract distribution in the assessment area. Banking services and hours of operations do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or to low- and moderate-income individuals. The record of opening and closing offices has not affected the accessibility of its delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

Community Development Services

Comerica provides a relatively high level of community development services. Staff provided community development services to approximately 43 organizations and participated in more than 1,250 events. Particularly noteworthy is the bank's participation as board and committee members for community service organizations. During the review period, bank staff served in those capacities for 29 organizations throughout the State of Florida.

Naples-Immokalee-Marco Island MSA

METROPOLITAN AREAS (Full Scope Review)

Description of Operations in Naples-Immokalee-Marco Island MSA

The Naples-Immokalee-Marco Island MSA includes Collier County.

According to the 2010 census, the assessment area population was 321,520, which accounts for 1.7% of the population in the state. Based on the 2017 population of 372,880, the assessment area has experienced an increase of 16.0% since 2010. Naples, the largest city within the assessment area accounts for 5.9% of the population in the assessment area. Other notable cities in the assessment area are Marco Island and Everglades City.

County	2017 Population Estimate	% Increase Since 2010	Major Municipalities
Collier	372,880	16.0	East Naples*, Naples, Marco Island, Everglades City

*Denotes county seat

As of December 31, 2017, the bank operated one branch in the assessment area representing 0.2% of its branches. The single location is located in an upper-income census tract.

According to the FDIC, as of June 30, 2017, the bank had \$36.7 million in deposits in this assessment area representing 0.1% of the bank's total deposits. It also represents a deposit market share of 0.2%, which includes all other FDIC-insured deposits that are located in the assessment area. KeyBank holds the largest deposit share at 18.9%, followed by Fifth Third Bank, at 14.0%, and Wells Fargo Bank, at 10.8%.

For 2016, there were 667 financial institutions that reported HMDA data in the assessment area. The bank ranked 77th in HMDA market share with 0.1%. Wells Fargo Bank and Quicken Loans, Inc. dominated the market with 9.8% and 4.9% of the market share, respectively. For 2017, there were 629 financial institutions that reported HMDA data in the assessment area. The bank ranked 82nd in HMDA market share with less than 0.1%. Wells Fargo Bank and LendUS dominated the market with 9.6% and 5.3% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, and it appears competition could have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding mortgage lending. However, this is not a major product for Comerica.

Naples-Immokalee-Marco Island MSA

For 2016, there were 127 financial institutions that reported CRA small business data in the assessment area. The bank ranked 41st in market share with 0.1%. Citibank and American Express Bank dominated the market with 33.5% and 20.4% of the market share, respectively. For 2017, there were 125 financial institutions that reported CRA small business data in the assessment area. The bank ranked 44th in market share with less than 0.1%. American Express Bank and Bank of America dominated the market with 23.8% and 11.3% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, and it appears competition could have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

At the 2010 census, the Naples MSA was made up of 74 distinct census tracts. Of the total tracts, six (8.1%) were designated as low-income, 15 (20.3%) were designated moderate-income, 28 (37.8%) were middle-income, 24 (32.4%) were upper-income, and one (1.4%) was designated as having an unknown-income level. As of the 2015 census estimates, six (8.1%) were designated as low-income, 15 (20.3%) were designated moderate-income, 26 (35.1%) were middle-income, 26 (35.1%) were upper-income, and one (1.4%) was designated as having an unknown-income level.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; HUD; D&B; and the Texas Workforce Commission.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses both U.S. Census 2010 data and 2015 estimated data. The following chart reflects the estimated median family income for the years 2010 and 2015 for the Naples-Immokalee-Marco Island MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 census, 7.9% of the families in the assessment area lived below the poverty level. According to the 2015 census estimates, 9.1% of the families in the assessment area lived below the poverty level. The Naples MSA also has the 2nd-highest income inequality in the country.¹⁴

¹⁴ Sommeiller, Estelle and Mark Price. "The new gilded age: Income inequality in the U.S. by state, metropolitan area, and county." EPI.org.
<https://www.epi.org/publication/the-new-gilded-age-income-inequality-in-the-u-s-by-state-metropolitan-area-and-county/> (accessed November 1, 2018)

Naples-Immokalee-Marco Island MSA

Income Level	2010	2015
Median Income	\$68,165	66,394
Low-income	< \$34,083	< \$33,197
Moderate-income	\$34,083 - \$54,531	\$33,197 - \$53,115
Middle-income	\$54,532 - \$81,797	\$53,116 - \$79,672
Upper-income	≥ \$81,798	≥ \$79,673

Housing Characteristics

2010 Census

According to the 2010 census, there were 194,529 housing units in the Naples-Immokalee-Marco Island MSA. Of total housing in the assessment area, 47.0% of the units were classified as owner-occupied, while 14.5% were classified as rental units and 38.6% of the available housing is vacant. Overall, 4.2% of the housing stock in the assessment area was in low-income tracts. In these census tracts, 26.9% of the housing units were owner-occupied, 43.3% were rental units, and 29.8% were vacant.

The median age of housing stock in these tracts was 28 years and the median housing value in low-income tracts for the assessment area in 2010 was \$119,379. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2010 was \$813, which is less affordable than the monthly mortgage payment of \$437 for a \$119,379 home for 30 years at 3.65% interest rate. However, 38.3% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts accounted for 17.0% of the housing stock in the assessment area. In these census tracts, 45.3% of the housing units were owner-occupied, 23.8% were rental units, and 31.0% were vacant. The median age of housing stock in these tracts was 24 years and the median housing value in moderate-income tracts for the assessment area in 2010 was \$234,392. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2010 was \$988, which is less affordable than the monthly mortgage payment of \$858 for a \$234,392 home for 30 years at 3.65% interest rate. However, 11.6% of families in moderate-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 43.3%, was in middle-income tracts. In these census tracts, 50.0% of the housing units were owner-occupied, 12.9% were rental units, and 37.1% were vacant. The median age of housing stock in these tracts was 17 years and 5.4% of families in middle-income tracts had incomes

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below the poverty level. The median housing value in middle-income tracts for the assessment area in 2010 was \$318,796.

Approximately 35.5% of the housing stock in the assessment area was in upper-income tracts. In these census tracts, 46.5% of the housing units were owner-occupied, 8.4% were rental units, and 45.1% were vacant. The median age of housing stock in these tracts was 18 years and only 4.2% of families in upper-income tracts had incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2010 was \$597,892.

2015 Census Estimates

According to 2015 census estimates, there are 201,582 housing units in the Naples-Immokalee-Marco Island MSA. Of total housing in the assessment area, 46.5% of the units are classified as owner-occupied while 17.9% are classified as rental units and 35.6% of the available housing is vacant. Overall, 3.6% of the housing stock in the assessment area is in low-income tracts. In these census tracts, 29.2% of the housing units are owner-occupied, 47.0% are rental units, and 23.8% are vacant.

The median age of housing stock in these tracts is 33 years and the median housing value in low-income tracts for the assessment area in 2015 was \$86,645. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2015 was \$708, which is less affordable than the monthly mortgage payment of \$331 for an \$86,645 home for 30 years at 3.99% interest rate. However, 39.6% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts account for 18.3% of the housing stock in the assessment area. In these census tracts, 41.4% of the housing units are owner-occupied, 27.7% are rental units, and 30.9% are vacant. The median age of housing stock in these tracts is 33 years and the median housing value in moderate-income tracts for the assessment area in 2015 was \$147,910. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2015 was \$959, which is less affordable than the monthly mortgage payment of \$564 for a \$147,910 home for 30 years at 3.99% interest rate. However, 17.8% of families in moderate-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 38.0%, is in middle-income tracts. In these census tracts, 50.5% of the housing units are owner-occupied, 17.8% are rental units, and 31.6% are vacant. The median age of housing stock in these tracts is 28 years and 6.1% of families in middle-income tracts have incomes below the poverty

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level. The median housing value in middle-income tracts for the assessment area in 2015 was \$242,660.

Approximately 40.0% of the housing stock in the assessment area is in upper-income tracts. In these census tracts, 46.6% of the housing units are owner-occupied, 11.0% are rental units, and 42.5% are vacant. The median age of housing stock in these tracts is 29 years and only 3.7% of families in upper-income tracts have incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2015 was \$433,365.

Employment and Economic Conditions

The national average unemployment rates for 2015, 2016, and 2017 were 5.3%, 4.9%, and 4.4%, respectively. Unemployment rates were similar to the annual unemployment rates for Florida and the nation. According to the 2010 census, the unemployment rate was 10.4% in low-income tracts and 9.5% in moderate-income tracts. At the time of 2015 census estimates, the unemployment rates had increased to 17.4% and 9.7% in low- and moderate-income tracts, respectively. The high unemployment rates in LMI tracts could affect loan demand from these tracts.

The following chart shows unemployment rates relevant to the assessment area for 2015 through 2017.

Annual Average Unemployment Rate			
AREA	2015	2016	2017
MSA	5.3%	4.7%	4.1%
State of Florida	5.5%	4.8%	4.2%
United States	5.3%	4.9%	4.4%

The tourism industry dominates the area economy. Almost two million people visit annually, and the leisure and hospitality sector is the largest employment sector; this sector accounts for 19.1% of all non-farm jobs in the MSA. The wholesale and retail trade sector is the second largest payroll sector due to the numerous malls and shops that cater to residents and tourists.

Most recently, the mining, logging, and construction sector has added the most jobs of any other sector. Education and health services have experienced growth partly due to the opening of the Robert, Mariann and Megan MacDonald Pediatric Emergency Department within the NHC Healthcare System. Manufacturing has increased due to the presence of Arthrex, a medical device manufacturer.¹⁵

¹⁵ Villavicencio, Diana. "Comprehensive Housing Market Analysis: Naples-Immokalee-Marco Island, Florida." HUDUser.gov.
<https://www.huduser.gov/portal/publications/pdf/NaplesFL-comp-17.pdf> (accessed September 27, 2018)

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Community Contacts and Community Development Opportunities

As part of the evaluation of the Naples MSA, two community contacts involved in economic development and community services were made. The two contacts highlighted needs for affordable housing, public transportation, financial literacy, small business education, and economic development.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

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Combined Demographics Report

Assessment Area: FL - Naples MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	8.1	4,181	5.2	1,603	38.3	17,150	21.1
Moderate-income	15	20.3	15,305	18.9	1,780	11.6	14,862	18.3
Middle-income	28	37.8	35,999	44.4	1,934	5.4	15,449	19
Upper-income	24	32.4	25,650	31.6	1,070	4.2	33,674	41.5
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	74	100.0	81,135	100.0	6,387	7.9	81,135	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	8,154	2,191	2.4	26.9	3,532	43.3	2,431	29.8
Moderate-income	33,145	15,007	16.4	45.3	7,875	23.8	10,263	31
Middle-income	84,139	42,071	46	50	10,889	12.9	31,179	37.1
Upper-income	69,091	32,128	35.2	46.5	5,824	8.4	31,139	45.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	194,529	91,397	100.0	47.0	28,120	14.5	75,012	38.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	800	2.9	754	2.9	38	2.5	8	2.9
Moderate-income	3,552	12.9	3,379	13.1	141	9.2	32	11.6
Middle-income	11,931	43.2	11,248	43.6	586	38.2	97	35.3
Upper-income	11,311	41	10,405	40.4	768	50.1	138	50.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	27,594	100.0	25,786	100.0	1,533	100.0	275	100.0
	Percentage of Total Businesses:			93.4		5.6		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	22	10.5	16	8.4	6	31.6	0	0
Moderate-income	35	16.7	30	15.7	5	26.3	0	0
Middle-income	96	45.7	91	47.6	5	26.3	0	0
Upper-income	57	27.1	54	28.3	3	15.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	210	100.0	191	100.0	19	100.0	0	.0
	Percentage of Total Farms:			91.0		9.0		.0

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Combined Demographics Report

Assessment Area: FL - Naples MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	8.1	4,106	4.7	1,627	39.6	18,278	20.8
Moderate-income	15	20.3	17,381	19.8	3,098	17.8	15,489	17.7
Middle-income	26	35.1	35,130	40.1	2,147	6.1	16,908	19.3
Upper-income	26	35.1	31,048	35.4	1,147	3.7	36,990	42.2
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	74	100.0	87,665	100.0	8,019	9.1	87,665	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,284	2,124	2.3	29.2	3,424	47	1,736	23.8
Moderate-income	36,919	15,285	16.3	41.4	10,215	27.7	11,419	30.9
Middle-income	76,674	38,746	41.3	50.5	13,667	17.8	24,261	31.6
Upper-income	80,705	37,578	40.1	46.6	8,849	11	34,278	42.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	201,582	93,733	100.0	46.5	36,155	17.9	71,694	35.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	779	3.1	716	3.1	54	3.4	9	3.9
Moderate-income	3,058	12.3	2,925	12.7	115	7.3	18	7.8
Middle-income	10,005	40.4	9,346	40.7	575	36.4	84	36.4
Upper-income	10,935	44.1	9,981	43.5	834	52.9	120	51.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	24,777	100.0	22,968	100.0	1,578	100.0	231	100.0
	Percentage of Total Businesses:			92.7		6.4		.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	23	12.2	17	10	6	31.6	0	0
Moderate-income	32	16.9	26	15.3	6	31.6	0	0
Middle-income	74	39.2	71	41.8	3	15.8	0	0
Upper-income	60	31.7	56	32.9	4	21.1	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	189	100.0	170	100.0	19	100.0	0	.0
	Percentage of Total Farms:			89.9		10.1		.0

Conclusions With Respect to Performance Tests

Lending Test

The bank's lending performance is Needs to Improve. Lending activity reflects poor responsiveness to assessment area credit needs. The geographic distribution of loans reflects a poor penetration throughout the assessment area. In addition, the distribution of lending to borrowers reflects poor penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes few, if any, community development loans.

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, as its volume is more significant than its HMDA lending. During the review period, the bank reported 20 (40.0%) small business loans compared to 30 (60.0%) HMDA loans in the Naples MSA. Therefore, small business lending was given less weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

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

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

The bank's distribution of lending to borrowers reflects a poor penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, small business lending received the most weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is poor. While Comerica has a small percentage of the market in this assessment area, opportunities exist for improvement regarding its small dollar credits and small business lending.

In 2016, the bank originated 14.3% of its loans, representing 18.5% by dollar volume, to businesses with gross annual revenue of \$1 million or less. This lags behind aggregate CRA lenders, which originated 42.1% (34.8% by dollar) to small businesses during the same period. In 2017, the bank closed the gap with aggregate CRA lenders, as it originated 50.0% of loans (17.4% by dollar) to small business while aggregate lenders originated 50.2% (38.7% by dollar) to businesses with gross revenue under \$1 million; however, the bank

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originated only six loans that year. Comerica's lending also fell below D&B demographic data, which in 2016 and 2017 reported 93.4% and 92.7%, respectively, of all businesses in the assessment area with gross annual revenues of \$1 million during the review period.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that only a small percentage of the bank's small business loans were made in loan amounts of \$100,000 or less. In 2016, only 14.3% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 96.5% for the aggregate. In 2017, only 16.7% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 95.1% for the aggregate. While the bank's competition primarily consists of large multi-regional or nationwide banks, it appears the bank has further opportunities to serve small businesses in the assessment area.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered good when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers is good. In 2016, the bank originated 8.3% (1.2% by dollar volume) of its total HMDA loans to low-income borrowers, which was greater than the 1.9% (0.7% by dollar) of total HMDA loans originated by the aggregate to low-income borrowers. In 2017, the bank's originations to low-income borrowers rose to 25.0% (14.9% by dollar) and remained greater than aggregate lending to low-income borrowers, which represented 2.7% of total HMDA loans and 1.0% of the total dollar volume. Low-income families made up 21.1% of total families in the assessment area in 2016 and 20.8% in 2017.

The bank's HMDA lending to moderate-income borrowers is good. In 2016, the bank originated 50.0% (10.3% by dollar volume) of its total HMDA-related loans to moderate-income borrowers, which was greater than the 10.4% of HMDA-related loans (5.3% by dollar) originated by the aggregate HMDA lenders. In 2017, the bank also exceeded aggregate, originating 25.0% of HMDA-related loans (19.4% by dollar volume) to moderate-income borrowers as compared with the aggregate lenders' 11.6% of HMDA loans (6.2% by dollar) to moderate-income borrowers. Moderate-income families made up 18.3% of families in the assessment area in 2016 and 17.7% in 2017.

Home Equity Lines of Credit

HELOC lending by borrower income in the assessment area is considered adequate when compared to the demographic characteristics of the assessment area.

HELOC lending to low-income borrowers is adequate. In 2015 and 2016, Comerica originated one HELOC to a low-income borrower, which represented 7.1% of its HELOC

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lending. The bank's performance was significantly below the percentage of low-income families in the assessment area, at 21.1%. However, 38.3% of low-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated no HELOCs to low-income borrowers. The bank's performance was significantly below the percentage of low-income families in the assessment area, at 20.8%. However, 39.6% of low-income families live below the poverty level, which might make it difficult to qualify for a HELOC. Additionally, it should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

HELOC lending to moderate-income borrowers is adequate. In 2015 and 2016, Comerica originated one HELOC to a moderate-income borrower, which represented 7.1% of its HELOC lending. The bank's performance was below the percentage of moderate-income families in the assessment area, at 18.3%. In 2017, the bank originated no HELOCs to moderate-income borrowers. The bank's performance was below the percentage of moderate-income families in the assessment area, at 17.7%. However, 17.8% of moderate-income families live below the poverty level, which might make it difficult to qualify for a HELOC.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects a poor penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects poor penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts is adequate considering the low percentage of small businesses located in those tracts and aggregate lending levels. In 2016, the bank originated no small business loans in low-income tracts, compared to 2.9% of businesses located in those tracts and 1.7% of aggregate loans (1.9% by dollar). In 2017, no small business loans were originated in low-income tracts, compared to 3.1% of businesses located in those tracts and 2.7% of aggregate loans (3.7% by dollar).

The bank's small business lending in moderate-income census tracts is poor. In 2016, the bank originated no small business loans in moderate-income tracts, compared to 13.1% of

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businesses located in those tracts and 10.9% of aggregate loans (8.6% by dollar). In 2017, the bank's performance improved slightly, as 16.7% of small business loans (7.0% by dollar) were originated in moderate-income tracts, compared to 12.7% of businesses located in those tracts and 10.7% of aggregate loans (6.6% by dollar). However, it should be noted that the bank's percentage in 2017 consisted of only one origination.

The bank's small business lending in middle-income tracts was higher than the percentage of small businesses in these tracts, and the bank originated more loans in those tracts than aggregate lenders. The bank's small business lending in upper-income tracts was slightly lower than the percentage of small businesses in these tracts, and the bank originated fewer loans in those tracts than aggregate lenders.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects a poor penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank makes very few home improvement and multifamily loans, these were not significant product lines and were not analyzed separately.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. While the bank originated no home purchase loans in these tracts during the review period, aggregate lenders also struggled to originate loans. In 2016, aggregate lenders originated 2.1% of home purchase loans (1.5% by dollar) in low-income census tracts; in 2017, aggregate lenders originated 1.3% of loans (0.9% by dollar) in low-income census tracts. Additionally, in 2016 and 2017, only 2.4% and 2.3% of owner-occupied units in the assessment area, respectively, were located in low-income tracts, which may provide for limited lending opportunities.

Home purchase lending in moderate-income tracts is poor. In 2016, the bank originated 16.7% of its home purchase loans in moderate-income census tracts (4.4% by dollar); in 2017, Comerica originated no loans. In 2016, aggregate lenders originated 14.1% of home purchase loans (10.4% by dollar) in moderate-income tracts; in 2017, aggregate lenders originated 17.3% (12.0% by dollar) of home purchase loans in these tracts. Additionally, in 2016 and 2017, 16.4% and 16.3% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts. Although it appears that the bank exceeded the aggregate in 2016, the bank only originated one loan in a moderate-income tract.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

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Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. While the bank originated no home refinance loans in these tracts during the review period, aggregate lenders also struggled to originate loans. In 2016, aggregate lenders originated only 1.4% of loans in low-income areas; in 2017, aggregate lenders originated 1.0% of loans in low-income areas. Additionally, in 2016 and 2017, only 2.4% and 2.3% of owner-occupied units in the assessment area, respectively, were located in low-income tracts, which may provide for limited lending opportunities.

Home refinance lending in moderate-income tracts is poor. Comerica originated no home refinance loans in moderate-income tracts during the review period. In contrast, aggregate lenders originated 12.1% of loans (7.7% by dollar) in moderate-income tracts in 2016 and 15.8% (9.5% by dollar) in 2017. Furthermore, the percentage of owner-occupied units located in moderate-income census tracts demonstrates lending opportunity; in 2016, 16.4% of owner-occupied units were located in moderate-income tracts, and this number remained steady at 16.3% in 2017.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Equity Lines of Credit

Considering the percentage of owner-occupied units, the geographic distribution of Comerica's HELOC lending is good.

Comerica's HELOC lending in low-income census tracts is adequate. In 2015 and 2016, the bank did not originate any HELOCs in low-income tracts. This performance was comparable to the percentage of owner-occupied units in these tracts, at 2.4%. In 2017, the bank again originated no HELOCs in low-income tracts, which was comparable to the percentage of owner-occupied units in these tracts, at 2.3%.

Comerica's HELOC lending in moderate-income census tracts is good. In 2015 and 2016, the bank originated 7.1% of its HELOCs in moderate-income tracts. This performance was below the percentage of owner-occupied units in these tracts, at 16.4%. In 2017, the bank originated 66.7% of its HELOCs in moderate-income tracts, which exceeded the percentage of owner-occupied units in these tracts, at 16.3%; however, this percentage in 2017 consisted of only two loans.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

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Community Development Lending

The bank makes few, if any, community development loans in the assessment area, and the bank's commitment to making qualified community development loans demonstrates a poor responsiveness to meeting community needs. The bank originated no community development loans in the assessment area during the review period. However, two loans benefitting the statewide area provided \$2.0 million to revitalization and stabilization efforts, and one loan benefitting the statewide area provided \$500,000 to economic development. Economic development funds were used to create a small business loan pool to provide opportunities to small and micro business owners located in Comerica's Florida assessment areas.

Investment Test

The Investment Test rating is Low Satisfactory. The bank has an excellent level of qualified community development investments and grants considering its deposits in the assessment area but exhibits poor responsiveness to credit and community development needs. The total amount of investments and contributions, at \$463,304, has more than tripled from the previous evaluation. The bank's investments were primarily focused on affordable housing, although the overall amount was low.

Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Affordable Housing	2	374	-	-	-	-	2	374
Community Services	-	-	-	-	16	74	16	74
Economic Development	-	-	-	-	1	15	1	15
Total	2	374	-	-	17	89	19	463

Although the majority of investments and grants were focused on affordable housing, which was a need identified by multiple contacts in the assessment area, contacts also identified needs in small business mentoring and counseling as well as economic development, which remained largely unaddressed by the bank. Therefore, further opportunities for responsiveness remain available to the bank.

One investment benefitting multiple assessment areas provided \$311,568 to affordable housing efforts in Naples.

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Service Test

The bank's Service Test performance is Needs to Improve. Its retail and community development services reflect poor responsiveness to the needs of the Naples MSA. The bank's branch hours are reasonable and services do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. While the bank provides a relatively high level of community development services, delivery systems are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in its assessment area.

Retail Services

The bank's delivery systems are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's one branch office and one ATM as of December 31, 2017, was compared to the distribution of households and businesses among the tract categories within the assessment area. The only branch location is located in an upper-income tract, which is surrounded by middle- and upper-income tracts. It is not adjacent to any low- or moderate tracts. The closest low- or moderate-income tract is two miles away from the branch; all others are located across waterways or interstates from the single branch location. The table below summarizes the bank's retail locations in the Naples MSA.

Tract Income	% of Geographies	% of Population	Branches		Full Service ATMs		Cash Only ATMS	
			#	%	#	%	#	%
Low	8.1	7.2	-	-	-	-	-	-
Moderate	20.3	23.5	-	-	-	-	-	-
Middle	35.1	38.0	-	-	-	-	-	-
Upper	35.1	31.3	1	100.0	1	100.0	-	-
Unknown	1.4	-	-	-	-	-	-	-
Total	100.0	100.0	1	100.0	1	100.0	-	-

The bank did not open or close any branches in the assessment area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals, as there is only one location.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and in other leadership roles, for nine community development financial organizations offering community development services that focused on community

Naples-Immokalee-Marco Island MSA

services targeting LMI individuals. The table below shows the number of events by type of involvement. Employees participated in 367 events or meetings during the review period.

Purpose	# Events / Meetings
Community Services Benefitting LMI Individuals/Geographies	367
Total	367

Metropolitan Areas Reviewed Using Limited Scope Procedures

METROPOLITAN AREAS (Limited Scope Review)

Description of Institution's Operations

- **Fort Lauderdale-West Palm Beach Assessment Area**
 - As of December 31, 2017, the bank operated six branches in the assessment area, representing 1.4% of its branches.
 - As of June 30, 2017, the bank had \$270.5 million in deposits in this assessment area, representing a market share of 0.3%. The \$270.5 million also represents 0.5% of the bank's total deposits.
- **Sarasota Assessment Area**
 - As of December 31, 2017, the bank operated zero branches in the assessment area.
 - As of June 30, 2017, the bank had no deposits in this assessment area.
 - Little weight was given to this assessment area given the lack of branching and deposits.
- **Stuart Assessment Area**
 - As of December 31, 2017, the bank operated zero branches in the assessment area.
 - As of June 30, 2017, the bank had no deposits in this assessment area.
 - Little weight was given to this assessment area given the lack of branching and deposits.

Conclusions With Respect to Performance Tests

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with the bank's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix H for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited scope assessment areas can be found in Appendices E and H, respectively.

Assessment Area	Lending Test	Investment Test	Service Test
Fort Lauderdale – West Palm Beach	Exceeds	Exceeds	Exceeds
Sarasota	Consistent	Below	Below
Stuart	Consistent	Below	Below

The performance in the limited-scope assessment areas did not change the bank's overall rating, but did affect some individual components of the Lending Test in Florida.

State of Michigan

CRA Rating for Michigan: Satisfactory

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

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects adequate responsiveness to the assessment areas' credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of HMDA lending reflects good penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Makes an adequate level of community development loans.
- Has an excellent level of qualified community development investments.
- Exhibits adequate responsiveness to credit and community development needs.
- Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- Provides a relatively high level of community development services.

Scope

The assessment areas were selected for full-scope reviews based on factors identified in the FFIEC procedures. These include, but are not limited to, the level of the institution's lending, investment, and service activity as well as opportunities for such in the assessment areas; population density; the number of other institutions in the assessment areas; and the length of time since the most recent full-scope review. Additionally, examiner knowledge of the assessment areas was considered when determining the full-scope assessment areas;

State of Michigan

approximately 32% of Kalamazoo residents live in poverty, putting the area in the 97th percentile among the nation's cities.¹⁶

Overall, approximately 75.4% of lending activity (by number of loans), 90.3% of the total deposits, and 75.4% of total branches within Michigan were evaluated through the full-scope reviews. Descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Kalamazoo-Portage
- Southeast Michigan

In addition, limited scope reviews were conducted for the remaining ten assessment areas, including:

- Ann Arbor MSA
- Battle Creek MSA
- Fenton
- Gladwin County
- Grand Rapids-Wyoming
- Jackson MSA
- Lansing-East Lansing
- Lenawee County
- Midland MSA
- Muskegon MSA

The time period, products, and affiliates evaluated for this state are consistent with the scope discussed in the Institution section of this report. The bank's performance in the Southeast Michigan assessment area was given greater consideration in determining the overall state rating, as a substantial majority of Comerica's activities are located in this assessment area.

Description of Institution's Operations in Michigan

The bank operates 195 branch offices in its assessment areas in Michigan, representing 44.5% of total branches. As of June 30, 2017, the bank had \$29.5 billion in deposits in the state, representing 51.4% of total deposits. According to the June 30, 2017, FDIC Summary of Deposits, the bank had a deposit market share of 14.0% and ranked 2nd out of 126 FDIC-insured financial institutions across the state. Of the 3,257 HMDA loans originated and purchased by the bank, 1,612 (49.5%) were in the Michigan assessment areas. Of the 28,214 small business loans originated and purchased by the bank, 11,919 (42.2%) were in the Michigan assessment areas.

¹⁶ Michigan Live. "Kalamazoo poverty report shows slow recovery after Great Recession." Mlive.com https://www.mlive.com/news/kalamazoo/index.ssf/2017/03/poverty_data_shows_racial_disp.html

Conclusions with Respect to Performance Tests in Michigan

Lending Test

In Michigan, the bank's overall Lending Test rating is Low Satisfactory. Lending activity reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of lending to borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

The bank is both a small business and HMDA lender. During the review period, the bank reported 11,919 (88.1%) small business loans compared to 1,612 (11.9%) HMDA loans. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices G, H, and I.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

Consistent with the performance standards for a large bank, conclusions about the bank's distribution of lending within its assessment areas considers the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home mortgage loans and consumer to low-, moderate-, middle-, and upper-income individuals; small-business and small-farm loans to businesses and farms with gross annual revenues of \$1 million or less; and, small-business and small-farm loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of revenue different sizes. Of the two full-scope assessment areas, one is considered adequate and one is considered good. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

The geographic distribution of loans reflects good penetration throughout the assessment areas. Of the two full-scope assessment areas, both are considered good. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Lending

In Michigan, the bank makes an adequate level of community development loans. During the review period, the bank originated 151 community development loans for \$338.6 million in Michigan representing 37.7% of the bank's total community development loans by number and 28.6% by total dollar amount. Of the two full-scope assessment areas, Southeast Michigan's performance exceeded that of Kalamazoo-Portage, as a low level of community development loans were originated within the Kalamazoo-Portage assessment area.

The community development loans originated during the evaluation period were for a variety of purposes. The table below summarizes the bank's community development lending.

Community Development Lending		
Purpose	Number	\$('000s)
Affordable Housing	12	30,870
Community Services Benefitting LMI Individuals	129	233,140
Economic Development	2	6,751
Revitalize and Stabilize	8	67,831
Total	151	338,592

Further, Comerica provided \$115,044 in consortia loans through Community or Economic Development Corporations in the state. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts.

Investment Test

In Michigan, the bank's overall Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants, and exhibits adequate responsiveness to credit and community development needs. The table below summarizes the bank's community development investments and grants by assessment area within the state. Specific details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

State of Michigan

Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Assessment Area	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Full Review:								
Kalamazoo-Portage	2	231	-	-	41	133	43	364
Southeast Michigan	30	22,314	6	15,673	830	4,532	866	42,519
Limited Review:								
Ann Arbor MSA	6	937	1	4,004	47	125	54	5,066
Battle Creek MSA	1	122	-	-	25	38	26	160
Fenton	-	-	-	-	8	24	8	24
Grand Rapids-Wyoming	8	3,230	1	1,955	113	300	122	5,485
Jackson MSA	2	247	-	-	24	73	26	320
Lansing-East Lansing	2	173	5	14,791	62	152	69	15,116
Midland MSA	1	101	-	-	22	27	23	128
Muskegon MSA	1	137	-	-	33	48	34	185
Gladwin County	-	-	-	-	-	-	-	-
Lenawee County	-	-	-	-	-	-	-	-
Total	53	27,492	13	36,423	1,205	5,452	1,271	69,367

In addition, a total of seven investments benefited the statewide area, which included the bank's assessment areas, and 29 benefited multiple assessment areas which included those in Michigan. These investments totaled \$1.9 million and \$99.3 million, respectively.

Furthermore, a total of seven donations benefited the statewide area, which included the bank's assessment areas. These donations totaled \$1,000.

Service Test

In Michigan, the bank's overall Service Test rating is Low Satisfactory.

Retail Services

Overall, delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's assessment areas and individuals of different income levels.

Banking services and hours of operations do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or to low- and moderate-income individuals. The record of opening and closing offices has not affected the accessibility of its delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals.

While delivery systems are reasonably accessible to the bank's assessment areas overall, one limited-scope assessment area was deemed to have branches that were unreasonably inaccessible to significant portions of the bank's geographies and individuals of different income levels in its AAs. The rating of the Fenton assessment area reflected this inaccessibility, as the assessment area excluded many of the LMI tracts in the MSA at the time of the evaluation. However, since that time, the bank has revised its Fenton assessment area to include the entire Flint MSA.

Community Development Services

Overall, the bank provides a relatively high level of community development services. In Kalamazoo-Portage, Comerica was a leader in providing community development services; in the Southeast Michigan full-scope assessment area, the bank provided a relatively high level of community development services. Staff provided community development services to approximately 223 organizations and participated in more than 2,100 events. Particularly noteworthy is the bank's participation in financial literacy initiatives. The bank participated in financial literacy initiatives with LMI schools throughout the state. In addition, one bank staff member served on the board of directors for the statewide initiative Neighborhood Associations of Michigan.

An analysis of the community development services delivered in each assessment area is provided in the following pages.

Kalamazoo-Portage

METROPOLITAN AREAS (Full Scope Review)

Description of Operations in Kalamazoo-Portage

The Kalamazoo-Portage Assessment Area includes Kalamazoo County. This county, along with Van Buren County, which is excluded from the assessment area, make up the Kalamazoo-Portage Metropolitan Statistical Area (MSA).

According to the 2010 census, the assessment area population was 250,331, which accounts for 2.5% of the population in the state. Based on the 2017 population of 262,985, the assessment area has experienced an increase of 5.1% since 2010. Kalamazoo, the largest city within the assessment area accounts for 28.8% of the population in the assessment area. Other notable cities in the assessment area are Battle Creek and Portage.

County	2017 Population Estimate	% Increase Since 2010	Major Municipalities
Kalamazoo	262,985	5.1	Kalamazoo*, Portage, Battle Creek

*Denotes county seat

As of December 31, 2017, the bank operated six branches in the assessment area representing 1.4% of its branches. There is one branch located in a low-income census tract, three branches in moderate-income census tracts, and two located in middle-income census tracts.

According to the FDIC, as of June 30, 2017, the bank had \$237.1 million deposits in this assessment area representing 0.4% of the bank's total deposits. It also represents a deposit market share of 7.5%, which includes all other FDIC-insured deposits that are located in the assessment area. PNC Bank holds the largest deposit share at 28.7%, followed by Fifth Third Bank, at 20.4%, and First National Bank of Michigan, at 10.3%.

For 2016, there were 263 financial institutions that reported HMDA data in the assessment area. The bank ranked 57th in HMDA market share with 0.1%. Lake Michigan Credit Union and Consumers Credit Union dominated the market with 11.5% and 8.7% of the market share, respectively. For 2017, there were 279 financial institutions that reported HMDA data in the assessment area. The bank ranked 56th in HMDA market share with 0.1%. Once again, Lake Michigan Credit Union and Consumers Credit Union dominated the market with 11.1% and 9.5% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding mortgage lending.

Kalamazoo-Portage

For 2016, there were 57 financial institutions that reported CRA small business data in the assessment area. The bank ranked 8th in market share with 3.2%. Citibank and American Express Bank dominated the market with 25.5% and 13.7% of the market share, respectively. For 2017, there were 61 financial institutions that reported CRA small business data in the assessment area. The bank ranked 9th in market share with 3.3%. PNC Bank and American Express Bank dominated the market with 16.9% and 14.9% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Kalamazoo-Portage MSA as a whole, but not the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 77.3% of the total MSA population, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to census data.

At the 2010 census, the Kalamazoo-Portage assessment area was made up of 57 distinct census tracts. Of the total tracts, seven (12.3%) were designated as low-income, 11 (19.3%) were designated moderate-income, 26 (45.6%) were middle-income, and 13 (22.8%) were upper-income. As of the 2015 census estimates, seven (12.3%) were designated as low-income, ten (17.5%) were designated moderate-income, 24 (42.1%) were middle-income, 15 (26.3%) were upper-income, and one (1.8%) was designated as having an unknown-income level.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; and the HUD; D&B; and the Texas Workforce Commission.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses both U.S. Census 2010 data and 2015 estimated data. The following chart reflects the estimated median family income for the years 2010 and 2015 for the Kalamazoo-Portage MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 census, 11.2% of the families in the assessment area lived below the poverty level. According to the 2015 census estimates, 11.2% of the families in the assessment area lived below the poverty level.

Kalamazoo-Portage

Income Level	2010	2015
Median Income	\$61,337	\$61,008
Low-income	< \$30,669	< \$30,504
Moderate-income	\$30,669 - \$49,069	\$30,504 - \$48,806
Middle-income	\$49,070 - \$73,603	\$48,807 - \$73,209
Upper-income	≥ \$73,604	≥ \$73,210

Housing Characteristics

2010 Census

According to the 2010 census, there were 109,233 housing units in the Kalamazoo-Portage Assessment Area. Of total housing in the assessment area, 59.3% of the units were classified as owner-occupied while 31.7% were classified as rental units and 9.0% of the available housing was vacant. Overall, 8.7% of the housing stock in the assessment area was in low-income tracts. In these census tracts, 33.7% of the housing units were owner-occupied, 52.2% were rental units, and 14.1% were vacant.

The median age of housing stock in these tracts was 60 years and the median housing value in low-income tracts for the assessment area in 2010 was \$68,770. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2010 was \$647, which is less affordable than the monthly mortgage payment of \$252 for a \$68,770 home for 30 years at 3.65% interest rate. However, 40.6% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts accounted for 17.0% of the housing stock in the assessment area. In these census tracts, 36.1% of the housing units were owner-occupied, 51.5% were rental units, and 12.4% were vacant. The median age of housing stock in these tracts was 55 years and the median housing value in moderate-income tracts for the assessment area in 2010 was \$99,371. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2010 was \$619, which is less affordable than the monthly mortgage payment of \$364 for a \$99,371 home for 30 years at 3.65% interest rate. However, 18.3% of families in moderate-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 49.4%, was in middle-income tracts. In these census tracts, 62.2% of the housing units were owner-occupied, 29.5% were rental units, and 8.3% were vacant. The median age of housing stock in these tracts was 39 years and 9.4% of families in middle-income tracts had incomes

Kalamazoo-Portage

below the poverty level. The median housing value in middle-income tracts for the assessment area in 2010 was \$137,152.

Approximately 24.9% of the housing stock in the assessment area was in upper-income tracts. In these census tracts, 78.4% of the housing units were owner-occupied, 15.6% were rental units, and 6.0% were vacant. The median age of housing stock in these tracts was 32 years and only 5.1% of families in upper-income tracts had incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2010 was \$195,825.

2015 Census Estimates

According to 2015 census estimates, there are 110,196 housing units in the Kalamazoo-Portage Assessment Area. Of total housing in the assessment area, 58.4% of the units are classified as owner-occupied while 32.7% are classified as rental units and 8.9% of the available housing is vacant. Overall, 11.1% of the housing stock in the assessment area is in low-income tracts. In these census tracts, 25.8% of the housing units are owner-occupied, 57.1% are rental units, and 17.1% are vacant.

The median age of housing stock in these tracts is 50 years and the median housing value in low-income tracts for the assessment area in 2015 was \$56,700. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2015 was \$671, which is less affordable than the monthly mortgage payment of \$216 for a \$56,700 home for 30 years at 3.99% interest rate. However, 39.8% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts account for 14.0% of the housing stock in the assessment area. In these census tracts, 41.8% of the housing units are owner-occupied, 46.6% are rental units, and 11.6% are vacant. The median age of housing stock in these tracts is 61 years and the median housing value in moderate-income tracts for the assessment area in 2015 was \$89,999. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2015 was \$643, which is less affordable than the monthly mortgage payment of \$343 for a \$89,999 home for 30 years at 3.99% interest rate. However, 18.7% of families in moderate-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 47.7%, is in middle-income tracts. In these census tracts, 61.3% of the housing units are owner-occupied, 30.9% are rental units, and 7.8% are vacant. The median age of housing stock in these tracts is 49 years and 9.5% of families in middle-income tracts have incomes below the poverty level.

Kalamazoo-Portage

The median housing value in middle-income tracts for the assessment area in 2015 was \$127,534.

Approximately 26.9% of the housing stock in the assessment area is in upper-income tracts. In these census tracts, 75.8% of the housing units are owner-occupied, 18.1% are rental units, and 6.1% are vacant. The median age of housing stock in these tracts is 42 years and only 4.3% of families in upper-income tracts have incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2015 was \$ 184,579.

Employment and Economic Conditions

The national average unemployment rates for 2015, 2016, and 2017 were 5.3%, 4.9%, and 4.4%, respectively. Unemployment rates for the assessment area were lower than the annual unemployment rates for the MSA, Michigan, and the nation. According to the 2010 census, the unemployment rate was 22.3% in low-income tracts and 13.9% in moderate-income tracts. At the time of 2015 census estimates, the unemployment rates had decreased to 18.6% and 11.0% in low- and moderate-income tracts, respectively. However, these remain high, and high unemployment rates in LMI tracts could affect loan demand from these tracts.

The following chart shows unemployment rates relevant to the assessment area for 2015 through 2017.

Annual Average Unemployment Rate			
AREA	2015	2016	2017
Kalamazoo County	4.3%	4.1%	4.1%
MSA	4.8%	4.4%	4.5%
State of Michigan	5.4%	5.0%	4.6%
United States	5.3%	4.9%	4.4%

The overall average hourly wage for workers in the Kalamazoo area is lower than that of the U.S. as a whole.¹⁷ The largest employment sectors are health care and social assistance, manufacturing, and retail trade. The 12th largest employer in the state of Michigan is Bronson Healthcare Group, located in Kalamazoo.¹⁸

¹⁷ Bureau of Labor Statistics. "Kalamazoo Area Economic Summary." BLS.gov
https://www.bls.gov/regions/midwest/summary/blssummary_kalamazoo.pdf (accessed September 30, 2018)

¹⁸ Career One Stop. "State Profile: Largest Employers – Michigan." CareerOneStop.org.
<https://www.careerinfonet.org/oview6.asp?socode=&stfips=26&from=State&id=&nodeid=12> (accessed January 10, 2019)

Kalamazoo-Portage

Community Contacts and Community Development Opportunities

As part of the evaluation of the Kalamazoo-Portage assessment area, two community contacts involved in affordable housing and small business development were made. The two contacts highlighted needs for affordable housing, homeowner education, financial literacy, and sponsorship of small business workshops.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

Kalamazoo-Portage

Combined Demographics Report

Assessment Area: MI - Kalamazoo-Portage

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	12.3	4,086	6.8	1,657	40.6	12,955	21.6
Moderate-income	11	19.3	6,928	11.5	1,266	18.3	9,592	16
Middle-income	26	45.6	30,486	50.8	2,861	9.4	12,121	20.2
Upper-income	13	22.8	18,486	30.8	945	5.1	25,318	42.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	57	100.0	59,986	100.0	6,729	11.2	59,986	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	9,471	3,192	4.9	33.7	4,941	52.2	1,338	14.1
Moderate-income	18,534	6,684	10.3	36.1	9,551	51.5	2,299	12.4
Middle-income	53,979	33,561	51.8	62.2	15,913	29.5	4,505	8.3
Upper-income	27,249	21,375	33	78.4	4,239	15.6	1,635	6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	109,233	64,812	100.0	59.3	34,644	31.7	9,777	9.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	684	7	557	6.5	122	11.8	5	6.3
Moderate-income	1,729	17.8	1,460	16.9	253	24.5	16	20.3
Middle-income	4,749	48.8	4,204	48.8	512	49.5	33	41.8
Upper-income	2,573	26.4	2,401	27.8	147	14.2	25	31.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	9,735	100.0	8,622	100.0	1,034	100.0	79	100.0
	Percentage of Total Businesses:			88.6		10.6		.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	23	10.5	18	9	5	26.3	0	0
Middle-income	139	63.2	128	63.7	11	57.9	0	0
Upper-income	57	25.9	54	26.9	3	15.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	220	100.0	201	100.0	19	100.0	0	.0
	Percentage of Total Farms:			91.4		8.6		.0

Kalamazoo-Portage

Combined Demographics Report

Assessment Area: MI - Kalamazoo-Portage

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	12.3	4,549	7.5	1,812	39.8	12,389	20.5
Moderate-income	10	17.5	6,660	11	1,243	18.7	10,041	16.6
Middle-income	24	42.1	29,410	48.7	2,783	9.5	12,072	20
Upper-income	15	26.3	19,717	32.6	857	4.3	25,936	42.9
Unknown-income	1	1.8	102	0.2	51	50	0	0
Total Assessment Area	57	100.0	60,438	100.0	6,746	11.2	60,438	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,207	3,153	4.9	25.8	6,969	57.1	2,085	17.1
Moderate-income	15,402	6,428	10	41.7	7,185	46.6	1,789	11.6
Middle-income	52,563	32,229	50.1	61.3	16,236	30.9	4,098	7.8
Upper-income	29,613	22,442	34.9	75.8	5,356	18.1	1,815	6.1
Unknown-income	411	50	0.1	12.2	293	71.3	68	16.5
Total Assessment Area	110,196	64,302	100.0	58.4	36,039	32.7	9,855	8.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	658	7.6	528	7	127	12.4	3	4.1
Moderate-income	1,596	18.5	1,296	17.2	285	27.9	15	20.5
Middle-income	3,935	45.6	3,480	46.1	430	42.1	25	34.2
Upper-income	2,409	27.9	2,206	29.2	174	17	29	39.7
Unknown-income	40	0.5	33	0.4	6	0.6	1	1.4
Total Assessment Area	8,638	100.0	7,543	100.0	1,022	100.0	73	100.0
	Percentage of Total Businesses:			87.3		11.8		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	1	2	1.1	0	0	0	0
Moderate-income	21	10.6	16	8.8	5	27.8	0	0
Middle-income	113	56.8	105	58	8	44.4	0	0
Upper-income	63	31.7	58	32	5	27.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	199	100.0	181	100.0	18	100.0	0	.0
	Percentage of Total Farms:			91.0		9.0		.0

Conclusions With Respect to Performance Tests

Lending Test

The bank's lending performance is Low Satisfactory. The geographic distribution of loans reflects a good penetration throughout the assessment area. In addition, the distribution of lending to borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. However, the bank makes a low level of community development loans, and lending activity reflects poor responsiveness to assessment area credit needs.

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, as its volume is more significant than its HMDA lending. During the review period, the bank reported 450 (92.6%) small business loans compared to 36 (7.4%) HMDA loans in the Kalamazoo-Portage assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

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

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

The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, small business lending received the most weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The assessment area is saturated with large national banks; therefore, competition for business loans is high in the market.

In 2016, the bank originated 27.0% of its loans, representing 23.6% by dollar volume, to businesses with gross annual revenue of \$1 million or less. This lags behind aggregate CRA lenders, which originated 43.3% (34.7% by dollar) to small businesses during the same period. In 2017, the bank again fell below aggregate CRA lenders by originating 23.6% of loans (14.0% by dollar) to small business while aggregate lenders originated 49.4% (34.9% by dollar) to businesses with gross revenue under \$1 million. Comerica's lending also fell

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below D&B demographic data, which in 2016 and 2017 reported 88.6% and 87.3%, respectively, of all businesses in the assessment area with gross annual revenues of \$1 million during the review period.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a large percentage of the bank's small business loans were made in loan amounts of \$100,000 or less. In 2016, 44.6% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 10.8% for the aggregate. In 2017, 48.0% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 88.4% for the aggregate. However, it should be noted that the bank's competition consists primarily of large multi-regional or nationwide banks.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered good when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers is good. In 2016, the bank originated 9.1% (3.2% by dollar volume) of its total HMDA loans to low-income borrowers, which was greater than the 6.9% (3.1% by dollar) of total HMDA loans originated by the aggregate to low-income borrowers. In 2017, the bank's originations to low-income borrowers rose to 20.0% (6.9% by dollar) and again exceeded aggregate lending to low-income borrowers, which represented 6.2% of total HMDA loans and 2.6% of the total dollar volume. While the percentages compare favorably to aggregate data, Comerica's overall lending levels were low, as the lending percentages to low-income borrowers represented only four total loans during the review period. Low-income families made up 21.6% of total families in the assessment area in 2016 and 20.5% in 2017, meaning that both the bank and aggregate lending are below demographics.

The bank's HMDA lending to moderate-income borrowers is good. In 2016, the bank originated 36.4% (21.8% by dollar volume) of its total HMDA-related loans to moderate-income borrowers, which was greater than the 17.6% of HMDA-related loans (10.7% by dollar) originated by the aggregate HMDA lenders. In 2017, the bank once again exceeded aggregate, originating 20.0% of HMDA-related loans (11.0% by dollar volume) to moderate-income borrowers as compared with the aggregate lenders' 17.6% of HMDA loans (10.9% by dollar) to moderate-income borrowers. While the percentages compare favorably to aggregate data, Comerica's overall lending levels were low, as the lending percentages to moderate-income borrowers represented only nine total loans during the review period. Both the bank and the aggregate HMDA lenders were comparable to demographics, with 16.0% and 16.6% of families in 2016 and 2017 (respectively) in the assessment area classified as moderate-income according to available data.

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Home Equity Lines of Credit

HELOC lending by borrower income in the assessment area is considered good when compared to the demographic characteristics of the assessment area.

HELOC lending to low-income borrowers is good. In 2015 and 2016, Comerica originated 16.2% of its HELOCs to low-income borrowers. The bank's performance was slightly below the percentage of low-income families in the assessment area, at 21.6%. However, 40.6% of low-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 9.1% of its HELOCs to low-income borrowers. The bank's performance was significantly below the percentage of low-income families in the assessment area, at 20.5%. However, 39.8% of low-income families live below the poverty level, which might make it difficult to qualify for a HELOC. Additionally, it should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

HELOC lending to moderate-income borrowers is excellent. In 2015 and 2016, Comerica originated 17.6% of its HELOCs to moderate-income borrowers. The bank's performance exceeded the percentage of moderate-income families in the assessment area, at 16.0%. Additionally, 18.3% of moderate-income families live below the poverty level, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 18.2% of its HELOCs to moderate-income borrowers. The bank's performance exceeded the percentage of moderate-income families in the assessment area, at 16.6%. Additionally, 18.7% of moderate-income families live below the poverty level, which might make it difficult to qualify for a HELOC.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts is excellent. The bank's small business lending by number in low-income tracts during the review period exceeded

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the percentage of small businesses located in these tracts as well as aggregate lending. In 2016, 8.1% of small business loans (7.3% by dollar) were originated in low-income tracts, compared to 6.5% of businesses located in those tracts and 5.5% of aggregate loans (7.6% by dollar). In 2017, 7.9% of small business loans (6.7% by dollar) were originated in low-income tracts, compared to 7.0% of businesses located in those tracts and 6.9% of aggregate loans (7.6% by dollar).

The bank's small business lending in moderate-income census tracts is excellent. In 2016, 21.6% of small business loans (19.1% by dollar) were originated in moderate-income tracts, compared to 16.9% of businesses located in those tracts and 14.7% of aggregate loans (18.2% by dollar). In 2017, the bank's performance improved, as 25.2% of small business loans (29.8% by dollar) were originated in moderate-income tracts, compared to 17.2% of businesses located in those tracts and 19.8% of aggregate loans (20.9% by dollar).

The bank's small business lending in middle-income tracts was higher than the percentage of small businesses in these tracts, and the bank originated more loans in those tracts than aggregate lenders. The bank's small business lending in upper-income tracts was slightly lower overall than the percentage of small businesses in these tracts, and the bank originated fewer loans in those tracts than aggregate lenders.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank makes very few home improvement and multifamily loans, these were not significant product lines and were not analyzed separately.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. While the bank originated no home purchase loans in these tracts during the review period, aggregate lenders struggled to lend as well. In 2016, aggregate lenders originated only 1.7% of home purchase loans (0.8% by dollar) in low-income census tracts; in 2017, aggregate lenders originated 3.1% of loans (1.6% by dollar) in low-income census tracts. Additionally, in both 2016 and 2017, only 4.9% of owner-occupied units in the assessment area were located in low-income tracts, which may indicate limited lending opportunities.

Home purchase lending in moderate-income tracts is poor. In 2016, the bank originated 20.0% of its home purchase loans in moderate-income census tracts (6.5% by dollar); in 2017, Comerica originated no loans. In 2016, aggregate lenders originated 10.7% of home purchase loans (6.1% by dollar) in moderate-income tracts; in 2017, aggregate lenders originated 10.8% (6.5% by dollar) of home purchase loans in these tracts. Additionally, in 2016 and 2017, 10.3% and 10.0% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts. Although it appears that the bank

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exceeded the aggregate in 2016, the bank only originated one loan in a moderate-income tract.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. While the bank originated no home refinance loans in these tracts during the review period, aggregate lenders also struggled to originate loans. In 2016, aggregate lenders originated only 1.1% of loans in low-income areas; in 2017, aggregate lenders originated 1.8% of loans in low-income areas. Additionally, in both 2016 and 2017, only 4.9% of owner-occupied units in the assessment area were located in low-income tracts, which may indicate limited lending opportunities.

Home refinance lending in moderate-income tracts is adequate. The bank originated no loans in 2016; however, in 2017, the bank originated 33.3% of its home refinance loans in moderate-income census tracts (22.0% by dollar). While this represents only one origination, home mortgage lending is not a key product for the bank and overall lending in the assessment area was low as a result. Furthermore, aggregate lending in these tract types was also fairly low: in 2016, aggregate lenders originated 7.0% of home refinance loans (4.1% by dollar) in moderate-income tracts, and in 2017, aggregate lenders originated 9.7% (6.6% by dollar) of home refinance loans in these tracts. In 2016 and 2017, 10.3% and 10.0% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Equity Lines of Credit

Considering the percentage of owner-occupied units, the geographic distribution of Comerica's HELOC lending is poor.

Comerica's HELOC lending in low-income census tracts is poor. In 2015 and 2016, the bank originated 1.5% of its HELOCs in low-income tracts. This performance was slightly below the percentage of owner-occupied units in these tracts, at 4.9%. In 2017, the bank originated no HELOCs in low-income tracts, while the percentage of owner-occupied units in these tracts remained steady at 4.9%.

Comerica's HELOC lending in moderate-income census tracts is poor. In 2015 and 2016, the bank originated 5.9% of its HELOCs in moderate-income tracts. This performance was below the percentage of owner-occupied units in these tracts, at 10.3%. In 2017, the

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bank originated 3.6% of its HELOCs in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts, at 10.0%.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Community Development Lending

The bank makes a low level of community development loans in the assessment area. The bank originated three community development loans in the Kalamazoo-Portage Assessment Area totaling approximately \$8.0 million during the review period. The bank's commitment to making qualified community development loans demonstrates a poor responsiveness to meeting community needs. The table below provides a breakdown of the types of community development loans the bank originated during the review period.

Community Development Lending		
Purpose	#	\$000s
Community Services	3	8,040
Totals	3	8,040

The majority of community development funds (\$8.0 million) was to fund healthcare services for LMI seniors and/or disabled individuals.

The contacts in the assessment area mentioned financial education and sponsorship of small business workshops as needs within the assessment area. However, none of the bank's community development lending funded these types of initiatives.

Investment Test

The Investment Test rating is Low Satisfactory. The bank has an excellent level of qualified community development investments and grants given its deposits in the assessment area, but exhibits poor responsiveness to credit and community development needs. The bank's investments were primarily focused on affordable housing.

The total amount of investments and contributions, at \$364,115, has increased substantially from the previous evaluation. However, the overall level remains low.

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Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Affordable Housing	2	231	-	-	4	32	6	263
Community Services	-	-	-	-	32	83	32	83
Revitalization and Stabilization	-	-	-	-	5	18	5	18
Total	2	231	-	-	41	133	43	364

Although the majority of investments and grants were focused on affordable housing, which was a need identified by multiple contacts in the assessment area, the overall amount was low. Furthermore, the bank ranks 4th out of 15 institutions for deposit market share, indicating there are opportunities for Comerica to further demonstrate responsiveness in the assessment area.

Three investments benefitting multiple assessment areas provided \$534,640 to affordable housing efforts in Kalamazoo. Fourteen investments and grants benefitting the statewide area provided approximately \$160,917 to affordable housing efforts, \$542 to community services targeting LMI individuals, and \$458 to revitalization and stabilization.

Service Test

The bank's Service Test performance is High Satisfactory. Its retail and community development services reflect good responsiveness to the needs of the Kalamazoo-Portage assessment area. Delivery systems are readily accessible to all portions of the assessment area. The bank's branch hours are reasonable and services do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. The bank is a leader in providing community development services. Bank officers and employees actively support organizations dedicated to community development initiatives.

Retail Services

The bank's delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment area, as 66.7% of branches in the assessment area are located in low- or moderate-income tracts. The distribution of the bank's six branch offices and six ATMs as of December 31, 2017, was compared to the distribution of households and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Kalamazoo-Portage assessment area.

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Tract Income	% of Geographies	% of Population	Branches		Full Service ATMs		Cash Only ATMS	
			#	%	#	%	#	%
Low	12.3	8.0	1	16.7	1	16.7	-	-
Moderate	17.5	16.7	3	50.0	3	50.0	-	-
Middle	42.1	51.8	2	33.3	2	33.3	-	-
Upper	26.3	21.9	-	-	-	-	-	-
Unknown	1.8	1.6	-	-	-	-	-	-
Total	100.0	100.0	6	100.0	6	100.0	-	-

The bank did not open or close any branches in the assessment area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are essentially the same throughout the assessment area.

Community Development Services

The bank is a leader in providing community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and in other leadership roles, for ten community development financial organizations offering affordable housing and community services targeting LMI individuals. The table below shows the number of events by type of involvement. Employees participated in 105 events or meetings during the review period.

Purpose	# Events / Meetings
Affordable Housing	39
Community Services Benefitting LMI Individuals/Geographies	66
Total	105

The bank supports affordable housing initiatives through the LIFT Foundation, which is a community resource for building, preserving, operating, and maintaining homes for people with low incomes in west Michigan. This is responsive to needs identified by contacts in the area. Bank personnel also serve with Ministry with Community, whose mission is to rebuild lives by providing food, shelter, and other supportive services to those struggling with homelessness and poverty.

Southeast Michigan

Description of Operations in Southeast Michigan

The Southeast Michigan Assessment Area includes Livingston, Macomb, Oakland, and Wayne Counties and portions of Lapeer County. These counties, along with St. Clair County, which is excluded from the assessment area, make up the Detroit-Warren-Dearborn MSA.

According to the 2010 census, the assessment area population was 4,091,311, which accounted for 41.84% of the population in the state. Based on the 2017 population of 4,153,652, the assessment area has experienced an increase of 1.5% since 2010. Detroit, the largest city within the assessment area, accounts for 16.2% of the population in the assessment area. Other notable cities in the assessment area are Pontiac, Utica, and Dearborn.

County	2017 Population Estimate	% Increase Since 2010	Major Municipalities
Lapeer	88,174	0.0	Lapeer*, Brown City, Imlay City
Livingston	189,651	4.8	Howell*, Brighton
Macomb	871,375	3.6	Mount Clemens*, Utica, Warren
Oakland	1,250,836	4.0	Pontiac*, Auburn Hills, Troy
Wayne	1,753,616	-3.7	Detroit*, Dearborn, Lincoln Park

*Denotes county seat

As of December 31, 2017, the bank operated 141 branches in the assessment area representing 32.2% of its branches. There are 10 branches located in low-income census tracts, 29 branches in moderate-income census tracts, 42 in middle-income census tracts, and 59 branches in upper-income census tracts; one branch was located in an unknown-income census tract. Additionally, Comerica operates one LPO in a moderate-income tract and three LPOs in upper-income tracts.

According to the FDIC, as of June 30, 2017, the bank had \$26.4 billion in deposits in this assessment area representing 46.0% of the bank's total deposits. It also represents a deposit market share of 20.8%, which includes all other FDIC-insured deposits that are located in the assessment area. JPMorgan Chase holds the largest deposit share at 28.0%, followed by Comerica, and Bank of America, at 12.3%.

Southeast Michigan

For 2016, there were 583 financial institutions that reported HMDA data in the assessment area. The bank ranked 68th in HMDA market share with 0.3%. Quicken Loans, Inc. and Wells Fargo Bank dominated the market with 11.9% and 7.3% of the market share, respectively. For 2017, there were 572 financial institutions that reported HMDA data in the assessment area. The bank ranked 70th in HMDA market share with 0.3%. Once again, Quicken Loans, Inc. and Wells Fargo Bank dominated the market with 11.6% and 5.8% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding mortgage lending.

For 2016, there were 152 financial institutions that reported CRA small business data in the assessment area. The bank ranked 8th in market share with 2.9%. Citibank and American Express Bank dominated the market with 27.5% and 19.4% of the market share, respectively. For 2017, there were 145 financial institutions that reported CRA small business data in the assessment area. The bank ranked 8th in market share with 3.0%. American Express Bank and Chase Bank USA dominated the market with 22.0% and 12.9% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Detroit-Warren-Dearborn MSA as a whole, but not the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 95.3% of the total MSA population, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to census data.

At the 2010 census, the Southeast Michigan assessment area was made up of 1,239 distinct census tracts. Of the total tracts, 139 (11.2%) were designated as low-income, 297 (24.0%) were designated moderate-income, 423 (34.1%) were middle-income, 363 (29.3%) were upper-income, and 17 (1.4%) were designated as having an unknown-income level. As of the 2015 census estimates, 170 (13.7%) were designated as low-income, 306 (24.7%) were designated moderate-income, 382 (30.8%) were middle-income, 357 (28.8%) were upper-income, and 24 (1.9%) were designated as having an unknown-income level.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; and the HUD; D&B; and the Texas Workforce Commission.

Southeast Michigan

Income Characteristics

For purposes of classifying borrower income, this evaluation uses both U.S. census 2010 data and 2015 estimated data. The following chart reflects the estimated median family income for the years 2010 and 2015 for the Detroit-Warren-Dearborn MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 census, 10.8% of the families in the assessment area lived below the poverty level. According to the 2015 census estimates, 12.9% of the families in the assessment area lived below the poverty level.

Income Level	2010	2015
Median Income	\$66,024	\$67,425
Low-income	< \$33,012	< \$33,713
Moderate-income	\$33,012 - \$52,819	\$33,713 - \$53,940
Middle-income	\$52,820 - \$79,228	\$53,941 - \$80,910
Upper-income	≥ \$79,229	≥ \$80,911

Housing Characteristics

2010 Census

According to the 2010 census, there were 1,800,471 housing units in the Southeast Michigan Assessment Area. Of total housing in the assessment area, 64.3% of the units were classified as owner-occupied while 23.9% were classified as rental units and 11.8% of the available housing was vacant. Overall, 9.6% of the housing stock in the assessment area was in low-income tracts. In these census tracts, 29.9% of the housing units were owner-occupied, 43.6% were rental units, and 26.5% were vacant.

The median age of housing stock in these tracts was 61 years and the median housing value in low-income tracts for the assessment area in 2010 was \$73,382. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2010 was \$686, which is less affordable than the monthly mortgage payment of \$269 for a \$73,382 home for 30 years at 3.65% interest rate. However, 40.7% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts accounted for 24.3% of the housing stock in the assessment area. In these census tracts, 50.5% of the housing units were owner-occupied, 32.5% were rental units, and 17.0% were vacant. The median age of housing stock in these tracts was 56 years and the median housing value in moderate-income tracts for the assessment area in 2010 was \$97,322. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2010 was \$771, which is less affordable than the monthly mortgage payment of \$356 for a

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\$97,322 home for 30 years at 3.65% interest rate. However, 20.2% of families in moderate-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 36.7%, was in middle-income tracts. In these census tracts, 69.6% of the housing units were owner-occupied, 21.5% were rental units, and 9.0% were vacant. The median age of housing stock in these tracts was 44 years and 7.2% of families in middle-income tracts have incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2010 was \$154,000.

Approximately 29.4% of the housing stock in the assessment area was in upper-income tracts. In these census tracts, 80.4% of the housing units were owner-occupied, 13.3% were rental units, and 6.3% were vacant. The median age of housing stock in these tracts was 37 years and only 3.2% of families in upper-income tracts had incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2010 was \$224,505.

2015 Census Estimates

According to 2015 census estimates, there are 1,802,601 housing units in the Southeast Michigan Assessment Area. Of total housing in the assessment area, 60.3% of the units are classified as owner-occupied while 27.5% are classified as rental units and 12.1% of the available housing is vacant. Overall, 12.2% of the housing stock in the assessment area is in low-income tracts. In these census tracts, 30.4% of the housing units are owner-occupied, 42.5% are rental units, and 27.1% are vacant.

The median age of housing stock in these tracts is 61 years and the median housing value in low-income tracts for the assessment area in 2015 was \$40,898. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2015 was \$712, which is less affordable than the monthly mortgage payment of \$156 for a \$40,898 home for 30 years at 3.99% interest rate. However, 42.7% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts account for 24.6% of the housing stock in the assessment area. In these census tracts, 46.2% of the housing units are owner-occupied, 36.0% are rental units, and 17.7% are vacant. The median age of housing stock in these tracts is 61 years and the median housing value in moderate-income tracts for the assessment area in 2015 was \$65,312. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2015 was \$827, which is less affordable than the monthly mortgage payment of \$249 for a \$65,312 home for 30 years at 3.99% interest rate. However, 22.8% of families in moderate-

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income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 32.7%, is in middle-income tracts. In these census tracts, 67.0% of the housing units are owner-occupied, 25.1% are rental units, and 7.9% are vacant. The median age of housing stock in these tracts is 52 years and 8.4% of families in middle-income tracts have incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2015 was \$123,628.

Approximately 30.2% of the housing stock in the assessment area is in upper-income tracts. In these census tracts, 77.0% of the housing units are owner-occupied, 17.1% are rental units, and 5.9% are vacant. The median age of housing stock in these tracts is 46 years and only 4.0% of families in upper-income tracts have incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2015 was \$200,849.

Employment and Economic Conditions

The national average unemployment rates for 2015, 2016, and 2017 were 5.3%, 4.9%, and 4.4%, respectively. With the exception of two counties, unemployment rates for all counties in the assessment area were higher than the annual unemployment rates for Michigan and the nation. Unemployment rates for Livingston County and Oakland County were slightly lower than those of the state and the country. According to the 2010 census, the unemployment rate was 25.1% in low-income tracts and 18.3% in moderate-income tracts. At the time of 2015 census estimates, the unemployment rates had decreased slightly, but remained high at 24.0% and 16.0% in low- and moderate-income tracts, respectively. The high unemployment rates in LMI tracts could affect loan demand from these tracts.

The following chart shows unemployment rates relevant to the assessment area for 2015 through 2017.

Annual Average Unemployment Rate			
AREA	2015	2016	2017
Lapeer County	7.2%	6.4%	5.4%
Livingston County	4.6%	4.1%	3.3%
Macomb County	5.8%	5.2%	4.3%
Oakland County	4.7%	4.2%	3.4%
Wayne County	6.9%	6.3%	5.4%
MSA	5.9%	5.3%	4.4%
State of Michigan	5.4%	5.0%	4.6%
United States	5.3%	4.9%	4.4%

Southeast Michigan

The Detroit-Warren-Dearborn MSA is one of the population centers of Michigan; 43.4% of the state's population resides within the MSA. The MSA had a real gross domestic product of \$260.6 billion in 2017, making it the 14th largest metropolitan economy in the U.S.¹⁹ and similar to the economic output of countries such as Finland and Egypt²⁰. The city of Detroit is the 32nd largest city by GDP in the world.

Detroit is the primary headquarters of the domestic auto industry as the home of the "Big Three": General Motors, Ford, and Chrysler. The MSA is also home to several Fortune 500 companies, including Lear Corporation, DTE Energy, and Autoliv. Many firms in the area exist primarily to support the automotive industry.²¹ Other notable companies with a headquarters or major presence in the area include Compuware, IBM, and Google.

Community Contacts and Community Development Opportunities

As part of the evaluation of the Southeast Michigan assessment area, two community contacts involved in small business development and local government services were made. The two contacts highlighted needs for affordable housing, loans and grants to non-profits, and small business training for financing.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

¹⁹ U.S. Bureau of Economic Analysis. "Gross Domestic Product by Metropolitan Area, 2017." BEA.gov. https://www.bea.gov/system/files/2018-09/gdp_metro0918_0.pdf (accessed October 10, 2018)

²⁰ Country Economy. "GDP: Gross Domestic Product." CountryEconomy.com <https://countryeconomy.com/gdp> (accessed October 10, 2018)

²¹ Crain's Detroit Business. "Fewer Michigan Companies on Fortune 500 but Metro Detroit Makes Gains." CrainsDetroit.com. <https://www.crainsdetroit.com/article/20170608/news/630891/fewer-michigan-companies-fortune-500-metro-detroit-makes-gains> (accessed January 10, 2019)

Southeast Michigan

Combined Demographics Report

Assessment Area: MI - Southeast

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	139	11.2	71,115	6.8	28,979	40.7	227,372	21.7
Moderate-income	297	24	219,749	21	44,405	20.2	177,481	17
Middle-income	423	34.1	392,662	37.6	28,135	7.2	206,432	19.7
Upper-income	363	29.3	361,912	34.6	11,536	3.2	434,189	41.5
Unknown-income	17	1.4	36	0	0	0	0	0
Total Assessment Area	1,239	100.0	1,045,474	100.0	113,055	10.8	1,045,47	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	172,011	51,413	4.4	29.9	75,015	43.6	45,583	26.5
Moderate-income	437,372	220,935	19.1	50.5	142,197	32.5	74,240	17
Middle-income	660,402	459,367	39.7	69.6	141,829	21.5	59,206	9
Upper-income	530,115	426,127	36.8	80.4	70,398	13.3	33,590	6.3
Unknown-income	571	53	0	9.3	60	10.5	458	80.2
Total Assessment Area	1,800,471	1,157,895	100.0	64.3	429,499	23.9	213,077	11.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	10,231	5.9	8,538	5.5	1,622	9.4	71	6.8
Moderate-income	31,196	18	27,132	17.5	3,910	22.6	154	14.8
Middle-income	62,574	36.2	56,480	36.5	5,750	33.3	344	33.1
Upper-income	68,295	39.5	62,083	40.1	5,748	33.3	464	44.7
Unknown-income	683	0.4	430	0.3	248	1.4	5	0.5
Total Assessment Area	172,979	100.0	154,663	100.0	17,278	100.0	1,038	100.0
	Percentage of Total Businesses:			89.4		10.0		.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	21	2.3	20	2.2	1	3.2	0	0
Moderate-income	82	8.8	78	8.7	4	12.9	0	0
Middle-income	490	52.7	481	53.5	9	29	0	0
Upper-income	336	36.1	320	35.6	16	51.6	0	0
Unknown-income	1	0.1	0	0	1	3.2	0	0
Total Assessment Area	930	100.0	899	100.0	31	100.0	0	.0
	Percentage of Total Farms:			96.7		3.3		.0

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Combined Demographics Report

Assessment Area: MI - Southeast

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	170	13.7	89,261	8.7	38,094	42.7	232,928	22.7
Moderate-income	306	24.7	216,266	21.1	49,308	22.8	168,273	16.4
Middle-income	382	30.8	351,740	34.3	29,481	8.4	192,329	18.7
Upper-income	357	28.8	367,439	35.8	14,878	4	432,768	42.2
Unknown-income	24	1.9	1,592	0.2	599	37.6	0	0
Total Assessment Area	1,239	100.0	1,026,298	100.0	132,360	12.9	1,026,29	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	219,705	66,878	6.2	30.4	93,384	42.5	59,443	27.1
Moderate-income	442,828	204,621	18.8	46.2	159,628	36	78,579	17.7
Middle-income	589,771	395,403	36.4	67	147,855	25.1	46,513	7.9
Upper-income	543,945	418,763	38.5	77	93,215	17.1	31,967	5.9
Unknown-income	6,352	1,466	0.1	23.1	2,423	38.1	2,463	38.8
Total Assessment Area	1,802,601	1,087,131	100.0	60.3	496,505	27.5	218,965	12.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	11,210	7.3	9,259	6.8	1,878	11	73	7.7
Moderate-income	30,257	19.6	25,892	19	4,214	24.6	151	16
Middle-income	48,637	31.5	44,012	32.3	4,345	25.3	280	29.6
Upper-income	63,303	41	56,426	41.4	6,440	37.6	437	46.2
Unknown-income	828	0.5	559	0.4	264	1.5	5	0.5
Total Assessment Area	154,235	100.0	136,148	100.0	17,141	100.0	946	100.0
	Percentage of Total Businesses:			88.3		11.1		.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	17	2	15	1.9	2	6.7	0	0
Moderate-income	97	11.6	92	11.4	5	16.7	0	0
Middle-income	431	51.6	421	52.3	10	33.3	0	0
Upper-income	289	34.6	276	34.3	13	43.3	0	0
Unknown-income	1	0.1	1	0.1	0	0	0	0
Total Assessment Area	835	100.0	805	100.0	30	100.0	0	.0
	Percentage of Total Farms:			96.4		3.6		.0

Conclusions With Respect to Performance Tests

Lending Test

The bank's lending performance is High Satisfactory. Lending activity reflects excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects a good penetration throughout the assessment area. In addition, the distribution of lending to borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, as its volume is more significant than its HMDA lending. During the review period, the bank reported 8,560 (88.1%) small business loans compared to 1,153 (11.9%) HMDA loans in the Southeast Michigan assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

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

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

The bank's distribution of lending to borrowers reflects good penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, small business lending received the most weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The assessment area is saturated with large national banks; therefore, competition for business loans is high in the market, which is experiencing economic growth and increased loan demand.

In 2016, the bank originated 26.2% of its loans, representing 19.2% by dollar volume, to businesses with gross annual revenue of \$1 million or less. This lags behind aggregate CRA lenders, which originated 42.1% (28.4% by dollar) to small businesses during the same period. In 2017, the bank again fell below aggregate CRA lenders by originating 24.7% of loans (17.2% by dollar) to small business while aggregate lenders originated 52.0% (30.5%

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by dollar) to businesses with gross revenue under \$1 million. Comerica's lending also fell below D&B demographic data, which reported 89.4% and 88.3% of all businesses in the assessment area with gross annual revenues of \$1 million during the review period.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a large percentage of the bank's small business loans were made in loan amounts of \$100,000 or less. In 2016, 49.7% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 95.1% for the aggregate. In 2017, 49.4% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 93.9% for the aggregate. However, it should be noted that the bank's competition consists primarily of large multi-regional or nationwide banks.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered excellent when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers is excellent. In 2016, the bank originated 10.8% (3.9% by dollar volume) of its total HMDA loans to low-income borrowers, which exceeded the 7.4% (3.6% by dollar) of total HMDA loans originated by the aggregate to low-income borrowers. In 2017, the bank's originations to low-income borrowers rose to 17.6% (8.0% by dollar) and again exceeded aggregate lending, which represented 8.1% of total HMDA loans and 4.0% of the total dollar volume. Low-income families made up 21.7% of total families in the assessment area in 2016 and 22.7% in 2017, meaning that both the bank and aggregate lending are below demographics.

The bank's HMDA lending to moderate-income borrowers is excellent. In 2016, the bank originated 24.7% (11.9% by dollar volume) of its total HMDA-related loans to moderate-income borrowers, which exceeded the 16.5% of HMDA-related loans (10.8% by dollar) originated by the aggregate HMDA lenders. In 2017, the bank again exceeded aggregate, originating 39.8% of HMDA-related loans (25.2% by dollar volume) to moderate-income borrowers as compared with the aggregate lenders' 18.3% of HMDA loans (12.2% by dollar) to moderate-income borrowers. Both the bank and the aggregate HMDA lenders were comparable to, or exceeded, the demographics, with 17.0% and 16.4% of families in 2016 and 2017 (respectively) in the assessment area classified as moderate-income according to available data.

Home Equity Lines of Credit

HELOC lending by borrower income in the assessment area is considered good when compared to the demographic characteristics of the assessment area.

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HELOC lending to low-income borrowers is adequate. In 2015 and 2016, Comerica originated 12.3% of its HELOCs to low-income borrowers. The bank's performance was below the percentage of low-income families in the assessment area, at 21.7%. However, 40.7% of low-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 11.4% of its HELOCs to low-income borrowers. The bank's performance was below the percentage of low-income families in the assessment area, at 22.7%. However, 42.7% of low-income families live below the poverty level, which might make it difficult to qualify for a HELOC. Additionally, it should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

HELOC lending to moderate-income borrowers is excellent. In 2015 and 2016, Comerica originated 18.2% of its HELOCs to moderate-income borrowers. The bank's performance exceeded the percentage of moderate-income families in the assessment area, at 17.0%. In 2017, the bank originated 19.1% of its HELOCs to moderate-income borrowers. The bank's performance exceeded the percentage of moderate-income families in the assessment area, at 16.4%.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts is excellent. The bank's small business lending by number in low-income tracts during the review period exceeded the percentage of small businesses located in these tracts as well as aggregate lending. In 2016, 9.2% of small business loans (8.9% by dollar) were originated in low-income tracts, compared to 5.5% of businesses located in those tracts and 4.4% of aggregate loans (5.7% by dollar). In 2017, 10.9% of small business loans (12.1% by dollar) were originated in low-income tracts, compared to 6.8% of businesses located in those tracts and 6.6% of aggregate loans (7.4% by dollar).

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The bank's small business lending in moderate-income census tracts is excellent. In 2016, the bank's performance improved, as 22.6% of small business loans (24.7% by dollar) were originated in moderate-income tracts, compared to 17.5% of businesses located in those tracts and 15.8% of aggregate loans (19.0% by dollar). In 2017, 22.4% of small business loans (23.0% by dollar) were originated in moderate-income tracts, compared to 19.0% of businesses located in those tracts and 18.9% of aggregate loans (21.5% by dollar).

The bank's small business lending in middle- and upper-income tracts was lower than the percentage of small businesses in these tracts. When compared to the aggregate by percentage, the bank originated fewer loans in middle- and upper-income tracts.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects good penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank makes very few home improvement and multifamily loans, these were not significant product lines and were not analyzed separately.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. In 2016, Comerica originated 1.5% of its loans (0.6% by dollar) in low-income tracts; while this is lower than the owner-occupancy rate of 4.4%, it is comparable to aggregate lending at 1.2% (0.7% by dollar). In 2017, Comerica originated 1.6% of its loans (0.8% by dollar) in low-income tracts; while this is lower than the owner-occupancy rate of 6.2%, it is comparable to aggregate lending at 2.3% (1.1% by dollar).

Home purchase lending in moderate-income tracts is good. In 2016, the bank originated 13.9% of its home purchase loans in moderate-income census tracts (7.6% by dollar); while this is lower than the owner-occupancy rate of 19.1%, it exceeds aggregate lending levels of 12.2% (7.4% by dollar). In 2017, the bank originated 18.6% of its home purchase loans in moderate-income census tracts (13.6% by dollar), which is comparable to the owner-occupancy rate (18.8%) and exceeds lending by the aggregate (14.6% by number, 9.1% by dollar).

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. In 2016, Comerica originated 0.6% of loans in low-income tracts (0.1% by dollar). Aggregate lenders also struggled to originate loans, originating only 0.7% of loans (0.4% by dollar) in these tracts.

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In 2017, the bank originated 1.5% of loans (0.6% by dollar) in low-income census tracts, which was comparable to aggregate lending (1.6% by number, 0.8% by dollar). In 2016 and 2017, 4.4% and 6.2% of owner-occupied units in the assessment area, respectively, were located in low-income tracts.

Home refinance lending in moderate-income tracts is good. The bank exceeded aggregate lending in 2016 and 2017, as well as the percentage of owner-occupied units in 2017. In 2016, Comerica originated 8.3% of its home refinance loans (4.9% by dollar) in moderate-income tracts, compared to aggregate which originated 7.7% of loans in those tracts (4.5% by dollar). In 2017, the bank originated 19.0% of its home refinance loans (10.4% by dollar) in moderate-income tracts, compared to aggregate which originated 11.3% of loans in those tracts (7.2% by dollar). In 2016 and 2017, 19.1% and 18.8% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Equity Lines of Credit

Considering the percentage of owner-occupied units, the geographic distribution of Comerica's HELOC lending is poor.

Comerica's HELOC lending in low-income census tracts is adequate. In 2015 and 2016, the bank originated 1.1% of its HELOCs in low-income tracts. This performance was slightly below the percentage of owner-occupied units in these tracts, at 4.4%. In 2017, the bank originated 2.2% of its HELOCs in low-income tracts, which was slightly below the percentage of owner-occupied units in these tracts, at 6.2%.

Comerica's HELOC lending in moderate-income census tracts is poor. In 2015 and 2016, the bank originated 8.7% of its HELOCs in moderate-income tracts. This performance was below the percentage of owner-occupied units in these tracts, at 19.1%. In 2017, the bank originated 11.7% of its HELOCs in moderate-income tracts, which was below the percentage of owner-occupied units in these tracts, at 18.8%.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Community Development Lending

The bank makes a relatively high level of community development loans in the assessment area given its market share. The bank originated 104 community development loans in the Southeast Michigan Assessment Area totaling approximately \$260.1 million during the review period; this has more than doubled since the prior evaluation. The bank's

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commitment to making qualified community development loans demonstrates an excellent responsiveness to meeting community needs. The table below provides a breakdown of the types of community development loans the bank originated during the review period.

Community Development Lending		
Purpose	#	\$000s
Affordable Housing	7	27,720
Community Services	89	161,218
Economic Development	1	4,800
Revitalization and Stabilization	7	66,331
Totals	104	260,069

Four affordable housing loans totaling \$16.5 million served to purchase and rehabilitate 625 Section 8 housing units; affordable housing was identified by contacts as a need within the assessment area. One \$22.2 million loan in a low-income Detroit census tract was for the purpose of creating a mixed-use development, leveraging support from a CDFI; the project will revitalize vacant lots, and 20% of residential units are set aside for affordable housing.

Contacts identified loans to non-profits serving LMI individuals as a need within the assessment area. In response to this need, Comerica originated \$60.5 million in loans to fund these types of organizations. Examples of organizations benefitting from this responsiveness are Helping Heroes Thrive, SER Metro Detroit, Midwest Creative Investments, and several schools where a majority of the students are eligible for free or reduced lunches.

Investment Test

The Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, and exhibits good responsiveness to credit and community development needs. The bank's investments were primarily focused on affordable housing.

The total amount of investments and contributions, at \$42.5 million, has increased 68.0% from the previous evaluation.

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Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Affordable Housing	29	20,355	6	15,673	20	85	55	36,113
Community Services	-	-	-	-	708	3,449	708	3,449
Economic Development	1	1,959	-	-	17	264	18	2,223
Revitalization and Stabilization	-	-	-	-	85	734	85	734
Total	30	22,314	6	15,673	830	4,532	866	42,519

One way the bank demonstrated responsiveness to needs in the assessment area was through its economic development grants. These totaled \$157,500 and supported small business lending and / or training in the assessment area. This type of support was noted by contacts as a need within the assessment area, as was affordable housing.

In addition, 20 investments benefitting multiple assessment areas provided \$40.9 million to affordable housing efforts in Southeast Michigan.

Service Test

The bank's Service Test performance is Low Satisfactory. Its retail and community development services reflect good responsiveness to the needs of the Southeast Michigan assessment area. Delivery systems are reasonably accessible to all portions of the assessment area. The bank's branch hours are reasonable and services do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. The bank provides a relatively high level of community development services. Bank officers and employees actively support organizations dedicated to community development initiatives.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 141 branch offices and 288 ATMs as of December 31, 2017, was compared to the distribution of households and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Southeast Michigan assessment area.

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Tract Income	% of Geographies	% of Population	Branches		Full Service ATMs		Cash Only ATMS	
			#	%	#	%	#	%
Low	13.7	10.4	10	7.1	22	10.5	14	17.7
Moderate	24.7	22.9	29	20.6	51	24.4	26	32.9
Middle	30.8	33.4	42	29.8	57	27.3	10	12.7
Upper	28.8	33.1	59	41.8	77	36.8	25	31.6
Unknown	2.0	0.2	1	0.7	2	1.0	4	5.1
Total	100.0	100.0	141	100.0	209	100.0	79	100.0

The bank opened four branches (one in a moderate-income, one in a middle-income, and two in upper-income census tracts) and closed 11 branches (three in lower-income, two in moderate-income, two in middle-income, and four in upper-income census tracts) in the assessment area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are essentially the same throughout the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and in other leadership roles, for 145 community development financial organizations offering community development services that focused on community services targeting LMI individuals as well as economic development. The table below shows the number of events by type of involvement. Employees participated in 1,470 events or meetings during the review period.

Purpose	# Events / Meetings
Community Services Benefitting LMI Individuals/Geographies	1,441
Economic Development	29
Total	1,470

The bank supports LMI students in the area through involvement with various K-12 schools. Bank personnel also serve with Mary's Mantle, an organization providing shelter to homeless expecting mothers.

Comerica is also a key sponsor of The Financial Institutions Community Development Conference. This conference seeks to bring together financial, governmental, nonprofit, and private sector entities involved in neighborhood revitalization efforts to problem solve, build relationships, educate, and advance the cause of neighborhood community development in Detroit and the surrounding region. This is an example of a responsive activity given the needs in the assessment area.

METROPOLITAN AREAS (Limited Scope Review)

Description of Institution's Operations

- **Ann Arbor MSA**

- As of December 31, 2017, the bank operated nine branches in the assessment area, representing 2.1% of its branches.
- As of June 30, 2017 the bank had \$742.0 million in deposits in this assessment area, representing a market share of 8.4%. The \$742.0 million also represents 1.3% of the bank's total deposits.

- **Battle Creek MSA**

- As of December 31, 2017, the bank operated four branches in the assessment area, representing 0.9% of its branches.
- As of June 30, 2017, the bank had \$207.7 million in deposits in this assessment area, representing a market share of 18.4%. The \$207.7 million also represents 0.4% of the bank's total deposits.

- **Fenton Assessment Area**

- As of December 31, 2017, the bank operated one branch in the assessment area, representing 0.2% of its branches.
- As of June 30, 2017, the bank had \$58.5 million in deposits in this assessment area, representing a market share of 1.5%. The \$58.5 million also represents 0.1% of the bank's total deposits.

- **Grand Rapids-Wyoming Assessment Area**

- As of December 31, 2017, the bank operated 11 branches in the assessment area, representing 2.5% of its branches.
- As of June 30, 2017, the bank had \$517.9 million in deposits in this assessment area, representing a market share of 2.6%. The \$517.9 million also represents 0.9% of the bank's total deposits.

- **Jackson MSA**

- As of December 31, 2017, the bank operated nine branches in the assessment area, representing 2.1% of its branches.
- As of June 30, 2017, the bank had \$414.3 million in deposits in this assessment area, representing a market share of 25.1%. The \$414.3 million also represents 0.7% of the bank's total deposits.

- **Lansing-East Lansing Assessment Area**

- As of December 31, 2017, the bank operated seven branches in the assessment area, representing 1.6% of its branches.
- As of June 30, 2017, the bank had \$541.3 million in deposits in this assessment area, representing a market share of 8.6%. The \$541.3 million also represents 0.9% of the bank's total deposits.

- **Midland MSA**

- As of December 31, 2017, the bank operated two branches in the assessment area, representing 0.5% of its branches.

Metropolitan Areas Reviewed Using Limited Scope Procedures

- As of June 30, 2017, the bank had \$121.4 million in deposits in this assessment area, representing a market share of 6.0%. The \$121.4 million also represents 0.2% of the bank's total deposits.
- **Muskegon MSA**
 - As of December 31, 2017, the bank operated four branches in the assessment area, representing 0.9% of its branches.
 - As of June 30, 2017, the bank had \$210.6 million in deposits in this assessment area, representing a market share of 13.5%. The \$210.6 million also represents 0.4% of the bank's total deposits.

Conclusions With Respect to Performance Tests

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with the bank's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix H for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited scope assessment areas can be found in Appendices E and H, respectively.

Assessment Area	Lending Test	Investment Test	Service Test
Ann Arbor MSA	Consistent	Consistent	Below
Battle Creek MSA	Below	Below	Exceeds
Fenton	Below	Below	Consistent
Grand Rapids-Wyoming	Consistent	Consistent	Exceeds
Jackson MSA	Below	Below	Below
Lansing-East Lansing	Below	Exceeds	Exceeds
Midland MSA	Below	Consistent	Below
Muskegon MSA	Below	Below	Exceeds

The performance in the limited-scope assessment areas did not change the bank's overall rating.

Non-Metropolitan Areas Reviewed Using Limited Scope Procedures

NON-METROPOLITAN STATEWIDE AREAS (Limited Scope Review)

Description of Institution's Operations in the Non-Metropolitan Assessment Areas

- **Gladwin County Assessment Area**
 - As of December 31, 2017, the bank operated zero branches in the assessment area.
 - As of June 30, 2017, the bank had \$20.0 million in deposits in this assessment area, representing a market share of 9.2%. The \$20.0 million also represents less than 0.1% of the bank's total deposits.
 - Little weight was given to this assessment area given the lack of branching and deposits.
- **Lenawee County Assessment Area**
 - As of December 31, 2017, the bank operated one branch in the assessment area, representing 0.2% of its branches.
 - As of June 30, 2017, the bank had \$31.5 million in deposits in this assessment area, representing a market share of 3.1%. The \$31.5 million also represents 0.1% of the bank's total deposits.
 - Little weight was given to this assessment area given the lack of branching and deposits.

Conclusions With Respect to Performance Tests

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with the bank's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix I for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited scope assessment areas can be found in Appendices F and I, respectively.

Assessment Area	Lending Test	Investment Test	Service Test
Gladwin County	Below	Below	Below
Lenawee County	Below	Below	Below

The performance in the limited-scope assessment areas did not change the bank's overall rating.

State of Texas

CRA Rating for Texas: Satisfactory

The Lending Test is Rated: High Satisfactory

The Investment Test is Rated: High Satisfactory

The Service Test is Rated: High Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to the assessment areas' credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of HMDA lending reflects adequate penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Makes a relatively high level of community development loans.
- Has an excellent level of qualified community development investments.
- Exhibits good responsiveness to credit and community development needs.
- Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- Provides a relatively high level of community development services.

Scope

The assessment areas were selected for full-scope reviews based on factors identified in the FFIEC procedures. These include, but are not limited to, the level of the institution's lending, investment, and service activity as well as opportunities for such in the assessment areas; population density; the number of other institutions in the assessment areas; and the length of time since the most recent full-scope review. Overall, approximately 86.4% of lending activity (by number of loans), 86.8% of the total deposits, and 83.6% of total branches within Texas were evaluated through the full-scope reviews. Descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Dallas-Fort Worth Metroplex
- Houston

In addition, limited scope reviews were conducted for the remaining three assessment areas, including:

- Austin
- Kerr County
- San Antonio

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

Description of Institution's Operations in Texas

The bank operates 122 branch offices in its assessment areas in Texas, representing 27.9% of total branches. As of June 30, 2017, the bank had \$9.5 billion in deposits in the state, representing 16.6% of total deposits. According to the June 30, 2017, FDIC Summary of Deposits, the bank had a deposit market share of 1.2% and ranked 11th out of 529 FDIC-insured financial institutions across the state. Of the 3,257 HMDA loans originated and purchased by the bank, 566 (17.4%) were in the Texas assessment areas. Of the 28,214 small business loans originated and purchased by the bank, 6,694 (23.7%) were in the Texas assessment areas.

Conclusions with Respect to Performance Tests in Texas

Lending Test

In Texas, the bank's overall Lending Test rating is High Satisfactory. Lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of lending to borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

The bank is both a small business and HMDA lender. During the review period, the bank reported 6,474 (92.0%) small business loans compared to 566 (8.0%) HMDA loans. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices G, H, and I.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

Consistent with the performance standards for a large bank, conclusions about the bank's distribution of lending within its assessment areas considers the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home mortgage loans and consumer loans to low-, moderate-, middle-, and upper-income individuals; small-business loans to businesses with gross annual revenues of \$1 million or less; and, small-business loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of revenue different sizes. Both full-scope assessment areas were considered adequate overall. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

The geographic distribution of loans reflects good penetration throughout the assessment areas. Both full-scope assessment areas were considered good overall. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Lending

In Texas, the bank makes a relatively high level of community development loans. During the review period, the bank originated 93 community development loans for \$466.6 million in Texas representing 23.2% of the bank's total community development loans by number and 39.4% by total dollar amount. In both full-scope assessment areas, Comerica was a leader in providing community development loans; however, performance in the limited scope areas was taken into account, resulting in an overall rating as previously mentioned.

The community development loans originated during the evaluation period were for a variety of purposes. The table below summarizes the bank's community development lending.

Community Development Lending		
Purpose	Number	\$('000s)
Affordable Housing	3	21,093
Community Services Benefitting LMI Individuals	25	16,703
Economic Development	14	33,742
Revitalize and Stabilize	51	395,017
Total	93	466,555

Further, Comerica provided \$88,076 in consortia loans through Community or Economic Development Corporations in the state. These loans provide financing to qualified businesses, some of which are also located in low- and moderate-income census tracts.

Investment Test

In Texas, the bank's overall Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants, and exhibits good responsiveness to credit and community development needs. The table below summarizes the bank's community development investments and grants by assessment area within the state. Specific details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Investments								
Assessment Area	Current Period Investments		Prior Period Investments		Donations		Total	
	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Full Review:								
Dallas-Fort Worth Metroplex	26	8,392	1	956	183	1,325	210	10,673
Houston	16	15,653	4	10,248	131	779	151	26,680
Limited Review:								
Austin	10	1,214	-	-	28	300	38	1,514
San Antonio	7	14,398	2	4,902	22	264	31	19,564
Kerr County	-	-	-	-	13	61	13	61
Total	59	39,657	7	16,106	377	2,729	443	58,492

In addition, a total of four investments benefited the statewide area, which included the bank's assessment areas, and 23 benefited multiple assessment areas which included those in Texas. These investments totaled \$1.1 million and \$34.5 million, respectively.

Furthermore, a total of two donations benefited the statewide area, which included the bank's assessment areas. These donations totaled \$6,500.

Service Test

In Texas, the bank's overall Service Test rating is High Satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's assessment areas and individuals of different income levels. Banking services and hours of operations do not vary in a way that inconveniences the

assessment areas, including low- and moderate-income geographies or to low- and moderate-income individuals. Overall, the record of opening and closing offices has not affected the accessibility of its delivery systems, including to low- and moderate-income geographies and/or low- and moderate-income individuals. In the Dallas-Fort Worth assessment area, Comerica's record of opening and closing branches has improved the accessibility of its delivery systems.

Community Development Services

Overall, the bank provides a relatively high level of community development services. In both full-scope assessment areas, Comerica provided a relatively high level of community development services. Staff provided community development services to approximately 89 organizations and participated in more than 1,200 events. Particularly noteworthy is the bank's participation in financial literacy initiatives at schools and organizations across the state. An analysis of the community development services delivered in each assessment area is provided in the following pages.

Dallas-Ft. Worth Metroplex

METROPOLITAN AREAS (Full Scope Review)

Description of Operations in Dallas-Fort Worth Metroplex

The Dallas-Fort Worth Metroplex Assessment Area includes Dallas, Ellis, Rockwall, and Tarrant Counties as well as portions of Collin and Denton Counties. These counties, along with Hood, Hunt, Johnson, Kaufman, Parker, Somervell, and Wise Counties, (which are excluded from the assessment area) make up the Dallas-Fort Worth-Arlington Metropolitan Statistical Area (MSA).

According to the 2010 census, the assessment area population was 5,622,672, which accounted for 22.4% of the population in the state. Based on the 2017 population of 6,748,844, the assessment area has experienced an increase of 20.0% since 2010. Dallas, the largest city within the assessment area, accounts for 19.9% of the population in the assessment area. Other notable cities in the assessment area are Fort Worth, Plano, Allen, and Denton.

County	2017 Population Estimate	% Increase Since 2010	Major Municipalities
Collin	969,603	23.9	McKinney*, Plano, Allen, Frisco
Dallas	2,618,148	10.6	Dallas*, University Park, Farmers Branch, Irving
Denton	836,210	26.2	Denton*, Highland Village, Sanger
Ellis	173,620	16.0	Waxahachie*, Ennis, Midlothian
Rockwall	96,788	23.6	Rockwall*, Mobile City
Tarrant	2,054,475	13.6	Fort Worth*, Arlington, Bedford, Hurst, Euless

*Denotes county seat

As of December 31, 2017, the bank operated 54 branches in the assessment area representing 12.3% of its branches. There are six branches located in low-income census tracts, 12 branches in moderate-income census tracts, 16 in middle-income census tracts, and 20 branches in upper-income census tracts.

According to the FDIC, as of June 30, 2017, the bank had \$5.1 billion in deposits in this assessment area representing 8.9% of the bank's total deposits. It also represents a deposit market share of 2.0%, which includes all other FDIC-insured deposits that are

Dallas-Ft. Worth Metroplex

located in the assessment area. Bank of America holds the largest deposit share at 30.0%, followed by JPMorgan Chase, at 22.4%, and Wells Fargo Bank, at 7.3%.

For 2016, there were 971 financial institutions that reported HMDA data in the assessment area. The bank ranked 207th in HMDA market share with less than 0.1%. Wells Fargo Bank and Quicken Loans, Inc. led the market with 11.0% and 3.6% of the market share, respectively. For 2017, there were 943 financial institutions that reported HMDA data in the assessment area. The bank ranked 227th in HMDA market share with less than 0.1%. Wells Fargo Bank and JPMorgan Chase Bank led the market with 11.8% and 5.4% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding mortgage lending.

For 2016, there were 236 financial institutions that reported CRA small business data in the assessment area. The bank ranked 19th in market share with 0.6%. American Express Bank and Citibank dominated the market with 18.2% and 17.5% of the market share, respectively. For 2017, there were 236 financial institutions that reported CRA small business data in the assessment area. The bank ranked 19th in market share with 0.7%. American Express Bank and Chase Bank USA dominated the market with 20.0% and 15.2% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Dallas-Fort Worth-Arlington MSA as a whole, but not the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 87.5% of the total MSA population, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to census data.

At the 2010 census, the Dallas-Fort Worth assessment area was made up of 1,176 distinct census tracts. Of the total tracts, 143 (12.2%) were designated as low-income, 306 (26.0%) were designated moderate-income, 325 (27.6%) were middle-income, 398 (33.8%) were upper-income, and four (0.3%) were designated as having an unknown-income level. As of the 2015 census estimates, 167 (14.2%) were designated as low-income, 306 (26.0%) were designated moderate-income, 311 (26.4%) were middle-income, 385 (32.7%) were upper-income, and seven (0.6%) were designated as having an unknown-income level.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the

Dallas-Ft. Worth Metroplex

U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; and the HUD; D&B; and the Texas Workforce Commission.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses both U.S. Census 2010 data and 2015 estimated data. The following chart reflects the estimated median family income for the years 2010 and 2015 for the Dallas-Fort Worth-Arlington MSA. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 census, 10.6% of the families in the assessment area lived below the poverty level. According to the 2015 census estimates, 11.7% of the families in the assessment area lived below the poverty level.

Income Level	2010	2015
Median Income	\$66,441	\$70,025
Low-income	< \$33,221	< \$35,012
Moderate-income	\$33,221 - \$53,152	\$35,012 - \$56,020
Middle-income	\$53,153 - \$79,729	\$56,021 - \$84,030
Upper-income	≥ \$79,730	≥ \$84,031

Housing Characteristics

2010 Census

According to the 2010 census, there were 2,154,849 housing units in the Dallas-Fort Worth Metroplex Assessment Area. Of total housing in the assessment area, 55.6% of the units were classified as owner-occupied, while 35.2% were classified as rental units and 9.2% of the available housing was vacant. Overall, 10.9% of the housing stock in the assessment area was in low-income tracts. In these census tracts, 26.2% of the housing units were owner-occupied, 57.9% were rental units, and 15.9% were vacant.

The median age of housing stock in these tracts was 38 years and the median housing value in low-income tracts for the assessment area in 2010 was \$73,488. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2010 was \$705, which is less affordable than the monthly mortgage payment of \$269 for a \$73,488 home for 30 years at 3.65% interest rate. However, 33.0% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts accounted for 25.1% of the housing stock in the assessment area. In these census tracts, 44.0% of the housing units were owner-occupied, 44.3% were rental units, and 11.7% were vacant. The median age of housing stock in these tracts was 37 years and the median housing value in moderate-income tracts for the assessment area in 2010 was \$92,731. Mortgage payments on homes in these areas

Dallas-Ft. Worth Metroplex

would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2010 was \$784, which is less affordable than the monthly mortgage payment of \$339 for a \$92,731 home for 30 years at 3.65% interest rate. However, 17.9% of families in moderate-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 30.3%, was in middle-income tracts. In these census tracts, 55.5% of the housing units were owner-occupied, 36.1% were rental units, and 8.3% were vacant. The median age of housing stock in these tracts was 27 years and 7.6% of families in middle-income tracts had incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2010 was \$132,056.

Approximately 33.7% of the housing stock in the assessment area was in upper-income tracts. In these census tracts, 73.8% of the housing units were owner-occupied, 20.3% were rental units, and 5.9% were vacant. The median age of housing stock in these tracts was 18 years and only 2.8% of families in upper-income tracts had incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2010 was \$213,291.

2015 Census Estimates

According to 2015 census estimates, there are 2,285,520 housing units in the Dallas-Fort Worth Metroplex Assessment Area. Of total housing in the assessment area, 53.8% of the units are classified as owner-occupied, while 38.6% are classified as rental units and 7.5% of the available housing is vacant. Overall, 12.5% of the housing stock in the assessment area is in low-income tracts. In these census tracts, 25.1% of the housing units are owner-occupied, 61.6% are rental units, and 13.3% are vacant.

The median age of housing stock in these tracts is 46 years and the median housing value in low-income tracts for the assessment area in 2015 was \$72,037. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2015 was \$747, which is less affordable than the monthly mortgage payment of \$275 for a \$72,037 home for 30 years at 3.99% interest rate. However, 34.1% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts account for 24.6% of the housing stock in the assessment area. In these census tracts, 43.9% of the housing units are owner-occupied, 47.4% are rental units, and 8.7% are vacant. The median age of housing stock in these tracts is 45 years and the median housing value in moderate-income tracts for the assessment area in 2015 was \$94,417. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to

Dallas-Ft. Worth Metroplex

homeownership. The median gross monthly rental payment in moderate-income tracts in 2015 was \$876, which is less affordable than the monthly mortgage payment of \$360 for a \$94,417 home for 30 years at 3.99% interest rate. However, 18.9% of families in moderate-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

A large portion of the housing stock in the assessment area, at 28.3%, is in middle-income tracts. In these census tracts, 55.5% of the housing units are owner-occupied, 37.9% are rental units, and 6.6% are vacant. The median age of housing stock in these tracts is 34 years and 8.2% of families in middle-income tracts have incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2015 was \$138,698.

The majority of the housing stock in the assessment area, at 34.4%, is in upper-income tracts. In these census tracts, 70.1% of the housing units are owner-occupied, 24.5% are rental units, and 5.4% are vacant. The median age of housing stock in these tracts is 26 years and only 3.4% of families in upper-income tracts have incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2015 was \$ 239,687.

Employment and Economic Conditions

The national average unemployment rates for 2015, 2016, and 2017 were 5.3%, 4.9%, and 4.4%, respectively. Unemployment rates for all counties within the assessment area were lower than the annual unemployment rates for Texas as well as the nation. According to the 2010 census, the unemployment rate was 11.7% in low-income tracts and 9.1% in moderate-income tracts. At the time of 2015 census estimates, the unemployment rates had decreased slightly to 10.6% and 8.6% in low- and moderate-income tracts, respectively. The high unemployment rates in LMI tracts could affect loan demand from these tracts.

The following chart shows unemployment rates relevant to the assessment area for 2015 through 2017.

Dallas-Ft. Worth Metroplex

Annual Average Unemployment Rate			
AREA	2015	2016	2017
Collin County	3.6%	3.5%	3.4%
Dallas County	4.3%	4.0%	3.8%
Denton County	3.6%	3.4%	3.3%
Ellis County	3.9%	3.7%	3.4%
Rockwall County	3.7%	3.5%	3.3%
Tarrant County	4.2%	4.0%	3.7%
MSA	4.1%	3.9%	3.6%
State of Texas	4.4%	4.6%	4.3%
United States	5.3%	4.9%	4.4%

The Dallas-Fort Worth-Arlington MSA has one of the highest concentrations of corporate headquarters in the U.S. This has resulted in a rapid population growth of the metro area. Commonly known as "the Metroplex", the MSA had a gross domestic product of \$535.5 billion in 2017, making it the 4th largest metropolitan economy in the U.S.²² The area also contains the largest information technology industry base in the state, often referred to as "Silicon Prairie". The area has numerous electronics and telecommunication firms such as Texas Instruments, Microsoft, Dell Services, HP Enterprise Services, Nokia, Google, Cisco, Fujitsu, AT&T, Ericsson, and Verizon.

For several years, American Airlines has remained the largest employer in the Metroplex, and the headquarters of Southwest Airlines is also located in Dallas. Other major employers in the Metroplex include Bank of America Corporation, Texas Health Resources, Dallas Independent School District, and Baylor Health Care System.²³ In 2016, Toyota USA relocated its corporate headquarters to Plano, Texas.²⁴ In October 2016, Jacobs Engineering, a Fortune 500 company and one of the world's largest engineering companies, relocated from Pasadena, California to Dallas.²⁵ In addition, the Texas farming and ranching industry is based in Fort Worth. Several major defense manufacturers, including Lockheed Martin, Bell Textron (formerly known as Bell Helicopter), and Raytheon, maintain significant operations in the Metroplex, primarily around Fort Worth.

²² U.S. Bureau of Economic Analysis. "Gross Domestic Product by Metropolitan Area, 2017." BEA.gov. https://www.bea.gov/system/files/2018-09/gdp_metro0918_0.pdf (accessed October 10, 2018)

²³ Destination DFW. "Largest Employers in Dallas-Fort Worth." DestinationDFW.com <http://www.destinationdfw.com/Largest-Employers-in-Dallas-Fort-Worth-Texas/> (accessed January 10, 2019)

²⁴ Detroit Free Press. "Toyota's Move to Texas Goes Far Beyond Moving Employees." Freep.com. <https://www.freep.com/story/money/cars/2016/10/18/toyotas-move-texas-goes-far-beyond-moving-employees/92356352/> (accessed January 10, 2019)

²⁵ Jacobs Engineering. "Jacobs Relocates Global Headquarters to Dallas." Jacobs.com. <http://invest.jacobs.com/investors/Press-Release-Details/2016/Jacobs-Relocates-Global-Headquarters-to-Dallas/default.aspx> (accessed September 27, 2018)

Dallas-Ft. Worth Metroplex

Community Contacts and Community Development Opportunities

As part of the evaluation of the Dallas-Fort Worth Metroplex assessment area, two community contacts involved in community development and community services were made. The two contacts highlighted needs for affordable housing, small dollar loans for customers with lower credit scores, and donations and loans to organizations that support LMI individuals.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

Dallas-Ft. Worth Metroplex

Combined Demographics Report

Assessment Area: TX - DFW Metroplex

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	143	12.2	123,393	9.2	40,743	33	307,265	22.9
Moderate-income	306	26	317,861	23.7	56,937	17.9	224,949	16.7
Middle-income	325	27.6	397,396	29.6	30,333	7.6	246,421	18.3
Upper-income	398	33.8	504,799	37.6	14,255	2.8	564,823	42
Unknown-income	4	0.3	9	0	0	0	0	0
Total Assessment Area	1,176	100.0	1,343,458	100.0	142,268	10.6	1,343,45	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	235,554	61,650	5.1	26.2	136,377	57.9	37,527	15.9
Moderate-income	540,371	237,707	19.8	44	239,214	44.3	63,450	11.7
Middle-income	652,808	362,602	30.3	55.5	235,947	36.1	54,259	8.3
Upper-income	726,098	535,689	44.7	73.8	147,374	20.3	43,035	5.9
Unknown-income	18	18	0	100	0	0	0	0
Total Assessment Area	2,154,849	1,197,666	100.0	55.6	758,912	35.2	198,271	9.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	22,314	7.3	19,107	6.9	3,062	12.5	145	5.4
Moderate-income	57,304	18.8	50,781	18.3	6,195	25.3	328	12.2
Middle-income	82,462	27.1	75,779	27.4	6,098	24.9	585	21.8
Upper-income	141,596	46.6	131,048	47.3	8,938	36.6	1,610	60.1
Unknown-income	500	0.2	335	0.1	154	0.6	11	0.4
Total Assessment Area	304,176	100.0	277,050	100.0	24,447	100.0	2,679	100.0
	Percentage of Total Businesses:			91.1		8.0		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	86	4.3	80	4	6	15.8	0	0
Moderate-income	242	12	236	11.9	6	15.8	0	0
Middle-income	597	29.6	588	29.7	9	23.7	0	0
Upper-income	1,090	54.1	1,072	54.2	17	44.7	1	100
Unknown-income	1	0	1	0.1	0	0	0	0
Total Assessment Area	2,016	100.0	1,977	100.0	38	100.0	1	100.0
	Percentage of Total Farms:			98.1		1.9		.0

Dallas-Ft. Worth Metroplex

Combined Demographics Report

Assessment Area: TX - DFW Metroplex

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	167	14.2	152,147	10.5	51,883	34.1	346,337	23.8
Moderate-income	306	26	343,526	23.7	64,935	18.9	238,276	16.4
Middle-income	311	26.4	409,513	28.2	33,686	8.2	259,958	17.9
Upper-income	385	32.7	545,851	37.6	18,817	3.4	607,954	41.9
Unknown-income	7	0.6	1,488	0.1	273	18.3	0	0
Total Assessment Area	1,176	100.0	1,452,525	100.0	169,594	11.7	1,452,52	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	286,414	71,906	5.8	25.1	176,455	61.6	38,053	13.3
Moderate-income	561,260	246,281	20	43.9	265,923	47.4	49,056	8.7
Middle-income	645,889	358,406	29.1	55.5	244,972	37.9	42,511	6.6
Upper-income	787,035	552,104	44.9	70.1	192,633	24.5	42,298	5.4
Unknown-income	4,922	1,248	0.1	25.4	3,133	63.7	541	11
Total Assessment Area	2,285,520	1,229,945	100.0	53.8	883,116	38.6	172,459	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	21,624	7.9	18,645	7.5	2,865	11.8	114	4.7
Moderate-income	55,743	20.3	48,898	19.7	6,516	26.8	329	13.4
Middle-income	72,609	26.4	65,816	26.5	6,245	25.7	548	22.4
Upper-income	123,737	45	114,150	45.9	8,144	33.5	1,443	59
Unknown-income	1,542	0.6	992	0.4	537	2.2	13	0.5
Total Assessment Area	275,255	100.0	248,501	100.0	24,307	100.0	2,447	100.0
	Percentage of Total Businesses:			90.3		8.8		.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	78	4.2	74	4.1	4	10	0	0
Moderate-income	251	13.7	243	13.5	8	20	0	0
Middle-income	504	27.4	489	27.2	15	37.5	0	0
Upper-income	998	54.3	986	54.8	12	30	0	0
Unknown-income	7	0.4	6	0.3	1	2.5	0	0
Total Assessment Area	1,838	100.0	1,798	100.0	40	100.0	0	.0
	Percentage of Total Farms:			97.8		2.2		.0

Conclusions With Respect to Performance Tests

Lending Test

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

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, as its volume is more significant than its HMDA lending. During the review period, the bank reported 3,114 (92.4%) small business loans compared to 255 (7.6%) HMDA loans in the Dallas-Fort Worth Metroplex assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

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

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

The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, small business lending received the most weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The assessment area is saturated with large national banks; therefore, competition for business loans is high in the market, which is experiencing economic growth and increased loan demand.

In 2016, the bank originated 24.0% of its loans, representing 16.1% by dollar volume, to businesses with gross annual revenue of \$1 million or less. This lags behind aggregate CRA lenders, which originated 42.3% (34.0% by dollar) to small businesses during the same period. In 2017, the bank again fell below aggregate CRA lenders by originating 25.1% of loans (16.3% by dollar) to small business while aggregate lenders originated 47.0% (35.5%

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by dollar) to businesses with gross revenue under \$1 million. Comerica's lending also fell below D&B demographic data, which reported 91.1% and 90.3% of all businesses in the assessment area with gross annual revenues of \$1 million during the review period.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a large percentage of the bank's small business loans were made in loan amounts of \$100,000 or less. In 2016, 46.1% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 94.3% for the aggregate. In 2017, 47.4% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 93.6% for the aggregate. However, it should be noted that the bank's competition consists primarily of large multi-regional or nationwide banks.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered good when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers is good. In 2016, the bank originated 3.2% (0.9% by dollar volume) of its total HMDA loans to low-income borrowers, which was comparable to the 3.3% (1.3% by dollar) of total HMDA loans originated by the aggregate to low-income borrowers. In 2017, the bank's originations to low-income borrowers increased to 10.0% (2.8% by dollar) and exceeded aggregate lending, which represented 3.5% of total HMDA loans and 1.4% of the total dollar volume. Low-income families made up 22.9% of total families in the assessment area in 2016 and 23.8% in 2017, meaning that both the bank and aggregate lending are below demographics.

The bank's HMDA lending to moderate-income borrowers is adequate. In 2016, the bank originated 7.4% (2.2% by dollar volume) of its total HMDA-related loans to moderate-income borrowers; while this was lower than aggregate lending levels (11.3% of loans, 6.2% by dollar), Comerica exceeded aggregate the next year. In 2017, the bank originated 16.7% (8.0% by dollar) to moderate-income borrowers, compared to aggregate lenders, which originated 12.0% of HMDA-related loans (6.6% by dollar volume) to moderate-income borrowers. In 2016 and 2017 (respectively), 16.7% and 16.4% of families in the assessment area classified as moderate-income according to available data.

Home Equity Lines of Credit

HELOC lending by borrower income in the assessment area is considered good when compared to the demographic characteristics of the assessment area.

HELOC lending to low-income borrowers is good. In 2015 and 2016, Comerica originated 10.4% of its HELOCs to low-income borrowers. The bank's performance was below the percentage of low-income families in the assessment area, at 22.9%. However, 33.0%

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of low-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 12.6% of its HELOCs to low-income borrowers. The bank's performance was below the percentage of low-income families in the assessment area, at 23.8%. However, 34.1% of low-income families live below the poverty level, which might make it difficult to qualify for a HELOC. Additionally, it should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

HELOC lending to moderate-income borrowers is good. In 2015 and 2016, Comerica originated 16.9% of its HELOCs to moderate-income borrowers. The bank's performance was comparable to the percentage of moderate-income families in the assessment area, at 16.7%. Furthermore, 17.9% of moderate-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 16.6% of its HELOCs to moderate-income borrowers. The bank's performance was comparable to the percentage of moderate-income families in the assessment area, at 16.4%. Furthermore, 18.9% of moderate-income families live below the poverty level, which might make it difficult to qualify for a HELOC.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts is excellent. The bank's small business lending by number in low-income tracts during the review period exceeded the percentage of small businesses located in these tracts as well as aggregate lending. In 2016, 15.4% of small business loans (16.8% by dollar) were originated in low-income tracts, compared to 6.9% of businesses located in those tracts and 7.3% of aggregate loans (9.5% by dollar). In 2017, 12.1% of small business loans (11.9% by dollar) were originated in low-income tracts, compared to 7.5% of businesses located in those tracts and 8.0% of aggregate loans (8.7% by dollar).

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The bank's small business lending in moderate-income census tracts is excellent. In 2016, 23.8% of small business loans (24.8% by dollar) were originated in moderate-income tracts, compared to 18.3% of businesses located in those tracts and 18.0% of aggregate loans (20.7% by dollar). In 2017, 26.7% of small business loans (26.5% by dollar) were originated in moderate-income tracts, compared to 19.7% of businesses located in those tracts and 19.9% of aggregate loans (22.1% by dollar).

The bank's small business lending in middle- and upper-income tracts was lower than the percentage of small businesses in these tracts. When compared to the aggregate by percentage, the bank originated fewer loans in middle- and upper-income tracts.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank makes very few home improvement and multifamily loans, these were not significant product lines and were not analyzed separately.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. While the bank originated no home purchase loans in these tracts in 2016 and only one in 2017, aggregate lenders struggled to lend as well. In 2016, aggregate lenders originated 2.5% of home purchase loans (1.9% by dollar) in low-income census tracts; in 2017, aggregate lenders originated 3.7% of loans (2.5% by dollar) in low-income census tracts. Additionally, in 2016 and 2017, only 5.1% and 5.8% of owner-occupied units in the assessment area, respectively, were located in low-income tracts, which may indicate limited lending opportunities.

Home purchase lending in moderate-income tracts is adequate. In 2016, the bank originated 8.7% of its home purchase loans in moderate-income census tracts (2.4% by dollar), while aggregate lenders originated 11.7% of home purchase loans (7.6% by dollar) in those tracts. In 2017, Comerica originated 29.6% of its home purchase loans in moderate-income census tracts (14.2% by dollar); aggregate lenders originated 13.6% of home purchase loans (9.0% by dollar) in those tracts. Additionally, in 2016 and 2017, 19.8% and 20.0% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

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Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. While the bank originated no home refinance loans in these tracts in 2017 and only one in 2016, aggregate lenders also struggled to originate loans in 2016 before slightly improving performance in 2017. In 2016, aggregate lenders originated only 1.5% of loans in low-income areas; in 2017, aggregate lenders originated 2.1% of loans in low-income areas. Additionally, in 2016 and 2017, 5.1% and 5.8% of owner-occupied units in the assessment area, respectively, were located in low-income tracts.

Home refinance lending in moderate-income tracts is good. In 2016, the bank originated 10.3% of its home refinance loans in moderate-income census tracts (2.6% by dollar); while this is lower than the owner-occupancy rate of 19.8%, it exceeds aggregate lending levels of 8.8% (5.3% by dollar). In 2017, the bank originated 16.7% of its home refinance loans in moderate-income census tracts (5.1% by dollar), which is slightly less than the owner-occupancy rate (20.0%), but exceeds lending by the aggregate (13.3% by number, 8.0% by dollar).

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Equity Lines of Credit

Considering the percentage of owner-occupied units, the geographic distribution of Comerica's HELOC lending is adequate.

Comerica's HELOC lending in low-income census tracts is adequate. In 2015 and 2016, the bank originated 3.8% of its HELOCs in low-income tracts. This performance was comparable to the percentage of owner-occupied units in these tracts, at 5.1%. In 2017, the bank originated 4.0% of its HELOCs in low-income tracts, which was comparable to the percentage of owner-occupied units in these tracts, at 5.8%.

Comerica's HELOC lending in moderate-income census tracts is adequate. In 2015 and 2016, the bank originated 14.3% of its HELOCs in moderate-income tracts. This performance was slightly below the percentage of owner-occupied units in these tracts, at 19.8%. In 2017, the bank originated 16.4% of its HELOCs in moderate-income tracts, which was slightly below the percentage of owner-occupied units in these tracts, at 20.0%.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

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Community Development Lending

The bank is a leader in making community development loans in the assessment area. The bank originated 36 community development loans in the DFW Metroplex Assessment Area totaling approximately \$217.1 million during the review period. The bank's commitment to making qualified community development loans demonstrates a good responsiveness to meeting community needs. The table below provides a breakdown of the types of community development loans the bank originated during the review period.

Community Development Lending		
Purpose	#	\$000s
Community Services	13	6,075
Economic Development	8	25,155
Revitalization and Stabilization	15	185,910
Totals	36	217,140

Several loans were for the purpose of revitalization and stabilization. One example demonstrating responsiveness is the lending in designated reinvestment zones. Six loans totaling \$112.7 million benefitted Grand Prairie and Carrollton Tax Increment Financing Reinvestment Zones, with the purposes of increasing economic vitality and activity for the city; stimulating commercial growth and development of surrounding and neighboring commercial and retail properties; and promoting local economic development within the city.

Investment Test

The Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants and exhibits good responsiveness to credit and community development needs. The bank's investments were primarily focused on affordable housing.

The total amount of investments and contributions, at \$10.7 million, has doubled since the previous evaluation.

Community Development Investments								
Purpose	Current Period Investments		Prior Period Investments		Donations		Total	
	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Affordable Housing	26	8,392	1	956	9	38	36	9,386
Community Services	-	-	-	-	174	1,287	174	1,287
Total	26	8,392	1	956	183	1,325	210	10,673

One way the bank demonstrated responsiveness to needs in the assessment area was through its grants for community services providing assistance to LMI individuals. These

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totaled \$1.3 million, and this type of support was noted by contacts as a need within the assessment area, as was affordable housing.

In addition, seven investments benefitting multiple assessment areas provided \$13.2 million to affordable housing efforts in the Dallas-Fort Worth Metroplex.

Service Test

The bank's Service Test performance is High Satisfactory. Its retail and community development services reflect good responsiveness to the needs of the Dallas-Fort Worth assessment area. Delivery systems are reasonably accessible to all portions of the assessment area. The bank's branch hours are reasonable and services do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. The bank provides a relatively high level of community development services. Bank officers and employees actively support organizations dedicated to community development initiatives.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 54 branch offices and 63 ATMs as of December 31, 2017, was compared to the distribution of households and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Dallas-Fort Worth Metroplex assessment area.

Tract Income	% of Geographies	% of Population	Branches		Full Service ATMs		Cash Only ATMS	
			#	%	#	%	#	%
Low	14.2	12.1	6	11.1	6	10.0	-	-
Moderate	26.0	25.8	12	22.2	15	25.0	-	-
Middle	26.4	27.7	16	29.7	16	26.7	-	-
Upper	32.7	34.3	20	37.0	23	38.3	3	100.0
Unknown	0.7	0.1	-	-	-	-	-	-
Total	100.0	100.0	54	100.0	60	100.0	3	100.0

The bank opened one branch (in a moderate-income census tract), and did not close any branches in the assessment area. The bank's record of opening or closing branches has improved the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are essentially the same throughout the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and in other leadership roles, for 43 community development financial organizations offering economic development and community services targeting LMI individuals. The table below shows the number of events by type of involvement. Employees participated in 567 events or meetings during the review period.

Purpose	# Events / Meetings
Community Services Benefitting LMI Individuals/Geographies	532
Economic Development	35
Total	567

The bank actively supports LMI students in the area through involvement in Boys and Girls Clubs as well as various school districts in the area. Bank personnel also provide financial education through several avenues such as Circle of Support, Inc. and Dallas County Community College District Foundation, Inc. FBO Cedar Valley College. These are responsive to needs identified by contacts in the area.

Houston

Description of Operations in Houston

The Houston Assessment Area includes Harris and Montgomery Counties as well as portions of Brazoria, Fort Bend, and Galveston Counties. These counties, along with Liberty, Waller, Chambers, and Austin Counties (which are excluded from the assessment area), make up the Houston-The Woodlands-Sugar Land MSA.

According to the 2010 census, the assessment area population was 5,527,221, which accounts for 22.0% of the population in the state. Based on the 2017 population of 6,686,235, the assessment area has experienced an increase of 21.0% since 2010. Houston, the largest city within the assessment area, accounts for 34.6% of the population in the assessment area. Other notable cities in the assessment area are Pearland and Sugar Land.

County	2017 Population Estimate	% Increase Since 2010	Major Municipalities
Brazoria	362,457	15.7	Angleton*, Pearland, Brazoria
Fort Bend	764,828	30.7	Richmond*, Sugar Land
Galveston	335,036	15.0	Galveston*, Friendswood, League City
Harris	4,652,980	13.7	Houston*, Katy, Pasadena
Montgomery	570,934	25.3	Conroe*, Montgomery

*Denotes county seat

As of December 31, 2017, the bank operated 48 branches in the assessment area representing 11.0% of its branches. There are six branches located in low-income census tracts, nine branches in moderate-income census tracts, ten in middle-income census tracts, and 23 branches in upper-income census tracts. Additionally, Comerica operates one LPO in an upper-income tract.

According to the FDIC, as of June 30, 2017, the bank had \$3.2 billion in deposits in this assessment area representing 5.5% of the bank's total deposits. It also represents a deposit market share of 1.3%, which includes all other FDIC-insured deposits that are located in the assessment area. JPMorgan Chase holds the largest deposit share at 44.1%, followed by Wells Fargo Bank, at 10.8%, and Bank of America, at 8.7%.

For 2016, there were 884 financial institutions that reported HMDA data in the assessment area. The bank ranked 207th in HMDA market share with less than 0.1%. Wells Fargo Bank and Quicken Loans, Inc. led the market with 10.6% and 4.5% of the market share,

respectively. For 2017, there were 872 financial institutions that reported HMDA data in the assessment area. The bank ranked 208th in HMDA market share with less than 0.1%. Wells Fargo Bank and JPMorgan Chase Bank led the market with 11.2% and 5.6% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding mortgage lending.

For 2016, there were 210 financial institutions that reported CRA small business data in the assessment area. The bank ranked 20th in market share with 0.6%. American Express Bank and Chase Bank USA dominated the market with 19.6% and 14.4% of the market share, respectively. For 2017, there were 216 financial institutions that reported CRA small business data in the assessment area. The bank ranked 21st in market share with 0.5%. Again, American Express Bank and Chase Bank USA dominated the market with 21.8% and 17.6% of the market share, respectively. Many of the bank's competitors are statewide, multi-regional, and national banks, but competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Houston-The Woodlands-Sugar Land MSA as a whole, but not the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area because the population of the assessment area includes 93.7% of the total MSA population, and distribution of low-, moderate-, middle-, and upper-income families for the two areas is similar according to census data.

At the 2010 census, the Houston assessment area was made up of 981 distinct census tracts. Of the total tracts, 125 (12.7%) were designated as low-income, 278 (28.3%) were designated moderate-income, 249 (25.4%) were middle-income, 325 (33.1%) were upper-income, and four (0.4%) were designated as having an unknown-income level. As of the 2015 census estimates, 154 (15.7%) were designated as low-income, 286 (29.2%) were designated moderate-income, 229 (23.3%) were middle-income, 305 (31.1%) were upper-income, and seven (0.7%) were designated as having an unknown-income level.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; HUD; D&B; and the Texas Workforce Commission.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses both U.S. Census 2010 data and 2015 estimated data. The following chart reflects the estimated median family income for the years 2010 and 2015 for the Houston-The Woodlands-Sugar Land MSA.

Houston

It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to the 2010 census, 11.9% of the families in the assessment area lived below the poverty level. According to the 2015 census estimates, 12.9% of the families in the assessment area lived below the poverty level.

Income Level	2010	2015
Median Income	\$64,295	\$69,385
Low-income	< \$32,148	< \$34,693
Moderate-income	\$32,148 - \$51,435	\$34,693 - \$55,508
Middle-income	\$51,436 - \$77,153	\$55,509 - \$83,262
Upper-income	≥ \$77,154	≥ \$83,263

Housing Characteristics

2010 Census

According to the 2010 census, there were 2,046,205 housing units in the Houston Assessment Area. Of total housing in the assessment area, 55.8% of the units were classified as owner-occupied while 33.2% were classified as rental units and 11.0% of the available housing was vacant. Overall, 11.0% of the housing stock in the assessment area was in low-income tracts. In these census tracts, 21.5% of the housing units were owner-occupied, 59.4% were rental units, and 19.1% were vacant.

The median age of housing stock in these tracts was 37 years and the median housing value in low-income tracts for the assessment area in 2010 was \$76,672. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2010 was \$676, which is less affordable than the monthly mortgage payment of \$281 for a \$76,672 home for 30 years at 3.65% interest rate. However, 34.3% of families in low-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts accounted for 25.5% of the housing stock in the assessment area. In these census tracts, 44.9% of the housing units were owner-occupied, 41.7% were rental units, and 13.4% were vacant. The median age of housing stock in these tracts was 36 years and the median housing value in moderate-income tracts for the assessment area in 2010 was \$93,102. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2010 was \$771, which is less affordable than the monthly mortgage payment of \$341 for a \$93,102 home for 30 years at 3.65% interest rate. However, 19.2% of families in moderate-income tracts had incomes below the poverty level, which may make it difficult to qualify for a loan.

Houston

A large portion of the housing stock in the assessment area, at 26.5%, was in middle-income tracts. In these census tracts, 59.8% of the housing units were owner-occupied, 30.3% were rental units, and 9.9% were vacant. The median age of housing stock in these tracts was 26 years and 9.7% of families in middle-income tracts had incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2010 was \$120,017.

Approximately 37.0% of the housing stock in the assessment area was in upper-income tracts. In these census tracts, 70.6% of the housing units were owner-occupied, 21.6% were rental units, and 7.8% were vacant. The median age of housing stock in these tracts was 19 years and only 3.6% of families in upper-income tracts had incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2010 was \$195,991.

2015 Census Estimates

According to the 2015 census, there are 2,227,702 housing units in the Houston Assessment Area. Of total housing in the assessment area, 54.6% of the units are classified as owner-occupied while 36.4% are classified as rental units and 9.1% of the available housing is vacant. Overall, 12.9% of the housing stock in the assessment area is in low-income tracts. In these census tracts, 23.2% of the housing units are owner-occupied, 61.3% are rental units, and 15.5% are vacant.

The median age of housing stock in these tracts is 47 years and the median housing value in low-income tracts for the assessment area in 2015 was \$79,987. Mortgage payments on homes in these areas would still be considered affordable for a low-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in low-income tracts in 2015 was \$725, which is less affordable than the monthly mortgage payment of \$305 for a \$79,987 home for 30 years at 3.99% interest rate. However, 35.8% of families in low-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income tracts account for 25.1% of the housing stock in the assessment area. In these census tracts, 46.0% of the housing units are owner-occupied, 43.6% are rental units, and 10.4% are vacant. The median age of housing stock in these tracts is 44 years and the median housing value in moderate-income tracts for the assessment area in 2015 was \$94,032. Mortgage payments on homes in these areas would still be considered affordable for a moderate-income family, although a down payment is typically a barrier to homeownership. The median gross monthly rental payment in moderate-income tracts in 2015 was \$855, which is less affordable than the monthly mortgage payment of \$359 for a \$94,032 home for 30 years at 3.99% interest rate. However, 19.6% of families in moderate-income tracts have incomes below the poverty level, which may make it difficult to qualify for a loan.

Houston

A large portion of the housing stock in the assessment area, at 25.0%, is in middle-income tracts. In these census tracts, 58.9% of the housing units are owner-occupied, 33.6% are rental units, and 7.6% are vacant. The median age of housing stock in these tracts is 33 years and 10.2% of families in middle-income tracts have incomes below the poverty level. The median housing value in middle-income tracts for the assessment area in 2015 was \$125,773.

Approximately 36.7% of the housing stock in the assessment area is in upper-income tracts. In these census tracts, 68.8% of the housing units are owner-occupied, 24.3% are rental units, and 6.9% are vacant. The median age of housing stock in these tracts is 25 years and only 3.9% of families in upper-income tracts have incomes below the poverty level. In addition, the median housing value in upper-income tracts for the assessment area in 2015 was \$229,232.

Employment and Economic Conditions

The national average unemployment rates for 2015, 2016, and 2017 were 5.3%, 4.9%, and 4.4%, respectively. Unemployment rates for counties in the assessment area were similar to those of the state and the nation in 2015. However, in 2016, unemployment rates increased within the assessment area, and were slightly higher than those in the state and the nation. For most counties, the unemployment rates improved slightly in 2017. According to the 2010 census, the unemployment rate was 11.5% in low-income tracts and 9.3% in moderate-income tracts. At the time of 2015 census estimates, the unemployment rates had decreased slightly to 10.8% and 9.2% in low- and moderate-income tracts, respectively. The high unemployment rates in LMI tracts could affect loan demand from these tracts.

The following chart shows unemployment rates relevant to the assessment area for 2015 through 2017.

Annual Average Unemployment Rate			
AREA	2015	2016	2017
Brazoria County	4.6%	5.2%	5.3%
Fort Bend County	4.3%	5.0%	4.6%
Galveston County	5.0%	5.3%	5.2%
Harris County	4.6%	5.3%	5.0%
Montgomery County	4.2%	4.9%	4.3%
MSA	4.6%	5.3%	5.0%
State of Texas	4.4%	4.6%	4.3%
United States	5.3%	4.9%	4.4%

Although known for its concentrations in the energy sector, the Houston metropolitan economy is diverse and has the fourth-highest number of Fortune 500 companies in the

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country.²⁶ Major employers include Memorial Hermann Hospital System, MD Anderson Cancer Center, United Airlines, Houston Methodist, Exxon Mobil, Kroger, and H-E-B. The MSA had a gross domestic product of \$490.1 billion in 2017, making it the 7th largest metropolitan economy in the U.S.²⁷ and similar to the economic output of countries such as Poland and Belgium²⁸.

Houston added over 12,000 jobs from August to December 2017, an annual growth rate of 1.3%. Financial activities and construction saw the fastest rates of growth although trade, transportation, and utilities grew by the largest amount.²⁹ The local economy continues to recover from Hurricane Harvey, which hit the area in August 2017. Estimated damages of \$80 billion mean Harvey is, economically speaking, the most devastating natural disaster to ever hit the area.³⁰

Community Contacts and Community Development Opportunities

As part of the evaluation of the Houston assessment area, two community contacts involved in small business development and community development were made. The two contacts highlighted needs for affordable housing, financial education, and small business lending for startups.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

²⁶ Greater Houston Partnership. "Corporate Headquarters." Houston.org.
http://www.houston.org/newgen/14_Company_Information/14A%20W001%20Fortune%20500%20Companies.pdf (accessed January 10, 2019)

²⁷ U.S. Bureau of Economic Analysis. "Gross Domestic Product by Metropolitan Area, 2017." BEA.gov.
https://www.bea.gov/system/files/2018-09/gdp_metro0918_0.pdf (accessed October 10, 2018)

²⁸ Country Economy. "GDP: Gross Domestic Product." CountryEconomy.com
<https://countryeconomy.com/gdp> (accessed October 10, 2018)

²⁹ NAI Partners. "Houston Office – Monthly Market Snapshots." NAIPartners.com.
<https://www.naipartners.com/research/houston-office-monthly-market-snapshot-february-2018/> (accessed 10/8/2018)

³⁰ Long, Heather. "Harvey's financial toll: \$80 billion so far in damage, second only to Katrina." WashingtonPost.com.
https://www.washingtonpost.com/news/wonk/wp/2017/09/01/harveys-toll-80-billion-so-far-in-damage-second-only-to-katrina/?noredirect=on&utm_term=.bf73d711a22c (accessed October 14, 2018)

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Combined Demographics Report

Assessment Area: TX - Houston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	125	12.7	116,349	9	39,956	34.3	306,726	23.7
Moderate-income	278	28.3	318,673	24.6	61,201	19.2	212,404	16.4
Middle-income	249	25.4	351,019	27.1	34,072	9.7	224,538	17.3
Upper-income	325	33.1	508,585	39.3	18,342	3.6	550,958	42.6
Unknown-income	4	0.4	0	0	0	0	0	0
Total Assessment Area	981	100.0	1,294,626	100.0	153,571	11.9	1,294,62	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	224,690	48,213	4.2	21.5	133,554	59.4	42,923	19.1
Moderate-income	522,623	234,643	20.6	44.9	217,936	41.7	70,044	13.4
Middle-income	542,165	324,005	28.4	59.8	164,235	30.3	53,925	9.9
Upper-income	756,648	534,458	46.8	70.6	163,533	21.6	58,657	7.8
Unknown-income	79	0	0	0	50	63.3	29	36.7
Total Assessment Area	2,046,205	1,141,319	100.0	55.8	679,308	33.2	225,578	11.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	22,387	7.9	19,306	7.5	2,954	12.2	127	5.3
Moderate-income	53,133	18.8	47,563	18.6	5,297	21.9	273	11.4
Middle-income	68,853	24.3	62,546	24.4	5,845	24.1	462	19.3
Upper-income	138,466	48.9	126,831	49.5	10,107	41.7	1,528	63.9
Unknown-income	132	0	114	0	16	0.1	2	0.1
Total Assessment Area	282,971	100.0	256,360	100.0	24,219	100.0	2,392	100.0
	Percentage of Total Businesses:			90.6		8.6		.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	54	2.9	51	2.8	3	8.3	0	0
Moderate-income	201	11	197	11	4	11.1	0	0
Middle-income	496	27	481	26.8	14	38.9	1	100
Upper-income	1,083	59.1	1,068	59.4	15	41.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,834	100.0	1,797	100.0	36	100.0	1	100.0
	Percentage of Total Farms:			98.0		2.0		.1

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Combined Demographics Report

Assessment Area: TX - Houston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	154	15.7	157,131	11	56,331	35.8	349,343	24.4
Moderate-income	286	29.2	349,232	24.4	68,433	19.6	228,678	16
Middle-income	229	23.3	372,071	26	37,866	10.2	242,033	16.9
Upper-income	305	31.1	550,382	38.5	21,302	3.9	611,067	42.7
Unknown-income	7	0.7	2,305	0.2	999	43.3	0	0
Total Assessment Area	981	100.0	1,431,121	100.0	184,931	12.9	1,431,12	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	286,650	66,621	5.5	23.2	175,649	61.3	44,380	15.5
Moderate-income	559,466	257,608	21.2	46	243,806	43.6	58,052	10.4
Middle-income	557,969	328,376	27	58.9	187,226	33.6	42,367	7.6
Upper-income	817,434	562,638	46.3	68.8	198,535	24.3	56,261	6.9
Unknown-income	6,183	789	0.1	12.8	4,770	77.1	624	10.1
Total Assessment Area	2,227,702	1,216,032	100.0	54.6	809,986	36.4	201,684	9.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	25,861	10.4	21,815	9.9	3,911	15.9	135	6.1
Moderate-income	47,920	19.4	42,086	19.1	5,552	22.6	282	12.8
Middle-income	55,564	22.4	50,062	22.7	5,094	20.7	408	18.6
Upper-income	117,759	47.6	106,445	48.2	9,945	40.5	1,369	62.3
Unknown-income	467	0.2	409	0.2	53	0.2	5	0.2
Total Assessment Area	247,571	100.0	220,817	100.0	24,555	100.0	2,199	100.0
	Percentage of Total Businesses:			89.2		9.9		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	70	4.4	65	4.2	5	13.9	0	0
Moderate-income	204	12.8	196	12.6	8	22.2	0	0
Middle-income	392	24.5	384	24.6	8	22.2	0	0
Upper-income	928	58.1	913	58.5	15	41.7	0	0
Unknown-income	3	0.2	3	0.2	0	0	0	0
Total Assessment Area	1,597	100.0	1,561	100.0	36	100.0	0	.0
	Percentage of Total Farms:			97.7		2.3		.0

Conclusions With Respect to Performance Tests

Lending Test

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

The bank is both a small business and HMDA lender. Comerica also elected to have its HELOC lending activity evaluated, as its volume is more significant than its HMDA lending. During the review period, the bank reported 2,683 (92.4%) small business loans compared to 221 (7.6%) HMDA loans in the Houston assessment area. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area.

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

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

The bank's distribution of lending to borrowers reflects adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, small business lending received the most weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The assessment area is saturated with large national banks; therefore, competition for business loans is high in the market, which is experiencing economic growth and increased loan demand.

In 2016, the bank originated 23.7% of its loans, representing 19.9% by dollar volume, to businesses with gross annual revenue of \$1 million or less. This lags behind aggregate CRA lenders, which originated 40.7% (31.9% by dollar) to small businesses during the same period. In 2017, the bank again fell below aggregate CRA lenders by originating 24.7% of loans (19.1% by dollar) to small business while aggregate lenders originated 45.8% (34.5%

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by dollar) to businesses with gross revenue under \$1 million. Comerica's lending also fell below D&B demographic data, which reported 90.6% and 89.2% of all businesses in the assessment area with gross annual revenues of \$1 million during the review period.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a large percentage of the bank's small business loans were made in loan amounts of \$100,000 or less. In 2016, 43.2% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 94.3% for the aggregate. In 2017, 45.1% of the bank's small business loans were originated in loan amounts of \$100,000 or less, compared to 93.9% for the aggregate. However, it should be noted that the bank's competition consists primarily of large multi-regional or nationwide banks.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers is adequate. In 2016, the bank originated 4.5% (4.6% by dollar volume) of its total HMDA loans to low-income borrowers, which was greater than the 2.4% (1.0% by dollar) of total HMDA loans originated by the aggregate to low-income borrowers. In 2017, the bank's originations to low-income borrowers fell to 2.0% (0.6% by dollar), but remained only slightly below those of aggregate, which represented 3.5% of total HMDA loans and 1.5% of the total dollar volume. While the percentages compare favorably or similarly to aggregate data, Comerica's overall lending levels were low, as only eight home mortgage loans were originated in these tracts during the review period. Low-income families made up 23.7% of total families in the assessment area in 2016 and 24.4% in 2017, meaning that both the bank and aggregate lending are below demographics.

The bank's HMDA lending to moderate-income borrowers is adequate. In 2016, the bank originated 9.1% (3.0% by dollar volume) of its total HMDA-related loans to moderate-income borrowers, which was less than the 10.6% of HMDA-related loans (5.8% by dollar) originated by the aggregate HMDA lenders. In 2017, the bank's performance improved, as it originated 16.3% of HMDA-related loans (4.6% by dollar volume) to moderate-income borrowers as compared with the aggregate lenders' 12.1% of HMDA loans (6.9% by dollar) to moderate-income borrowers. Both the bank and the aggregate HMDA lenders fell below the demographics, with 16.4% and 16.0% of families in 2016 and 2017 (respectively) in the assessment area classified as moderate-income according to available data.

Home Equity Lines of Credit

HELOC lending by borrower income in the assessment area is considered good when compared to the demographic characteristics of the assessment area.

HELOC lending to low-income borrowers is good. In 2015 and 2016, Comerica originated 11.6% of its HELOCs to low-income borrowers. The bank's performance was significantly below the percentage of low-income families in the assessment area, at 23.7%. However, 34.3% of low-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 14.5% of its HELOCs to low-income borrowers. The bank's performance was below the percentage of low-income families in the assessment area, at 24.4%. However, 35.8% of low-income families live below the poverty level, which might make it difficult to qualify for a HELOC. Additionally, it should be noted that low-income families often find it challenging to obtain a HELOC loan because of maximum loan-to-value and debt-to-income ratio limits used by banks to qualify loan applicants.

HELOC lending to moderate-income borrowers is excellent. In 2015 and 2016, Comerica originated 17.4% of its HELOCs to moderate-income borrowers. The bank's performance exceeded the percentage of moderate-income families in the assessment area, at 16.4%. Furthermore, 19.2% of moderate-income families lived below the poverty level at this time, which might make it difficult to qualify for a HELOC. In 2017, the bank originated 17.3% of its HELOCs to moderate-income borrowers. The bank's performance exceeded the percentage of moderate-income families in the assessment area, at 16.0%. Furthermore, 19.6% of moderate-income families live below the poverty level, which might make it difficult to qualify for a HELOC.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts is excellent. The bank's small business lending by number in low-income tracts during the review period exceeded the percentage of small businesses located in these tracts as well as aggregate lending. In 2016, 10.9% of small business loans (12.4% by dollar) were originated in low-income tracts, compared to 7.5% of businesses located in those tracts and 7.5% of aggregate loans (9.2% by dollar). In 2017, 15.4% of small business loans (16.9% by dollar) were originated in low-

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income tracts, compared to 9.9% of businesses located in those tracts and 10.1% of aggregate loans (11.8% by dollar).

The bank's small business lending in moderate-income census tracts is excellent. In 2016, 24.5% of small business loans (22.7% by dollar) were originated in moderate-income tracts, compared to 18.6% of businesses located in those tracts and 17.5% of aggregate loans (17.9% by dollar). In 2017, 26.6% of small business loans (26.8% by dollar) were originated in moderate-income tracts, compared to 19.1% of businesses located in those tracts and 18.4% of aggregate loans (19.8% by dollar).

The bank's small business lending in middle- and upper-income tracts was lower than the percentage of small businesses in these tracts. When compared to the aggregate by percentage, the bank originated fewer loans in middle- and upper-income tracts.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank makes very few home improvement and multifamily loans, these were not significant product lines and were not analyzed separately.

Home Purchase Lending

Home purchase lending in low-income census tracts is adequate. In 2016, Comerica originated no home purchase loans in low-income census tracts; however, aggregate lenders also struggled to originate loans (1.6% by number and 1.2% by dollar). In 2017, the bank originated 5.0% of its home purchase loans (1.2% by dollar) in low-income tracts. The same year, aggregate lenders originated 2.4% of loans (1.8% by dollar) in low-income census tracts. Additionally, in 2016 and 2017, 4.2% and 5.5% of owner-occupied units in the assessment area, respectively, were located in low-income tracts.

Home purchase lending in moderate-income tracts is adequate. While the bank's performance was below that of aggregate lenders in 2016, it exceeded aggregate performance in 2017. In 2016, the bank originated 6.5% of its home purchase loans in moderate-income census tracts (3.1% by dollar); aggregate lenders originated 10.5% of home purchase loans in these tracts (7.0% by dollar). In 2017, the bank originated 20.0% of its home purchase loans in moderate-income census tracts (13.9% by dollar); aggregate lenders originated 12.8% of home purchase loans in these tracts (8.7% by dollar). While the 2017 percentages compare favorably to aggregate data, Comerica's overall lending levels were low, as only four home purchase loans were originated in these tracts in 2017. Additionally, in 2016 and 2017, 20.6% and 21.2% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Refinance Lending

Home refinance lending in low-income census tracts is adequate. In 2016, the bank originated 2.9% of its home refinance loans (0.8% by dollar) in low-income tracts. The same year, aggregate lenders originated 1.4% of loans (1.0% by dollar) in low-income census tracts. In 2017, the bank originated 3.7% of its home refinance loans (1.1% by dollar) in low-income tracts. The same year, aggregate lenders originated 2.5% of loans (1.6% by dollar) in low-income census tracts. While percentages compare favorably to aggregate data, Comerica's overall lending levels were low, as only two home refinance loans were originated in low-income tracts during the review period. Additionally, in 2016 and 2017, 4.2% and 5.5% of owner-occupied units in the assessment area (respectively) were located in low-income tracts.

Home refinance lending in moderate-income tracts is adequate. In 2016, the bank originated 17.1% of its home refinance loans (5.5% by dollar) in moderate-income tracts, compared to aggregate lenders which originated 9.6% of loans (5.7% by dollar) in these tracts. In 2017, the bank's performance dropped, as it originated 11.1% of its home refinance loans in moderate-income tracts (1.5% by dollar). That same year, aggregate lenders originated 14.2% (8.9% by dollar) in moderate-income tracts. In 2016 and 2017, 20.6% and 21.2% of owner-occupied units in the assessment area, respectively, were located in moderate-income tracts.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Equity Lines of Credit

Considering the percentage of owner-occupied units, the geographic distribution of Comerica's HELOC lending is adequate.

Comerica's HELOC lending in low-income census tracts is adequate. In 2015 and 2016 the bank originated 3.3% of its HELOCs in low-income tracts. This performance was comparable to the percentage of owner-occupied units in these tracts, at 4.2%. In 2017, the bank originated 4.7% of its HELOCs in low-income tracts, which was comparable to the percentage of owner-occupied units in these tracts, at 5.5%.

Comerica's HELOC lending in moderate-income census tracts is adequate. In 2015 and 2016, the bank originated 14.5% of its HELOCs in moderate-income tracts. This performance was slightly below the percentage of owner-occupied units in these tracts, at 20.6%. In 2017, the bank originated 20.4% of its HELOCs in moderate-income tracts,

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which was slightly below the percentage of owner-occupied units in these tracts, at 21.2%.

The distribution of the remainder of bank lending in middle- and upper- income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Community Development Lending

The bank is a leader in making community development loans in the assessment area. The bank originated 43 community development loans in the Houston Assessment Area totaling approximately \$197.8 million during the review period. The bank's commitment to making qualified community development loans demonstrates a good responsiveness to meeting community needs. The table below provides a breakdown of the types of community development loans the bank originated during the review period.

Community Development Lending		
Purpose	#	\$000s
Community Services	7	8,775
Economic Development	4	7,264
Revitalization and Stabilization	32	181,786
Totals	43	197,825

A majority of the loans originated during the review period were for the purpose of revitalizing and stabilizing LMI geographies. A total of 19 loans in the amount of \$133.5 million are dedicated to revitalizing and stabilizing LMI Super Neighborhoods and/or Municipal Management Districts. A Super Neighborhood is a City of Houston geographically designated area where residents, civic organizations, institutions and businesses work together to identify, plan, and set priorities to address the needs and concerns of their community. Municipal Management Districts are created to promote, encourage, and maintain employment, commerce, transportation, housing, economic development, and public welfare within the district's boundaries; these are designated by the Texas legislature. Investment in these areas demonstrates responsiveness to the assessment area's needs.

Investment Test

The Investment Test rating is High Satisfactory. The bank has an excellent level of qualified community development investments and grants and exhibits good responsiveness to credit and community development needs. The bank's investments were primarily focused on affordable housing.

The total amount of investments and contributions, at \$26.7 million, has nearly doubled since the previous evaluation.

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Community Development Investments								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	\$000s	#	\$000s	#	\$000s	#	\$000s
Affordable Housing	16	15,653	4	10,248	6	47	26	25,948
Community Services	-	-	-	-	120	718	120	718
Revitalization and Stabilization	-	-	-	-	5	14	5	14
Total	16	15,653	4	10,248	131	779	151	26,680

One way the bank demonstrated responsiveness to needs in the assessment area was through its grants for community services providing financial education to LMI individuals and small businesses. These totaled \$304,283, and this type of support was noted by contacts as a need within the assessment area, as was affordable housing.

In addition, 13 investments benefitting multiple assessment areas provided \$12.5 million to affordable housing efforts in Houston.

Service Test

The bank's Service Test performance is Low Satisfactory. Its retail and community development services reflect adequate responsiveness to the needs of the Houston assessment area. Delivery systems are reasonably accessible to all portions of the assessment area. The bank's branch hours are reasonable and services generally do not vary in a way that inconveniences low- or moderate-income census tracts or individuals. The bank provides a relatively high level of community development services. Bank officers and employees actively support organizations dedicated to community development initiatives.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 48 branch offices and 51 ATMs as of December 31, 2017, was compared to the distribution of households and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Houston assessment area.

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Tract Income	% of Geographies	% of Population	Branches		Full Service ATMs		Cash Only ATMS	
			#	%	#	%	#	%
Low	15.7	12.2	6	12.5	7	14.3	1	50.0
Moderate	29.2	26.0	9	18.8	9	18.4	1	50.0
Middle	23.3	25.9	10	20.8	10	20.4	-	-
Upper	31.1	35.6	23	47.9	23	46.9	-	-
Unknown	0.7	0.3	-	-	-	-	-	-
Total	100.0	100.0	48	100.0	49	100.0	2	100.0

The bank closed eight branches (one in a lower-income, one in a moderate-income, four in middle-income, and two in upper-income census tracts) in the assessment area; no branches were opened during the review period. The bank's record of opening or closing branches has generally not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are essentially the same throughout the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and in other leadership roles, for 31 community development financial organizations offering community services targeting LMI individuals, affordable housing, and economic development. The table below shows the number of events by type of involvement. Employees participated in 455 events or meetings during the review period.

Purpose	# Events / Meetings
Affordable Housing	19
Community Services Benefitting LMI Individuals/Geographies	417
Economic Development	19
Total	455

Particularly responsive is the bank's involvement in Houston Money Week and Houston ToolBank. Bank personnel worked to develop strategic plans as well as educational material for Houston Money Week, which assists in addressing the need for financial education as identified by contacts in the area. The ToolBank lends its inventory of tools to charitable organizations to increase the impact of their mission-related efforts in the community. Due to damage sustained from Hurricane Harvey, this was particularly responsive to the needs of the community and assisted non-profits in repairing the area.

Metropolitan Areas Reviewed Using Limited Scope Procedures

METROPOLITAN AREAS (Limited Scope Review)

Description of Institution's Operations

- **Austin Assessment Area**
 - As of December 31, 2017, the bank operated ten branches in the assessment area, representing 2.3% of its branches.
 - As of June 30, 2017, the bank had \$898.0 million in deposits in this assessment area, representing a market share of 2.3%. The \$898.0 million also represents 1.6% of the bank's total deposits.
- **San Antonio Assessment Area**
 - As of December 31, 2017, the bank operated six branches in the assessment area, representing 1.4% of its branches.
 - As of June 30, 2017, the bank had \$177.8 million in deposits in this assessment area, representing a market share of 0.2%. The \$177.8 million also represents 0.3% of the bank's total deposits.

Conclusions With Respect to Performance Tests

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with the bank's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix H for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited scope assessment areas can be found in Appendices E and H, respectively.

Assessment Area	Lending Test	Investment Test	Service Test
Austin	Below	Consistent	Exceeds
San Antonio	Below	Exceeds	Below

The performance in the limited-scope assessment areas did not change the bank's overall rating, but did affect some individual components of the Lending Test in Texas.

NON-METROPOLITAN STATEWIDE AREA (Limited Scope Review)

Description of Institution's Operations in the Non-Metropolitan Assessment Areas

• **Kerr County Assessment Area**

- As of December 31, 2017, the bank operated four branches in the assessment area, representing 0.9% of its branches.
- As of June 30, 2017, the bank had \$178.6 million in deposits in this assessment area, representing a market share of 13.6%. The \$178.6 million also represents 0.3% of the bank's total deposits.

Conclusions With Respect to Performance Tests

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with the bank's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix I for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited scope assessment areas can be found in Appendices F and I, respectively.

Assessment Area	Lending Test	Investment Test	Service Test
Kerr County	Below	Below	Below

The performance in the limited-scope assessment areas did not change the bank's overall rating, but did affect some individual components of the Lending Test in Texas.

Appendices

Appendices

Appendix A – Scope of Examination

SCOPE OF EXAMINATION	
Time Period Reviewed	
Lending Test: January 1, 2015 to December 31, 2017 Community Development Loans, Investment Test, and Service Tests: January 1, 2015 to March 31, 2018	
Financial Institution	Products Reviewed
Comerica Bank Dallas, Texas	CRA and HMDA Reportable Loans Community Development Loans HELOC Loans

List of Assessment Areas			
Assessment Area	Type of Examination	Branches Visited	Other Information
Arizona <ul style="list-style-type: none"> Phoenix – part of Phoenix-Mesa-Scottsdale MSA #38060 	Full		
California <ul style="list-style-type: none"> Fresno MSA #23420 Greater Los Angeles – part of the Los-Angeles-Long Beach-Anaheim MSA #31080 Inland Empire – part of the Riverside-San Bernardino-Ontario MSA #40140 Sacramento – part of the Sacramento-Arden Arcade-Roseville MSA #40900 Salinas – part of the Salinas MSA #41500 San Diego – part of the San Diego-Carlsbad-San Marcos MSA #41740 San Francisco Bay – part of the San Francisco-Oakland-Hayward MSA #41860 San Jose – part of the San Jose-Sunnyvale-Santa Clara MSA #41940 Santa Cruz – part of the Santa Cruz-Watsonville MSA #42100 Ventura – part of the Oxnard-Thousand Oaks-Ventura MSA #37100 	Limited Full Limited Limited Limited Limited Full Limited		
Florida <ul style="list-style-type: none"> Fort Lauderdale – West Palm Beach – part of the Miami-Fort Lauderdale-Pompano Beach MSA #33100 	Limited		

Appendix A

List of Assessment Areas			
Assessment Area	Type of Examination	Branches Visited	Other Information
<ul style="list-style-type: none"> Naples-Immokalee-Marco Island MSA #34940 Sarasota – part of the North Port-Bradenton-Sarasota MSA #35840 Stuart – part of the Port St. Lucie MSA #38940 	<p>Full</p> <p>Limited</p> <p>Limited</p>		
Michigan <ul style="list-style-type: none"> Ann Arbor MSA #11460 Battle Creek MSA #12980 Fenton – part of the Flint MSA #22420 Grand Rapids – Wyoming – part of the Grand Rapids-Wyoming MSA #24340 Jackson MSA #27100 Kalamazoo-Portage – part of the Kalamazoo-Portage MSA #28020 Lansing-East Lansing – part of the Lansing-East Lansing MSA #29620 Midland MSA #33220 Muskegon MSA #34740 Southeast Michigan – part of the Detroit-Warren-Dearborn MSA #19820 Gladwin County (non-MSA) #26051 Lenawee County (non-MSA) #26091 	<p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Full</p> <p>Limited</p> <p>Limited</p> <p>Limited</p> <p>Full</p> <p>Limited</p> <p>Limited</p>		
Texas <ul style="list-style-type: none"> Austin – part of the Austin-Round Rock MSA #12420 Dallas – Fort Worth Metroplex – part of the Dallas-Fort Worth-Arlington MSA #19100 Houston – part of the Houston-The Woodlands-Sugar Land MSA #26420 San Antonio – part of the San Antonio-New Braunfels MSA #41700 Kerr County (non-MSA) #48265 	<p>Limited</p> <p>Full</p> <p>Full</p> <p>Limited</p> <p>Limited</p>	<p>2</p> <p>1</p>	

Note: Branches Visited indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. The evaluation of the institution's CRA performance takes into consideration activity from all branch locations, as described in the Scope of Examination.

Appendix B – Summary of Ratings

Summary of Ratings				
State	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Arizona	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
California	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Florida	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve
Michigan	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Texas	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

Appendix C – General Information

Acronyms:

ATM	Automated Teller Machine
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
HMDA Home	Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LIHTC	Low Income Housing Tax Credit
LMI	Low- and Moderate-Income
LTD	Loan-to-Deposit Ratio
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OCC	Office of the Comptroller of the Currency
OMB	Office of Management and Budget
REIS	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

Rounding Convention: Because the percentages in the tables were rounded to the nearest tenth in most cases, some columns may not total exactly to 100 percent.

Appendix D - Glossary

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

Census tract: A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language:

1. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals.
2. Community services targeted to low- or moderate-income individuals.
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less.
4. Activities that revitalize or stabilize –
 - a. Low- or moderate-income geographies.
 - b. Designated disaster areas.
 - c. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - i. Rates of poverty, unemployment, and population loss.
 - ii. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.
5. Loans, investments, and services by financial institutions that-
 - a. Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP).
 - b. Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees.
 - c. Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment

area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of the applicants; the amount of loan requested; and the disposition of the application (for example, approved, denied, or withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent

communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Appendix E – Metropolitan Limited Scope Assessment Areas Demographics

Appendix E

Combined Demographics Report

Assessment Area: CA - Fresno MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	22	11.1	19,227	9.3	8,363	43.5	50,839	24.7
Moderate-income	56	28.1	56,736	27.6	15,970	28.1	33,021	16
Middle-income	51	25.6	56,403	27.4	8,780	15.6	35,245	17.1
Upper-income	68	34.2	73,442	35.7	3,359	4.6	86,716	42.1
Unknown-income	2	1	13	0	0	0	0	0
Total Assessment Area	199	100.0	205,821	100.0	36,472	17.7	205,821	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	30,054	7,729	5	25.7	19,408	64.6	2,917	9.7
Moderate-income	84,071	32,485	20.8	38.6	44,587	53	6,999	8.3
Middle-income	87,136	43,326	27.7	49.7	37,253	42.8	6,557	7.5
Upper-income	108,945	72,592	46.5	66.6	26,443	24.3	9,910	9.1
Unknown-income	13	0	0	0	13	100	0	0
Total Assessment Area	310,219	156,132	100.0	50.3	127,704	41.2	26,383	8.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,832	9.4	2,510	9.2	294	11.6	28	17.7
Moderate-income	6,933	23	6,110	22.3	790	31.3	33	20.9
Middle-income	7,820	26	7,159	26.1	622	24.6	39	24.7
Upper-income	12,486	41.5	11,609	42.4	819	32.4	58	36.7
Unknown-income	22	0.1	19	0.1	3	0.1	0	0
Total Assessment Area	30,093	100.0	27,407	100.0	2,528	100.0	158	100.0
	Percentage of Total Businesses:			91.1		8.4		.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	94	4.9	62	3.6	32	15	0	0
Moderate-income	605	31.5	531	31.1	74	34.6	0	0
Middle-income	682	35.5	614	36	67	31.3	1	100
Upper-income	539	28.1	498	29.2	41	19.2	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,920	100.0	1,705	100.0	214	100.0	1	100.0
	Percentage of Total Farms:			88.8		11.1		.1

Appendix E

Combined Demographics Report**Assessment Area: CA - Inland Empire**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	28	5.4	26,567	4.3	8,671	32.6	121,980	19.9
Moderate-income	135	26	142,881	23.3	26,096	18.3	104,730	17.1
Middle-income	173	33.3	194,392	31.7	18,364	9.4	120,585	19.7
Upper-income	182	35	249,194	40.6	9,075	3.6	265,739	43.3
Unknown-income	2	0.4	0	0	0	0	0	0
Total Assessment Area	520	100.0	613,034	100.0	62,206	10.1	613,034	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	42,215	12,589	2.4	29.8	25,076	59.4	4,550	10.8
Moderate-income	206,456	98,972	18.8	47.9	90,042	43.6	17,442	8.4
Middle-income	275,008	166,277	31.6	60.5	87,253	31.7	21,478	7.8
Upper-income	321,418	248,462	47.2	77.3	53,025	16.5	19,931	6.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	845,097	526,300	100.0	62.3	255,396	30.2	63,401	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	3,526	3.6	3,248	3.6	243	3.1	35	8
Moderate-income	21,840	22.4	19,363	21.7	2,367	29.7	110	25
Middle-income	31,047	31.8	28,091	31.5	2,818	35.4	138	31.4
Upper-income	41,118	42.1	38,453	43.1	2,508	31.5	157	35.7
Unknown-income	54	0.1	30	0	24	0.3	0	0
Total Assessment Area	97,585	100.0	89,185	100.0	7,960	100.0	440	100.0
	Percentage of Total Businesses:			91.4		8.2		.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	3	0.4	3	0.4	0	0	0	0
Moderate-income	81	10.9	79	11.4	2	3.8	0	0
Middle-income	264	35.4	237	34.1	27	51.9	0	0
Upper-income	398	53.4	375	54	23	44.2	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	746	100.0	694	100.0	52	100.0	0	.0
	Percentage of Total Farms:			93.0		7.0		.0

Appendix E

Combined Demographics Report**Assessment Area: CA - Inland Empire**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	28	5.4	27,592	4.4	11,383	41.3	131,983	20.8
Moderate-income	143	27.5	147,417	23.3	34,396	23.3	101,876	16.1
Middle-income	175	33.7	199,907	31.6	24,800	12.4	119,325	18.8
Upper-income	172	33.1	258,333	40.8	12,951	5	280,065	44.2
Unknown-income	2	0.4	0	0	0	0	0	0
Total Assessment Area	520	100.0	633,249	100.0	83,530	13.2	633,249	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	44,253	11,540	2.3	26.1	27,993	63.3	4,720	10.7
Moderate-income	218,052	89,516	17.6	41.1	111,353	51.1	17,183	7.9
Middle-income	277,036	164,163	32.3	59.3	95,318	34.4	17,555	6.3
Upper-income	333,178	243,779	47.9	73.2	72,654	21.8	16,745	5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	872,519	508,998	100.0	58.3	307,318	35.2	56,203	6.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	4,332	5	3,831	4.9	463	5.8	38	9.4
Moderate-income	20,015	23	17,441	22.2	2,458	30.9	116	28.6
Middle-income	29,199	33.5	26,081	33.1	3,004	37.7	114	28.1
Upper-income	33,464	38.4	31,311	39.8	2,015	25.3	138	34
Unknown-income	49	0.1	26	0	23	0.3	0	0
Total Assessment Area	87,059	100.0	78,690	100.0	7,963	100.0	406	100.0
	Percentage of Total Businesses:			90.4		9.1		.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	11	1.7	11	1.8	0	0	0	0
Moderate-income	93	14.2	86	14.3	7	13.5	0	0
Middle-income	215	32.9	194	32.2	21	40.4	0	0
Upper-income	335	51.2	311	51.7	24	46.2	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	654	100.0	602	100.0	52	100.0	0	.0
	Percentage of Total Farms:			92.0		8.0		.0

Appendix E

Combined Demographics Report**Assessment Area: CA - Sacramento**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	9	30,663	7.1	8,326	27.2	98,464	23
Moderate-income	102	25.6	104,153	24.3	16,023	15.4	73,839	17.2
Middle-income	142	35.7	156,228	36.4	10,054	6.4	86,036	20.1
Upper-income	117	29.4	137,800	32.1	4,235	3.1	170,515	39.8
Unknown-income	1	0.3	10	0	0	0	0	0
Total Assessment Area	398	100.0	428,854	100.0	38,638	9.0	428,854	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	58,467	18,123	4.5	31	33,566	57.4	6,778	11.6
Moderate-income	180,971	80,313	20.1	44.4	84,207	46.5	16,451	9.1
Middle-income	257,502	154,503	38.7	60	85,628	33.3	17,371	6.7
Upper-income	198,673	146,058	36.6	73.5	41,243	20.8	11,372	5.7
Unknown-income	21	0	0	0	21	100	0	0
Total Assessment Area	695,634	398,997	100.0	57.4	244,665	35.2	51,972	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	6,403	7.9	5,643	7.5	716	12.7	44	8.9
Moderate-income	17,538	21.7	15,956	21.3	1,472	26.1	110	22.3
Middle-income	30,714	37.9	28,473	38.1	2,019	35.8	222	45
Upper-income	26,287	32.5	24,743	33.1	1,428	25.3	116	23.5
Unknown-income	4	0	3	0	0	0	1	0.2
Total Assessment Area	80,946	100.0	74,818	100.0	5,635	100.0	493	100.0
	Percentage of Total Businesses:			92.4		7.0		.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	19	2.6	19	2.6	0	0	0	0
Moderate-income	104	14.2	102	14.2	2	12.5	0	0
Middle-income	338	46	326	45.4	12	75	0	0
Upper-income	273	37.2	271	37.7	2	12.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	734	100.0	718	100.0	16	100.0	0	.0
	Percentage of Total Farms:			97.8		2.2		.0

Appendix E

Combined Demographics Report

Assessment Area: CA - Salinas

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	5.1	4,514	6	1,532	33.9	16,251	21.7
Moderate-income	15	19	14,479	19.3	2,409	16.6	11,855	15.8
Middle-income	31	39.2	29,625	39.5	2,679	9	14,575	19.4
Upper-income	27	34.2	26,419	35.2	1,155	4.4	32,356	43.1
Unknown-income	2	2.5	0	0	0	0	0	0
Total Assessment Area	79	100.0	75,037	100.0	7,775	10.4	75,037	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	5,358	1,193	2.1	22.3	3,803	71	362	6.8
Moderate-income	21,189	6,636	11.9	31.3	12,874	60.8	1,679	7.9
Middle-income	47,750	21,089	37.8	44.2	23,228	48.6	3,433	7.2
Upper-income	43,859	26,909	48.2	61.4	11,217	25.6	5,733	13.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	118,156	55,827	100.0	47.2	51,122	43.3	11,207	9.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	232	1.6	222	1.7	9	0.8	1	1.4
Moderate-income	2,446	17.1	2,238	17	191	17.3	17	24.6
Middle-income	5,766	40.3	5,236	39.8	498	45.2	32	46.4
Upper-income	5,810	40.6	5,402	41.1	390	35.4	18	26.1
Unknown-income	70	0.5	56	0.4	13	1.2	1	1.4
Total Assessment Area	14,324	100.0	13,154	100.0	1,101	100.0	69	100.0
	Percentage of Total Businesses:			91.8		7.7		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.3	1	0.3	0	0	0	0
Moderate-income	29	7.6	24	8.2	5	5.5	0	0
Middle-income	182	47.6	121	41.6	61	67	0	0
Upper-income	166	43.5	143	49.1	23	25.3	0	0
Unknown-income	4	1	2	0.7	2	2.2	0	0
Total Assessment Area	382	100.0	291	100.0	91	100.0	0	.0
	Percentage of Total Farms:			76.2		23.8		.0

Appendix E

Combined Demographics Report

Assessment Area: CA - Salinas

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	3.8	2,494	3.3	984	39.5	15,489	20.5
Moderate-income	15	19	14,775	19.5	3,533	23.9	13,080	17.3
Middle-income	25	31.6	26,352	34.9	2,969	11.3	13,906	18.4
Upper-income	34	43	31,957	42.3	1,609	5	33,107	43.8
Unknown-income	2	2.5	4	0	4	100	0	0
Total Assessment Area	79	100.0	75,582	100.0	9,099	12.0	75,582	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,377	355	0.7	10.5	2,813	83.3	209	6.2
Moderate-income	19,764	6,007	11.6	30.4	12,713	64.3	1,044	5.3
Middle-income	38,414	16,041	31	41.8	20,130	52.4	2,243	5.8
Upper-income	57,453	29,346	56.7	51.1	19,146	33.3	8,961	15.6
Unknown-income	4	4	0	100	0	0	0	0
Total Assessment Area	119,012	51,753	100.0	43.5	54,802	46.0	12,457	10.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	574	4.3	524	4.3	43	3.9	7	10
Moderate-income	1,315	9.9	1,220	10.1	88	8	7	10
Middle-income	3,896	29.4	3,458	28.6	413	37.8	25	35.7
Upper-income	7,399	55.8	6,832	56.5	537	49.1	30	42.9
Unknown-income	66	0.5	52	0.4	13	1.2	1	1.4
Total Assessment Area	13,250	100.0	12,086	100.0	1,094	100.0	70	100.0
	Percentage of Total Businesses:			91.2		8.3		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	1.1	3	1.1	1	1.1	0	0
Moderate-income	27	7.6	19	7.3	8	8.8	0	0
Middle-income	156	44.2	101	38.5	55	60.4	0	0
Upper-income	162	45.9	137	52.3	25	27.5	0	0
Unknown-income	4	1.1	2	0.8	2	2.2	0	0
Total Assessment Area	353	100.0	262	100.0	91	100.0	0	.0
	Percentage of Total Farms:			74.2		25.8		.0

Appendix E

Combined Demographics Report

Assessment Area: CA - San Diego

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	55	10.9	50,232	9.2	14,717	29.3	122,995	22.5
Moderate-income	102	20.3	105,864	19.3	14,407	13.6	94,848	17.3
Middle-income	176	35	187,675	34.3	11,899	6.3	99,909	18.2
Upper-income	166	33	203,953	37.2	7,204	3.5	229,972	42
Unknown-income	4	0.8	0	0	0	0	0	0
Total Assessment Area	503	100.0	547,724	100.0	48,227	8.8	547,724	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	83,941	16,384	3.5	19.5	61,395	73.1	6,162	7.3
Moderate-income	184,128	65,007	14	35.3	104,060	56.5	15,061	8.2
Middle-income	331,357	173,179	37.3	52.3	133,519	40.3	24,659	7.4
Upper-income	332,686	209,511	45.1	63	98,916	29.7	24,259	7.3
Unknown-income	9	0	0	0	9	100	0	0
Total Assessment Area	932,121	464,081	100.0	49.8	397,899	42.7	70,141	7.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8,510	6	7,843	6	630	5.7	37	6.3
Moderate-income	21,056	14.9	19,362	14.9	1,622	14.7	72	12.2
Middle-income	48,565	34.4	44,579	34.4	3,819	34.7	167	28.3
Upper-income	63,082	44.6	57,856	44.6	4,912	44.6	314	53.1
Unknown-income	140	0.1	117	0.1	22	0.2	1	0.2
Total Assessment Area	141,353	100.0	129,757	100.0	11,005	100.0	591	100.0
	Percentage of Total Businesses:			91.8		7.8		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	20	2.4	20	2.6	0	0	0	0
Moderate-income	93	11.3	89	11.6	4	7.7	0	0
Middle-income	250	30.5	235	30.6	15	28.8	0	0
Upper-income	457	55.7	424	55.2	33	63.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	820	100.0	768	100.0	52	100.0	0	.0
	Percentage of Total Farms:			93.7		6.3		.0

Appendix E

Combined Demographics Report

Assessment Area: CA - San Diego

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	52	10.3	48,329	8.5	16,121	33.4	134,563	23.6
Moderate-income	109	21.7	121,038	21.3	18,636	15.4	95,092	16.7
Middle-income	161	32	176,363	31	15,476	8.8	98,851	17.4
Upper-income	177	35.2	223,334	39.2	10,462	4.7	240,595	42.3
Unknown-income	4	0.8	37	0	0	0	0	0
Total Assessment Area	503	100.0	569,101	100.0	60,695	10.7	569,101	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	77,311	12,880	2.9	16.7	58,990	76.3	5,441	7
Moderate-income	197,362	66,179	14.7	33.5	118,868	60.2	12,315	6.2
Middle-income	318,646	154,124	34.3	48.4	141,708	44.5	22,814	7.2
Upper-income	358,176	215,909	48.1	60.3	116,693	32.6	25,574	7.1
Unknown-income	48	26	0	54.2	11	22.9	11	22.9
Total Assessment Area	951,543	449,118	100.0	47.2	436,270	45.8	66,155	7.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	6,688	5.3	6,031	5.2	620	5.7	37	6.8
Moderate-income	18,691	14.7	17,093	14.8	1,536	14	62	11.4
Middle-income	43,951	34.5	39,660	34.3	4,124	37.6	167	30.6
Upper-income	57,836	45.4	52,894	45.7	4,664	42.5	278	51
Unknown-income	118	0.1	98	0.1	19	0.2	1	0.2
Total Assessment Area	127,284	100.0	115,776	100.0	10,963	100.0	545	100.0
	Percentage of Total Businesses:			91.0		8.6		.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	17	2.3	17	2.5	0	0	0	0
Moderate-income	89	12.1	84	12.2	5	10.9	0	0
Middle-income	280	38.1	257	37.3	23	50	0	0
Upper-income	349	47.5	331	48	18	39.1	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	735	100.0	689	100.0	46	100.0	0	.0
	Percentage of Total Farms:			93.7		6.3		.0

Appendix E

Combined Demographics Report

Assessment Area: CA - San Francisco Bay

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	115	13.2	86,783	10.2	19,147	22.1	203,177	23.8
Moderate-income	172	19.7	156,867	18.4	17,472	11.1	140,047	16.4
Middle-income	298	34.2	310,603	36.4	15,133	4.9	159,458	18.7
Upper-income	282	32.3	299,640	35.1	6,529	2.2	351,220	41.1
Unknown-income	5	0.6	9	0	0	0	0	0
Total Assessment Area	872	100.0	853,902	100.0	58,281	6.8	853,902	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	195,608	39,220	5.1	20.1	130,412	66.7	25,976	13.3
Moderate-income	293,745	113,159	14.8	38.5	157,495	53.6	23,091	7.9
Middle-income	535,940	287,532	37.6	53.7	210,822	39.3	37,586	7
Upper-income	494,625	324,620	42.5	65.6	140,297	28.4	29,708	6
Unknown-income	59	0	0	0	59	100	0	0
Total Assessment Area	1,519,977	764,531	100.0	50.3	639,085	42.0	116,361	7.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	28,231	13.8	24,339	13.2	3,706	19.4	186	20.1
Moderate-income	30,917	15.1	28,112	15.2	2,686	14	119	12.8
Middle-income	64,713	31.6	59,101	32	5,340	27.9	272	29.3
Upper-income	80,825	39.5	73,105	39.6	7,370	38.5	350	37.8
Unknown-income	95	0	74	0	21	0.1	0	0
Total Assessment Area	204,781	100.0	184,731	100.0	19,123	100.0	927	100.0
	Percentage of Total Businesses:			90.2		9.3		.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	61	7.5	51	6.6	9	25	1	50
Moderate-income	100	12.3	99	12.8	1	2.8	0	0
Middle-income	214	26.4	208	26.9	6	16.7	0	0
Upper-income	435	53.7	414	53.6	20	55.6	1	50
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	810	100.0	772	100.0	36	100.0	2	100.0
	Percentage of Total Farms:			95.3		4.4		.2

Appendix E

Combined Demographics Report

Assessment Area: CA - San Francisco Bay

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	109	12.5	94,763	10.5	23,236	24.5	223,868	24.7
Moderate-income	184	21.1	185,995	20.5	21,109	11.3	144,328	15.9
Middle-income	258	29.6	285,195	31.5	15,275	5.4	163,154	18
Upper-income	309	35.4	337,793	37.3	8,501	2.5	374,700	41.4
Unknown-income	12	1.4	2,304	0.3	283	12.3	0	0
Total Assessment Area	872	100.0	906,050	100.0	68,404	7.5	906,050	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	184,029	37,813	5	20.5	130,406	70.9	15,810	8.6
Moderate-income	322,242	126,869	16.8	39.4	176,755	54.9	18,618	5.8
Middle-income	479,256	247,734	32.8	51.7	206,554	43.1	24,968	5.2
Upper-income	551,148	342,402	45.3	62.1	180,684	32.8	28,062	5.1
Unknown-income	10,511	1,318	0.2	12.5	7,999	76.1	1,194	11.4
Total Assessment Area	1,547,186	756,136	100.0	48.9	702,398	45.4	88,652	5.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	21,961	11.9	18,614	11.3	3,227	17	120	13.9
Moderate-income	30,966	16.8	27,713	16.9	3,108	16.4	145	16.8
Middle-income	51,574	28	46,654	28.4	4,716	24.8	204	23.6
Upper-income	78,271	42.5	70,193	42.7	7,715	40.6	363	42
Unknown-income	1,435	0.8	1,184	0.7	219	1.2	32	3.7
Total Assessment Area	184,207	100.0	164,358	100.0	18,985	100.0	864	100.0
	Percentage of Total Businesses:			89.2		10.3		.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	56	7.7	48	6.9	7	19.4	1	100
Moderate-income	91	12.5	88	12.7	3	8.3	0	0
Middle-income	169	23.2	161	23.2	8	22.2	0	0
Upper-income	412	56.4	394	56.9	18	50	0	0
Unknown-income	2	0.3	2	0.3	0	0	0	0
Total Assessment Area	730	100.0	693	100.0	36	100.0	1	100.0
	Percentage of Total Farms:			94.9		4.9		.1

Appendix E

Combined Demographics Report

Assessment Area: CA - San Jose

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	9.7	31,709	7.5	6,489	20.5	98,611	23.4
Moderate-income	84	22.6	91,939	21.8	8,162	8.9	68,076	16.2
Middle-income	138	37.2	159,464	37.9	7,531	4.7	81,502	19.4
Upper-income	112	30.2	138,027	32.8	3,586	2.6	172,960	41.1
Unknown-income	1	0.3	10	0	0	0	0	0
Total Assessment Area	371	100.0	421,149	100.0	25,768	6.1	421,149	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,950	15,850	4.5	33.1	29,203	60.9	2,897	6
Moderate-income	144,779	63,373	17.9	43.8	73,849	51	7,557	5.2
Middle-income	240,947	137,780	39	57.2	92,184	38.3	10,983	4.6
Upper-income	192,109	136,209	38.6	70.9	47,801	24.9	8,099	4.2
Unknown-income	239	0	0	0	239	100	0	0
Total Assessment Area	626,024	353,212	100.0	56.4	243,276	38.9	29,536	4.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,588	6.1	5,077	6.1	495	5.8	16	5.1
Moderate-income	19,758	21.5	17,150	20.6	2,531	29.9	77	24.4
Middle-income	32,207	35	29,240	35.2	2,878	34	89	28.3
Upper-income	34,269	37.3	31,584	38	2,552	30.2	133	42.2
Unknown-income	71	0.1	65	0.1	6	0.1	0	0
Total Assessment Area	91,893	100.0	83,116	100.0	8,462	100.0	315	100.0
	Percentage of Total Businesses:			90.4		9.2		.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	11	2.4	11	2.6	0	0	0	0
Moderate-income	82	18.1	72	17	10	35.7	0	0
Middle-income	143	31.6	136	32.1	7	25	0	0
Upper-income	216	47.8	205	48.3	11	39.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	452	100.0	424	100.0	28	100.0	0	.0
	Percentage of Total Farms:			93.8		6.2		.0

Appendix E

Combined Demographics Report

Assessment Area: CA - San Jose

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	34	9.2	34,983	7.8	7,016	20.1	106,396	23.8
Moderate-income	77	20.8	83,269	18.6	8,913	10.7	69,212	15.5
Middle-income	135	36.4	164,448	36.8	8,099	4.9	82,584	18.5
Upper-income	124	33.4	163,795	36.7	4,746	2.9	188,317	42.2
Unknown-income	1	0.3	14	0	4	28.6	0	0
Total Assessment Area	371	100.0	446,509	100.0	28,778	6.4	446,509	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	50,462	15,496	4.4	30.7	33,260	65.9	1,706	3.4
Moderate-income	124,428	54,515	15.5	43.8	65,318	52.5	4,595	3.7
Middle-income	243,441	129,091	36.6	53	105,023	43.1	9,327	3.8
Upper-income	227,325	153,510	43.5	67.5	64,849	28.5	8,966	3.9
Unknown-income	85	0	0	0	80	94.1	5	5.9
Total Assessment Area	645,741	352,612	100.0	54.6	268,530	41.6	24,599	3.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4,659	5.7	4,163	5.7	481	5.7	15	5.2
Moderate-income	14,719	17.9	12,578	17.1	2,086	24.9	55	19
Middle-income	29,626	36	26,316	35.7	3,224	38.5	86	29.7
Upper-income	33,256	40.4	30,543	41.5	2,579	30.8	134	46.2
Unknown-income	61	0.1	57	0.1	4	0	0	0
Total Assessment Area	82,321	100.0	73,657	100.0	8,374	100.0	290	100.0
	Percentage of Total Businesses:			89.5		10.2		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	11	2.6	9	2.3	2	7.7	0	0
Moderate-income	76	17.9	68	17.1	8	30.8	0	0
Middle-income	146	34.4	138	34.7	8	30.8	0	0
Upper-income	191	45	183	46	8	30.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	424	100.0	398	100.0	26	100.0	0	.0
	Percentage of Total Farms:			93.9		6.1		.0

Appendix E

Combined Demographics Report**Assessment Area: CA - Ventura**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	6	7,030	4.5	2,095	29.8	32,573	21
Moderate-income	36	26.9	34,504	22.3	4,175	12.1	25,866	16.7
Middle-income	46	34.3	54,513	35.2	2,974	5.5	31,360	20.2
Upper-income	44	32.8	58,968	38	1,215	2.1	65,216	42.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	134	100.0	155,015	100.0	10,459	6.7	155,015	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	9,683	2,539	1.8	26.2	6,686	69	458	4.7
Moderate-income	50,590	23,483	16.9	46.4	23,112	45.7	3,995	7.9
Middle-income	77,311	50,501	36.3	65.3	23,314	30.2	3,496	4.5
Upper-income	77,154	62,663	45	81.2	11,465	14.9	3,026	3.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	214,738	139,186	100.0	64.8	64,577	30.1	10,975	5.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,218	3.9	1,063	3.7	154	6.5	1	0.7
Moderate-income	6,038	19.3	5,465	18.9	546	23	27	19.6
Middle-income	11,137	35.5	10,156	35.2	940	39.6	41	29.7
Upper-income	12,961	41.3	12,159	42.2	733	30.9	69	50
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	31,354	100.0	28,843	100.0	2,373	100.0	138	100.0
	Percentage of Total Businesses:			92.0		7.6		.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	58	13.1	39	10.4	19	27.1	0	0
Moderate-income	98	22.1	79	21.1	19	27.1	0	0
Middle-income	163	36.7	142	38	21	30	0	0
Upper-income	125	28.2	114	30.5	11	15.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	444	100.0	374	100.0	70	100.0	0	.0
	Percentage of Total Farms:			84.2		15.8		.0

Appendix E

Combined Demographics Report**Assessment Area: CA - Ventura**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	6	6,306	4	1,870	29.7	34,144	21.7
Moderate-income	40	29.9	40,370	25.6	6,004	14.9	26,034	16.5
Middle-income	41	30.6	51,962	33	2,771	5.3	30,707	19.5
Upper-income	45	33.6	59,032	37.4	1,465	2.5	66,785	42.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	134	100.0	157,670	100.0	12,110	7.7	157,670	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	8,043	2,287	1.7	28.4	5,365	66.7	391	4.9
Moderate-income	57,481	24,989	18.1	43.5	28,649	49.8	3,843	6.7
Middle-income	76,113	49,012	35.6	64.4	22,857	30	4,244	5.6
Upper-income	77,290	61,405	44.6	79.4	13,745	17.8	2,140	2.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	218,927	137,693	100.0	62.9	70,616	32.3	10,618	4.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,520	5.3	1,189	4.5	328	13.9	3	2.3
Moderate-income	6,032	21	5,565	21.2	439	18.6	28	21.4
Middle-income	9,523	33.2	8,592	32.8	891	37.8	40	30.5
Upper-income	11,634	40.5	10,874	41.5	700	29.7	60	45.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	28,709	100.0	26,220	100.0	2,358	100.0	131	100.0
	Percentage of Total Businesses:			91.3		8.2		.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	36	8.6	24	6.9	12	17.6	0	0
Moderate-income	117	28	89	25.4	28	41.2	0	0
Middle-income	144	34.4	128	36.6	16	23.5	0	0
Upper-income	121	28.9	109	31.1	12	17.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	418	100.0	350	100.0	68	100.0	0	.0
	Percentage of Total Farms:			83.7		16.3		.0

Appendix E

Combined Demographics Report

Assessment Area: FL - Fort Lauderdale-West Palm Beach

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	34	5.1	25,584	3.6	7,600	29.7	156,940	21.9
Moderate-income	181	27	188,474	26.3	27,881	14.8	127,530	17.8
Middle-income	237	35.4	258,994	36.1	18,341	7.1	139,759	19.5
Upper-income	212	31.6	243,942	34	9,178	3.8	292,773	40.8
Unknown-income	6	0.9	8	0	0	0	0	0
Total Assessment Area	670	100.0	717,002	100.0	63,000	8.8	717,002	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	57,925	17,065	2.1	29.5	26,657	46	14,203	24.5
Moderate-income	407,996	209,294	25.5	51.3	120,444	29.5	78,258	19.2
Middle-income	528,360	309,462	37.8	58.6	122,212	23.1	96,686	18.3
Upper-income	427,750	283,905	34.6	66.4	65,769	15.4	78,076	18.3
Unknown-income	8	0	0	0	8	100	0	0
Total Assessment Area	1,422,039	819,726	100.0	57.6	335,090	23.6	267,223	18.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8,625	3.5	7,589	3.3	973	6.5	63	2.7
Moderate-income	55,400	22.3	50,776	21.9	4,267	28.6	357	15
Middle-income	83,729	33.7	78,388	33.9	4,656	31.2	685	28.8
Upper-income	100,756	40.5	94,518	40.8	4,972	33.3	1,266	53.3
Unknown-income	231	0.1	176	0.1	49	0.3	6	0.3
Total Assessment Area	248,741	100.0	231,447	100.0	14,917	100.0	2,377	100.0
	Percentage of Total Businesses:			93.0		6.0		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	28	2.8	26	2.7	2	4.5	0	0
Moderate-income	143	14.3	136	14.2	7	15.9	0	0
Middle-income	296	29.6	287	30	9	20.5	0	0
Upper-income	534	53.3	507	53	26	59.1	1	100
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,001	100.0	956	100.0	44	100.0	1	100.0
	Percentage of Total Farms:			95.5		4.4		.1

Appendix E

Combined Demographics Report

Assessment Area: FL - Fort Lauderdale-West Palm Beach

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	41	6.1	35,229	4.8	12,467	35.4	164,967	22.6
Moderate-income	196	29.3	193,594	26.5	34,224	17.7	127,349	17.4
Middle-income	205	30.6	237,964	32.6	21,248	8.9	134,575	18.4
Upper-income	220	32.8	263,243	36	11,614	4.4	303,897	41.6
Unknown-income	8	1.2	758	0.1	99	13.1	0	0
Total Assessment Area	670	100.0	730,788	100.0	79,652	10.9	730,788	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	78,121	21,666	2.8	27.7	39,924	51.1	16,531	21.2
Moderate-income	411,326	188,905	24.6	45.9	140,621	34.2	81,800	19.9
Middle-income	467,122	259,765	33.8	55.6	129,493	27.7	77,864	16.7
Upper-income	485,253	296,803	38.6	61.2	89,867	18.5	98,583	20.3
Unknown-income	1,988	851	0.1	42.8	599	30.1	538	27.1
Total Assessment Area	1,443,810	767,990	100.0	53.2	400,504	27.7	275,316	19.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	11,525	5.2	9,858	4.8	1,583	10.4	84	3.9
Moderate-income	50,180	22.5	45,639	22.2	4,213	27.7	328	15.3
Middle-income	68,345	30.7	63,802	31.1	3,999	26.3	544	25.5
Upper-income	91,880	41.3	85,371	41.6	5,340	35.1	1,169	54.7
Unknown-income	640	0.3	552	0.3	76	0.5	12	0.6
Total Assessment Area	222,570	100.0	205,222	100.0	15,211	100.0	2,137	100.0
	Percentage of Total Businesses:			92.2		6.8		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	37	4	34	3.9	3	6.8	0	0
Moderate-income	129	14	123	14	6	13.6	0	0
Middle-income	265	28.8	255	29.1	10	22.7	0	0
Upper-income	484	52.6	459	52.4	25	56.8	0	0
Unknown-income	5	0.5	5	0.6	0	0	0	0
Total Assessment Area	920	100.0	876	100.0	44	100.0	0	.0
	Percentage of Total Farms:			95.2		4.8		.0

Appendix E

Combined Demographics Report

Assessment Area: FL - Sarasota

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2	785	1.8	299	38.1	9,209	20.6
Moderate-income	14	27.5	11,617	26	1,865	16.1	8,177	18.3
Middle-income	21	41.2	20,280	45.4	1,213	6	8,644	19.4
Upper-income	15	29.4	11,983	26.8	503	4.2	18,635	41.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	51	100.0	44,665	100.0	3,880	8.7	44,665	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,717	583	1	34	901	52.5	233	13.6
Moderate-income	27,848	13,514	24.2	48.5	8,815	31.7	5,519	19.8
Middle-income	40,744	25,336	45.3	62.2	8,758	21.5	6,650	16.3
Upper-income	35,586	16,504	29.5	46.4	4,224	11.9	14,858	41.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	105,895	55,937	100.0	52.8	22,698	21.4	27,260	25.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	186	0.9	169	0.9	17	1.7	0	0
Moderate-income	5,763	28.6	5,387	28.1	368	37.8	8	53.3
Middle-income	8,333	41.4	8,053	42	277	28.5	3	20
Upper-income	5,868	29.1	5,553	29	311	32	4	26.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	20,150	100.0	19,162	100.0	973	100.0	15	100.0
	Percentage of Total Businesses:			95.1		4.8		.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0	0	0	0	0	0	0
Moderate-income	9	12	8	11	1	50	0	0
Middle-income	35	46.7	34	46.6	1	50	0	0
Upper-income	31	41.3	31	42.5	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	75	100.0	73	100.0	2	100.0	0	.0
	Percentage of Total Farms:			97.3		2.7		.0

Appendix E

Combined Demographics Report

Assessment Area: FL - Stuart

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,856	14.5
Moderate-income	2	14.3	1,244	9.7	169	13.6	2,456	19.2
Middle-income	7	50	6,704	52.3	373	5.6	2,485	19.4
Upper-income	5	35.7	4,873	38	236	4.8	6,024	47
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	14	100.0	12,821	100.0	778	6.1	12,821	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	3,543	1,115	6.7	31.5	1,696	47.9	732	20.7
Middle-income	17,096	8,912	53.4	52.1	3,523	20.6	4,661	27.3
Upper-income	12,250	6,649	39.9	54.3	1,586	12.9	4,015	32.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	32,889	16,676	100.0	50.7	6,805	20.7	9,408	28.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,529	23.5	1,333	21.9	192	45.3	4	25
Middle-income	3,172	48.7	3,007	49.5	159	37.5	6	37.5
Upper-income	1,815	27.9	1,736	28.6	73	17.2	6	37.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	6,516	100.0	6,076	100.0	424	100.0	16	100.0
	Percentage of Total Businesses:			93.2		6.5		.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	6	30	6	31.6	0	0	0	0
Middle-income	7	35	7	36.8	0	0	0	0
Upper-income	7	35	6	31.6	1	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	20	100.0	19	100.0	1	100.0	0	.0
	Percentage of Total Farms:			95.0		5.0		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Ann Arbor MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	11	5,300	6.7	1,305	24.6	17,167	21.7
Moderate-income	18	18	14,231	18	2,008	14.1	13,369	16.9
Middle-income	44	44	38,126	48.2	1,769	4.6	16,958	21.4
Upper-income	23	23	21,470	27.1	518	2.4	31,644	40
Unknown-income	4	4	11	0	0	0	0	0
Total Assessment Area	100	100.0	79,138	100.0	5,600	7.1	79,138	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	14,374	3,367	4	23.4	8,993	62.6	2,014	14
Moderate-income	29,394	12,583	14.9	42.8	13,716	46.7	3,095	10.5
Middle-income	69,696	43,820	51.9	62.9	20,019	28.7	5,857	8.4
Upper-income	33,589	24,717	29.3	73.6	6,844	20.4	2,028	6
Unknown-income	216	0	0	0	102	47.2	114	52.8
Total Assessment Area	147,269	84,487	100.0	57.4	49,674	33.7	13,108	8.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	734	4.5	659	4.5	72	4.9	3	3
Moderate-income	1,889	11.7	1,709	11.7	173	11.7	7	7
Middle-income	8,116	50.2	7,317	50.1	742	50	57	57
Upper-income	5,260	32.5	4,757	32.6	473	31.9	30	30
Unknown-income	178	1.1	152	1	23	1.6	3	3
Total Assessment Area	16,177	100.0	14,594	100.0	1,483	100.0	100	100.0
	Percentage of Total Businesses:			90.2		9.2		.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.9	3	0.9	0	0	0	0
Moderate-income	3	0.9	3	0.9	0	0	0	0
Middle-income	251	74.7	248	74.7	3	75	0	0
Upper-income	79	23.5	78	23.5	1	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	336	100.0	332	100.0	4	100.0	0	.0
	Percentage of Total Farms:			98.8		1.2		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Ann Arbor MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	16	8,921	11.2	2,461	27.6	18,032	22.7
Moderate-income	16	16	10,689	13.5	1,261	11.8	13,501	17
Middle-income	37	37	33,861	42.7	2,054	6.1	15,572	19.6
Upper-income	25	25	25,698	32.4	484	1.9	32,268	40.7
Unknown-income	6	6	204	0.3	67	32.8	0	0
Total Assessment Area	100	100.0	79,373	100.0	6,327	8.0	79,373	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	23,605	5,440	6.6	23	15,959	67.6	2,206	9.3
Moderate-income	21,049	9,873	12	46.9	9,787	46.5	1,389	6.6
Middle-income	60,457	36,901	44.7	61	19,025	31.5	4,531	7.5
Upper-income	40,983	30,117	36.5	73.5	8,317	20.3	2,549	6.2
Unknown-income	3,004	194	0.2	6.5	2,454	81.7	356	11.9
Total Assessment Area	149,098	82,525	100.0	55.3	55,542	37.3	11,031	7.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,192	8.2	1,053	8.1	136	9.3	3	3.1
Moderate-income	1,295	8.9	1,169	9	121	8.2	5	5.2
Middle-income	6,305	43.3	5,616	43.2	642	43.7	47	48.5
Upper-income	4,846	33.3	4,384	33.7	428	29.1	34	35.1
Unknown-income	930	6.4	780	6	142	9.7	8	8.2
Total Assessment Area	14,568	100.0	13,002	100.0	1,469	100.0	97	100.0
	Percentage of Total Businesses:			89.3		10.1		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3	1	3	1	0	0	0	0
Moderate-income	10	3.2	9	2.9	1	33.3	0	0
Middle-income	206	66.7	205	67	1	33.3	0	0
Upper-income	90	29.1	89	29.1	1	33.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	309	100.0	306	100.0	3	100.0	0	.0
	Percentage of Total Farms:			99.0		1.0		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Battle Creek MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	10.3	2,231	6.2	950	42.6	7,528	21
Moderate-income	11	28.2	8,557	23.9	1,780	20.8	6,475	18.1
Middle-income	15	38.5	13,975	39	1,308	9.4	7,362	20.5
Upper-income	9	23.1	11,096	30.9	403	3.6	14,494	40.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	39	100.0	35,859	100.0	4,441	12.4	35,859	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,442	1,908	4.9	43	1,766	39.8	768	17.3
Moderate-income	16,141	8,720	22.4	54	5,161	32	2,260	14
Middle-income	24,036	15,138	38.9	63	6,033	25.1	2,865	11.9
Upper-income	16,483	13,125	33.7	79.6	2,074	12.6	1,284	7.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	61,102	38,891	100.0	63.6	15,034	24.6	7,177	11.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	400	8.6	331	8	66	14.1	3	4.9
Moderate-income	1,048	22.6	859	20.9	167	35.8	22	36.1
Middle-income	1,770	38.1	1,620	39.3	124	26.6	26	42.6
Upper-income	1,427	30.7	1,307	31.7	110	23.6	10	16.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	4,645	100.0	4,117	100.0	467	100.0	61	100.0
	Percentage of Total Businesses:			88.6		10.1		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	20	9.3	20	9.7	0	0	0	0
Middle-income	134	62.6	128	62.1	6	75	0	0
Upper-income	59	27.6	57	27.7	2	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	214	100.0	206	100.0	8	100.0	0	.0
	Percentage of Total Farms:			96.3		3.7		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Battle Creek MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	10.3	2,135	6.3	908	42.5	7,285	21.7
Moderate-income	12	30.8	7,832	23.3	1,835	23.4	5,985	17.8
Middle-income	15	38.5	13,788	41	1,243	9	6,591	19.6
Upper-income	8	20.5	9,870	29.4	518	5.2	13,764	40.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	39	100.0	33,625	100.0	4,504	13.4	33,625	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,608	1,907	5.2	41.4	1,689	36.7	1,012	22
Moderate-income	16,795	7,716	21.1	45.9	6,041	36	3,038	18.1
Middle-income	23,487	15,641	42.7	66.6	5,338	22.7	2,508	10.7
Upper-income	15,826	11,376	31	71.9	3,142	19.9	1,308	8.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	60,716	36,640	100.0	60.3	16,210	26.7	7,866	13.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	321	7.9	252	7.1	58	12.4	11	18.3
Moderate-income	1,054	25.8	870	24.5	172	36.8	12	20
Middle-income	1,439	35.3	1,287	36.2	123	26.3	29	48.3
Upper-income	1,266	31	1,143	32.2	115	24.6	8	13.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	4,080	100.0	3,552	100.0	468	100.0	60	100.0
	Percentage of Total Businesses:			87.1		11.5		1.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1	0.5	1	0.6	0	0	0	0
Moderate-income	4	2.1	4	2.2	0	0	0	0
Middle-income	140	74.9	133	74.3	7	87.5	0	0
Upper-income	42	22.5	41	22.9	1	12.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	187	100.0	179	100.0	8	100.0	0	.0
	Percentage of Total Farms:			95.7		4.3		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Fenton

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,237	9.1
Moderate-income	0	0	0	0	0	0	1,846	13.6
Middle-income	5	38.5	5,028	37.2	363	7.2	3,026	22.4
Upper-income	8	61.5	8,503	62.8	358	4.2	7,422	54.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	13	100.0	13,531	100.0	721	5.3	13,531	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	8,125	5,591	34.8	68.8	1,830	22.5	704	8.7
Upper-income	13,550	10,466	65.2	77.2	1,868	13.8	1,216	9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	21,675	16,057	100.0	74.1	3,698	17.1	1,920	8.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	863	42.3	788	41.9	71	48.6	4	25
Upper-income	1,179	57.7	1,092	58.1	75	51.4	12	75
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,042	100.0	1,880	100.0	146	100.0	16	100.0
	Percentage of Total Businesses:			92.1		7.1		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	28	49.1	28	49.1	0	0	0	0
Upper-income	29	50.9	29	50.9	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	57	100.0	57	100.0	0	.0	0	.0
	Percentage of Total Farms:			100.0		.0		.0

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Combined Demographics Report

Assessment Area: MI - Fenton

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,745	12.9
Moderate-income	0	0	0	0	0	0	1,478	11
Middle-income	2	15.4	2,896	21.5	276	9.5	2,602	19.3
Upper-income	11	84.6	10,587	78.5	686	6.5	7,658	56.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	13	100.0	13,483	100.0	962	7.1	13,483	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	5,157	2,790	18.9	54.1	1,979	38.4	388	7.5
Upper-income	15,837	11,961	81.1	75.5	2,839	17.9	1,037	6.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	20,994	14,751	100.0	70.3	4,818	22.9	1,425	6.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	594	33.1	520	31.8	72	48.6	2	14.3
Upper-income	1,202	66.9	1,114	68.2	76	51.4	12	85.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,796	100.0	1,634	100.0	148	100.0	14	100.0
	Percentage of Total Businesses:			91.0		8.2		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	3	5.8	2	3.9	1	100	0	0
Upper-income	49	94.2	49	96.1	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	52	100.0	51	100.0	1	100.0	0	.0
	Percentage of Total Farms:			98.1		1.9		.0

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Combined Demographics Report

Assessment Area: MI - Grand Rapids-Wyoming

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	6.6	8,781	4	3,238	36.9	42,201	19.1
Moderate-income	35	19.2	33,110	15	6,761	20.4	39,460	17.9
Middle-income	90	49.5	114,206	51.7	7,610	6.7	49,204	22.3
Upper-income	44	24.2	64,658	29.3	1,899	2.9	89,890	40.7
Unknown-income	1	0.5	0	0	0	0	0	0
Total Assessment Area	182	100.0	220,755	100.0	19,508	8.8	220,755	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	16,095	5,594	2.4	34.8	8,082	50.2	2,419	15
Moderate-income	65,387	31,254	13.2	47.8	26,152	40	7,981	12.2
Middle-income	179,678	127,186	53.7	70.8	39,947	22.2	12,545	7
Upper-income	86,080	72,631	30.7	84.4	8,857	10.3	4,592	5.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	347,240	236,665	100.0	68.2	83,038	23.9	27,537	7.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1,546	4.4	1,184	3.9	352	8.1	10	4.4
Moderate-income	5,516	15.8	4,684	15.5	791	18.1	41	18.2
Middle-income	16,826	48.3	14,711	48.7	2,015	46.2	100	44.4
Upper-income	10,926	31.4	9,651	31.9	1,201	27.6	74	32.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	34,814	100.0	30,230	100.0	4,359	100.0	225	100.0
	Percentage of Total Businesses:			86.8		12.5		.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2	0.2	2	0.3	0	0	0	0
Moderate-income	15	1.9	11	1.5	4	6	0	0
Middle-income	548	67.8	502	67.7	46	68.7	0	0
Upper-income	243	30.1	226	30.5	17	25.4	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	808	100.0	741	100.0	67	100.0	0	.0
	Percentage of Total Farms:			91.7		8.3		.0

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Combined Demographics Report

Assessment Area: MI - Grand Rapids-Wyoming

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	13	7.1	9,170	4.1	3,693	40.3	42,970	19.1
Moderate-income	33	18.1	33,226	14.7	6,067	18.3	39,664	17.6
Middle-income	90	49.5	116,452	51.7	8,287	7.1	49,995	22.2
Upper-income	45	24.7	66,551	29.5	2,307	3.5	92,770	41.2
Unknown-income	1	0.5	0	0	0	0	0	0
Total Assessment Area	182	100.0	225,399	100.0	20,354	9.0	225,399	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	17,889	5,119	2.2	28.6	10,333	57.8	2,437	13.6
Moderate-income	62,402	29,435	12.6	47.2	28,255	45.3	4,712	7.6
Middle-income	181,551	125,745	53.7	69.3	44,873	24.7	10,933	6
Upper-income	90,229	73,974	31.6	82	11,510	12.8	4,745	5.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	352,071	234,273	100.0	66.5	94,971	27.0	22,827	6.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,072	3.4	804	3	262	6.1	6	2.9
Moderate-income	4,337	13.8	3,587	13.4	725	16.9	25	12.1
Middle-income	15,592	49.8	13,389	49.9	2,109	49	94	45.4
Upper-income	10,335	33	9,048	33.7	1,205	28	82	39.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	31,336	100.0	26,828	100.0	4,301	100.0	207	100.0
	Percentage of Total Businesses:			85.6		13.7		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	18	2.4	13	1.9	5	7.5	0	0
Middle-income	506	67.7	458	67.4	48	71.6	0	0
Upper-income	223	29.9	209	30.7	14	20.9	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	747	100.0	680	100.0	67	100.0	0	.0
	Percentage of Total Farms:			91.0		9.0		.0

Appendix E

Combined Demographics Report**Assessment Area: MI - Jackson MSA**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	18.4	3,595	8.7	1,179	32.8	8,584	20.7
Moderate-income	5	13.2	4,507	10.9	815	18.1	7,592	18.3
Middle-income	16	42.1	22,242	53.6	2,058	9.3	8,846	21.3
Upper-income	9	23.7	11,164	26.9	525	4.7	16,486	39.7
Unknown-income	1	2.6	0	0	0	0	0	0
Total Assessment Area	38	100.0	41,508	100.0	4,577	11.0	41,508	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,776	2,933	6.4	37.7	3,740	48.1	1,103	14.2
Moderate-income	8,910	4,625	10	51.9	2,930	32.9	1,355	15.2
Middle-income	35,507	25,197	54.7	71	6,044	17	4,266	12
Upper-income	16,903	13,294	28.9	78.6	1,849	10.9	1,760	10.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	69,096	46,049	100.0	66.6	14,563	21.1	8,484	12.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	814	14.9	652	13.5	153	26.5	9	16.7
Moderate-income	764	14	634	13.1	128	22.1	2	3.7
Middle-income	2,497	45.7	2,265	46.8	202	34.9	30	55.6
Upper-income	1,391	25.4	1,285	26.6	93	16.1	13	24.1
Unknown-income	2	0	0	0	2	0.3	0	0
Total Assessment Area	5,468	100.0	4,836	100.0	578	100.0	54	100.0
	Percentage of Total Businesses:			88.4		10.6		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	2	0.9	2	0.9	0	0	0	0
Middle-income	132	61.4	129	60.8	3	100	0	0
Upper-income	80	37.2	80	37.7	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	215	100.0	212	100.0	3	100.0	0	.0
	Percentage of Total Farms:			98.6		1.4		.0

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Combined Demographics Report

Assessment Area: MI - Jackson MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	15.8	3,504	8.8	1,654	47.2	8,910	22.3
Moderate-income	9	23.7	7,028	17.6	1,361	19.4	6,996	17.5
Middle-income	14	36.8	20,124	50.4	1,772	8.8	8,057	20.2
Upper-income	8	21.1	9,274	23.2	371	4	15,967	40
Unknown-income	1	2.6	0	0	0	0	0	0
Total Assessment Area	38	100.0	39,930	100.0	5,158	12.9	39,930	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,780	2,485	5.7	36.7	3,214	47.4	1,081	15.9
Moderate-income	14,319	6,790	15.6	47.4	5,487	38.3	2,042	14.3
Middle-income	32,454	23,375	53.7	72	5,948	18.3	3,131	9.6
Upper-income	15,568	10,905	25	70	2,387	15.3	2,276	14.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	69,121	43,555	100.0	63.0	17,036	24.6	8,530	12.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	510	10.5	404	9.5	103	17.8	3	6.1
Moderate-income	1,311	26.9	1,088	25.6	214	36.9	9	18.4
Middle-income	2,044	41.9	1,830	43.1	182	31.4	32	65.3
Upper-income	1,007	20.7	923	21.7	79	13.6	5	10.2
Unknown-income	2	0	0	0	2	0.3	0	0
Total Assessment Area	4,874	100.0	4,245	100.0	580	100.0	49	100.0
	Percentage of Total Businesses:			87.1		11.9		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	5	2.6	5	2.7	0	0	0	0
Middle-income	136	72	133	71.9	3	75	0	0
Upper-income	47	24.9	46	24.9	1	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	189	100.0	185	100.0	4	100.0	0	.0
	Percentage of Total Farms:			97.9		2.1		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Lansing-East Lansing

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	7.8	5,794	7	1,782	30.8	18,012	21.8
Moderate-income	25	24.5	15,626	18.9	3,176	20.3	14,138	17.1
Middle-income	33	32.4	33,044	40	2,817	8.5	16,822	20.4
Upper-income	26	25.5	28,197	34.1	1,200	4.3	33,689	40.8
Unknown-income	10	9.8	0	0	0	0	0	0
Total Assessment Area	102	100.0	82,661	100.0	8,975	10.9	82,661	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	11,204	4,384	4.9	39.1	5,360	47.8	1,460	13
Moderate-income	36,724	15,319	17.2	41.7	16,044	43.7	5,361	14.6
Middle-income	61,704	37,453	42.1	60.7	19,344	31.3	4,907	8
Upper-income	43,916	31,776	35.7	72.4	9,496	21.6	2,644	6
Unknown-income	1,223	31	0	2.5	904	73.9	288	23.5
Total Assessment Area	154,771	88,963	100.0	57.5	51,148	33.0	14,660	9.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	667	4.8	579	4.7	84	5.9	4	2.9
Moderate-income	3,574	25.8	3,024	24.6	497	35.1	53	38.7
Middle-income	4,685	33.8	4,250	34.6	393	27.8	42	30.7
Upper-income	4,670	33.7	4,239	34.5	400	28.3	31	22.6
Unknown-income	251	1.8	203	1.7	41	2.9	7	5.1
Total Assessment Area	13,847	100.0	12,295	100.0	1,415	100.0	137	100.0
	Percentage of Total Businesses:			88.8		10.2		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2	0.9	2	0.9	0	0	0	0
Moderate-income	16	7.2	16	7.4	0	0	0	0
Middle-income	97	43.9	95	44.2	2	33.3	0	0
Upper-income	102	46.2	100	46.5	2	33.3	0	0
Unknown-income	4	1.8	2	0.9	2	33.3	0	0
Total Assessment Area	221	100.0	215	100.0	6	100.0	0	.0
	Percentage of Total Farms:			97.3		2.7		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Lansing-East Lansing

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	11.8	6,456	8.1	2,491	38.6	18,024	22.6
Moderate-income	21	20.6	15,948	20	3,540	22.2	13,661	17.1
Middle-income	31	30.4	26,552	33.2	1,862	7	15,290	19.1
Upper-income	29	28.4	30,797	38.5	1,626	5.3	32,931	41.2
Unknown-income	9	8.8	153	0.2	62	40.5	0	0
Total Assessment Area	102	100.0	79,906	100.0	9,581	12.0	79,906	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	16,462	4,411	5.2	26.8	9,318	56.6	2,733	16.6
Moderate-income	34,913	15,655	18.4	44.8	15,201	43.5	4,057	11.6
Middle-income	49,986	30,121	35.4	60.3	16,252	32.5	3,613	7.2
Upper-income	52,860	34,714	40.8	65.7	15,350	29	2,796	5.3
Unknown-income	1,483	156	0.2	10.5	1,177	79.4	150	10.1
Total Assessment Area	155,704	85,057	100.0	54.6	57,298	36.8	13,349	8.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1,290	10.5	1,031	9.6	247	17.7	12	9.4
Moderate-income	2,372	19.3	2,036	18.9	293	21	43	33.9
Middle-income	3,542	28.8	3,183	29.6	330	23.6	29	22.8
Upper-income	4,737	38.6	4,227	39.3	476	34.1	34	26.8
Unknown-income	343	2.8	284	2.6	50	3.6	9	7.1
Total Assessment Area	12,284	100.0	10,761	100.0	1,396	100.0	127	100.0
	Percentage of Total Businesses:			87.6		11.4		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	6	3.1	6	3.2	0	0	0	0
Moderate-income	12	6.2	12	6.3	0	0	0	0
Middle-income	71	36.6	69	36.5	2	40	0	0
Upper-income	100	51.5	99	52.4	1	20	0	0
Unknown-income	5	2.6	3	1.6	2	40	0	0
Total Assessment Area	194	100.0	189	100.0	5	100.0	0	.0
	Percentage of Total Farms:			97.4		2.6		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Midland MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	5.3	668	2.9	58	8.7	4,771	20.7
Moderate-income	3	15.8	2,892	12.5	344	11.9	4,076	17.7
Middle-income	10	52.6	10,364	44.9	931	9	4,604	20
Upper-income	5	26.3	9,138	39.6	416	4.6	9,611	41.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	19	100.0	23,062	100.0	1,749	7.6	23,062	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,154	513	2	44.5	525	45.5	116	10.1
Moderate-income	5,886	3,218	12.5	54.7	2,221	37.7	447	7.6
Middle-income	15,649	11,891	46.3	76	2,540	16.2	1,218	7.8
Upper-income	13,176	10,088	39.2	76.6	2,566	19.5	522	4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	35,865	25,710	100.0	71.7	7,852	21.9	2,303	6.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	196	6.1	124	4.3	69	24.1	3	6.7
Moderate-income	586	18.3	517	18	61	21.3	8	17.8
Middle-income	1,154	36.1	1,056	36.9	73	25.5	25	55.6
Upper-income	1,260	39.4	1,168	40.8	83	29	9	20
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	3,196	100.0	2,865	100.0	286	100.0	45	100.0
	Percentage of Total Businesses:			89.6			8.9	1.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	23	20.5	23	20.9	0	0	0	0
Middle-income	71	63.4	69	62.7	2	100	0	0
Upper-income	18	16.1	18	16.4	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	112	100.0	110	100.0	2	100.0	0	.0
	Percentage of Total Farms:			98.2			1.8	.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Midland MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	5.3	599	2.6	182	30.4	4,635	20.1
Moderate-income	4	21.1	4,364	18.9	620	14.2	4,073	17.7
Middle-income	9	47.4	9,968	43.2	831	8.3	4,782	20.7
Upper-income	5	26.3	8,135	35.3	469	5.8	9,576	41.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	19	100.0	23,066	100.0	2,102	9.1	23,066	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,089	436	1.7	40	597	54.8	56	5.1
Moderate-income	7,588	4,423	17.5	58.3	2,571	33.9	594	7.8
Middle-income	15,259	11,325	44.7	74.2	2,607	17.1	1,327	8.7
Upper-income	12,259	9,153	36.1	74.7	2,505	20.4	601	4.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	36,195	25,337	100.0	70.0	8,280	22.9	2,578	7.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	183	6.5	112	4.5	69	24.2	2	4.7
Moderate-income	623	22	550	22	63	22.1	10	23.3
Middle-income	920	32.5	845	33.7	51	17.9	24	55.8
Upper-income	1,107	39.1	998	39.8	102	35.8	7	16.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,833	100.0	2,505	100.0	285	100.0	43	100.0
	Percentage of Total Businesses:			88.4		10.1		1.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	24	25.5	24	26.1	0	0	0	0
Middle-income	55	58.5	53	57.6	2	100	0	0
Upper-income	15	16	15	16.3	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	94	100.0	92	100.0	2	100.0	0	.0
	Percentage of Total Farms:			97.9		2.1		.0

Appendix E

Combined Demographics Report

Assessment Area: MI - Muskegon MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	7	1,303	2.9	746	57.3	9,587	21.1
Moderate-income	11	25.6	9,575	21.1	2,572	26.9	8,110	17.9
Middle-income	19	44.2	21,632	47.7	2,251	10.4	9,638	21.2
Upper-income	9	20.9	12,856	28.3	674	5.2	18,031	39.7
Unknown-income	1	2.3	0	0	0	0	0	0
Total Assessment Area	43	100.0	45,366	100.0	6,243	13.8	45,366	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	2,189	806	1.6	36.8	1,032	47.1	351	16
Moderate-income	19,219	8,501	17.1	44.2	8,120	42.2	2,598	13.5
Middle-income	33,685	25,525	51.3	75.8	4,730	14	3,430	10.2
Upper-income	18,434	14,966	30.1	81.2	2,098	11.4	1,370	7.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	73,527	49,798	100.0	67.7	15,980	21.7	7,749	10.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	297	5.3	220	4.4	77	13	0	0
Moderate-income	1,222	21.6	1,025	20.4	185	31.3	12	26.1
Middle-income	2,481	43.9	2,245	44.7	214	36.2	22	47.8
Upper-income	1,654	29.3	1,527	30.4	115	19.5	12	26.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5,654	100.0	5,017	100.0	591	100.0	46	100.0
	Percentage of Total Businesses:			88.7		10.5		.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1	0.7	1	0.7	0	0	0	0
Middle-income	119	81.5	114	82	5	71.4	0	0
Upper-income	26	17.8	24	17.3	2	28.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	146	100.0	139	100.0	7	100.0	0	.0
	Percentage of Total Farms:			95.2		4.8		.0

Appendix E

Combined Demographics Report**Assessment Area: MI - Muskegon MSA**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	11.6	3,329	7.6	1,611	48.4	9,463	21.7
Moderate-income	11	25.6	9,228	21.1	2,102	22.8	7,404	17
Middle-income	14	32.6	17,533	40.1	1,992	11.4	9,013	20.6
Upper-income	12	27.9	13,586	31.1	630	4.6	17,796	40.7
Unknown-income	1	2.3	0	0	0	0	0	0
Total Assessment Area	43	100.0	43,676	100.0	6,335	14.5	43,676	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,912	2,421	5	35	3,048	44.1	1,443	20.9
Moderate-income	17,758	9,070	18.8	51.1	6,583	37.1	2,105	11.9
Middle-income	26,965	20,263	41.9	75.1	3,873	14.4	2,829	10.5
Upper-income	21,719	16,567	34.3	76.3	2,665	12.3	2,487	11.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	73,354	48,321	100.0	65.9	16,169	22.0	8,864	12.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	449	8.9	358	8.1	89	15	2	4.3
Moderate-income	1,086	21.5	879	19.9	194	32.8	13	28.3
Middle-income	1,789	35.4	1,645	37.3	128	21.6	16	34.8
Upper-income	1,723	34.1	1,527	34.6	181	30.6	15	32.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5,047	100.0	4,409	100.0	592	100.0	46	100.0
	Percentage of Total Businesses:			87.4		11.7		.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1	0.8	1	0.8	0	0	0	0
Middle-income	84	64.1	83	67.5	1	12.5	0	0
Upper-income	46	35.1	39	31.7	7	87.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	131	100.0	123	100.0	8	100.0	0	.0
	Percentage of Total Farms:			93.9		6.1		.0

Appendix E

Combined Demographics Report

Assessment Area: TX - Austin

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	35	12.3	33,201	10.9	10,880	32.8	66,582	21.8
Moderate-income	67	23.5	60,951	19.9	8,869	14.6	51,873	17
Middle-income	90	31.6	95,909	31.4	5,398	5.6	58,906	19.3
Upper-income	90	31.6	115,576	37.8	3,411	3	128,276	42
Unknown-income	3	1.1	0	0	0	0	0	0
Total Assessment Area	285	100.0	305,637	100.0	28,558	9.3	305,637	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	68,485	15,543	5.5	22.7	44,286	64.7	8,656	12.6
Moderate-income	122,336	48,429	17.2	39.6	62,832	51.4	11,075	9.1
Middle-income	173,386	92,621	32.9	53.4	69,272	40	11,493	6.6
Upper-income	183,536	124,664	44.3	67.9	46,007	25.1	12,865	7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	547,743	281,257	100.0	51.3	222,397	40.6	44,089	8.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	5,546	6.6	4,892	6.4	611	9.9	43	4.3
Moderate-income	13,940	16.7	12,471	16.3	1,351	21.9	118	11.8
Middle-income	22,521	27	20,756	27.2	1,563	25.3	202	20.1
Upper-income	41,494	49.7	38,223	50	2,634	42.7	637	63.5
Unknown-income	44	0.1	32	0	9	0.1	3	0.3
Total Assessment Area	83,545	100.0	76,374	100.0	6,168	100.0	1,003	100.0
	Percentage of Total Businesses:			91.4		7.4		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	26	3.3	24	3.1	2	28.6	0	0
Moderate-income	126	16.2	124	16.1	2	28.6	0	0
Middle-income	192	24.7	190	24.7	2	28.6	0	0
Upper-income	433	55.7	432	56.1	1	14.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	777	100.0	770	100.0	7	100.0	0	.0
	Percentage of Total Farms:			99.1		.9		.0

Appendix E

Combined Demographics Report

Assessment Area: TX - Austin

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	35	12.3	31,879	9.5	10,391	32.6	75,889	22.6
Moderate-income	57	20	58,069	17.3	9,996	17.2	53,888	16
Middle-income	96	33.7	116,243	34.6	7,951	6.8	64,735	19.3
Upper-income	91	31.9	128,294	38.2	3,415	2.7	141,329	42.1
Unknown-income	6	2.1	1,356	0.4	723	53.3	0	0
Total Assessment Area	285	100.0	335,841	100.0	32,476	9.7	335,841	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	70,447	14,466	4.8	20.5	49,572	70.4	6,409	9.1
Moderate-income	105,869	46,974	15.5	44.4	51,507	48.7	7,388	7
Middle-income	208,426	105,603	34.8	50.7	88,415	42.4	14,408	6.9
Upper-income	207,703	135,742	44.7	65.4	57,209	27.5	14,752	7.1
Unknown-income	6,623	712	0.2	10.8	5,039	76.1	872	13.2
Total Assessment Area	599,068	303,497	100.0	50.7	251,742	42.0	43,829	7.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	5,311	7.1	4,601	6.8	670	10.8	40	4.4
Moderate-income	9,384	12.5	8,453	12.4	865	14	66	7.3
Middle-income	22,484	29.9	20,304	29.8	1,953	31.5	227	24.9
Upper-income	36,828	49	33,744	49.6	2,574	41.6	510	56
Unknown-income	1,134	1.5	935	1.4	132	2.1	67	7.4
Total Assessment Area	75,141	100.0	68,037	100.0	6,194	100.0	910	100.0
	Percentage of Total Businesses:			90.5		8.2		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	33	4.7	32	4.6	1	14.3	0	0
Moderate-income	71	10.2	68	9.8	3	42.9	0	0
Middle-income	203	29.1	202	29.2	1	14.3	0	0
Upper-income	389	55.7	388	56.2	1	14.3	0	0
Unknown-income	2	0.3	1	0.1	1	14.3	0	0
Total Assessment Area	698	100.0	691	100.0	7	100.0	0	.0
	Percentage of Total Farms:			99.0		1.0		.0

Appendix E

Combined Demographics Report

Assessment Area: TX - San Antonio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	9.7	28,260	7	10,543	37.3	95,848	23.7
Moderate-income	115	30.9	118,686	29.4	24,922	21	69,486	17.2
Middle-income	108	29	125,902	31.2	11,997	9.5	77,302	19.2
Upper-income	109	29.3	130,769	32.4	5,113	3.9	160,981	39.9
Unknown-income	4	1.1	0	0	0	0	0	0
Total Assessment Area	372	100.0	403,617	100.0	52,575	13.0	403,617	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,868	19,272	5.2	40.3	22,448	46.9	6,148	12.8
Moderate-income	201,352	96,350	25.9	47.9	81,313	40.4	23,689	11.8
Middle-income	209,277	120,029	32.3	57.4	69,399	33.2	19,849	9.5
Upper-income	197,865	136,120	36.6	68.8	47,348	23.9	14,397	7.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	656,362	371,771	100.0	56.6	220,508	33.6	64,083	9.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	4,006	5.5	3,481	5.2	499	8.9	26	4.7
Moderate-income	16,107	21.9	14,617	21.7	1,410	25.3	80	14.4
Middle-income	22,288	30.3	20,310	30.2	1,818	32.6	160	28.9
Upper-income	30,876	42	28,775	42.7	1,816	32.6	285	51.4
Unknown-income	176	0.2	137	0.2	36	0.6	3	0.5
Total Assessment Area	73,453	100.0	67,320	100.0	5,579	100.0	554	100.0
	Percentage of Total Businesses:			91.7		7.6		.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	23	2.8	21	2.6	2	22.2	0	0
Moderate-income	96	11.8	95	11.8	1	11.1	0	0
Middle-income	251	30.9	249	31	2	22.2	0	0
Upper-income	442	54.4	438	54.5	4	44.4	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	812	100.0	803	100.0	9	100.0	0	.0
	Percentage of Total Farms:			98.9		1.1		.0

Appendix E

Combined Demographics Report

Assessment Area: TX - San Antonio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	33	8.9	28,586	6.7	10,764	37.7	102,399	23.8
Moderate-income	131	35.2	135,059	31.5	28,860	21.4	75,626	17.6
Middle-income	94	25.3	117,189	27.3	12,655	10.8	82,128	19.1
Upper-income	110	29.6	148,558	34.6	6,006	4	169,251	39.4
Unknown-income	4	1.1	12	0	0	0	0	0
Total Assessment Area	372	100.0	429,404	100.0	58,285	13.6	429,404	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,834	19,121	5.1	40	22,334	46.7	6,379	13.3
Moderate-income	229,217	100,677	27.1	43.9	105,396	46	23,144	10.1
Middle-income	192,965	101,728	27.4	52.7	76,061	39.4	15,176	7.9
Upper-income	219,934	150,148	40.4	68.3	56,906	25.9	12,880	5.9
Unknown-income	12	12	0	100	0	0	0	0
Total Assessment Area	689,962	371,686	100.0	53.9	260,697	37.8	57,579	8.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	3,477	5.3	2,998	5	467	8.4	12	2.3
Moderate-income	15,746	23.8	14,241	23.7	1,424	25.6	81	15.5
Middle-income	18,929	28.6	16,992	28.3	1,790	32.2	147	28.1
Upper-income	27,798	42	25,685	42.8	1,834	33	279	53.3
Unknown-income	164	0.2	122	0.2	38	0.7	4	0.8
Total Assessment Area	66,114	100.0	60,038	100.0	5,553	100.0	523	100.0
	Percentage of Total Businesses:			90.8		8.4		.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	14	1.9	13	1.7	1	10	0	0
Moderate-income	94	12.5	92	12.4	2	20	0	0
Middle-income	196	26	193	25.9	3	30	0	0
Upper-income	450	59.7	446	59.9	4	40	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	754	100.0	744	100.0	10	100.0	0	.0
	Percentage of Total Farms:			98.7		1.3		.0

Appendix F – Non-Metropolitan Limited Scope Assessment Areas Demographics

Combined Demographics Report

Assessment Area: MI - Gladwin County

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,802	22.8
Moderate-income	3	33.3	2,467	31.2	474	19.2	1,734	21.9
Middle-income	6	66.7	5,440	68.8	643	11.8	1,795	22.7
Upper-income	0	0	0	0	0	0	2,576	32.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	9	100.0	7,907	100.0	1,117	14.1	7,907	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	5,555	3,013	31.2	54.2	818	14.7	1,724	31
Middle-income	12,270	6,656	68.8	54.2	834	6.8	4,780	39
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	17,825	9,669	100.0	54.2	1,652	9.3	6,504	36.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	414	46.6	373	46	35	60.3	6	30
Middle-income	474	53.4	437	54	23	39.7	14	70
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	888	100.0	810	100.0	58	100.0	20	100.0
	Percentage of Total Businesses:			91.2		6.5		2.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	10	22.7	9	20.9	1	100	0	0
Middle-income	34	77.3	34	79.1	0	0	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	44	100.0	43	100.0	1	100.0	0	.0
	Percentage of Total Farms:			97.7		2.3		.0

Appendix F

Combined Demographics Report

Assessment Area: MI - Gladwin County

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	1,758	24
Moderate-income	2	22.2	1,702	23.3	368	21.6	1,480	20.2
Middle-income	7	77.8	5,614	76.7	663	11.8	1,805	24.7
Upper-income	0	0	0	0	0	0	2,273	31.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	9	100.0	7,316	100.0	1,031	14.1	7,316	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	3,933	2,034	22.3	51.7	780	19.8	1,119	28.5
Middle-income	13,709	7,100	77.7	51.8	1,046	7.6	5,563	40.6
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	17,642	9,134	100.0	51.8	1,826	10.4	6,682	37.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	337	43.3	297	42.6	36	61	4	19
Middle-income	441	56.7	401	57.4	23	39	17	81
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	778	100.0	698	100.0	59	100.0	21	100.0
	Percentage of Total Businesses:			89.7		7.6		2.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	8	20	7	17.9	1	100	0	0
Middle-income	32	80	32	82.1	0	0	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	40	100.0	39	100.0	1	100.0	0	.0
	Percentage of Total Farms:			97.5		2.5		.0

Appendix F

Combined Demographics Report

Assessment Area: MI - Lenawee County

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	614	9.5
Moderate-income	0	0	0	0	0	0	939	14.5
Middle-income	2	40	1,994	30.8	112	5.6	1,286	19.9
Upper-income	3	60	4,475	69.2	174	3.9	3,630	56.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5	100.0	6,469	100.0	286	4.4	6,469	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	4,023	2,525	32.4	62.8	687	17.1	811	20.2
Upper-income	6,614	5,275	67.6	79.8	721	10.9	618	9.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	10,637	7,800	100.0	73.3	1,408	13.2	1,429	13.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	360	40	328	39.4	29	48.3	3	37.5
Upper-income	541	60	505	60.6	31	51.7	5	62.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	901	100.0	833	100.0	60	100.0	8	100.0
	Percentage of Total Businesses:			92.5		6.7		.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	10	20.4	10	20.8	0	0	0	0
Upper-income	39	79.6	38	79.2	1	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	49	100.0	48	100.0	1	100.0	0	.0
	Percentage of Total Farms:			98.0		2.0		.0

Appendix F

Combined Demographics Report

Assessment Area: MI - Lenawee County

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	856	13.9
Moderate-income	0	0	0	0	0	0	800	13
Middle-income	3	60	3,341	54.1	262	7.8	1,287	20.8
Upper-income	2	40	2,833	45.9	161	5.7	3,231	52.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5	100.0	6,174	100.0	423	6.9	6,174	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	6,169	3,818	51.6	61.9	1,335	21.6	1,016	16.5
Upper-income	4,493	3,580	48.4	79.7	515	11.5	398	8.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	10,662	7,398	100.0	69.4	1,850	17.4	1,414	13.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	501	61	458	60.5	38	67.9	5	62.5
Upper-income	320	39	299	39.5	18	32.1	3	37.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	821	100.0	757	100.0	56	100.0	8	100.0
	Percentage of Total Businesses:			92.2		6.8		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	19	42.2	19	43.2	0	0	0	0
Upper-income	26	57.8	25	56.8	1	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	45	100.0	44	100.0	1	100.0	0	.0
	Percentage of Total Farms:			97.8		2.2		.0

Appendix F

Combined Demographics Report

Assessment Area: TX - Kerr County

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	2,454	17.2
Moderate-income	1	10	592	4.2	95	16	2,561	18
Middle-income	6	60	9,981	70.1	1,219	12.2	2,738	19.2
Upper-income	3	30	3,662	25.7	166	4.5	6,482	45.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	10	100.0	14,235	100.0	1,480	10.4	14,235	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	855	392	2.6	45.8	367	42.9	96	11.2
Middle-income	16,648	10,258	68.7	61.6	4,224	25.4	2,166	13
Upper-income	5,804	4,284	28.7	73.8	760	13.1	760	13.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	23,307	14,934	100.0	64.1	5,351	23.0	3,022	13.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	52	1.6	49	1.7	3	1.7	0	0
Middle-income	2,459	77.6	2,283	77.1	152	84.9	24	80
Upper-income	658	20.8	628	21.2	24	13.4	6	20
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	3,169	100.0	2,960	100.0	179	100.0	30	100.0
	Percentage of Total Businesses:			93.4		5.6		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	95	72	95	72.5	0	0	0	0
Upper-income	37	28	36	27.5	1	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	132	100.0	131	100.0	1	100.0	0	.0
	Percentage of Total Farms:			99.2		.8		.0

Appendix F

Combined Demographics Report

Assessment Area: TX - Kerr County

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	2,581	19.7
Moderate-income	3	30	4,197	32	830	19.8	2,367	18
Middle-income	4	40	4,556	34.7	658	14.4	2,335	17.8
Upper-income	3	30	4,377	33.3	178	4.1	5,847	44.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	10	100.0	13,130	100.0	1,666	12.7	13,130	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	7,668	3,679	26	48	3,009	39.2	980	12.8
Middle-income	8,027	5,063	35.8	63.1	1,707	21.3	1,257	15.7
Upper-income	8,282	5,408	38.2	65.3	1,450	17.5	1,424	17.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	23,977	14,150	100.0	59.0	6,166	25.7	3,661	15.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	987	35.1	914	35.1	63	34.8	10	35.7
Middle-income	1,041	37	962	37	71	39.2	8	28.6
Upper-income	782	27.8	725	27.9	47	26	10	35.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	2,810	100.0	2,601	100.0	181	100.0	28	100.0
	Percentage of Total Businesses:			92.6		6.4		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	29	24	29	24.2	0	0	0	0
Middle-income	45	37.2	45	37.5	0	0	0	0
Upper-income	47	38.8	46	38.3	1	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	121	100.0	120	100.0	1	100.0	0	.0
	Percentage of Total Farms:			99.2		.8		.0

Appendix G

Appendix G – Metropolitan Full Scope Assessment Area Loan Tables

Geographic Distribution of Small Business Loans

Assessment Area: AZ - Phoenix

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2015, 2016					2015					2016						
	Bank		Small Businesses		Count	Count		Dollar			Count		Dollar				
	Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
														#	%	\$ (000s)	\$ %
Low	66	18.1%	\$17,584	21.5%	6.1%	38	19.8%	7.4%	\$9,616	20.9%	13.3%	28	16.3%	6.5%	\$7,968	22.4%	11.8%
Moderate	49	13.5%	\$10,361	12.7%	15.6%	28	14.6%	15.3%	\$5,769	12.5%	17.3%	21	12.2%	14.5%	\$4,592	12.9%	16.3%
Middle	93	25.5%	\$21,238	26.0%	29.5%	53	27.6%	27.4%	\$14,522	31.6%	25.0%	40	23.3%	26.5%	\$6,716	18.9%	24.4%
Upper	156	42.9%	\$32,459	39.8%	48.3%	73	38.0%	49.4%	\$16,108	35.0%	43.2%	83	48.3%	52.1%	\$16,351	45.9%	46.3%
Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	1.2%	0	0.0%	0.4%	\$0	0.0%	1.2%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	364	100.0%	\$81,642	100.0%	100.0%	192	100.0%	100.0%	\$46,015	100.0%	100.0%	172	100.0%	100.0%	\$35,627	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AZ - Phoenix

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison												
		Bank				Total Businesses %	2015			2016									
		Count		Dollar			Count	Dollar		Count	Dollar								
		Count					Bank	Agg		Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	101	27.7%	\$11,830	14.5%	91.5%	48	25.0%	52.2%	\$6,744	14.7%	32.5%	53	30.8%	41.4%		\$5,086	14.3%	29.2%
	Over \$1 Million	161	44.2%	\$46,631	57.1%	7.5%	82	42.7%					79	45.9%					
	Total Rev. available	262	71.9%	\$58,461	71.6%	99.0%	130	67.7%					132	76.7%					
	Rev. Not Known	102	28.0%	\$23,181	28.4%	1.0%	62	32.3%					40	23.3%					
	Total	364	100.0%	\$81,642	100.0%	100.0%	192	100.0%					172	100.0%					
LOAN SIZE	\$100,000 or Less	188	51.6%	\$10,927	13.4%		98	51.0%	94.9%	\$5,658	12.3%	40.7%	90	52.3%	95.9%		\$5,269	14.8%	47.4%
	\$100,001 - \$250,000	79	21.7%	\$14,669	18.0%		38	19.8%	2.3%	\$7,120	15.5%	12.8%	41	23.8%	1.9%		\$7,549	21.2%	11.2%
	\$250,001 - \$1 Million	97	26.6%	\$56,046	68.6%		56	29.2%	2.7%	\$33,237	72.2%	46.5%	41	23.8%	2.3%		\$22,809	64.0%	41.5%
	Total	364	100.0%	\$81,642	100.0%		192	100.0%	100.0%	\$46,015	100.0%	100.0%	172	100.0%	100.0%		\$35,627	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	84	83.2%	\$4,169	35.2%														
	\$100,001 - \$250,000	5	5.0%	\$740	6.3%														
	\$250,001 - \$1 Million	12	11.9%	\$6,921	58.5%														
	Total	101	100.0%	\$11,830	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: AZ - Phoenix

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	4	1.1%	\$877	1.7%	3.7%
Moderate	35	9.9%	\$2,107	4.2%	21.3%
Middle	95	26.8%	\$9,651	19.2%	35.0%
Upper	220	62.1%	\$37,502	74.8%	40.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	354	100.0%	\$50,137	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: AZ - Phoenix

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	17	4.8%	\$2,178	0.0%	21.0%
Moderate	43	12.1%	\$3,337	6.7%	17.5%
Middle	67	18.9%	\$5,854	11.7%	20.1%
Upper	225	63.6%	\$37,208	74.2%	41.4%
Unknown	2	0.6%	\$1,560	3.1%	0.0%
Total	354	100.0%	\$50,137	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: AZ - Phoenix

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	\$ (000s)	\$ %	\$ %	Bank #	Agg %	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	2.1%	\$0	0.0%	1.3%	0	0.0%	2.3%	\$0	0.0%	1.5%
	Moderate	2	10.5%	\$232	3.7%	21.3%	0	0.0%	16.2%	\$0	0.0%	10.3%	2	20.0%	16.4%	\$232	6.2%	11.0%
	Middle	6	31.6%	\$1,170	18.9%	35.0%	4	44.4%	37.8%	\$763	31.3%	31.7%	2	20.0%	37.4%	\$407	10.8%	31.8%
	Upper	11	57.9%	\$4,797	77.4%	40.1%	5	55.6%	43.5%	\$1,675	68.7%	56.3%	6	60.0%	43.3%	\$3,122	83.0%	55.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.4%	0	0.0%	0.6%	\$0	0.0%	0.7%
	Total	19	100.0%	\$6,199	100.0%	100.0%	9	100.0%	100.0%	\$2,438	100.0%	100.0%	10	100.0%	100.0%	\$3,761	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	1.5%	\$0	0.0%	0.9%	0	0.0%	1.3%	\$0	0.0%	0.8%
	Moderate	1	3.7%	\$68	0.7%	21.3%	0	0.0%	11.9%	\$0	0.0%	7.4%	1	7.1%	11.7%	\$68	1.2%	7.3%
	Middle	11	40.7%	\$2,914	29.5%	35.0%	5	38.5%	36.0%	\$1,322	30.9%	28.2%	6	42.9%	35.4%	\$1,592	28.5%	28.2%
	Upper	15	55.6%	\$6,888	69.8%	40.1%	8	61.5%	50.6%	\$2,956	69.1%	63.3%	7	50.0%	51.3%	\$3,932	70.3%	63.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Total	27	100.0%	\$9,870	100.0%	100.0%	13	100.0%	100.0%	\$4,278	100.0%	100.0%	14	100.0%	100.0%	\$5,592	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	1.7%	\$0	0.0%	3.0%	0	0.0%	1.8%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	21.3%	0	0.0%	11.9%	\$0	0.0%	7.5%	0	0.0%	13.1%	\$0	0.0%	8.5%
	Middle	0	0.0%	\$0	0.0%	35.0%	0	0.0%	34.5%	\$0	0.0%	27.0%	0	0.0%	35.6%	\$0	0.0%	29.1%
	Upper	0	0.0%	\$0	0.0%	40.1%	0	0.0%	51.6%	\$0	0.0%	62.3%	0	0.0%	49.2%	\$0	0.0%	61.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	15.3%	0	0.0%	20.7%	\$0	0.0%	12.8%	0	0.0%	23.7%	\$0	0.0%	11.6%
	Moderate	0	0.0%	\$0	0.0%	37.1%	0	0.0%	42.6%	\$0	0.0%	40.0%	0	0.0%	40.3%	\$0	0.0%	32.5%
	Middle	0	0.0%	\$0	0.0%	28.6%	0	0.0%	25.7%	\$0	0.0%	35.7%	0	0.0%	26.9%	\$0	0.0%	42.7%
	Upper	0	0.0%	\$0	0.0%	18.8%	0	0.0%	10.9%	\$0	0.0%	11.5%	0	0.0%	9.1%	\$0	0.0%	13.2%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	1.9%	\$0	0.0%	1.7%	0	0.0%	1.9%	\$0	0.0%	1.7%
	Moderate	3	6.5%	\$300	1.9%	21.3%	0	0.0%	14.3%	\$0	0.0%	10.5%	3	12.5%	14.3%	\$300	3.2%	10.6%
	Middle	17	37.0%	\$4,084	25.4%	35.0%	9	40.9%	36.9%	\$2,085	31.0%	30.4%	8	33.3%	36.4%	\$1,999	21.4%	30.9%
	Upper	26	56.5%	\$11,685	72.7%	40.1%	13	59.1%	46.7%	\$4,631	69.0%	57.0%	13	54.2%	47.0%	\$7,054	75.4%	56.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.5%
	Total	46	100.0%	\$16,069	100.0%	100.0%	22	100.0%	100.0%	\$6,716	100.0%	100.0%	24	100.0%	100.0%	\$9,353	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: AZ - Phoenix

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %												#	%
HOME PURCHASE	Low	2	10.5%	\$417	6.7%	21.0%	2	22.2%	5.1%	\$417	17.1%	2.6%	0	0.0%	4.2%	\$0	0.0%	2.1%
	Moderate	4	21.1%	\$789	12.7%	17.5%	1	11.1%	16.5%	\$278	11.4%	11.3%	3	30.0%	15.2%	\$511	13.6%	10.4%
	Middle	3	15.8%	\$688	11.1%	20.1%	1	11.1%	19.9%	\$332	13.6%	17.4%	2	20.0%	20.3%	\$356	9.5%	17.7%
	Upper	9	47.4%	\$3,630	58.6%	41.4%	5	55.6%	38.1%	\$1,411	57.9%	50.1%	4	40.0%	40.4%	\$2,219	59.0%	52.0%
	Unknown	1	5.3%	\$675	10.9%	0.0%	0	0.0%	20.4%	\$0	0.0%	18.6%	1	10.0%	19.9%	\$675	17.9%	17.7%
	Total	19	100.0%	\$6,199	100.0%	100.0%	9	100.0%	100.0%	\$2,438	100.0%	100.0%	10	100.0%	100.0%	\$3,761	100.0%	100.0%
REFINANCE	Low	3	11.1%	\$379	3.8%	21.0%	0	0.0%	4.9%	\$0	0.0%	2.6%	3	21.4%	4.0%	\$379	6.8%	2.0%
	Moderate	6	22.2%	\$847	8.6%	17.5%	4	30.8%	11.9%	\$616	14.4%	7.5%	2	14.3%	11.1%	\$231	4.1%	7.0%
	Middle	2	7.4%	\$402	4.1%	20.1%	1	7.7%	16.0%	\$207	4.8%	13.0%	1	7.1%	17.0%	\$195	3.5%	13.7%
	Upper	14	51.9%	\$6,843	69.3%	41.4%	6	46.2%	35.9%	\$2,056	48.1%	45.9%	8	57.1%	41.3%	\$4,787	85.6%	51.1%
	Unknown	2	7.4%	\$1,399	14.2%	0.0%	2	15.4%	31.3%	\$1,399	32.7%	31.0%	0	0.0%	26.6%	\$0	0.0%	26.3%
	Total	27	100.0%	\$9,870	100.0%	100.0%	13	100.0%	100.0%	\$4,278	100.0%	100.0%	14	100.0%	100.0%	\$5,592	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	5.1%	\$0	0.0%	2.7%	0	0.0%	5.0%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	14.4%	\$0	0.0%	10.5%	0	0.0%	14.4%	\$0	0.0%	11.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	20.1%	\$0	0.0%	17.5%	0	0.0%	21.6%	\$0	0.0%	20.3%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	54.4%	\$0	0.0%	58.8%	0	0.0%	54.6%	\$0	0.0%	60.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	10.5%	0	0.0%	4.4%	\$0	0.0%	5.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	5	10.9%	\$796	5.0%	21.0%	2	9.1%	5.0%	\$417	6.2%	2.5%	3	12.5%	4.1%	\$379	4.1%	2.0%
	Moderate	10	21.7%	\$1,636	10.2%	17.5%	5	22.7%	14.4%	\$894	13.3%	9.2%	5	20.8%	13.3%	\$742	7.9%	8.5%
	Middle	5	10.9%	\$1,090	6.8%	20.1%	2	9.1%	18.2%	\$539	8.0%	14.7%	3	12.5%	18.9%	\$551	5.9%	15.1%
	Upper	23	50.0%	\$10,473	65.2%	41.4%	11	50.0%	37.5%	\$3,467	51.6%	46.0%	12	50.0%	41.1%	\$7,006	74.9%	48.9%
	Unknown	3	6.5%	\$2,074	12.9%	0.0%	2	9.1%	24.9%	\$1,399	20.8%	27.6%	1	4.2%	22.6%	\$675	7.2%	25.5%
	Total	46	100.0%	\$16,069	100.0%	100.0%	22	100.0%	100.0%	\$6,716	100.0%	100.0%	24	100.0%	100.0%	\$9,353	100.0%	100.0%

Originations & Purchases

2016 FFEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: AZ - Phoenix

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2017					2017					
	Bank		Small		Businesses	Count		Agg	Dollar		Agg
	Count		Dollar			Bank			Bank		
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
Low	15	9.2%	\$3,085	9.8%	6.4%	15	9.2%	7.3%	\$3,085	9.8%	10.8%
Moderate	25	15.3%	\$4,618	14.6%	16.3%	25	15.3%	16.8%	\$4,618	14.6%	19.6%
Middle	53	32.5%	\$8,644	27.3%	28.5%	53	32.5%	26.9%	\$8,644	27.3%	25.3%
Upper	68	41.7%	\$15,163	47.9%	48.4%	68	41.7%	48.4%	\$15,163	47.9%	42.8%
Unknown	2	1.2%	\$118	0.4%	0.4%	2	1.2%	0.6%	\$118	0.4%	1.4%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>163</i>	<i>100.0%</i>	<i>\$31,628</i>	<i>100.0%</i>	<i>100.0%</i>	<i>163</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$31,628</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AZ - Phoenix

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Total Businesses	Count			Dollar		
		Count		\$ (000s)			Bank	Agg	Bank		Agg	
#	%	\$	%	%	#	%			%	\$ (000s)		\$ %
BUSINESS REVENUE	\$1million or Less	51	31.3%	\$5,974	18.9%	90.7%	51	31.3%	50.4%	\$5,974	18.9%	33.1%
	Over \$1 Million	80	49.1%	\$19,192	60.7%	8.3%	80	49.1%				
	Total Rev. available	131	80.4%	\$25,166	79.6%	99.0%	131	80.4%				
	Rev. Not Known	32	19.6%	\$6,462	20.4%	1.0%	32	19.6%				
	Total	163	100.0%	\$31,628	100.0%	100.0%	163	100.0%				
LOAN SIZE	\$100,000 or Less	89	54.6%	\$5,342	16.9%		89	54.6%	94.7%	\$5,342	16.9%	40.9%
	\$100,001 - \$250,000	41	25.2%	\$7,790	24.6%		41	25.2%	2.5%	\$7,790	24.6%	12.7%
	\$250,001 - \$1 Million	33	20.2%	\$18,496	58.5%		33	20.2%	2.8%	\$18,496	58.5%	46.4%
	Total	163	100.0%	\$31,628	100.0%		163	100.0%	100.0%	\$31,628	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	37	72.5%	\$2,037	34.1%							
	\$100,001 - \$250,000	9	17.6%	\$1,612	27.0%							
	\$250,001 - \$1 Million	5	9.8%	\$2,325	38.9%							
	Total	51	100.0%	\$5,974	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: AZ - Phoenix

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	4	2.7%	\$186	1.0%	4.7%
Moderate	16	10.8%	\$1,614	8.5%	18.9%
Middle	46	31.1%	\$4,290	22.7%	34.5%
Upper	82	55.4%	\$12,788	67.7%	41.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	148	100.0%	\$18,878	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: AZ - Phoenix

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	11	7.4%	\$641	0.0%	21.9%
Moderate	22	14.9%	\$1,689	8.9%	16.8%
Middle	26	17.6%	\$2,703	14.3%	19.1%
Upper	89	60.1%	\$13,845	73.3%	42.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>148</i>	<i>100.0%</i>	<i>\$18,878</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: AZ - Phoenix

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Owner Occupied Units	Count		Dollar			
		Count		Dollar			Bank		Agg		Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	4.4%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	16.4%	\$0	0.0%	11.6%
	Middle	4	80.0%	\$684	67.5%	34.5%	4	80.0%	36.8%	\$684	67.5%	31.6%
	Upper	1	20.0%	\$330	32.5%	41.9%	1	20.0%	41.7%	\$330	32.5%	53.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.6%	\$0	0.0%	0.7%
	Total	5	100.0%	\$1,014	100.0%	100.0%	5	100.0%	100.0%	\$1,014	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	3.1%	\$0	0.0%	1.8%
	Moderate	1	8.3%	\$49	0.7%	18.9%	1	8.3%	14.8%	\$49	0.7%	9.8%
	Middle	2	16.7%	\$449	6.2%	34.5%	2	16.7%	35.5%	\$449	6.2%	29.2%
	Upper	9	75.0%	\$6,732	93.1%	41.9%	9	75.0%	46.4%	\$6,732	93.1%	59.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Total	12	100.0%	\$7,230	100.0%	100.0%	12	100.0%	100.0%	\$7,230	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	3.4%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	18.9%	0	0.0%	14.4%	\$0	0.0%	11.1%
	Middle	0	0.0%	\$0	0.0%	34.5%	0	0.0%	34.2%	\$0	0.0%	30.5%
	Upper	0	0.0%	\$0	0.0%	41.9%	0	0.0%	47.8%	\$0	0.0%	56.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	18.9%	0	0.0%	29.1%	\$0	0.0%	16.1%
	Moderate	0	0.0%	\$0	0.0%	30.6%	0	0.0%	38.6%	\$0	0.0%	38.0%
	Middle	0	0.0%	\$0	0.0%	30.9%	0	0.0%	20.9%	\$0	0.0%	25.0%
	Upper	0	0.0%	\$0	0.0%	19.0%	0	0.0%	10.4%	\$0	0.0%	19.5%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.9%	\$0	0.0%	1.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	4.0%	\$0	0.0%	3.2%
	Moderate	1	5.9%	\$49	0.6%	18.9%	1	5.9%	15.9%	\$49	0.6%	12.6%
	Middle	6	35.3%	\$1,133	13.7%	34.5%	6	35.3%	36.3%	\$1,133	13.7%	30.5%
	Upper	10	58.8%	\$7,062	85.7%	41.9%	10	58.8%	43.4%	\$7,062	85.7%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.6%
	Total	17	100.0%	\$8,244	100.0%	100.0%	17	100.0%	100.0%	\$8,244	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: AZ - Phoenix

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Borrower Income Levels		Bank		Families by Family Income	Count			Dollar		
				Count	Dollar		Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	4.3%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	14.7%	\$0	0.0%	10.2%
	Middle	2	40.0%	\$350	34.5%	19.1%	2	40.0%	21.1%	\$350	34.5%	18.3%
	Upper	3	60.0%	\$664	65.5%	42.1%	3	60.0%	39.4%	\$664	65.5%	50.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.5%	\$0	0.0%	18.5%
	Total	5	100.0%	\$1,014	100.0%	100.0%	5	100.0%	100.0%	\$1,014	100.0%	100.0%
REFINANCE	Low	1	8.3%	\$59	0.8%	21.9%	1	8.3%	6.4%	\$59	0.8%	3.3%
	Moderate	1	8.3%	\$49	0.7%	16.8%	1	8.3%	14.7%	\$49	0.7%	9.8%
	Middle	2	16.7%	\$656	9.1%	19.1%	2	16.7%	21.1%	\$656	9.1%	17.7%
	Upper	8	66.7%	\$6,466	89.4%	42.1%	8	66.7%	39.5%	\$6,466	89.4%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.3%	\$0	0.0%	19.0%
	Total	12	100.0%	\$7,230	100.0%	100.0%	12	100.0%	100.0%	\$7,230	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	6.5%	\$0	0.0%	4.3%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	15.2%	\$0	0.0%	12.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	21.7%	\$0	0.0%	19.5%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	53.8%	\$0	0.0%	58.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	5.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	5.9%	\$59	0.7%	21.9%	1	5.9%	5.1%	\$59	0.7%	2.5%
	Moderate	1	5.9%	\$49	0.6%	16.8%	1	5.9%	14.7%	\$49	0.6%	9.5%
	Middle	4	23.5%	\$1,006	12.2%	19.1%	4	23.5%	21.1%	\$1,006	12.2%	17.0%
	Upper	11	64.7%	\$7,130	86.5%	42.1%	11	64.7%	39.9%	\$7,130	86.5%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.2%	\$0	0.0%	23.3%
	Total	17	100.0%	\$8,244	100.0%	100.0%	17	100.0%	100.0%	\$8,244	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: CA - Greater Los Angeles

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2015, 2016					2015						2016					
	Count		Bank Dollar		Small Businesses	Count		Dollar			Count		Dollar				
	Count	%	\$ (000s)	\$ %		#	%	Bank %	\$ 000s		\$ %	#	%	Bank %		\$ 000s	\$ %
Low	98	6.6%	\$27,992	7.4%	5.7%	52	6.4%	5.6%	\$13,429	6.6%	7.4%	46	6.8%	5.2%	\$14,563	8.2%	7.0%
Moderate	293	19.7%	\$78,079	20.6%	20.4%	152	18.8%	19.6%	\$40,450	20.0%	21.2%	141	20.7%	18.8%	\$37,629	21.2%	20.4%
Middle	348	23.4%	\$79,691	21.0%	27.7%	186	23.0%	27.7%	\$43,109	21.3%	28.2%	162	23.8%	27.1%	\$36,582	20.6%	27.5%
Upper	695	46.7%	\$179,208	47.2%	45.3%	384	47.6%	45.9%	\$97,035	48.0%	40.7%	311	45.7%	47.6%	\$82,173	46.3%	42.9%
Unknown	53	3.6%	\$14,564	3.8%	0.9%	33	4.1%	0.9%	\$8,184	4.0%	2.1%	20	2.9%	0.9%	\$6,380	3.6%	1.9%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.4%
Total	1,487	100.0%	\$379,534	100.0%	100.0%	807	100.0%	100.0%	\$202,207	100.0%	100.0%	680	100.0%	100.0%	\$177,327	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: CA - Greater Los Angeles

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2015			2016								
		Count		Dollar			Count		Dollar		Count		Dollar					
		Count					Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
BUSINESS REVENUE	\$1million or Less	324	21.8%	\$44,868	11.8%	90.4%	198	24.5%	54.0%	\$26,353	13.0%	33.0%	126	18.5%	44.3%	\$18,515	10.4%	30.5%
	Over \$1 Million	714	48.0%	\$233,454	61.5%	9.2%	382	47.3%					332	48.8%				
	Total Rev. available	1,038	69.8%	\$278,322	73.3%	99.6%	580	71.8%					458	67.3%				
	Rev. Not Known	449	30.2%	\$101,212	26.7%	0.4%	227	28.1%					222	32.6%				
	Total	1,487	100.0%	\$379,534	100.0%	100.0%	807	100.0%					680	100.0%				
LOAN SIZE	\$100,000 or Less	738	49.6%	\$42,554	11.2%		412	51.1%	95.6%	\$23,417	11.6%	44.5%	326	47.9%	96.4%	\$19,137	10.8%	51.5%
	\$100,001 - \$250,000	308	20.7%	\$60,309	15.9%		162	20.1%	2.1%	\$31,727	15.7%	11.7%	146	21.5%	1.8%	\$28,582	16.1%	11.0%
	\$250,001 - \$1 Million	441	29.7%	\$276,671	72.9%		233	28.9%	2.3%	\$147,063	72.7%	43.8%	208	30.6%	1.8%	\$129,608	73.1%	37.5%
	Total	1,487	100.0%	\$379,534	100.0%		807	100.0%	100.0%	\$202,207	100.0%	100.0%	680	100.0%	100.0%	\$177,327	100.0%	100.0%
LOAN SIZE Rev \$1 Mil or Less	\$100,000 or Less	243	75.0%	\$13,795	30.7%													
	\$100,001 - \$250,000	41	12.7%	\$7,503	16.7%													
	\$250,001 - \$1 Million	40	12.3%	\$23,570	52.5%													
	Total	324	100.0%	\$44,868	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Greater Los Angeles

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	14	1.0%	\$1,237	0.3%	2.5%
Moderate	87	6.2%	\$11,672	3.1%	17.6%
Middle	269	19.3%	\$42,493	11.3%	30.2%
Upper	1,023	73.3%	\$320,433	85.1%	49.7%
Unknown	2	0.1%	\$625	0.2%	0.0%
Total	1,395	100.0%	\$376,460	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Greater Los Angeles

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	24	1.7%	\$8,079	0.0%	23.8%
Moderate	37	2.7%	\$4,060	1.1%	16.8%
Middle	131	9.4%	\$15,817	4.2%	18.1%
Upper	1,193	85.5%	\$328,954	87.4%	41.2%
Unknown	10	0.7%	\$19,550	5.2%	0.0%
Total	1,395	100.0%	\$376,460	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %										#	%	\$ (000s)	\$ %
HOME PURCHASE	Low	1	1.9%	\$2,600	3.5%	2.5%	1	3.1%	2.8%	\$2,600	5.6%	1.9%	0	0.0%	2.7%	\$0	0.0%	1.9%
	Moderate	4	7.5%	\$3,311	4.5%	17.6%	1	3.1%	17.8%	\$463	1.0%	12.1%	3	14.3%	18.8%	\$2,848	10.6%	13.1%
	Middle	5	9.4%	\$3,310	4.5%	30.2%	3	9.4%	29.8%	\$1,929	4.1%	23.5%	2	9.5%	30.0%	\$1,381	5.1%	24.1%
	Upper	43	81.1%	\$64,370	87.5%	49.7%	27	84.4%	49.6%	\$41,605	89.3%	62.4%	16	76.2%	48.0%	\$22,765	84.3%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.5%	\$0	0.0%	0.6%
	Total	53	100.0%	\$73,591	100.0%	100.0%	32	100.0%	100.0%	\$46,597	100.0%	100.0%	21	100.0%	100.0%	\$26,994	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	2.0%	\$0	0.0%	1.3%	0	0.0%	1.9%	\$0	0.0%	1.3%
	Moderate	3	3.6%	\$1,662	1.1%	17.6%	1	2.9%	16.1%	\$194	0.5%	11.1%	2	4.1%	16.1%	\$1,468	1.4%	11.4%
	Middle	11	13.1%	\$6,120	4.1%	30.2%	4	11.4%	29.8%	\$2,956	6.9%	23.5%	7	14.3%	30.0%	\$3,164	3.0%	23.9%
	Upper	70	83.3%	\$141,104	94.8%	49.7%	30	85.7%	52.1%	\$39,936	92.7%	64.1%	40	81.6%	52.0%	\$101,168	95.6%	63.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	84	100.0%	\$148,886	100.0%	100.0%	35	100.0%	100.0%	\$43,086	100.0%	100.0%	49	100.0%	100.0%	\$105,800	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	2.1%	\$0	0.0%	1.3%	0	0.0%	1.9%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	16.2%	\$0	0.0%	10.3%	0	0.0%	17.1%	\$0	0.0%	11.8%
	Middle	0	0.0%	\$0	0.0%	30.2%	0	0.0%	30.3%	\$0	0.0%	21.2%	0	0.0%	30.4%	\$0	0.0%	23.2%
	Upper	0	0.0%	\$0	0.0%	49.7%	0	0.0%	51.4%	\$0	0.0%	67.3%	0	0.0%	50.5%	\$0	0.0%	63.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	3	37.5%	\$4,672	26.3%	12.7%	3	37.5%	14.5%	\$4,672	26.3%	12.7%	0	0.0%	14.2%	\$0	0.0%	13.5%
	Moderate	2	25.0%	\$7,993	45.0%	32.4%	2	25.0%	40.8%	\$7,993	45.0%	32.5%	0	0.0%	41.2%	\$0	0.0%	32.5%
	Middle	2	25.0%	\$3,944	22.2%	26.5%	2	25.0%	24.6%	\$3,944	22.2%	28.2%	0	0.0%	23.7%	\$0	0.0%	25.3%
	Upper	1	12.5%	\$1,170	6.6%	28.3%	1	12.5%	20.1%	\$1,170	6.6%	26.5%	0	0.0%	20.9%	\$0	0.0%	28.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	8	100.0%	\$17,779	100.0%	100.0%	8	100.0%	100.0%	\$17,779	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	2.8%	\$7,272	3.0%	2.5%	4	5.3%	2.5%	\$7,272	6.8%	2.6%	0	0.0%	2.4%	\$0	0.0%	2.6%
	Moderate	9	6.2%	\$12,966	5.4%	17.6%	4	5.3%	17.1%	\$8,650	8.0%	13.5%	5	7.1%	17.4%	\$4,316	3.3%	13.8%
	Middle	18	12.4%	\$13,374	5.6%	30.2%	9	12.0%	29.7%	\$8,829	8.2%	23.9%	9	12.9%	29.9%	\$4,545	3.4%	24.0%
	Upper	114	78.6%	\$206,644	86.0%	49.7%	58	77.3%	50.6%	\$82,711	77.0%	60.0%	56	80.0%	50.2%	\$123,933	93.3%	59.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Total	145	100.0%	\$240,256	100.0%	100.0%	75	100.0%	100.0%	\$107,462	100.0%	100.0%	70	100.0%	100.0%	\$132,794	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans
Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income %	Count		Dollar		Count		Dollar							
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
													#	%	\$ (000s)	\$ %	#	%
HOME PURCHASE	Low	2	3.8%	\$2,897	3.9%	23.8%	2	6.3%	0.7%	\$2,897	6.2%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	5.0%	\$0	0.0%	2.3%	0	0.0%	4.1%	\$0	0.0%	1.9%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	15.5%	\$0	0.0%	9.6%	0	0.0%	14.4%	\$0	0.0%	8.8%
	Upper	42	79.2%	\$57,378	78.0%	41.2%	24	75.0%	62.9%	\$33,269	71.4%	72.1%	18	85.7%	68.5%	\$24,109	89.3%	76.7%
	Unknown	9	17.0%	\$13,316	18.1%	0.0%	6	18.8%	15.8%	\$10,431	22.4%	15.7%	3	14.3%	12.3%	\$2,885	10.7%	12.4%
	Total	53	100.0%	\$73,591	100.0%	100.0%	32	100.0%	100.0%	\$46,597	100.0%	100.0%	21	100.0%	100.0%	\$26,994	100.0%	100.0%
REFINANCE	Low	1	1.2%	\$110	0.1%	23.8%	0	0.0%	2.3%	\$0	0.0%	1.0%	1	2.0%	2.0%	\$110	0.1%	0.9%
	Moderate	2	2.4%	\$421	0.3%	16.8%	2	5.7%	7.1%	\$421	1.0%	3.7%	0	0.0%	6.4%	\$0	0.0%	3.4%
	Middle	7	8.3%	\$3,385	2.3%	18.1%	2	5.7%	15.7%	\$1,312	3.0%	10.6%	5	10.2%	15.5%	\$2,073	2.0%	10.4%
	Upper	62	73.8%	\$113,046	75.9%	41.2%	26	74.3%	56.8%	\$34,867	80.9%	66.4%	36	73.5%	62.6%	\$78,179	73.9%	70.9%
	Unknown	12	14.3%	\$31,924	21.4%	0.0%	5	14.3%	18.1%	\$6,486	15.1%	18.4%	7	14.3%	13.4%	\$25,438	24.0%	14.3%
	Total	84	100.0%	\$148,886	100.0%	100.0%	35	100.0%	100.0%	\$43,086	100.0%	100.0%	49	100.0%	100.0%	\$105,800	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	2.8%	\$0	0.0%	0.9%	0	0.0%	2.7%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	9.6%	\$0	0.0%	4.7%	0	0.0%	8.8%	\$0	0.0%	4.6%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	18.9%	\$0	0.0%	12.0%	0	0.0%	18.8%	\$0	0.0%	12.6%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	62.1%	\$0	0.0%	74.3%	0	0.0%	66.1%	\$0	0.0%	75.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.7%	\$0	0.0%	8.1%	0	0.0%	3.6%	\$0	0.0%	6.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	8	100.0%	\$17,779	100.0%	0.0%	8	100.0%	100.0%	\$17,779	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	8	100.0%	\$17,779	100.0%	100.0%	8	100.0%	100.0%	\$17,779	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	2.1%	\$3,007	1.3%	23.8%	2	2.7%	1.8%	\$2,897	2.7%	0.7%	1	1.4%	1.6%	\$110	0.1%	0.7%
	Moderate	2	1.4%	\$421	0.2%	16.8%	2	2.7%	6.4%	\$421	0.4%	2.9%	0	0.0%	5.8%	\$0	0.0%	2.6%
	Middle	7	4.8%	\$3,385	1.4%	18.1%	2	2.7%	15.5%	\$1,312	1.2%	9.3%	5	7.1%	15.1%	\$2,073	1.6%	9.1%
	Upper	104	71.7%	\$170,424	70.9%	41.2%	50	66.7%	57.8%	\$68,136	63.4%	62.1%	54	77.1%	63.3%	\$102,288	77.0%	66.5%
	Unknown	29	20.0%	\$63,019	26.2%	0.0%	19	25.3%	18.5%	\$34,696	32.3%	25.1%	10	14.3%	14.2%	\$28,323	21.3%	21.1%
	Total	145	100.0%	\$240,256	100.0%	100.0%	75	100.0%	100.0%	\$107,462	100.0%	100.0%	70	100.0%	100.0%	\$132,794	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: CA - Greater Los Angeles

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2017					2017					
	Count		Bank		Small Businesses	Count		Agg	Dollar		
	#	%	\$ (000s)	\$ %		#	%		Bank	Agg	
					%				\$ 000s	\$ %	\$ %
Low	30	4.6%	\$8,356	4.6%	4.9%	30	4.6%	4.7%	\$8,356	4.6%	5.2%
Moderate	123	18.7%	\$40,387	22.2%	19.5%	123	18.7%	19.6%	\$40,387	22.2%	20.2%
Middle	145	22.1%	\$43,839	24.1%	25.5%	145	22.1%	25.6%	\$43,839	24.1%	27.4%
Upper	326	49.6%	\$80,385	44.3%	48.6%	326	49.6%	48.3%	\$80,385	44.3%	44.3%
Unknown	33	5.0%	\$8,667	4.8%	1.5%	33	5.0%	1.5%	\$8,667	4.8%	2.7%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.3%	\$0	0.0%	0.3%
Total	657	100.0%	\$181,634	100.0%	100.0%	657	100.0%	100.0%	\$181,634	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: CA - Greater Los Angeles

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Total Businesses %	Count			Dollar		
		Count # %		\$ (000s) \$ %			Bank # %	Agg %	Bank \$ (000s) \$ %		Agg \$ %	
BUSINESS REVENUE	\$1million or Less	114	17.4%	\$20,829	11.5%	89.4%	114	17.4%	53.1%	\$20,829	11.5%	33.7%
	Over \$1 Million	329	50.1%	\$111,573	61.4%	10.1%	329	50.1%				
	Total Rev. available	443	67.5%	\$132,402	72.9%	99.5%	443	67.5%				
	Rev. Not Known	214	32.6%	\$49,232	27.1%	0.4%	214	32.6%				
	Total	657	100.0%	\$181,634	100.0%	100.0%	657	100.0%				
LOAN SIZE	\$100,000 or Less	290	44.1%	\$16,629	9.2%		290	44.1%	95.8%	\$16,629	9.2%	47.6%
	\$100,001 - \$250,000	145	22.1%	\$27,825	15.3%		145	22.1%	2.1%	\$27,825	15.3%	12.2%
	\$250,001 - \$1 Million	222	33.8%	\$137,180	75.5%		222	33.8%	2.1%	\$137,180	75.5%	40.2%
	Total	657	100.0%	\$181,634	100.0%		657	100.0%	100.0%	\$181,634	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	64	56.1%	\$4,034	19.4%							
	\$100,001 - \$250,000	34	29.8%	\$5,655	27.1%							
	\$250,001 - \$1 Million	16	14.0%	\$11,140	53.5%							
	Total	114	100.0%	\$20,829	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Greater Los Angeles

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	7	1.1%	\$4,746	3.1%	2.7%
Moderate	52	8.3%	\$7,254	4.8%	17.6%
Middle	104	16.6%	\$15,963	10.5%	27.6%
Upper	462	73.8%	\$124,225	81.4%	52.0%
Unknown	1	0.2%	\$500	0.3%	0.1%
Total	626	100.0%	\$152,688	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Greater Los Angeles

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	7	1.1%	\$569	0.0%	24.6%
Moderate	16	2.6%	\$1,620	1.1%	16.4%
Middle	48	7.7%	\$5,108	3.3%	17.0%
Upper	538	85.9%	\$126,609	82.9%	42.0%
Unknown	17	2.7%	\$18,782	12.3%	0.0%
Total	626	100.0%	\$152,688	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.7%	0	0.0%	3.3%	\$0	0.0%	2.7%
	Moderate	1	3.7%	\$320	0.4%	17.6%	1	3.7%	18.5%	\$320	0.4%	13.2%
	Middle	2	7.4%	\$2,055	2.4%	27.6%	2	7.4%	27.1%	\$2,055	2.4%	23.5%
	Upper	23	85.2%	\$80,577	96.0%	52.0%	23	85.2%	50.1%	\$80,577	96.0%	59.5%
	Unknown	1	3.7%	\$1,000	1.2%	0.1%	1	3.7%	1.0%	\$1,000	1.2%	1.0%
	Total	27	100.0%	\$83,952	100.0%	100.0%	27	100.0%	100.0%	\$83,952	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.7%	0	0.0%	2.9%	\$0	0.0%	2.0%
	Moderate	1	3.3%	\$252	0.2%	17.6%	1	3.3%	18.8%	\$252	0.2%	13.3%
	Middle	1	3.3%	\$1,237	1.2%	27.6%	1	3.3%	28.8%	\$1,237	1.2%	25.2%
	Upper	28	93.3%	\$101,353	98.6%	52.0%	28	93.3%	49.4%	\$101,353	98.6%	59.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	30	100.0%	\$102,842	100.0%	100.0%	30	100.0%	100.0%	\$102,842	100.0%	100.0%
HOME IMPROVEMENT	Low	1	100.0%	\$1,375	100.0%	2.7%	1	100.0%	2.9%	\$1,375	100.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	19.3%	\$0	0.0%	14.0%
	Middle	0	0.0%	\$0	0.0%	27.6%	0	0.0%	29.4%	\$0	0.0%	22.5%
	Upper	0	0.0%	\$0	0.0%	52.0%	0	0.0%	48.3%	\$0	0.0%	61.1%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	1	100.0%	\$1,375	100.0%	100.0%	1	100.0%	100.0%	\$1,375	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	12.3%	0	0.0%	16.6%	\$0	0.0%	12.1%
	Moderate	0	0.0%	\$0	0.0%	31.3%	0	0.0%	39.3%	\$0	0.0%	30.0%
	Middle	0	0.0%	\$0	0.0%	23.7%	0	0.0%	21.2%	\$0	0.0%	24.7%
	Upper	0	0.0%	\$0	0.0%	31.5%	0	0.0%	22.4%	\$0	0.0%	31.9%
	Unknown	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.4%	\$0	0.0%	1.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	1.7%	\$1,375	0.7%	2.7%	1	1.7%	3.4%	\$1,375	0.7%	3.3%
	Moderate	2	3.4%	\$572	0.3%	17.6%	2	3.4%	19.2%	\$572	0.3%	14.9%
	Middle	3	5.2%	\$3,292	1.7%	27.6%	3	5.2%	28.0%	\$3,292	1.7%	24.4%
	Upper	51	87.9%	\$181,930	96.7%	52.0%	51	87.9%	49.0%	\$181,930	96.7%	56.8%
	Unknown	1	1.7%	\$1,000	0.5%	0.1%	1	1.7%	0.5%	\$1,000	0.5%	0.6%
	Total	58	100.0%	\$188,169	100.0%	100.0%	58	100.0%	100.0%	\$188,169	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Families by Family Income e	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.6%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	3.8%	\$0	0.0%	1.6%
	Middle	1	3.7%	\$2,250	2.7%	17.0%	1	3.7%	13.0%	\$2,250	2.7%	7.3%
	Upper	23	85.2%	\$69,927	83.3%	42.0%	23	85.2%	69.1%	\$69,927	83.3%	78.2%
	Unknown	3	11.1%	\$11,775	14.0%	0.0%	3	11.1%	13.4%	\$11,775	14.0%	12.6%
	Total	27	100.0%	\$83,952	100.0%	100.0%	27	100.0%	100.0%	\$83,952	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	24.6%	0	0.0%	3.3%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	8.1%	\$0	0.0%	3.1%
	Middle	3	10.0%	\$2,960	2.9%	17.0%	3	10.0%	17.1%	\$2,960	2.9%	8.6%
	Upper	23	76.7%	\$50,014	48.6%	42.0%	23	76.7%	59.0%	\$50,014	48.6%	77.1%
	Unknown	4	13.3%	\$49,868	48.5%	0.0%	4	13.3%	12.5%	\$49,868	48.5%	9.9%
	Total	30	100.0%	\$102,842	100.0%	100.0%	30	100.0%	100.0%	\$102,842	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.6%	0	0.0%	3.8%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	9.7%	\$0	0.0%	5.2%
	Middle	0	0.0%	\$0	0.0%	17.0%	0	0.0%	19.5%	\$0	0.0%	13.5%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	62.6%	\$0	0.0%	73.4%
	Unknown	1	100.0%	\$1,375	100.0%	0.0%	1	100.0%	4.4%	\$1,375	100.0%	6.2%
	Total	1	100.0%	\$1,375	100.0%	100.0%	1	100.0%	100.0%	\$1,375	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	24.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	24.6%	0	0.0%	2.2%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	6.3%	\$0	0.0%	2.3%
	Middle	4	6.9%	\$5,210	2.8%	17.0%	4	6.9%	15.3%	\$5,210	2.8%	7.5%
	Upper	46	79.3%	\$119,941	63.7%	42.0%	46	79.3%	61.9%	\$119,941	63.7%	69.6%
	Unknown	8	13.8%	\$63,018	33.5%	0.0%	8	13.8%	14.3%	\$63,018	33.5%	19.8%
	Total	58	100.0%	\$188,169	100.0%	100.0%	58	100.0%	100.0%	\$188,169	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: CA - Santa Cruz

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2015, 2016					2015						2016					
	Count		Bank		Small Businesses	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		#	%	%	\$ 000s		\$ %	#	%	%		\$ 000s	\$ %
Low	2	0.9%	\$1,500	3.5%	2.0%	1	0.8%	1.4%	\$750	3.4%	2.1%	1	0.9%	1.2%	\$750	3.7%	0.7%
Moderate	72	32.1%	\$9,950	23.5%	21.5%	43	36.4%	24.6%	\$5,385	24.6%	29.1%	29	27.4%	21.8%	\$4,565	22.3%	23.0%
Middle	107	47.8%	\$20,968	49.5%	48.6%	53	44.9%	45.5%	\$10,667	48.7%	47.2%	54	50.9%	44.9%	\$10,301	50.4%	43.9%
Upper	43	19.2%	\$9,918	23.4%	27.9%	21	17.8%	28.5%	\$5,088	23.2%	21.5%	22	20.8%	32.1%	\$4,830	23.6%	32.4%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	224	100.0%	\$42,336	100.0%	100.0%	118	100.0%	100.0%	\$21,890	100.0%	100.0%	106	100.0%	100.0%	\$20,446	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: CA - Santa Cruz

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Total Businesses		Count		Dollar			Count		Dollar					
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
BUSINESS REVENUE	\$1million or Less	78	34.8%	\$9,783	23.1%	92.5%	43	36.4%	56.4%	\$5,269	24.1%	42.0%	35	33.0%	39.0%	\$4,514	22.1%	33.8%
	Over \$1 Million	99	44.2%	\$25,446	60.1%	7.2%	54	45.8%				45	42.5%					
	Total Rev. available	177	79.0%	\$35,229	83.2%	99.7%	97	82.2%				80	75.5%					
	Rev. Not Known	47	21.0%	\$7,107	16.8%	0.4%	21	17.8%				26	24.5%					
	Total	224	100.0%	\$42,336	100.0%	100.0%	118	100.0%				106	100.0%					
LOAN SIZE	\$100,000 or Less	131	58.5%	\$8,131	19.2%		67	56.8%	97.0%	\$4,110	18.8%	55.9%	64	60.4%	98.1%	\$4,021	19.7%	67.6%
	\$100,001 - \$250,000	53	23.7%	\$10,689	25.2%		32	27.1%	1.6%	\$6,482	29.6%	11.8%	21	19.8%	1.0%	\$4,207	20.6%	7.6%
	\$250,001 - \$1 Million	40	17.9%	\$23,516	55.5%		19	16.1%	1.3%	\$11,298	51.6%	32.2%	21	19.8%	0.9%	\$12,218	59.8%	24.9%
	Total	224	100.0%	\$42,336	100.0%		118	100.0%	100.0%	\$21,890	100.0%	100.0%	106	100.0%	100.0%	\$20,446	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	61	78.2%	\$3,296	33.7%													
	\$100,001 - \$250,000	9	11.5%	\$2,000	20.4%													
	\$250,001 - \$1 Million	8	10.3%	\$4,487	45.9%													
	Total	78	100.0%	\$9,783	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Santa Cruz

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.6%
Moderate	39	15.4%	\$4,912	10.4%	26.3%
Middle	99	39.0%	\$19,956	42.4%	40.0%
Upper	116	45.7%	\$22,247	47.2%	33.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	254	100.0%	\$47,115	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Santa Cruz

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	13	5.1%	\$2,070	0.0%	25.2%
Moderate	37	14.6%	\$4,513	9.6%	17.6%
Middle	47	18.5%	\$6,120	13.0%	18.2%
Upper	156	61.4%	\$34,312	72.8%	39.0%
Unknown	1	0.4%	\$100	0.2%	0.0%
Total	254	100.0%	\$47,115	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: CA - Santa Cruz

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units			Count		Dollar				Count		Dollar			
		Count	Dollar		%		Bank	Agg	Bank	Agg	%	Bank	Agg	Bank	Agg	%	Bank	Agg
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %	#	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.7%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.4%
	Moderate	1	25.0%	\$500	3.9%	26.3%	0	0.0%	26.5%	\$0	0.0%	20.0%	1	100.0%	26.9%	\$500	100.0%	20.7%
	Middle	2	50.0%	\$1,684	13.1%	40.0%	2	66.7%	38.7%	\$1,684	13.6%	39.1%	0	0.0%	39.5%	\$0	0.0%	39.3%
	Upper	1	25.0%	\$10,672	83.0%	33.1%	1	33.3%	34.2%	\$10,672	86.4%	40.4%	0	0.0%	33.2%	\$0	0.0%	39.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$12,856	100.0%	100.0%	3	100.0%	100.0%	\$12,356	100.0%	100.0%	1	100.0%	100.0%	\$500	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	11	68.8%	\$4,617	62.0%	26.3%	4	66.7%	24.8%	\$1,286	73.0%	18.7%	7	70.0%	23.8%	\$3,331	58.6%	18.2%
	Middle	4	25.0%	\$2,036	27.3%	40.0%	2	33.3%	40.5%	\$475	27.0%	41.5%	2	20.0%	40.4%	\$1,561	27.5%	41.2%
	Upper	1	6.3%	\$793	10.7%	33.1%	0	0.0%	34.3%	\$0	0.0%	39.5%	1	10.0%	35.4%	\$793	13.9%	40.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	16	100.0%	\$7,446	100.0%	100.0%	6	100.0%	100.0%	\$1,761	100.0%	100.0%	10	100.0%	100.0%	\$5,685	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	26.3%	0	0.0%	31.1%	\$0	0.0%	25.9%	0	0.0%	23.6%	\$0	0.0%	18.1%
	Middle	0	0.0%	\$0	0.0%	40.0%	0	0.0%	36.7%	\$0	0.0%	34.6%	0	0.0%	41.8%	\$0	0.0%	43.7%
	Upper	0	0.0%	\$0	0.0%	33.1%	0	0.0%	31.8%	\$0	0.0%	39.3%	0	0.0%	34.2%	\$0	0.0%	38.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.6%	0	0.0%	3.6%	\$0	0.0%	2.1%	0	0.0%	11.6%	\$0	0.0%	10.9%
	Moderate	1	100.0%	\$4,000	100.0%	39.7%	1	100.0%	42.9%	\$4,000	100.0%	32.7%	0	0.0%	30.2%	\$0	0.0%	17.7%
	Middle	0	0.0%	\$0	0.0%	43.4%	0	0.0%	42.9%	\$0	0.0%	57.5%	0	0.0%	53.5%	\$0	0.0%	67.7%
	Upper	0	0.0%	\$0	0.0%	11.4%	0	0.0%	10.7%	\$0	0.0%	7.6%	0	0.0%	4.7%	\$0	0.0%	3.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$4,000	100.0%	100.0%	1	100.0%	100.0%	\$4,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.5%	\$0	0.0%	0.4%	0	0.0%	0.4%	\$0	0.0%	0.5%
	Moderate	13	61.9%	\$9,117	37.5%	26.3%	5	50.0%	25.7%	\$5,286	29.2%	19.6%	8	72.7%	24.7%	\$3,831	61.9%	19.0%
	Middle	6	28.6%	\$3,720	15.3%	40.0%	4	40.0%	39.7%	\$2,159	11.9%	40.6%	2	18.2%	40.3%	\$1,561	25.2%	41.3%
	Upper	2	9.5%	\$11,465	47.2%	33.1%	1	10.0%	34.1%	\$10,672	58.9%	39.5%	1	9.1%	34.6%	\$793	12.8%	39.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	21	100.0%	\$24,302	100.0%	100.0%	10	100.0%	100.0%	\$18,117	100.0%	100.0%	11	100.0%	100.0%	\$6,185	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: CA - Santa Cruz

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count	%	\$ (000s)	\$ %		Bank	Agg	%	\$ (000s)	\$ %	\$ %	Bank	Agg	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	1.1%	\$0	0.0%	0.4%	0	0.0%	0.7%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	7.8%	\$0	0.0%	3.8%	0	0.0%	6.7%	\$0	0.0%	3.1%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	15.5%	\$0	0.0%	11.6%	0	0.0%	14.4%	\$0	0.0%	10.1%
	Upper	1	25.0%	\$1,284	10.0%	39.0%	1	33.3%	56.4%	\$1,284	10.4%	65.2%	0	0.0%	67.6%	\$0	0.0%	76.7%
	Unknown	3	75.0%	\$11,572	90.0%	0.0%	2	66.7%	19.3%	\$11,072	89.6%	19.1%	1	100.0%	10.6%	\$500	100.0%	9.8%
	Total	4	100.0%	\$12,856	100.0%	100.0%	3	100.0%	100.0%	\$12,356	100.0%	100.0%	1	100.0%	100.0%	\$500	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	3.0%	\$0	0.0%	1.4%	0	0.0%	3.0%	\$0	0.0%	1.4%
	Moderate	4	25.0%	\$726	9.8%	17.6%	3	50.0%	9.7%	\$416	23.6%	5.5%	1	10.0%	8.9%	\$310	5.5%	5.2%
	Middle	3	18.8%	\$815	10.9%	18.2%	1	16.7%	18.5%	\$385	21.9%	14.4%	2	20.0%	18.6%	\$430	7.6%	14.6%
	Upper	7	43.8%	\$4,023	54.0%	39.0%	2	33.3%	52.4%	\$960	54.5%	61.3%	5	50.0%	59.0%	\$3,063	53.9%	67.3%
	Unknown	2	12.5%	\$1,882	25.3%	0.0%	0	0.0%	16.4%	\$0	0.0%	17.3%	2	20.0%	10.5%	\$1,882	33.1%	11.5%
	Total	16	100.0%	\$7,446	100.0%	100.0%	6	100.0%	100.0%	\$1,761	100.0%	100.0%	10	100.0%	100.0%	\$5,685	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	4.2%	\$0	0.0%	1.4%	0	0.0%	3.4%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	14.8%	\$0	0.0%	10.3%	0	0.0%	11.3%	\$0	0.0%	7.1%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	26.5%	\$0	0.0%	22.7%	0	0.0%	25.7%	\$0	0.0%	20.7%
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	48.5%	\$0	0.0%	58.4%	0	0.0%	57.5%	\$0	0.0%	68.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	7.2%	0	0.0%	2.1%	\$0	0.0%	1.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$4,000	100.0%	0.0%	1	100.0%	100.0%	\$4,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	1	100.0%	\$4,000	100.0%	100.0%	1	100.0%	100.0%	\$4,000	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	25.2%	0	0.0%	2.4%	\$0	0.0%	1.0%	0	0.0%	2.3%	\$0	0.0%	1.0%
	Moderate	4	19.0%	\$726	3.0%	17.6%	3	30.0%	9.2%	\$416	2.3%	4.9%	1	9.1%	8.4%	\$310	5.0%	4.5%
	Middle	3	14.3%	\$815	3.4%	18.2%	1	10.0%	17.7%	\$385	2.1%	13.4%	2	18.2%	17.8%	\$430	7.0%	13.2%
	Upper	8	38.1%	\$5,307	21.8%	39.0%	3	30.0%	53.4%	\$2,244	12.4%	62.0%	5	45.5%	61.0%	\$3,063	49.5%	68.8%
	Unknown	6	28.6%	\$17,454	71.8%	0.0%	3	30.0%	17.4%	\$15,072	83.2%	18.7%	3	27.3%	10.5%	\$2,382	38.5%	12.5%
	Total	21	100.0%	\$24,302	100.0%	100.0%	10	100.0%	100.0%	\$18,117	100.0%	100.0%	11	100.0%	100.0%	\$6,185	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: CA - Santa Cruz

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2017					2017					
	Bank		Small		Businesses	Count		Agg	Dollar		Agg
	Count		Dollar			Bank			Bank		
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
Low	4	3.7%	\$235	1.0%	4.4%	4	3.7%	4.1%	\$235	1.0%	4.3%
Moderate	25	23.4%	\$4,053	18.0%	16.5%	25	23.4%	18.5%	\$4,053	18.0%	15.6%
Middle	43	40.2%	\$7,519	33.3%	48.1%	43	40.2%	47.3%	\$7,519	33.3%	45.2%
Upper	35	32.7%	\$10,762	47.7%	31.0%	35	32.7%	30.1%	\$10,762	47.7%	34.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
Total	107	100.0%	\$22,569	100.0%	100.0%	107	100.0%	100.0%	\$22,569	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: CA - Santa Cruz

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Total Businesses	Count			Dollar		
		Count		\$ (000s)			#	%	Agg %	Bank		Agg \$ %
#	%	\$	%	%	\$ (000s)	\$ %				\$ %		
BUSINESS REVENUE	\$1million or Less	36	33.6%	\$5,285	23.4%	91.7%	36	33.6%	54.1%	\$5,285	23.4%	40.9%
	Over \$1 Million	48	44.9%	\$13,925	61.7%	8.0%	48	44.9%				
	Total Rev. available	84	78.5%	\$19,210	85.1%	99.7%	84	78.5%				
	Rev. Not Known	23	21.5%	\$3,359	14.9%	0.4%	23	21.5%				
	Total	107	100.0%	\$22,569	100.0%	100.0%	107	100.0%				
LOAN SIZE	\$100,000 or Less	57	53.3%	\$3,478	15.4%		57	53.3%	96.9%	\$3,478	15.4%	57.9%
	\$100,001 - \$250,000	27	25.2%	\$5,197	23.0%		27	25.2%	1.7%	\$5,197	23.0%	11.3%
	\$250,001 - \$1 Million	23	21.5%	\$13,894	61.6%		23	21.5%	1.4%	\$13,894	61.6%	30.8%
	Total	107	100.0%	\$22,569	100.0%		107	100.0%	100.0%	\$22,569	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	23	63.9%	\$1,188	22.5%							
	\$100,001 - \$250,000	8	22.2%	\$1,532	29.0%							
	\$250,001 - \$1 Million	5	13.9%	\$2,565	48.5%							
	Total	36	100.0%	\$5,285	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Santa Cruz

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	3.0%
Moderate	16	16.0%	\$2,172	11.9%	20.5%
Middle	40	40.0%	\$7,206	39.3%	41.2%
Upper	44	44.0%	\$8,937	48.8%	35.3%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	100	100.0%	\$18,315	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Santa Cruz

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	24.5%
Moderate	4	4.0%	\$386	2.1%	17.2%
Middle	23	23.0%	\$3,422	18.7%	17.9%
Upper	73	73.0%	\$14,507	79.2%	40.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	100	100.0%	\$18,315	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: CA - Santa Cruz

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	3.9%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	20.7%	\$0	0.0%	17.0%
	Middle	1	100.0%	\$485	100.0%	41.2%	1	100.0%	42.3%	\$485	100.0%	41.0%
	Upper	0	0.0%	\$0	0.0%	35.3%	0	0.0%	33.1%	\$0	0.0%	39.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$485	100.0%	100.0%	1	100.0%	100.0%	\$485	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	4.1%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	20.4%	\$0	0.0%	30.0%
	Middle	3	100.0%	\$842	100.0%	41.2%	3	100.0%	42.4%	\$842	100.0%	36.2%
	Upper	0	0.0%	\$0	0.0%	35.3%	0	0.0%	33.1%	\$0	0.0%	31.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$842	100.0%	100.0%	3	100.0%	100.0%	\$842	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	1.7%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	17.6%	\$0	0.0%	15.3%
	Middle	0	0.0%	\$0	0.0%	41.2%	0	0.0%	45.6%	\$0	0.0%	41.0%
	Upper	0	0.0%	\$0	0.0%	35.3%	0	0.0%	35.1%	\$0	0.0%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	17.9%	0	0.0%	13.9%	\$0	0.0%	7.5%
	Moderate	0	0.0%	\$0	0.0%	23.1%	0	0.0%	19.4%	\$0	0.0%	9.6%
	Middle	1	100.0%	\$4,000	100.0%	47.7%	1	100.0%	63.9%	\$4,000	100.0%	81.7%
	Upper	0	0.0%	\$0	0.0%	11.3%	0	0.0%	2.8%	\$0	0.0%	1.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$4,000	100.0%	100.0%	1	100.0%	100.0%	\$4,000	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	3.9%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	20.3%	\$0	0.0%	23.4%
	Middle	5	100.0%	\$5,327	100.0%	41.2%	5	100.0%	42.7%	\$5,327	100.0%	39.6%
	Upper	0	0.0%	\$0	0.0%	35.3%	0	0.0%	33.1%	\$0	0.0%	34.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$5,327	100.0%	100.0%	5	100.0%	100.0%	\$5,327	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: CA - Santa Cruz

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
Borrower Income Levels		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.9%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	4.9%	\$0	0.0%	2.3%
	Middle	0	0.0%	\$0	0.0%	17.9%	0	0.0%	13.3%	\$0	0.0%	8.9%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	70.0%	\$0	0.0%	78.5%
	Unknown	1	100.0%	\$485	100.0%	0.0%	1	100.0%	10.9%	\$485	100.0%	10.0%
	Total	1	100.0%	\$485	100.0%	100.0%	1	100.0%	100.0%	\$485	100.0%	100.0%
REFINANCE	Low	1	33.3%	\$153	18.2%	24.5%	1	33.3%	3.7%	\$153	18.2%	1.8%
	Moderate	1	33.3%	\$265	31.5%	17.2%	1	33.3%	9.9%	\$265	31.5%	4.7%
	Middle	0	0.0%	\$0	0.0%	17.9%	0	0.0%	18.5%	\$0	0.0%	11.9%
	Upper	1	33.3%	\$424	50.4%	40.5%	1	33.3%	58.8%	\$424	50.4%	73.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.2%	\$0	0.0%	8.6%
	Total	3	100.0%	\$842	100.0%	100.0%	3	100.0%	100.0%	\$842	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.5%	0	0.0%	4.5%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	6.5%	\$0	0.0%	4.2%
	Middle	0	0.0%	\$0	0.0%	17.9%	0	0.0%	23.2%	\$0	0.0%	18.5%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	63.2%	\$0	0.0%	71.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	2.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	24.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$4,000	100.0%	0.0%	1	100.0%	100.0%	\$4,000	100.0%	100.0%
	Total	1	100.0%	\$4,000	100.0%	100.0%	1	100.0%	100.0%	\$4,000	100.0%	100.0%
HMDA TOTALS	Low	1	20.0%	\$153	2.9%	24.5%	1	20.0%	2.6%	\$153	2.9%	1.2%
	Moderate	1	20.0%	\$265	5.0%	17.2%	1	20.0%	7.6%	\$265	5.0%	3.5%
	Middle	0	0.0%	\$0	0.0%	17.9%	0	0.0%	16.5%	\$0	0.0%	10.6%
	Upper	1	20.0%	\$424	8.0%	40.5%	1	20.0%	63.3%	\$424	8.0%	73.4%
	Unknown	2	40.0%	\$4,485	84.2%	0.0%	2	40.0%	10.0%	\$4,485	84.2%	11.4%
	Total	5	100.0%	\$5,327	100.0%	100.0%	5	100.0%	100.0%	\$5,327	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: FL - Naples MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2015, 2016					2015						2016					
	Bank		Small Businesses		Count	Count		Dollar		Count	Count		Dollar		Count		
	Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg		Bank	Agg					
	#	%	\$ (000s)	\$ %		%	#	%	%		\$ 000s	\$ %	\$ %	#		%	%
Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	2.1%	\$0	0.0%	2.2%	0	0.0%	1.7%	\$0	0.0%	1.9%
Moderate	0	0.0%	\$0	0.0%	13.1%	0	0.0%	10.6%	\$0	0.0%	8.7%	0	0.0%	10.9%	\$0	0.0%	8.6%
Middle	5	35.7%	\$2,450	44.9%	43.6%	3	42.9%	41.5%	\$1,600	58.1%	40.8%	2	28.6%	41.7%	\$850	31.3%	38.0%
Upper	9	64.3%	\$3,005	55.1%	40.4%	4	57.1%	45.1%	\$1,155	41.9%	47.7%	5	71.4%	44.4%	\$1,850	68.5%	50.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.8%	\$0	0.0%	0.5%	0	0.0%	1.4%	\$0	0.0%	0.9%
Total	14	100.0%	\$5,455	100.0%	100.0%	7	100.0%	100.0%	\$2,755	100.0%	100.0%	7	100.0%	100.0%	\$2,700	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL - Naples MSA

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Total Businesses		Count		Dollar		Count		Dollar						
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
BUSINESS REVENUE	\$1million or Less	2	14.3%	\$600	11.0%	93.4%	1	14.3%	54.2%	\$100	3.6%	41.3%	1	14.3%	42.1%	\$500	18.5%	34.8%
	Over \$1 Million	10	71.4%	\$4,200	77.0%	5.6%	5	71.4%				5	71.4%					
	Total Rev. available	12	85.7%	\$4,800	88.0%	99.0%	6	85.7%				6	85.7%					
	Rev. Not Known	2	14.3%	\$655	12.0%	1.0%	1	14.3%				1	14.3%					
	Total	14	100.0%	\$5,455	100.0%	100.0%	7	100.0%				7	100.0%					
LOAN SIZE	\$100,000 or Less	3	21.4%	\$200	3.7%		2	28.6%	95.5%	\$150	5.4%	43.7%	1	14.3%	96.5%	\$50	1.9%	53.8%
	\$100,001) - \$250,000	2	14.3%	\$500	9.2%		1	14.3%	2.1%	\$250	9.1%	13.6%	1	14.3%	1.6%	\$250	9.3%	10.4%
	\$250,001) - \$1 Million	9	64.3%	\$4,755	87.2%		4	57.1%	2.4%	\$2,355	85.5%	42.7%	5	71.4%	1.9%	\$2,400	88.9%	35.8%
	Total	14	100.0%	\$5,455	100.0%		7	100.0%	100.0%	\$2,755	100.0%	100.0%	7	100.0%	100.0%	\$2,700	100.0%	100.0%
LOAN SIZE Rev \$1 Mil or Less	\$100,000 or Less	1	50.0%	\$100	16.7%													
	\$100,001) - \$250,000	0	0.0%	\$0	0.0%													
	\$250,001) - \$1 Million	1	50.0%	\$500	83.3%													
	Total	2	100.0%	\$600	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue

2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: FL - Naples MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	2.4%
Moderate	1	7.1%	\$100	1.9%	16.4%
Middle	6	42.9%	\$1,500	28.7%	46.0%
Upper	7	50.0%	\$3,626	69.4%	35.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	14	100.0%	\$5,226	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: FL - Naples MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	1	7.1%	\$20	0.0%	21.1%
Moderate	1	7.1%	\$30	0.6%	18.3%
Middle	1	7.1%	\$240	4.6%	19.0%
Upper	11	78.6%	\$4,936	94.5%	41.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>\$5,226</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: FL - Naples MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	%	\$ (000s)	\$ %	\$ %	Bank	Agg	%	\$ (000s)	\$ %	\$ %
		#	%	\$ (000s)	\$ %													
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	2.2%	\$0	0.0%	1.1%	0	0.0%	2.1%	\$0	0.0%	1.5%
	Moderate	4	26.7%	\$568	15.6%	16.4%	3	33.3%	14.9%	\$474	31.3%	10.8%	1	16.7%	14.1%	\$94	4.4%	10.4%
	Middle	9	60.0%	\$1,472	40.4%	46.0%	6	66.7%	51.8%	\$1,039	68.7%	41.2%	3	50.0%	56.3%	\$433	20.4%	47.6%
	Upper	2	13.3%	\$1,600	44.0%	35.2%	0	0.0%	31.1%	\$0	0.0%	47.0%	2	33.3%	27.5%	\$1,600	75.2%	40.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	15	100.0%	\$3,640	100.0%	100.0%	9	100.0%	100.0%	\$1,513	100.0%	100.0%	6	100.0%	100.0%	\$2,127	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.3%	\$0	0.0%	0.6%	0	0.0%	1.4%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	13.0%	\$0	0.0%	8.2%	0	0.0%	12.1%	\$0	0.0%	7.7%
	Middle	7	63.6%	\$1,227	17.5%	46.0%	3	60.0%	51.6%	\$400	64.9%	40.3%	4	66.7%	52.3%	\$827	12.9%	40.7%
	Upper	4	36.4%	\$5,785	82.5%	35.2%	2	40.0%	34.0%	\$216	35.1%	50.9%	2	33.3%	34.2%	\$5,569	87.1%	51.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$7,012	100.0%	100.0%	5	100.0%	100.0%	\$616	100.0%	100.0%	6	100.0%	100.0%	\$6,396	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	0.9%	\$0	0.0%	0.3%	0	0.0%	1.5%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	15.4%	\$0	0.0%	8.2%	0	0.0%	12.1%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	46.0%	0	0.0%	59.3%	\$0	0.0%	35.5%	0	0.0%	58.7%	\$0	0.0%	48.9%
	Upper	0	0.0%	\$0	0.0%	35.2%	0	0.0%	24.5%	\$0	0.0%	56.1%	0	0.0%	27.7%	\$0	0.0%	43.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	3.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	11.1%	\$0	0.0%	8.0%
	Moderate	0	0.0%	\$0	0.0%	13.8%	0	0.0%	45.8%	\$0	0.0%	47.1%	0	0.0%	22.2%	\$0	0.0%	41.7%
	Middle	0	0.0%	\$0	0.0%	39.5%	0	0.0%	20.8%	\$0	0.0%	42.3%	0	0.0%	33.3%	\$0	0.0%	37.5%
	Upper	0	0.0%	\$0	0.0%	43.7%	0	0.0%	33.3%	\$0	0.0%	10.6%	0	0.0%	33.3%	\$0	0.0%	12.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.9%	\$0	0.0%	0.9%	0	0.0%	1.9%	\$0	0.0%	1.4%
	Moderate	4	15.4%	\$568	5.3%	16.4%	3	21.4%	14.4%	\$474	22.3%	11.1%	1	8.3%	13.4%	\$94	1.1%	10.4%
	Middle	16	61.5%	\$2,699	25.3%	46.0%	9	64.3%	51.9%	\$1,439	67.6%	40.9%	7	58.3%	55.0%	\$1,260	14.8%	45.1%
	Upper	6	23.1%	\$7,385	69.3%	35.2%	2	14.3%	31.9%	\$216	10.1%	47.1%	4	33.3%	29.8%	\$7,169	84.1%	43.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$10,652	100.0%	100.0%	14	100.0%	100.0%	\$2,129	100.0%	100.0%	12	100.0%	100.0%	\$8,523	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: FL - Naples MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar		%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
		#	%	\$ (000s)	\$ %													
HOME PURCHASE	Low	1	6.7%	\$100	2.7%	21.1%	0	0.0%	2.4%	\$0	0.0%	0.9%	1	16.7%	1.4%	\$100	4.7%	0.5%
	Moderate	6	40.0%	\$1,015	27.9%	18.3%	3	33.3%	11.3%	\$582	38.5%	5.6%	3	50.0%	10.2%	\$433	20.4%	5.7%
	Middle	3	20.0%	\$427	11.7%	19.0%	3	33.3%	13.5%	\$427	28.2%	8.4%	0	0.0%	16.4%	\$0	0.0%	11.0%
	Upper	5	33.3%	\$2,098	57.6%	41.5%	3	33.3%	57.8%	\$504	33.3%	72.9%	2	33.3%	58.3%	\$1,594	74.9%	69.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.0%	\$0	0.0%	12.2%	0	0.0%	13.7%	\$0	0.0%	13.5%
	Total	15	100.0%	\$3,640	100.0%	100.0%	9	100.0%	100.0%	\$1,513	100.0%	100.0%	6	100.0%	100.0%	\$2,127	100.0%	100.0%
REFINANCE	Low	1	9.1%	\$80	1.1%	21.1%	1	20.0%	4.2%	\$80	13.0%	1.7%	0	0.0%	2.8%	\$0	0.0%	1.1%
	Moderate	5	45.5%	\$762	10.9%	18.3%	2	40.0%	11.3%	\$320	51.9%	5.4%	3	50.0%	10.4%	\$442	6.9%	5.1%
	Middle	2	18.2%	\$216	3.1%	19.0%	2	40.0%	16.2%	\$216	35.1%	10.1%	0	0.0%	16.0%	\$0	0.0%	9.8%
	Upper	3	27.3%	\$5,954	84.9%	41.5%	0	0.0%	51.5%	\$0	0.0%	66.9%	3	50.0%	54.8%	\$5,954	93.1%	68.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.8%	\$0	0.0%	15.9%	0	0.0%	16.0%	\$0	0.0%	15.6%
	Total	11	100.0%	\$7,012	100.0%	100.0%	5	100.0%	100.0%	\$616	100.0%	100.0%	6	100.0%	100.0%	\$6,396	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	5.1%	\$0	0.0%	0.9%	0	0.0%	2.2%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	16.2%	\$0	0.0%	6.8%	0	0.0%	14.1%	\$0	0.0%	6.2%
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	23.4%	\$0	0.0%	10.8%	0	0.0%	22.1%	\$0	0.0%	13.5%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	48.7%	\$0	0.0%	47.8%	0	0.0%	57.3%	\$0	0.0%	73.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.6%	\$0	0.0%	33.7%	0	0.0%	4.4%	\$0	0.0%	6.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	7.7%	\$180	1.7%	21.1%	1	7.1%	3.0%	\$80	3.8%	1.1%	1	8.3%	1.9%	\$100	1.2%	0.7%
	Moderate	11	42.3%	\$1,777	16.7%	18.3%	5	35.7%	11.4%	\$902	42.4%	5.4%	6	50.0%	10.4%	\$875	10.3%	5.3%
	Middle	5	19.2%	\$643	6.0%	19.0%	5	35.7%	14.6%	\$643	30.2%	8.7%	0	0.0%	16.4%	\$0	0.0%	10.3%
	Upper	8	30.8%	\$8,052	75.6%	41.5%	3	21.4%	55.5%	\$504	23.7%	68.5%	5	41.7%	57.0%	\$7,548	88.6%	67.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.5%	\$0	0.0%	16.3%	0	0.0%	14.4%	\$0	0.0%	16.6%
	Total	26	100.0%	\$10,652	100.0%	100.0%	14	100.0%	100.0%	\$2,129	100.0%	100.0%	12	100.0%	100.0%	\$8,523	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: FL - Naples MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2017					2017					
	Bank		Small		Businesses	Count		Agg	Dollar		Agg
	Count		Dollar			Bank			Bank		
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
Low	0	0.0%	\$0	0.0%	3.1%	0	0.0%	2.7%	\$0	0.0%	3.7%
Moderate	1	16.7%	\$127	7.0%	12.7%	1	16.7%	10.7%	\$127	7.0%	6.6%
Middle	3	50.0%	\$790	43.5%	40.7%	3	50.0%	39.3%	\$790	43.5%	36.5%
Upper	2	33.3%	\$900	49.5%	43.5%	2	33.3%	46.5%	\$900	49.5%	52.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.5%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$1,817</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,817</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL - Naples MSA

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Total Businesses	Count		Dollar			
		Count		\$ (000s)			Bank	Agg	Bank		Agg	
#	%	\$	%	%	#	%			%	\$ (000s)	\$ %	\$ %
BUSINESS REVENUE	\$1million or Less	3	50.0%	\$317	17.4%	92.7%	3	50.0%	50.2%	\$317	17.4%	38.7%
	Over \$1 Million	2	33.3%	\$1,100	60.5%	6.4%	2	33.3%				
	Total Rev. available	5	83.3%	\$1,417	77.9%	99.1%	5	83.3%				
	Rev. Not Known	1	16.7%	\$400	22.0%	0.9%	1	16.7%				
	Total	6	100.0%	\$1,817	100.0%	100.0%	6	100.0%				
LOAN SIZE	\$100,000 or Less	1	16.7%	\$65	3.6%		1	16.7%	95.1%	\$65	3.6%	42.3%
	\$100,001 - \$250,000	2	33.3%	\$252	13.9%		2	33.3%	2.3%	\$252	13.9%	12.6%
	\$250,001 - \$1 Million	3	50.0%	\$1,500	82.6%		3	50.0%	2.6%	\$1,500	82.6%	45.1%
	Total	6	100.0%	\$1,817	100.0%		6	100.0%	100.0%	\$1,817	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	1	33.3%	\$65	20.5%							
	\$100,001 - \$250,000	2	66.7%	\$252	79.5%							
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%							
	Total	3	100.0%	\$317	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: FL - Naples MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	2.3%
Moderate	2	66.7%	\$528	63.8%	16.3%
Middle	0	0.0%	\$0	0.0%	41.3%
Upper	1	33.3%	\$300	36.2%	40.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	3	100.0%	\$828	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: FL - Naples MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	20.8%
Moderate	0	0.0%	\$0	0.0%	17.7%
Middle	0	0.0%	\$0	0.0%	19.3%
Upper	3	100.0%	\$828	100.0%	42.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$828</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: FL - Naples MSA

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	1.3%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	17.3%	\$0	0.0%	12.0%
	Middle	0	0.0%	\$0	0.0%	41.3%	0	0.0%	41.8%	\$0	0.0%	35.8%
	Upper	1	100.0%	\$149	100.0%	40.1%	1	100.0%	39.6%	\$149	100.0%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$149	100.0%	100.0%	1	100.0%	100.0%	\$149	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	1.0%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	15.8%	\$0	0.0%	9.5%
	Middle	0	0.0%	\$0	0.0%	41.3%	0	0.0%	44.8%	\$0	0.0%	32.9%
	Upper	2	100.0%	\$439	100.0%	40.1%	2	100.0%	38.4%	\$439	100.0%	56.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$439	100.0%	100.0%	2	100.0%	100.0%	\$439	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	0.5%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	16.7%	\$0	0.0%	10.3%
	Middle	1	100.0%	\$412	100.0%	41.3%	1	100.0%	44.0%	\$412	100.0%	36.7%
	Upper	0	0.0%	\$0	0.0%	40.1%	0	0.0%	38.9%	\$0	0.0%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$412	100.0%	100.0%	1	100.0%	100.0%	\$412	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	37.5%	\$0	0.0%	39.9%
	Middle	0	0.0%	\$0	0.0%	33.6%	0	0.0%	37.5%	\$0	0.0%	42.0%
	Upper	0	0.0%	\$0	0.0%	48.1%	0	0.0%	25.0%	\$0	0.0%	18.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	1.2%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	16.9%	\$0	0.0%	12.1%
	Middle	1	25.0%	\$412	41.2%	41.3%	1	25.0%	42.6%	\$412	41.2%	35.3%
	Upper	3	75.0%	\$588	58.8%	40.1%	3	75.0%	39.3%	\$588	58.8%	51.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$1,000	100.0%	100.0%	4	100.0%	100.0%	\$1,000	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: FL - Naples MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2017					Bank & Aggregate Lending Comparison 2017					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %		\$ %
HOME PURCHASE	Low	1	100.0%	\$149	100.0%	20.8%	1	100.0%	1.9%	\$149	100.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	10.9%	\$0	0.0%	6.2%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	16.1%	\$0	0.0%	11.2%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	56.4%	\$0	0.0%	68.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.7%	\$0	0.0%	13.0%
	Total	1	100.0%	\$149	100.0%	100.0%	1	100.0%	100.0%	\$149	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	4.9%	\$0	0.0%	1.9%
	Moderate	1	50.0%	\$194	44.2%	17.7%	1	50.0%	13.3%	\$194	44.2%	6.7%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	19.3%	\$0	0.0%	12.0%
	Upper	1	50.0%	\$245	55.8%	42.2%	1	50.0%	49.2%	\$245	55.8%	67.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.3%	\$0	0.0%	12.3%
	Total	2	100.0%	\$439	100.0%	100.0%	2	100.0%	100.0%	\$439	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	4.2%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	15.7%	\$0	0.0%	9.3%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	22.0%	\$0	0.0%	15.1%
	Upper	1	100.0%	\$412	100.0%	42.2%	1	100.0%	54.4%	\$412	100.0%	70.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.7%	\$0	0.0%	3.2%
	Total	1	100.0%	\$412	100.0%	100.0%	1	100.0%	100.0%	\$412	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	25.0%	\$149	14.9%	20.8%	1	25.0%	2.7%	\$149	14.9%	1.0%
	Moderate	1	25.0%	\$194	19.4%	17.7%	1	25.0%	11.6%	\$194	19.4%	6.2%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	17.0%	\$0	0.0%	11.1%
	Upper	2	50.0%	\$657	65.7%	42.2%	2	50.0%	54.5%	\$657	65.7%	66.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.1%	\$0	0.0%	15.0%
	Total	4	100.0%	\$1,000	100.0%	100.0%	4	100.0%	100.0%	\$1,000	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: MI - Kalamazoo-Portage

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2015, 2016					2015						2016					
	Bank		Small Businesses		Count	Count		Dollar		Count	Dollar		Count	Dollar			
	Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg		Bank	Agg					
	#	%	\$ (000s)	\$ %		%	#	%	%		\$ 000s	\$ %		\$ %	#	%	%
Low	26	8.0%	\$5,561	7.1%	6.5%	14	8.0%	5.7%	\$2,945	7.0%	8.5%	12	8.1%	5.5%	\$2,616	7.3%	7.6%
Moderate	67	20.7%	\$12,380	15.9%	16.9%	35	20.0%	17.8%	\$5,580	13.2%	21.6%	32	21.6%	14.7%	\$6,800	19.1%	18.2%
Middle	166	51.4%	\$43,426	55.8%	48.8%	93	53.1%	46.6%	\$25,427	60.2%	43.6%	73	49.3%	45.6%	\$17,999	50.5%	45.8%
Upper	64	19.8%	\$16,498	21.2%	27.8%	33	18.9%	28.7%	\$8,273	19.6%	26.1%	31	20.9%	33.3%	\$8,225	23.1%	28.1%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.3%	0	0.0%	0.9%	\$0	0.0%	0.3%
Total	323	100.0%	\$77,865	100.0%	100.0%	175	100.0%	100.0%	\$42,225	100.0%	100.0%	148	100.0%	100.0%	\$35,640	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: MI - Kalamazoo-Portage

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Total Businesses		Count		Dollar		Count		Dollar						
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
BUSINESS REVENUE	\$1million or Less	82	25.4%	\$14,492	18.6%	88.6%	42	24.0%	49.0%	\$6,070	14.4%	36.1%	40	27.0%	43.3%	\$8,422	23.6%	34.7%
	Over \$1 Million	180	55.7%	\$54,023	69.4%	10.6%	105	60.0%				75	50.7%					
	Total Rev. available	262	81.1%	\$68,515	88.0%	99.2%	147	84.0%				115	77.7%					
	Rev. Not Known	61	18.9%	\$9,350	12.0%	0.8%	28	16.0%				33	22.3%					
	Total	323	100.0%	\$77,865	100.0%	100.0%	175	100.0%				148	100.0%					
LOAN SIZE	\$100,000 or Less	138	42.7%	\$7,939	10.2%		72	41.1%	89.2%	\$4,089	9.7%	29.8%	66	44.6%	90.0%	\$3,850	10.8%	31.3%
	\$100,001 - \$250,000	75	23.2%	\$13,804	17.7%		40	22.9%	5.0%	\$7,259	17.2%	16.3%	35	23.6%	4.7%	\$6,545	18.4%	15.8%
	\$250,001 - \$1 Million	110	34.1%	\$56,122	72.1%		63	36.0%	5.8%	\$30,877	73.1%	54.0%	47	31.8%	5.4%	\$25,245	70.8%	52.9%
	Total	323	100.0%	\$77,865	100.0%		175	100.0%	100.0%	\$42,225	100.0%	100.0%	148	100.0%	100.0%	\$35,640	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	59	72.0%	\$3,321	22.9%													
	\$100,001 - \$250,000	7	8.5%	\$1,409	9.7%													
	\$250,001 - \$1 Million	16	19.5%	\$9,762	67.4%													
	Total	82	100.0%	\$14,492	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Kalamazoo-Portage

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	2	1.5%	\$16	0.1%	4.9%
Moderate	8	5.9%	\$712	5.6%	10.3%
Middle	58	42.6%	\$3,960	31.1%	51.8%
Upper	68	50.0%	\$8,049	63.2%	33.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>136</i>	<i>100.0%</i>	<i>\$12,737</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Kalamazoo-Portage

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	22	16.2%	\$1,065	0.0%	21.6%
Moderate	24	17.6%	\$1,299	10.2%	16.0%
Middle	27	19.9%	\$2,310	18.1%	20.2%
Upper	62	45.6%	\$7,983	62.7%	42.2%
Unknown	1	0.7%	\$80	0.6%	0.0%
Total	136	100.0%	\$12,737	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: MI - Kalamazoo-Portage

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar							
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.1%	\$0	0.0%	1.0%	0	0.0%	1.7%	\$0	0.0%	0.8%
	Moderate	2	16.7%	\$96	4.4%	10.3%	1	14.3%	10.4%	\$44	3.2%	6.5%	1	20.0%	10.7%	\$52	6.5%	6.1%
	Middle	5	41.7%	\$785	35.9%	51.8%	4	57.1%	50.3%	\$633	45.6%	41.8%	1	20.0%	51.5%	\$152	19.0%	43.5%
	Upper	5	41.7%	\$1,307	59.7%	33.0%	2	28.6%	37.2%	\$712	51.3%	50.8%	3	60.0%	36.1%	\$595	74.5%	49.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$2,188	100.0%	100.0%	7	100.0%	100.0%	\$1,389	100.0%	100.0%	5	100.0%	100.0%	\$799	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.6%	\$0	0.0%	0.8%	0	0.0%	1.1%	\$0	0.0%	0.4%
	Moderate	1	7.1%	\$65	3.3%	10.3%	1	12.5%	7.6%	\$65	5.6%	5.0%	0	0.0%	7.0%	\$0	0.0%	4.1%
	Middle	8	57.1%	\$1,054	53.4%	51.8%	5	62.5%	47.5%	\$519	44.9%	39.5%	3	50.0%	48.5%	\$535	65.6%	38.9%
	Upper	5	35.7%	\$853	43.3%	33.0%	2	25.0%	43.2%	\$573	49.5%	54.8%	3	50.0%	43.4%	\$280	34.4%	56.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$1,972	100.0%	100.0%	8	100.0%	100.0%	\$1,157	100.0%	100.0%	6	100.0%	100.0%	\$815	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.6%	\$0	0.0%	4.5%	0	0.0%	4.2%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	10.3%	0	0.0%	9.7%	\$0	0.0%	5.9%	0	0.0%	10.4%	\$0	0.0%	6.6%
	Middle	0	0.0%	\$0	0.0%	51.8%	0	0.0%	48.5%	\$0	0.0%	43.7%	0	0.0%	51.2%	\$0	0.0%	37.2%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	39.2%	\$0	0.0%	45.9%	0	0.0%	34.3%	\$0	0.0%	54.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	9.9%	0	0.0%	5.7%	\$0	0.0%	2.0%	0	0.0%	10.3%	\$0	0.0%	14.9%
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	34.3%	\$0	0.0%	28.2%	0	0.0%	24.1%	\$0	0.0%	25.6%
	Middle	0	0.0%	\$0	0.0%	51.6%	0	0.0%	42.9%	\$0	0.0%	59.8%	0	0.0%	41.4%	\$0	0.0%	41.1%
	Upper	0	0.0%	\$0	0.0%	11.4%	0	0.0%	17.1%	\$0	0.0%	10.0%	0	0.0%	24.1%	\$0	0.0%	18.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.9%	\$0	0.0%	1.0%	0	0.0%	1.6%	\$0	0.0%	1.7%
	Moderate	3	11.5%	\$161	3.9%	10.3%	2	13.3%	9.3%	\$109	4.3%	7.7%	1	9.1%	9.2%	\$52	3.2%	6.9%
	Middle	13	50.0%	\$1,839	44.2%	51.8%	9	60.0%	49.0%	\$1,152	45.2%	42.5%	4	36.4%	50.3%	\$687	42.6%	41.4%
	Upper	10	38.5%	\$2,160	51.9%	33.0%	4	26.7%	39.7%	\$1,285	50.5%	48.8%	6	54.5%	38.9%	\$875	54.2%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	26	100.0%	\$4,160	100.0%	100.0%	15	100.0%	100.0%	\$2,546	100.0%	100.0%	11	100.0%	100.0%	\$1,614	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: MI - Kalamazoo-Portage

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income		Count		Dollar			Count		Dollar					
		Count	Dollar					Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	2	16.7%	\$96	4.4%	21.6%	1	14.3%	7.9%	\$44	3.2%	3.7%	1	20.0%	8.0%	\$52	6.5%	3.9%
	Moderate	4	33.3%	\$885	40.4%	16.0%	3	42.9%	17.8%	\$825	59.4%	11.7%	1	20.0%	20.9%	\$60	7.5%	13.9%
	Middle	1	8.3%	\$152	6.9%	20.2%	0	0.0%	22.4%	\$0	0.0%	19.1%	1	20.0%	22.0%	\$152	19.0%	19.5%
	Upper	5	41.7%	\$1,055	48.2%	42.2%	3	42.9%	36.7%	\$520	37.4%	52.8%	2	40.0%	35.2%	\$535	67.0%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.3%	\$0	0.0%	12.7%	0	0.0%	13.9%	\$0	0.0%	12.3%
	Total	12	100.0%	\$2,188	100.0%	100.0%	7	100.0%	100.0%	\$1,389	100.0%	100.0%	5	100.0%	100.0%	\$799	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	5.8%	\$0	0.0%	2.9%	0	0.0%	5.4%	\$0	0.0%	2.6%
	Moderate	3	21.4%	\$292	14.8%	16.0%	0	0.0%	13.3%	\$0	0.0%	8.3%	3	50.0%	13.3%	\$292	35.8%	8.4%
	Middle	5	35.7%	\$458	23.2%	20.2%	4	50.0%	19.6%	\$370	32.0%	15.2%	1	16.7%	17.9%	\$88	10.8%	13.6%
	Upper	6	42.9%	\$1,222	62.0%	42.2%	4	50.0%	43.8%	\$787	68.0%	54.5%	2	33.3%	45.7%	\$435	53.4%	59.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.4%	\$0	0.0%	19.1%	0	0.0%	17.6%	\$0	0.0%	16.4%
	Total	14	100.0%	\$1,972	100.0%	100.0%	8	100.0%	100.0%	\$1,157	100.0%	100.0%	6	100.0%	100.0%	\$815	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	8.7%	\$0	0.0%	2.9%	0	0.0%	8.1%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	19.1%	\$0	0.0%	10.4%	0	0.0%	17.6%	\$0	0.0%	8.5%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	23.2%	\$0	0.0%	16.4%	0	0.0%	29.2%	\$0	0.0%	21.0%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	44.9%	\$0	0.0%	59.2%	0	0.0%	42.6%	\$0	0.0%	61.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	11.0%	0	0.0%	2.5%	\$0	0.0%	4.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	7.7%	\$96	2.3%	21.6%	1	6.7%	7.0%	\$44	1.7%	3.1%	1	9.1%	6.9%	\$52	3.2%	3.1%
	Moderate	7	26.9%	\$1,177	28.3%	16.0%	3	20.0%	15.9%	\$825	32.4%	9.4%	4	36.4%	17.6%	\$352	21.8%	10.7%
	Middle	6	23.1%	\$610	14.7%	20.2%	4	26.7%	21.2%	\$370	14.5%	16.0%	2	18.2%	20.7%	\$240	14.9%	15.8%
	Upper	11	42.3%	\$2,277	54.7%	42.2%	7	46.7%	39.9%	\$1,307	51.3%	49.2%	4	36.4%	39.7%	\$970	60.1%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.0%	\$0	0.0%	22.3%	0	0.0%	15.1%	\$0	0.0%	20.4%
	Total	26	100.0%	\$4,160	100.0%	100.0%	15	100.0%	100.0%	\$2,546	100.0%	100.0%	11	100.0%	100.0%	\$1,614	100.0%	100.0%

Origination & Purchases

2018 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: MI - Kalamazoo-Portage

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2017					2017					
	Bank		Small		Businesses	Count		Agg	Dollar		Agg
	Count		Dollar			Bank			Bank		
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
Low	10	7.9%	\$2,002	6.7%	7.0%	10	7.9%	6.9%	\$2,002	6.7%	7.6%
Moderate	32	25.2%	\$8,871	29.8%	17.2%	32	25.2%	19.8%	\$8,871	29.8%	20.9%
Middle	63	49.6%	\$14,213	47.7%	46.1%	63	49.6%	42.2%	\$14,213	47.7%	43.2%
Upper	22	17.3%	\$4,695	15.8%	29.2%	22	17.3%	30.3%	\$4,695	15.8%	28.0%
Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.3%	\$0	0.0%	0.2%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.6%	\$0	0.0%	0.2%
<i>Total</i>	<i>127</i>	<i>100.0%</i>	<i>\$29,781</i>	<i>100.0%</i>	<i>100.0%</i>	<i>127</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$29,781</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: MI - Kalamazoo-Portage

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Total Businesses	Count			Dollar		
		Count		\$ (000s)			Bank		Agg	Bank		Agg
#	%	\$	%	%	#	%	%	\$ (000s)	\$ %	\$ %		
BUSINESS REVENUE	\$1million or Less	30	23.6%	\$4,168	14.0%	87.3%	30	23.6%	49.4%	\$4,168	14.0%	34.9%
	Over \$1 Million	66	52.0%	\$20,546	69.0%	11.8%	66	52.0%				
	Total Rev. available	96	75.6%	\$24,714	83.0%	99.1%	96	75.6%				
	Rev. Not Known	31	24.4%	\$5,067	17.0%	0.8%	31	24.4%				
	Total	127	100.0%	\$29,781	100.0%	100.0%	127	100.0%				
LOAN SIZE	\$100,000 or Less	61	48.0%	\$3,764	12.6%		61	48.0%	88.4%	\$3,764	12.6%	27.9%
	\$100,001 - \$250,000	25	19.7%	\$4,762	16.0%		25	19.7%	5.6%	\$4,762	16.0%	18.1%
	\$250,001 - \$1 Million	41	32.3%	\$21,255	71.4%		41	32.3%	6.0%	\$21,255	71.4%	54.0%
	Total	127	100.0%	\$29,781	100.0%		127	100.0%	100.0%	\$29,781	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	21	70.0%	\$1,274	30.6%							
	\$100,001 - \$250,000	5	16.7%	\$950	22.8%							
	\$250,001 - \$1 Million	4	13.3%	\$1,944	46.6%							
	Total	30	100.0%	\$4,168	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

Geographic Distribution of Home Equity Lines of Credit**Assessment Area: MI - Kalamazoo-Portage**

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	4.9%
Moderate	2	3.6%	\$169	2.8%	10.0%
Middle	31	56.4%	\$3,194	52.8%	50.1%
Upper	22	40.0%	\$2,690	44.4%	34.9%
Unknown	0	0.0%	\$0	0.0%	0.1%
Total	55	100.0%	\$6,053	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Kalamazoo-Portage

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	5	9.1%	\$270	0.0%	20.5%
Moderate	10	18.2%	\$535	8.8%	16.6%
Middle	14	25.5%	\$1,189	19.6%	20.0%
Upper	26	47.3%	\$4,059	67.1%	42.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	55	100.0%	\$6,053	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: MI - Kalamazoo-Portage

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	3.1%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	10.8%	\$0	0.0%	6.5%
	Middle	4	57.1%	\$512	30.9%	50.1%	4	57.1%	50.5%	\$512	30.9%	43.1%
	Upper	3	42.9%	\$1,146	69.1%	34.9%	3	42.9%	35.6%	\$1,146	69.1%	48.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$1,658	100.0%	100.0%	7	100.0%	100.0%	\$1,658	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.8%	\$0	0.0%	0.8%
	Moderate	1	33.3%	\$83	22.0%	10.0%	1	33.3%	9.7%	\$83	22.0%	6.6%
	Middle	1	33.3%	\$254	67.4%	50.1%	1	33.3%	50.6%	\$254	67.4%	44.6%
	Upper	1	33.3%	\$40	10.6%	34.9%	1	33.3%	37.8%	\$40	10.6%	48.0%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$377	100.0%	100.0%	3	100.0%	100.0%	\$377	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	3.6%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	9.4%	\$0	0.0%	5.2%
	Middle	0	0.0%	\$0	0.0%	50.1%	0	0.0%	47.7%	\$0	0.0%	45.1%
	Upper	0	0.0%	\$0	0.0%	34.9%	0	0.0%	39.4%	\$0	0.0%	48.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	16.1%	\$0	0.0%	10.2%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	25.8%	\$0	0.0%	4.8%
	Middle	0	0.0%	\$0	0.0%	49.6%	0	0.0%	48.4%	\$0	0.0%	74.6%
	Upper	0	0.0%	\$0	0.0%	12.9%	0	0.0%	9.7%	\$0	0.0%	10.5%
	Unknown	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.8%	\$0	0.0%	1.9%
	Moderate	1	10.0%	\$83	4.1%	10.0%	1	10.0%	10.4%	\$83	4.1%	6.4%
	Middle	5	50.0%	\$766	37.6%	50.1%	5	50.0%	50.3%	\$766	37.6%	45.2%
	Upper	4	40.0%	\$1,186	58.3%	34.9%	4	40.0%	36.5%	\$1,186	58.3%	46.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$2,035	100.0%	100.0%	10	100.0%	100.0%	\$2,035	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: MI - Kalamazoo-Portage

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2017					Bank & Aggregate Lending Comparison 2017					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %						#	%
HOME PURCHASE	Low	1	14.3%	\$101	6.1%	20.5%	1	14.3%	5.7%	\$101	6.1%	2.6%
	Moderate	2	28.6%	\$223	13.4%	16.6%	2	28.6%	18.7%	\$223	13.4%	11.9%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	22.8%	\$0	0.0%	19.0%
	Upper	4	57.1%	\$1,334	80.5%	42.9%	4	57.1%	39.0%	\$1,334	80.5%	52.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.8%	\$0	0.0%	14.3%
	Total	7	100.0%	\$1,658	100.0%	100.0%	7	100.0%	100.0%	\$1,658	100.0%	100.0%
REFINANCE	Low	1	33.3%	\$40	10.6%	20.5%	1	33.3%	6.3%	\$40	10.6%	3.0%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	15.5%	\$0	0.0%	10.5%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	20.8%	\$0	0.0%	17.8%
	Upper	2	66.7%	\$337	89.4%	42.9%	2	66.7%	43.7%	\$337	89.4%	54.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.7%	\$0	0.0%	14.0%
	Total	3	100.0%	\$377	100.0%	100.0%	3	100.0%	100.0%	\$377	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	9.5%	\$0	0.0%	3.9%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	18.7%	\$0	0.0%	12.2%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	22.8%	\$0	0.0%	15.9%
	Upper	0	0.0%	\$0	0.0%	42.9%	0	0.0%	48.3%	\$0	0.0%	65.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	2.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	20.0%	\$141	6.9%	20.5%	2	20.0%	6.2%	\$141	6.9%	2.6%
	Moderate	2	20.0%	\$223	11.0%	16.6%	2	20.0%	17.6%	\$223	11.0%	10.9%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	22.1%	\$0	0.0%	17.6%
	Upper	6	60.0%	\$1,671	82.1%	42.9%	6	60.0%	41.1%	\$1,671	82.1%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.0%	\$0	0.0%	18.4%
	Total	10	100.0%	\$2,035	100.0%	100.0%	10	100.0%	100.0%	\$2,035	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: MI - Southeast

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2015, 2016					2015						2016					
	Bank		Small Businesses		Count	Count		Dollar		Count	Count		Dollar		Count	Dollar	
	Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg		Bank	Agg					
	#	%	\$ (000s)	\$ %		%	#	%	%		\$ 000s	\$ %	\$ %	#		%	%
Low	541	8.9%	\$125,536	8.7%	5.5%	283	8.6%	5.1%	\$65,597	8.6%	6.8%	258	9.2%	4.4%	\$59,939	8.9%	5.7%
Moderate	1,395	22.9%	\$363,086	25.3%	17.5%	765	23.1%	17.4%	\$196,479	25.8%	20.5%	630	22.6%	15.8%	\$166,607	24.7%	19.0%
Middle	1,936	31.8%	\$452,104	31.5%	36.5%	1,048	31.7%	34.4%	\$242,368	31.8%	33.6%	888	31.8%	33.6%	\$209,736	31.1%	32.5%
Upper	2,129	34.9%	\$469,521	32.7%	40.1%	1,158	35.0%	41.9%	\$244,801	32.1%	37.6%	971	34.8%	45.0%	\$224,720	33.4%	41.2%
Unknown	95	1.6%	\$25,184	1.8%	0.3%	52	1.6%	0.5%	\$12,844	1.7%	1.2%	43	1.5%	0.4%	\$12,340	1.8%	1.1%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.4%
Total	6,096	100.0%	\$1,435,431	100.0%	100.0%	3,306	100.0%	100.0%	\$762,089	100.0%	100.0%	2,790	100.0%	100.0%	\$673,342	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: MI - Southeast

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses	2015			2016								
		Count		Dollar			Bank	Agg	Dollar		Count		Dollar		Bank	Agg	Dollar	
		Count							Bank	Agg	Bank	Agg	Bank	Agg			Bank	Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
BUSINESS REVENUE	\$1million or Less	1,618	26.5%	\$257,539	17.9%	89.4%	887	26.8%	47.6%	\$128,257	16.8%	29.3%	731	26.2%	42.1%	\$129,282	19.2%	28.4%
	Over \$1 Million	3,052	50.1%	\$929,659	64.8%	10.0%	1,689	51.1%					1,363	48.9%				
	Total Rev. available	4,670	76.6%	\$1,187,198	82.7%	99.4%	2,576	77.9%					2,094	75.1%				
	Rev. Not Known	1,426	23.4%	\$248,233	17.3%	0.6%	730	22.1%					696	24.9%				
	Total	6,096	100.0%	\$1,435,431	100.0%	100.0%	3,306	100.0%					2,790	100.0%				
LOAN SIZE	\$100,000 or Less	3,046	50.0%	\$166,758	11.6%		1,659	50.2%	94.1%	\$89,961	11.8%	34.2%	1,387	49.7%	95.1%	\$76,797	11.4%	42.0%
	\$100,001 - \$250,000	1,242	20.4%	\$234,540	16.3%		699	21.1%	2.7%	\$131,133	17.2%	13.6%	543	19.5%	2.3%	\$103,407	15.4%	12.9%
	\$250,001 - \$1 Million	1,808	29.7%	\$1,034,133	72.0%		948	28.7%	3.2%	\$540,995	71.0%	52.2%	860	30.8%	2.6%	\$493,138	73.2%	45.1%
	Total	6,096	100.0%	\$1,435,431	100.0%		3,306	100.0%	100.0%	\$762,089	100.0%	100.0%	2,790	100.0%	100.0%	\$673,342	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	1,129	69.8%	\$61,717	24.0%													
	\$100,001 - \$250,000	191	11.8%	\$34,876	13.5%													
	\$250,001 - \$1 Million	298	18.4%	\$160,946	62.5%													
	Total	1,618	100.0%	\$257,539	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Southeast

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	49	1.1%	\$2,372	0.5%	4.4%
Moderate	378	8.7%	\$21,684	4.6%	19.1%
Middle	1,410	32.5%	\$117,164	24.7%	39.7%
Upper	2,504	57.7%	\$332,982	70.2%	36.8%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	4,341	100.0%	\$474,202	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Southeast

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	532	12.3%	\$27,951	0.0%	21.7%
Moderate	790	18.2%	\$55,405	11.7%	17.0%
Middle	958	22.1%	\$83,928	17.7%	19.7%
Upper	2,047	47.2%	\$291,833	61.5%	41.5%
Unknown	14	0.3%	\$15,085	3.2%	0.0%
Total	4,341	100.0%	\$474,202	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: MI - Southeast

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison									
		2015, 2016					2015					2016				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	7	1.7%	\$520	0.7%	4.4%	4	1.9%	\$311	0.9%	0.7%	3	1.5%	\$209	0.6%	0.7%
	Moderate	60	14.4%	\$5,496	7.8%	19.1%	32	14.9%	\$2,816	8.0%	7.2%	28	13.9%	\$2,680	7.6%	7.4%
	Middle	165	39.7%	\$21,059	29.9%	39.7%	82	38.1%	\$10,144	28.6%	35.8%	83	41.3%	\$10,915	31.1%	36.4%
	Upper	184	44.2%	\$43,396	61.6%	36.8%	97	45.1%	\$22,145	62.5%	56.3%	87	43.3%	\$21,251	60.6%	55.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	416	100.0%	\$70,471	100.0%	100.0%	215	100.0%	\$35,416	100.0%	100.0%	201	100.0%	\$35,055	100.0%	100.0%
REFINANCE	Low	2	0.5%	\$115	0.1%	4.4%	1	0.5%	\$63	0.2%	0.4%	1	0.6%	\$52	0.1%	0.4%
	Moderate	31	7.8%	\$3,263	3.9%	19.1%	16	7.4%	\$1,074	2.8%	4.8%	15	8.3%	\$2,189	4.9%	4.5%
	Middle	154	38.9%	\$22,407	27.1%	39.7%	90	41.9%	\$11,725	30.5%	32.4%	64	35.4%	\$10,682	24.1%	31.7%
	Upper	209	52.8%	\$56,938	68.8%	36.8%	108	50.2%	\$25,521	66.5%	62.4%	101	55.8%	\$31,417	70.9%	63.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	396	100.0%	\$82,723	100.0%	100.0%	215	100.0%	\$38,383	100.0%	100.0%	181	100.0%	\$44,340	100.0%	100.0%
HOME IMPROVEMENT	Low	2	20.0%	\$5	1.6%	4.4%	1	11.1%	\$1	0.3%	0.7%	1	100.0%	\$4	100.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	\$0	0.0%	4.8%	0	0.0%	\$0	0.0%	5.3%
	Middle	5	50.0%	\$36	11.5%	39.7%	5	55.6%	\$36	11.7%	29.7%	0	0.0%	\$0	0.0%	32.4%
	Upper	3	30.0%	\$272	86.9%	36.8%	3	33.3%	\$272	88.0%	64.7%	0	0.0%	\$0	0.0%	61.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$313	100.0%	100.0%	9	100.0%	\$309	100.0%	100.0%	1	100.0%	\$4	100.0%	100.0%
MULTI FAMILY	Multi-Family Units															
	Low	1	14.3%	\$3,800	18.4%	17.1%	0	0.0%	\$0	0.0%	15.2%	1	20.0%	\$3,800	30.2%	15.4%
	Moderate	2	28.6%	\$1,945	9.4%	27.5%	0	0.0%	\$0	0.0%	10.1%	2	40.0%	\$1,945	15.4%	14.1%
	Middle	2	28.6%	\$8,006	38.9%	36.8%	2	100.0%	\$8,006	100.0%	47.4%	0	0.0%	\$0	0.0%	49.5%
	Upper	2	28.6%	\$6,852	33.3%	18.5%	0	0.0%	\$0	0.0%	26.6%	2	40.0%	\$6,852	54.4%	21.0%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.7%	0	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$20,603	100.0%	100.0%	2	100.0%	\$8,006	100.0%	100.0%	5	100.0%	\$12,597	100.0%	100.0%
HMDA TOTALS	Low	12	1.4%	\$4,440	2.6%	4.4%	6	1.4%	\$375	0.5%	0.9%	6	1.5%	\$4,065	4.4%	0.9%
	Moderate	93	11.2%	\$10,704	6.1%	19.1%	48	10.9%	\$3,890	4.7%	6.1%	45	11.6%	\$6,814	7.4%	6.1%
	Middle	326	39.3%	\$51,508	29.6%	39.7%	179	40.6%	\$29,911	36.4%	34.4%	147	37.9%	\$21,597	23.5%	34.4%
	Upper	398	48.0%	\$107,458	61.7%	36.8%	208	47.2%	\$47,938	58.4%	58.6%	190	49.0%	\$59,520	64.7%	58.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%
	Total	829	100.0%	\$174,110	100.0%	100.0%	441	100.0%	\$82,114	100.0%	100.0%	388	100.0%	\$91,996	100.0%	100.0%

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: MI - Southeast

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
													#	%	\$ (000s)	%	#	%
HOME PURCHASE	Low	62	14.9%	\$5,406	7.7%	21.7%	33	15.3%	9.8%	\$2,818	8.0%	5.0%	29	14.4%	9.2%	\$2,588	7.4%	4.7%
	Moderate	110	26.4%	\$12,351	17.5%	17.0%	56	26.0%	20.6%	\$6,491	18.3%	14.3%	54	26.9%	19.9%	\$5,860	16.7%	13.8%
	Middle	95	22.8%	\$13,869	19.7%	19.7%	53	24.7%	22.3%	\$7,045	19.9%	20.3%	42	20.9%	22.9%	\$6,824	19.5%	20.8%
	Upper	144	34.6%	\$37,972	53.9%	41.5%	72	33.5%	33.2%	\$18,951	53.5%	41.2%	72	35.8%	35.3%	\$19,021	54.3%	49.5%
	Unknown	5	1.2%	\$873	1.2%	0.0%	1	0.5%	14.2%	\$111	0.3%	13.2%	4	2.0%	12.6%	\$762	2.2%	11.3%
	Total	416	100.0%	\$70,471	100.0%	100.0%	215	100.0%	100.0%	\$35,416	100.0%	100.0%	201	100.0%	100.0%	\$35,055	100.0%	100.0%
REFINANCE	Low	35	8.8%	\$2,651	3.2%	21.7%	23	10.7%	6.1%	\$1,663	4.3%	3.0%	12	6.6%	5.5%	\$988	2.2%	2.7%
	Moderate	83	21.0%	\$9,819	11.9%	17.0%	41	19.1%	13.8%	\$4,771	12.4%	9.0%	42	23.2%	12.8%	\$5,048	11.4%	8.4%
	Middle	92	23.2%	\$11,841	14.3%	19.7%	54	25.1%	20.1%	\$7,008	18.3%	16.7%	38	21.0%	20.2%	\$4,833	10.9%	16.9%
	Upper	184	46.5%	\$55,298	66.8%	41.5%	96	44.7%	41.0%	\$24,827	64.7%	52.6%	88	48.6%	45.7%	\$30,471	68.7%	57.5%
	Unknown	2	0.5%	\$3,114	3.8%	0.0%	1	0.5%	19.0%	\$114	0.3%	18.6%	1	0.6%	15.7%	\$3,000	6.8%	14.5%
	Total	396	100.0%	\$82,723	100.0%	100.0%	215	100.0%	100.0%	\$38,383	100.0%	100.0%	181	100.0%	100.0%	\$44,340	100.0%	100.0%
HOME IMPROVEMENT	Low	3	30.0%	\$9	2.9%	21.7%	2	22.2%	10.3%	\$5	1.6%	4.4%	1	100.0%	8.8%	\$4	100.0%	3.6%
	Moderate	2	20.0%	\$97	31.0%	17.0%	2	22.2%	19.8%	\$97	31.4%	11.8%	0	0.0%	19.2%	\$0	0.0%	10.4%
	Middle	1	10.0%	\$8	2.6%	19.7%	1	11.1%	24.6%	\$8	2.6%	20.5%	0	0.0%	24.2%	\$0	0.0%	19.1%
	Upper	4	40.0%	\$199	63.6%	41.5%	4	44.4%	42.2%	\$199	64.4%	59.8%	0	0.0%	45.4%	\$0	0.0%	64.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.1%	\$0	0.0%	3.6%	0	0.0%	2.4%	\$0	0.0%	2.7%
	Total	10	100.0%	\$313	100.0%	100.0%	9	100.0%	100.0%	\$309	100.0%	100.0%	1	100.0%	100.0%	\$4	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	7	100.0%	\$20,603	100.0%	0.0%	2	100.0%	100.0%	\$8,006	100.0%	100.0%	5	100.0%	100.0%	\$12,597	100.0%	100.0%
	Total	7	100.0%	\$20,603	100.0%	100.0%	2	100.0%	100.0%	\$8,006	100.0%	100.0%	5	100.0%	100.0%	\$12,597	100.0%	100.0%
HMDA TOTALS	Low	100	12.1%	\$8,066	4.6%	21.7%	58	13.2%	8.1%	\$4,486	5.5%	4.0%	42	10.8%	7.4%	\$3,580	3.9%	3.6%
	Moderate	195	23.5%	\$22,267	12.8%	17.0%	99	22.4%	17.4%	\$11,359	13.8%	11.5%	96	24.7%	16.5%	\$10,908	11.9%	10.8%
	Middle	188	22.7%	\$25,718	14.8%	19.7%	108	24.5%	21.4%	\$14,061	17.1%	18.1%	80	20.6%	21.7%	\$11,657	12.7%	18.4%
	Upper	332	40.0%	\$93,469	53.7%	41.5%	172	39.0%	37.2%	\$43,977	53.6%	48.8%	160	41.2%	40.7%	\$49,492	53.8%	52.5%
	Unknown	14	1.7%	\$24,590	14.1%	0.0%	4	0.9%	15.9%	\$8,231	10.0%	17.6%	10	2.6%	13.6%	\$16,359	17.8%	14.6%
	Total	829	100.0%	\$174,110	100.0%	100.0%	441	100.0%	100.0%	\$82,114	100.0%	100.0%	388	100.0%	100.0%	\$91,996	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: MI - Southeast

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2017					2017					
	Count		Bank		Small	Count		Agg	Dollar		Agg
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
Low	268	10.9%	\$71,882	12.1%	6.8%	268	10.9%	6.6%	\$71,882	12.1%	7.4%
Moderate	553	22.4%	\$136,547	23.0%	19.0%	553	22.4%	18.9%	\$136,547	23.0%	21.5%
Middle	659	26.7%	\$162,032	27.3%	32.3%	659	26.7%	30.5%	\$162,032	27.3%	27.6%
Upper	942	38.2%	\$213,324	35.9%	41.4%	942	38.2%	42.9%	\$213,324	35.9%	41.9%
Unknown	42	1.7%	\$10,810	1.8%	0.4%	42	1.7%	0.6%	\$10,810	1.8%	1.4%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.5%	\$0	0.0%	0.2%
Total	2,464	100.0%	\$594,595	100.0%	100.0%	2,464	100.0%	100.0%	\$594,595	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: MI - Southeast

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison					
		2017				2017					
		Count		Bank		Total	Count		Dollar		Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %
BUSINESS REVENUE	\$1million or Less	608	24.7%	\$102,493	17.2%	88.3%	608	24.7%	\$102,493	17.2%	30.5%
	Over \$1 Million	1,272	51.6%	\$380,499	64.0%	11.1%	1,272	51.6%			
	Total Rev. available	1,880	76.3%	\$482,992	81.2%	99.4%	1,880	76.3%			
	Rev. Not Known	584	23.7%	\$111,603	18.8%	0.6%	584	23.7%			
	Total	2,464	100.0%	\$594,595	100.0%	100.0%	2,464	100.0%			
LOAN SIZE	\$100,000 or Less	1,218	49.4%	\$67,811	11.4%		1,218	49.4%	\$67,811	11.4%	35.4%
	\$100,001 - \$250,000	476	19.3%	\$93,602	15.7%		476	19.3%	\$93,602	15.7%	14.5%
	\$250,001 - \$1 Million	770	31.3%	\$433,182	72.9%		770	31.3%	\$433,182	72.9%	50.1%
	Total	2,464	100.0%	\$594,595	100.0%		2,464	100.0%	\$594,595	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	398	65.5%	\$23,310	22.7%						
	\$100,001 - \$250,000	92	15.1%	\$16,901	16.5%						
	\$250,001 - \$1 Million	118	19.4%	\$62,282	60.8%						
	Total	608	100.0%	\$102,493	100.0%						

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Southeast

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	187	11.4%	\$10,234	0.0%	22.7%
Moderate	315	19.1%	\$21,174	11.7%	16.4%
Middle	395	24.0%	\$32,980	18.2%	18.7%
Upper	742	45.1%	\$115,517	63.9%	42.2%
Unknown	8	0.5%	\$974	0.5%	0.0%
Total	1,647	100.0%	\$180,879	100.0%	100.0%

Originations & Purchases

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Southeast

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	37	2.2%	\$1,486	0.8%	6.2%
Moderate	193	11.7%	\$11,739	6.5%	18.8%
Middle	515	31.3%	\$43,315	23.9%	36.4%
Upper	902	54.8%	\$124,339	68.7%	38.5%
Unknown	0	0.0%	\$0	0.0%	0.1%
Total	1,647	100.0%	\$180,879	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: MI - Southeast

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	3	1.6%	\$231	0.8%	6.2%	3	1.6%	2.3%	\$231	0.8%	1.1%
	Moderate	34	18.6%	\$3,921	13.6%	18.8%	34	18.6%	14.6%	\$3,921	13.6%	9.1%
	Middle	73	39.9%	\$8,958	31.1%	36.4%	73	39.9%	39.7%	\$8,958	31.1%	34.5%
	Upper	73	39.9%	\$15,670	54.4%	38.5%	73	39.9%	43.4%	\$15,670	54.4%	55.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	183	100.0%	\$28,780	100.0%	100.0%	183	100.0%	100.0%	\$28,780	100.0%	100.0%
REFINANCE	Low	2	1.5%	\$154	0.6%	6.2%	2	1.5%	1.6%	\$154	0.6%	0.8%
	Moderate	26	19.0%	\$2,644	10.4%	18.8%	26	19.0%	11.3%	\$2,644	10.4%	7.2%
	Middle	49	35.8%	\$6,645	26.0%	36.4%	49	35.8%	38.6%	\$6,645	26.0%	32.7%
	Upper	60	43.8%	\$16,102	63.0%	38.5%	60	43.8%	48.5%	\$16,102	63.0%	59.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	137	100.0%	\$25,545	100.0%	100.0%	137	100.0%	100.0%	\$25,545	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	6.2%	0	0.0%	3.0%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	14.8%	\$0	0.0%	7.7%
	Middle	1	100.0%	\$78	100.0%	36.4%	1	100.0%	39.3%	\$78	100.0%	32.3%
	Upper	0	0.0%	\$0	0.0%	38.5%	0	0.0%	42.9%	\$0	0.0%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	1	100.0%	\$78	100.0%	100.0%	1	100.0%	100.0%	\$78	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	16.8%	0	0.0%	11.9%	\$0	0.0%	2.5%
	Moderate	2	66.7%	\$2,350	17.9%	29.1%	2	66.7%	27.7%	\$2,350	17.9%	24.8%
	Middle	1	33.3%	\$10,767	82.1%	31.4%	1	33.3%	33.3%	\$10,767	82.1%	27.8%
	Upper	0	0.0%	\$0	0.0%	22.1%	0	0.0%	26.6%	\$0	0.0%	44.4%
	Unknown	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.6%	\$0	0.0%	0.6%
	Total	3	100.0%	\$13,117	100.0%	100.0%	3	100.0%	100.0%	\$13,117	100.0%	100.0%
HMDA TOTALS	Low	5	1.5%	\$385	0.6%	6.2%	5	1.5%	2.1%	\$385	0.6%	1.0%
	Moderate	62	19.1%	\$8,915	13.2%	18.8%	62	19.1%	13.4%	\$8,915	13.2%	9.0%
	Middle	124	38.3%	\$26,448	39.2%	36.4%	124	38.3%	39.2%	\$26,448	39.2%	33.5%
	Upper	133	41.0%	\$31,772	47.1%	38.5%	133	41.0%	45.2%	\$31,772	47.1%	56.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	324	100.0%	\$67,520	100.0%	100.0%	324	100.0%	100.0%	\$67,520	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: MI - Southeast

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	38	20.8%	\$3,681	12.8%	22.7%	38	20.8%	8.3%	\$3,681	12.8%	4.2%
	Moderate	77	42.1%	\$10,633	36.9%	16.4%	77	42.1%	19.9%	\$10,633	36.9%	13.7%
	Middle	32	17.5%	\$4,421	15.4%	18.7%	32	17.5%	23.1%	\$4,421	15.4%	20.7%
	Upper	35	19.1%	\$9,885	34.3%	42.2%	35	19.1%	35.7%	\$9,885	34.3%	49.5%
	Unknown	1	0.5%	\$160	0.6%	0.0%	1	0.5%	13.0%	\$160	0.6%	12.0%
	Total	183	100.0%	\$28,780	100.0%	100.0%	183	100.0%	100.0%	\$28,780	100.0%	100.0%
REFINANCE	Low	19	13.9%	\$1,752	6.9%	22.7%	19	13.9%	7.6%	\$1,752	6.9%	4.1%
	Moderate	51	37.2%	\$6,307	24.7%	16.4%	51	37.2%	15.9%	\$6,307	24.7%	11.1%
	Middle	25	18.2%	\$3,003	11.8%	18.7%	25	18.2%	22.1%	\$3,003	11.8%	19.2%
	Upper	42	30.7%	\$14,483	56.7%	42.2%	42	30.7%	41.0%	\$14,483	56.7%	52.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.4%	\$0	0.0%	13.0%
	Total	137	100.0%	\$25,545	100.0%	100.0%	137	100.0%	100.0%	\$25,545	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	10.0%	\$0	0.0%	4.6%
	Moderate	1	100.0%	\$78	100.0%	16.4%	1	100.0%	18.7%	\$78	100.0%	12.2%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	24.2%	\$0	0.0%	18.7%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	44.8%	\$0	0.0%	61.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.3%	\$0	0.0%	3.1%
	Total	1	100.0%	\$78	100.0%	100.0%	1	100.0%	100.0%	\$78	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	3	100.0%	\$13,117	100.0%	0.0%	3	100.0%	100.0%	\$13,117	100.0%	100.0%
	Total	3	100.0%	\$13,117	100.0%	100.0%	3	100.0%	100.0%	\$13,117	100.0%	100.0%
HMDA TOTALS	Low	57	17.6%	\$5,433	8.0%	22.7%	57	17.6%	8.1%	\$5,433	8.0%	4.0%
	Moderate	129	39.8%	\$17,018	25.2%	16.4%	129	39.8%	18.3%	\$17,018	25.2%	12.2%
	Middle	57	17.6%	\$7,424	11.0%	18.7%	57	17.6%	22.8%	\$7,424	11.0%	19.2%
	Upper	77	23.8%	\$24,368	36.1%	42.2%	77	23.8%	38.3%	\$24,368	36.1%	48.9%
	Unknown	4	1.2%	\$13,277	19.7%	0.0%	4	1.2%	12.5%	\$13,277	19.7%	15.7%
	Total	324	100.0%	\$67,520	100.0%	100.0%	324	100.0%	100.0%	\$67,520	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: TX - DFW Metroplex

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2015, 2016					2015						2016					
	Bank		Small Businesses		Count	Count		Dollar		Count	Count		Dollar				
	Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg		Bank	Agg					
	#	%	\$ (000s)	\$ %		%	#	%	%		\$ 000s	\$ %	\$ %	#	%	%	\$ 000s
Low	335	15.5%	\$87,411	16.5%	6.9%	184	15.6%	7.8%	\$46,706	16.2%	9.8%	151	15.4%	7.3%	\$40,705	16.8%	9.5%
Moderate	517	23.9%	\$132,879	25.1%	18.3%	284	24.0%	18.2%	\$73,070	25.4%	20.2%	233	23.8%	18.0%	\$59,809	24.8%	20.7%
Middle	479	22.1%	\$115,151	21.7%	27.4%	263	22.3%	24.8%	\$65,097	22.6%	24.0%	216	22.0%	24.5%	\$50,054	20.7%	23.6%
Upper	812	37.5%	\$189,607	35.8%	47.3%	439	37.1%	47.9%	\$100,357	34.8%	45.0%	373	38.0%	48.9%	\$89,250	36.9%	45.2%
Unknown	20	0.9%	\$4,605	0.9%	0.1%	12	1.0%	0.1%	\$2,830	1.0%	0.4%	8	0.8%	0.1%	\$1,775	0.7%	0.3%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.6%	0	0.0%	1.2%	\$0	0.0%	0.7%
Total	2,163	100.0%	\$529,653	100.0%	100.0%	1,182	100.0%	100.0%	\$288,060	100.0%	100.0%	981	100.0%	100.0%	\$241,593	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TX - DFW Metroplex

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Total Businesses		Count		Dollar		Count		Dollar						
		Count	Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
BUSINESS REVENUE	\$1million or Less	549	25.4%	\$84,264	15.9%	91.1%	314	26.6%	49.3%	\$45,292	15.7%	35.0%	235	24.0%	42.3%	\$38,972	16.1%	34.0%
	Over \$1 Million	1,116	51.6%	\$342,087	64.6%	8.0%	585	49.5%				531	54.1%					
	Total Rev. available	1,665	77.0%	\$426,351	80.5%	99.1%	899	76.1%				766	78.1%					
	Rev. Not Known	498	23.0%	\$103,302	19.5%	0.9%	283	23.9%				215	21.9%					
	Total	2,163	100.0%	\$529,653	100.0%	100.0%	1,182	100.0%				981	100.0%					
LOAN SIZE	\$100,000 or Less	1,027	47.5%	\$61,875	11.7%		575	48.6%	93.5%	\$35,040	12.2%	36.0%	452	46.1%	94.3%	\$26,835	11.1%	40.5%
	\$100,001 - \$250,000	467	21.6%	\$92,717	17.5%		249	21.1%	3.0%	\$49,105	17.0%	14.1%	218	22.2%	2.7%	\$43,612	18.1%	13.5%
	\$250,001 - \$1 Million	669	30.9%	\$375,061	70.8%		358	30.3%	3.4%	\$203,915	70.8%	49.9%	311	31.7%	2.9%	\$171,146	70.8%	46.0%
	Total	2,163	100.0%	\$529,653	100.0%		1,182	100.0%	100.0%	\$288,060	100.0%	100.0%	981	100.0%	100.0%	\$241,593	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	394	71.8%	\$23,496	27.9%													
	\$100,001 - \$250,000	67	12.2%	\$12,951	15.4%													
	\$250,001 - \$1 Million	88	16.0%	\$47,817	56.7%													
	Total	549	100.0%	\$84,264	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - DFW Metroplex

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	53	3.8%	\$2,666	1.7%	5.1%
Moderate	198	14.3%	\$11,887	7.6%	19.8%
Middle	299	21.6%	\$24,560	15.8%	30.3%
Upper	833	60.2%	\$116,454	74.9%	44.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	1,383	100.0%	\$155,567	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - DFW Metroplex

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	144	10.4%	\$7,811	0.0%	22.9%
Moderate	234	16.9%	\$16,881	10.9%	16.7%
Middle	245	17.7%	\$20,668	13.3%	18.3%
Upper	758	54.8%	\$109,057	70.1%	42.0%
Unknown	2	0.1%	\$1,150	0.7%	0.0%
Total	1,383	100.0%	\$155,567	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: TX - DFW Metroplex

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Owner Occupied Units	Count			Dollar			Count			Dollar				
		Count	Dollar		Bank	Agg	Dollar	Bank	Agg	Dollar	Bank	Agg	Dollar					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	3	4.8%	\$1,201	4.4%	5.1%	3	7.5%	2.1%	\$1,201	6.5%	1.3%	0	0.0%	2.5%	\$0	0.0%	1.9%
	Moderate	5	7.9%	\$559	2.0%	19.8%	3	7.5%	11.1%	\$344	1.9%	6.9%	2	8.7%	11.7%	\$215	2.4%	7.6%
	Middle	13	20.6%	\$2,043	7.5%	30.3%	8	20.0%	29.7%	\$1,285	6.9%	22.7%	5	21.7%	30.3%	\$758	8.6%	23.9%
	Upper	42	66.7%	\$23,579	86.1%	44.7%	26	65.0%	57.1%	\$15,732	84.8%	69.0%	16	69.6%	55.4%	\$7,847	89.0%	66.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	63	100.0%	\$27,382	100.0%	100.0%	40	100.0%	100.0%	\$18,562	100.0%	100.0%	23	100.0%	100.0%	\$8,820	100.0%	100.0%
REFINANCE	Low	3	2.4%	\$274	0.7%	5.1%	2	3.4%	1.4%	\$168	1.3%	0.8%	1	1.5%	1.5%	\$106	0.4%	0.9%
	Moderate	16	12.7%	\$1,627	4.2%	19.8%	9	15.5%	9.1%	\$946	7.3%	5.5%	7	10.3%	8.8%	\$681	2.6%	5.3%
	Middle	40	31.7%	\$5,916	15.2%	30.3%	19	32.8%	27.0%	\$2,532	19.4%	19.4%	21	30.9%	26.0%	\$3,384	13.1%	18.9%
	Upper	67	53.2%	\$30,995	79.9%	44.7%	28	48.3%	62.5%	\$9,393	72.0%	74.2%	39	57.4%	63.7%	\$21,602	83.8%	74.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	126	100.0%	\$38,812	100.0%	100.0%	58	100.0%	100.0%	\$13,039	100.0%	100.0%	68	100.0%	100.0%	\$25,773	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	2.5%	\$0	0.0%	1.0%	0	0.0%	2.0%	\$0	0.0%	0.8%
	Moderate	1	20.0%	\$10	1.0%	19.8%	1	100.0%	11.4%	\$10	100.0%	5.8%	0	0.0%	11.5%	\$0	0.0%	5.5%
	Middle	0	0.0%	\$0	0.0%	30.3%	0	0.0%	23.6%	\$0	0.0%	17.4%	0	0.0%	25.4%	\$0	0.0%	18.7%
	Upper	4	80.0%	\$946	99.0%	44.7%	0	0.0%	62.5%	\$0	0.0%	75.9%	4	100.0%	61.1%	\$946	100.0%	74.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	5	100.0%	\$956	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	4	100.0%	100.0%	\$946	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	1	100.0%	\$33,201	100.0%	20.1%	1	100.0%	23.3%	\$33,201	100.0%	15.8%	0	0.0%	23.9%	\$0	0.0%	17.8%
	Moderate	0	0.0%	\$0	0.0%	29.7%	0	0.0%	29.6%	\$0	0.0%	21.8%	0	0.0%	31.1%	\$0	0.0%	20.0%
	Middle	0	0.0%	\$0	0.0%	30.3%	0	0.0%	28.4%	\$0	0.0%	27.3%	0	0.0%	27.4%	\$0	0.0%	34.3%
	Upper	0	0.0%	\$0	0.0%	19.9%	0	0.0%	18.7%	\$0	0.0%	35.1%	0	0.0%	17.7%	\$0	0.0%	27.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$33,201	100.0%	100.0%	1	100.0%	100.0%	\$33,201	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	7	3.6%	\$34,676	34.6%	5.1%	6	6.0%	1.9%	\$34,570	53.3%	2.5%	1	1.1%	2.2%	\$106	0.3%	2.8%
	Moderate	22	11.3%	\$2,196	2.2%	19.8%	13	13.0%	10.5%	\$1,300	2.0%	7.9%	9	9.5%	10.7%	\$896	2.5%	7.8%
	Middle	53	27.2%	\$7,959	7.9%	30.3%	27	27.0%	28.6%	\$3,817	5.9%	22.1%	26	27.4%	28.5%	\$4,142	11.7%	23.0%
	Upper	113	57.9%	\$55,520	55.3%	44.7%	54	54.0%	59.0%	\$25,125	38.8%	67.6%	59	62.1%	58.6%	\$30,395	85.5%	66.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	195	100.0%	\$100,351	100.0%	100.0%	100	100.0%	100.0%	\$64,812	100.0%	100.0%	95	100.0%	100.0%	\$35,539	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: TX - DFW Metroplex

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income			Count		Dollar				Count		Dollar			
		Count					Bank	Agg	Bank	Agg			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	%	%	#	%	\$ (000s)	%	%	%	#	%	\$ (000s)	%	%	%
HOME PURCHASE	Low	3	4.8%	\$284	1.0%	22.9%	2	5.0%	\$177	1.0%	1.7%	1	4.3%	3.4%	\$107	1.2%	1.5%	
	Moderate	8	12.7%	\$987	3.6%	16.7%	5	12.5%	\$655	3.5%	8.0%	3	13.0%	12.8%	\$332	3.8%	7.8%	
	Middle	12	19.0%	\$2,260	8.3%	18.3%	8	20.0%	\$1,688	9.1%	14.1%	4	17.4%	18.3%	\$572	6.5%	15.0%	
	Upper	38	60.3%	\$23,364	85.3%	42.0%	25	62.5%	\$16,042	86.4%	59.7%	13	56.5%	48.4%	\$7,377	83.0%	60.8%	
	Unknown	2	3.2%	\$487	1.8%	0.0%	0	0.0%	\$0	0.0%	16.5%	2	8.7%	17.0%	\$487	5.5%	14.9%	
	Total	63	100.0%	\$27,382	100.0%	100.0%	35	100.0%	\$18,562	100.0%	100.0%	23	100.0%	100.0%	\$8,820	100.0%	100.0%	
REFINANCE	Low	8	6.3%	\$811	2.1%	22.9%	6	10.3%	\$587	4.5%	1.5%	2	2.9%	2.9%	\$224	0.9%	1.3%	
	Moderate	16	12.7%	\$1,744	4.5%	16.7%	13	22.4%	\$1,313	10.1%	5.2%	3	4.4%	8.9%	\$431	1.7%	4.9%	
	Middle	32	25.4%	\$4,537	11.7%	18.3%	12	20.7%	\$1,710	13.1%	10.9%	20	29.4%	15.4%	\$2,827	11.0%	10.9%	
	Upper	67	53.2%	\$27,869	71.8%	42.0%	27	46.6%	\$9,429	72.3%	59.4%	40	58.8%	49.9%	\$18,440	71.5%	62.3%	
	Unknown	3	2.4%	\$3,851	9.9%	0.0%	0	0.0%	\$0	0.0%	22.9%	3	4.4%	22.9%	\$3,851	14.9%	20.6%	
	Total	126	100.0%	\$38,812	100.0%	100.0%	58	100.0%	\$13,039	100.0%	100.0%	68	100.0%	100.0%	\$25,773	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	\$0	0.0%	1.3%	0	0.0%	4.7%	\$0	0.0%	1.9%	
	Moderate	1	20.0%	\$6	0.6%	16.7%	0	0.0%	\$0	0.0%	5.0%	1	25.0%	11.2%	\$6	0.6%	5.7%	
	Middle	1	20.0%	\$10	1.0%	18.3%	1	100.0%	\$10	100.0%	9.7%	0	0.0%	17.1%	\$0	0.0%	12.2%	
	Upper	3	60.0%	\$940	98.3%	42.0%	0	0.0%	\$0	0.0%	76.1%	3	75.0%	63.3%	\$940	99.4%	75.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	7.9%	0	0.0%	3.7%	\$0	0.0%	5.0%	
	Total	5	100.0%	\$956	100.0%	100.0%	1	100.0%	\$10	100.0%	100.0%	4	100.0%	100.0%	\$946	100.0%	100.0%	
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	1	100.0%	\$33,201	100.0%	0.0%	1	100.0%	\$33,201	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	1	100.0%	\$33,201	100.0%	100.0%	1	100.0%	\$33,201	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	11	5.6%	\$1,095	1.1%	22.9%	8	8.0%	\$764	1.2%	1.5%	3	3.2%	3.3%	\$331	0.9%	1.3%	
	Moderate	25	12.8%	\$2,737	2.7%	16.7%	18	18.0%	\$1,968	3.0%	6.4%	7	7.4%	11.3%	\$769	2.2%	6.2%	
	Middle	45	23.1%	\$6,807	6.8%	18.3%	21	21.0%	\$3,408	5.3%	11.8%	24	25.3%	17.2%	\$3,399	9.6%	12.4%	
	Upper	108	55.4%	\$52,173	52.0%	42.0%	52	52.0%	\$25,471	39.3%	54.5%	56	58.9%	49.5%	\$26,702	75.1%	56.9%	
	Unknown	6	3.1%	\$37,539	37.4%	0.0%	1	1.0%	\$33,201	51.2%	25.9%	5	5.3%	18.9%	\$4,338	12.2%	23.1%	
	Total	195	100.0%	\$100,351	100.0%	100.0%	100	100.0%	\$64,812	100.0%	100.0%	95	100.0%	100.0%	\$35,539	100.0%	100.0%	

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: TX - DFW Metroplex

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2017					2017					
	Bank		Small		Businesses	Count		Agg	Dollar		Agg
	Count		Dollar			Bank			Bank		
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
Low	115	12.1%	\$27,945	11.9%	7.5%	115	12.1%	8.0%	\$27,945	11.9%	8.7%
Moderate	254	26.7%	\$62,354	26.5%	19.7%	254	26.7%	19.9%	\$62,354	26.5%	22.1%
Middle	222	23.3%	\$56,624	24.1%	26.5%	222	23.3%	24.9%	\$56,624	24.1%	24.2%
Upper	342	36.0%	\$82,908	35.2%	45.9%	342	36.0%	45.6%	\$82,908	35.2%	42.8%
Unknown	18	1.9%	\$5,528	2.3%	0.4%	18	1.9%	0.7%	\$5,528	2.3%	1.7%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.6%
<i>Total</i>	<i>951</i>	<i>100.0%</i>	<i>\$235,359</i>	<i>100.0%</i>	<i>100.0%</i>	<i>951</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$235,359</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TX - DFW Metroplex

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Total Businesses	Count			Dollar		
		Count		\$ (000s)			#	Bank %	Agg %	Bank		Agg
#	%	\$	%	%	\$ (000s)	\$ %				\$ %		
BUSINESS REVENUE	\$1million or Less	239	25.1%	\$38,394	16.3%	90.3%	239	25.1%	47.0%	\$38,394	16.3%	35.5%
	Over \$1 Million	473	49.7%	\$144,973	61.6%	8.8%	473	49.7%				
	Total Rev. available	712	74.8%	\$183,367	77.9%	99.1%	712	74.8%				
	Rev. Not Known	239	25.1%	\$51,992	22.1%	0.9%	239	25.1%				
	Total	951	100.0%	\$235,359	100.0%	100.0%	951	100.0%				
LOAN SIZE	\$100,000 or Less	451	47.4%	\$28,144	12.0%		451	47.4%	93.6%	\$28,144	12.0%	38.2%
	\$100,001 - \$250,000	215	22.6%	\$43,309	18.4%		215	22.6%	3.2%	\$43,309	18.4%	14.7%
	\$250,001 - \$1 Million	285	30.0%	\$163,906	69.6%		285	30.0%	3.2%	\$163,906	69.6%	47.1%
	Total	951	100.0%	\$235,359	100.0%		951	100.0%	100.0%	\$235,359	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	160	66.9%	\$10,215	26.6%							
	\$100,001 - \$250,000	40	16.7%	\$7,086	18.5%							
	\$250,001 - \$1 Million	39	16.3%	\$21,093	54.9%							
	Total	239	100.0%	\$38,394	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - DFW Metroplex

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	26	4.0%	\$1,349	1.7%	5.8%
Moderate	107	16.4%	\$8,719	10.8%	20.0%
Middle	165	25.3%	\$14,475	17.9%	29.1%
Upper	353	54.2%	\$56,522	69.7%	44.9%
Unknown	0	0.0%	\$0	0.0%	0.1%
Total	651	100.0%	\$81,065	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - DFW Metroplex

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	82	12.6%	\$4,504	0.0%	23.8%
Moderate	108	16.6%	\$9,161	11.3%	16.4%
Middle	128	19.7%	\$12,052	14.9%	17.9%
Upper	328	50.4%	\$54,586	67.3%	41.9%
Unknown	5	0.8%	\$762	0.9%	0.0%
Total	651	100.0%	\$81,065	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: TX - DFW Metroplex

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2017					Bank & Aggregate Lending Comparison 2017					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %		%	#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	1	3.7%	\$133	1.5%	5.8%	1	3.7%	3.7%	\$133	1.5%	2.5%
	Moderate	8	29.6%	\$1,293	14.2%	20.0%	8	29.6%	13.6%	\$1,293	14.2%	9.0%
	Middle	10	37.0%	\$1,856	20.3%	29.1%	10	37.0%	30.2%	\$1,856	20.3%	24.5%
	Upper	8	29.6%	\$5,842	64.0%	44.9%	8	29.6%	52.4%	\$5,842	64.0%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	27	100.0%	\$9,124	100.0%	100.0%	27	100.0%	100.0%	\$9,124	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.8%	0	0.0%	2.1%	\$0	0.0%	1.3%
	Moderate	5	16.7%	\$489	5.1%	20.0%	5	16.7%	13.3%	\$489	5.1%	8.0%
	Middle	8	26.7%	\$1,103	11.5%	29.1%	8	26.7%	30.4%	\$1,103	11.5%	23.1%
	Upper	17	56.7%	\$8,030	83.5%	44.9%	17	56.7%	54.1%	\$8,030	83.5%	67.5%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	30	100.0%	\$9,622	100.0%	100.0%	30	100.0%	100.0%	\$9,622	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.8%	0	0.0%	3.1%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	20.0%	0	0.0%	13.7%	\$0	0.0%	8.0%
	Middle	2	66.7%	\$627	78.5%	29.1%	2	66.7%	27.0%	\$627	78.5%	21.4%
	Upper	1	33.3%	\$172	21.5%	44.9%	1	33.3%	56.1%	\$172	21.5%	69.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	3	100.0%	\$799	100.0%	100.0%	3	100.0%	100.0%	\$799	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	28.0%	\$0	0.0%	19.8%
	Moderate	0	0.0%	\$0	0.0%	27.7%	0	0.0%	34.0%	\$0	0.0%	25.7%
	Middle	0	0.0%	\$0	0.0%	26.2%	0	0.0%	22.1%	\$0	0.0%	29.9%
	Upper	0	0.0%	\$0	0.0%	22.8%	0	0.0%	15.7%	\$0	0.0%	24.7%
	Unknown	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.2%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	1.7%	\$133	0.7%	5.8%	1	1.7%	3.3%	\$133	0.7%	4.3%
	Moderate	13	21.7%	\$1,782	9.1%	20.0%	13	21.7%	13.6%	\$1,782	9.1%	10.8%
	Middle	20	33.3%	\$3,586	18.3%	29.1%	20	33.3%	30.1%	\$3,586	18.3%	24.8%
	Upper	26	43.3%	\$14,044	71.9%	44.9%	26	43.3%	53.0%	\$14,044	71.9%	60.0%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	60	100.0%	\$19,545	100.0%	100.0%	60	100.0%	100.0%	\$19,545	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: TX - DFW Metroplex

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2017					Bank & Aggregate Lending Comparison 2017					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar		%	Bank		Agg	Bank		Agg
		#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	3	11.1%	\$299	3.3%	23.8%	3	11.1%	3.0%	\$299	3.3%	1.4%
	Moderate	5	18.5%	\$856	9.4%	16.4%	5	18.5%	12.3%	\$856	9.4%	7.7%
	Middle	5	18.5%	\$791	8.7%	17.9%	5	18.5%	19.3%	\$791	8.7%	15.8%
	Upper	14	51.9%	\$7,178	78.7%	41.9%	14	51.9%	49.8%	\$7,178	78.7%	61.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.6%	\$0	0.0%	13.4%
	Total	27	100.0%	\$9,124	100.0%	100.0%	27	100.0%	100.0%	\$9,124	100.0%	100.0%
REFINANCE	Low	3	10.0%	\$246	2.6%	23.8%	3	10.0%	4.5%	\$246	2.6%	2.1%
	Moderate	5	16.7%	\$714	7.4%	16.4%	5	16.7%	11.5%	\$714	7.4%	6.9%
	Middle	6	20.0%	\$822	8.5%	17.9%	6	20.0%	18.9%	\$822	8.5%	14.4%
	Upper	15	50.0%	\$4,847	50.4%	41.9%	15	50.0%	45.3%	\$4,847	50.4%	58.1%
	Unknown	1	3.3%	\$2,993	31.1%	0.0%	1	3.3%	19.8%	\$2,993	31.1%	18.6%
	Total	30	100.0%	\$9,622	100.0%	100.0%	30	100.0%	100.0%	\$9,622	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	5.3%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	12.0%	\$0	0.0%	7.3%
	Middle	0	0.0%	\$0	0.0%	17.9%	0	0.0%	19.0%	\$0	0.0%	15.1%
	Upper	3	100.0%	\$799	100.0%	41.9%	3	100.0%	60.4%	\$799	100.0%	70.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	4.1%
	Total	3	100.0%	\$799	100.0%	100.0%	3	100.0%	100.0%	\$799	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	6	10.0%	\$545	2.8%	23.8%	6	10.0%	3.5%	\$545	2.8%	1.4%
	Moderate	10	16.7%	\$1,570	8.0%	16.4%	10	16.7%	12.0%	\$1,570	8.0%	6.6%
	Middle	11	18.3%	\$1,613	8.3%	17.9%	11	18.3%	19.1%	\$1,613	8.3%	13.5%
	Upper	32	53.3%	\$12,824	65.6%	41.9%	32	53.3%	48.8%	\$12,824	65.6%	53.7%
	Unknown	1	1.7%	\$2,993	15.3%	0.0%	1	1.7%	16.5%	\$2,993	15.3%	24.8%
	Total	60	100.0%	\$19,545	100.0%	100.0%	60	100.0%	100.0%	\$19,545	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: TX - Houston

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison										
	2015, 2016					2015						2016				
	Bank		Small Businesses		Count	Bank		Agg	Dollar		Agg	Bank		Dollar		Agg
	Count	Dollar	Count	Dollar		Count	Dollar		Count	Dollar		Count	Dollar	Count	Dollar	
	#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%
Low	190	10.0%	\$48,390	10.7%	7.5%	97	9.3%	7.8%	\$21,979	9.2%	9.1%	93	10.9%	7.5%	\$26,411	12.4%
Moderate	443	23.4%	\$102,513	22.8%	18.6%	234	22.5%	18.2%	\$54,227	22.8%	18.6%	209	24.5%	17.5%	\$48,286	22.7%
Middle	487	25.7%	\$121,637	27.0%	21.1%	265	25.5%	23.8%	\$62,676	26.4%	23.8%	222	26.0%	23.7%	\$58,961	27.8%
Upper	774	40.8%	\$177,662	39.5%	49.5%	445	42.7%	49.1%	\$98,961	41.6%	47.7%	329	38.5%	50.1%	\$78,701	37.1%
Unknown	1	0.1%	\$20	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	1	0.1%	0.0%	\$20	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.1%	\$0	0.0%	0.8%	0	0.0%	1.1%	\$0	0.0%
Total	1,895	100.0%	\$450,222	100.0%	100.0%	1,041	100.0%	100.0%	\$237,843	100.0%	100.0%	854	100.0%	100.0%	\$212,379	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TX - Houston

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Total Businesses	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
BUSINESS REVENUE	\$1 million or Less	493	26.0%	\$83,936	18.6%	90.6%	291	28.0%	47.2%	\$41,760	17.6%	33.4%	202	23.7%	40.7%	\$42,176	19.9%	31.9%
	Over \$1 Million	898	47.4%	\$270,828	60.2%	8.6%	482	46.3%				416	48.7%					
	Total Rev. available	1,391	73.4%	\$354,764	78.8%	99.2%	773	74.3%				618	72.4%					
	Rev. Not Known	504	26.6%	\$95,458	21.2%	0.8%	268	25.7%				236	27.6%					
	Total	1,895	100.0%	\$450,222	100.0%	100.0%	1,041	100.0%				854	100.0%					
LOAN SIZE	\$100,000 or Less	871	46.0%	\$51,231	11.4%		502	48.2%	93.8%	\$29,554	12.4%	36.8%	369	43.2%	94.3%	\$21,677	10.2%	39.9%
	\$100,001 - \$250,000	458	24.2%	\$88,166	19.6%		247	23.7%	2.9%	\$47,510	20.0%	13.4%	211	24.7%	2.7%	\$40,656	19.1%	13.5%
	\$250,001 - \$1 Million	566	29.9%	\$310,825	69.0%		292	28.0%	3.3%	\$160,779	67.6%	49.8%	274	32.1%	2.9%	\$150,046	70.7%	46.6%
	Total	1,895	100.0%	\$450,222	100.0%		1,041	100.0%	100.0%	\$237,843	100.0%	100.0%	854	100.0%	100.0%	\$212,379	100.0%	100.0%
LOAN SIZE Rev \$1 Mil or Less	\$100,000 or Less	326	66.1%	\$19,340	23.0%													
	\$100,001 - \$250,000	76	15.4%	\$13,566	16.2%													
	\$250,001 - \$1 Million	91	18.5%	\$51,030	60.8%													
	Total	493	100.0%	\$83,936	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - Houston

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	45	3.3%	\$3,046	1.9%	4.2%
Moderate	196	14.5%	\$12,420	7.9%	20.6%
Middle	320	23.6%	\$24,857	15.8%	28.4%
Upper	794	58.6%	\$117,272	74.4%	46.8%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	1,355	100.0%	\$157,595	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - Houston

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	157	11.6%	\$9,293	0.0%	23.7%
Moderate	236	17.4%	\$17,227	10.9%	16.4%
Middle	280	20.7%	\$24,797	15.7%	17.3%
Upper	682	50.3%	\$106,278	67.4%	42.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	1,355	100.0%	\$157,595	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank			Owner Occupied Units %	Count		Dollar			Count		Dollar					
		Count	%	\$ (000s)		\$ %	#	%	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	%	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	1.5%	\$0	0.0%	1.1%	0	0.0%	1.6%	\$0	0.0%	1.2%
	Moderate	7	9.1%	\$1,307	5.1%	20.6%	5	10.9%	10.0%	\$1,002	6.4%	6.3%	2	6.5%	10.5%	\$305	3.1%	7.0%
	Middle	20	26.0%	\$4,514	17.6%	28.4%	13	28.3%	29.1%	\$3,165	20.1%	23.0%	7	22.6%	29.1%	\$1,349	13.6%	23.4%
	Upper	50	64.9%	\$19,873	77.3%	46.8%	28	60.9%	59.4%	\$11,610	73.6%	69.6%	22	71.0%	58.8%	\$8,263	83.3%	68.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	77	100.0%	\$25,694	100.0%	100.0%	46	100.0%	100.0%	\$15,777	100.0%	100.0%	31	100.0%	100.0%	\$9,917	100.0%	100.0%
REFINANCE	Low	1	1.1%	\$98	0.4%	4.2%	0	0.0%	1.4%	\$0	0.0%	1.0%	1	2.9%	1.4%	\$98	0.8%	1.0%
	Moderate	13	13.7%	\$1,356	5.5%	20.6%	7	11.7%	9.6%	\$693	5.5%	5.7%	6	17.1%	9.6%	\$663	5.5%	5.7%
	Middle	23	24.2%	\$3,670	14.9%	28.4%	14	23.3%	25.3%	\$2,128	16.8%	18.8%	9	25.7%	26.0%	\$1,542	12.8%	19.6%
	Upper	58	61.1%	\$19,580	79.3%	46.8%	39	65.0%	63.7%	\$9,871	77.8%	74.6%	19	54.3%	63.0%	\$9,709	80.8%	73.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	95	100.0%	\$24,704	100.0%	100.0%	60	100.0%	100.0%	\$12,692	100.0%	100.0%	35	100.0%	100.0%	\$12,012	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	2.3%	\$0	0.0%	1.0%	0	0.0%	3.0%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	20.6%	0	0.0%	11.5%	\$0	0.0%	6.5%	0	0.0%	11.5%	\$0	0.0%	6.2%
	Middle	0	0.0%	\$0	0.0%	28.4%	0	0.0%	23.4%	\$0	0.0%	17.6%	0	0.0%	24.5%	\$0	0.0%	17.8%
	Upper	0	0.0%	\$0	0.0%	46.8%	0	0.0%	62.9%	\$0	0.0%	74.9%	0	0.0%	61.0%	\$0	0.0%	74.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	21.3%	\$0	0.0%	12.4%	0	0.0%	20.6%	\$0	0.0%	13.9%
	Moderate	0	0.0%	\$0	0.0%	30.7%	0	0.0%	35.8%	\$0	0.0%	24.4%	0	0.0%	30.7%	\$0	0.0%	21.7%
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	21.9%	\$0	0.0%	26.9%	0	0.0%	25.4%	\$0	0.0%	29.1%
	Upper	0	0.0%	\$0	0.0%	25.6%	0	0.0%	21.0%	\$0	0.0%	36.3%	0	0.0%	23.4%	\$0	0.0%	35.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	0.6%	\$98	0.2%	4.2%	0	0.0%	1.5%	\$0	0.0%	1.9%	1	1.5%	1.6%	\$98	0.4%	2.2%
	Moderate	20	11.6%	\$2,663	5.3%	20.6%	12	11.3%	10.0%	\$1,695	6.0%	7.4%	8	12.1%	10.3%	\$968	4.4%	7.8%
	Middle	43	25.0%	\$8,184	16.2%	28.4%	27	25.5%	27.7%	\$5,293	18.6%	22.1%	16	24.2%	28.0%	\$2,891	13.2%	22.7%
	Upper	108	62.8%	\$39,453	78.3%	46.8%	67	63.2%	60.8%	\$21,481	75.5%	68.6%	41	62.1%	60.1%	\$17,972	82.0%	67.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	172	100.0%	\$50,398	100.0%	100.0%	106	100.0%	100.0%	\$28,469	100.0%	100.0%	66	100.0%	100.0%	\$21,929	100.0%	100.0%

Originations & Purchases

2016 FRIEC Census Data and 2010 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income	Count			Dollar			Count			Dollar				
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
													#	%	\$ (000s)	\$ %	%	#
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	3.0%	\$0	0.0%	1.3%	0	0.0%	2.1%	\$0	0.0%	0.9%
	Moderate	12	15.6%	\$1,657	6.4%	16.4%	11	23.9%	12.5%	\$1,505	9.5%	7.5%	1	3.2%	11.8%	\$152	1.5%	7.2%
	Middle	14	18.2%	\$2,125	8.3%	17.3%	12	26.1%	18.2%	\$1,811	11.5%	14.1%	2	6.5%	19.0%	\$314	3.2%	14.8%
	Upper	49	63.6%	\$20,351	79.2%	42.6%	23	50.0%	48.5%	\$12,461	79.0%	62.0%	26	83.9%	50.4%	\$7,890	79.6%	62.9%
	Unknown	2	2.6%	\$1,561	6.1%	0.0%	0	0.0%	17.8%	\$0	0.0%	15.2%	2	6.5%	16.7%	\$1,561	15.7%	14.2%
	Total	77	100.0%	\$25,694	100.0%	100.0%	46	100.0%	100.0%	\$15,777	100.0%	100.0%	31	100.0%	100.0%	\$9,917	100.0%	100.0%
REFINANCE	Low	7	7.4%	\$1,365	5.5%	23.7%	4	6.7%	3.7%	\$365	2.9%	1.7%	3	8.6%	2.8%	\$1,000	8.3%	1.4%
	Moderate	13	13.7%	\$1,267	5.1%	16.4%	8	13.3%	9.1%	\$756	6.0%	4.9%	5	14.3%	8.2%	\$511	4.3%	4.3%
	Middle	15	15.8%	\$1,854	7.5%	17.3%	9	15.0%	15.3%	\$1,106	8.7%	10.4%	6	17.1%	14.4%	\$748	6.2%	9.5%
	Upper	60	63.2%	\$20,218	81.8%	42.6%	39	65.0%	49.8%	\$10,465	82.5%	62.6%	21	60.0%	50.6%	\$9,753	81.2%	62.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.1%	\$0	0.0%	20.5%	0	0.0%	24.1%	\$0	0.0%	22.4%
	Total	95	100.0%	\$24,704	100.0%	100.0%	60	100.0%	100.0%	\$12,692	100.0%	100.0%	35	100.0%	100.0%	\$12,012	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	5.0%	\$0	0.0%	1.4%	0	0.0%	3.9%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	10.4%	\$0	0.0%	5.1%	0	0.0%	10.2%	\$0	0.0%	5.0%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	16.0%	\$0	0.0%	10.9%	0	0.0%	16.8%	\$0	0.0%	10.8%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	65.1%	\$0	0.0%	77.6%	0	0.0%	65.3%	\$0	0.0%	78.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	5.0%	0	0.0%	3.7%	\$0	0.0%	4.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	7	4.1%	\$1,365	2.7%	23.7%	4	3.8%	3.3%	\$365	1.3%	1.3%	3	4.5%	2.4%	\$1,000	4.6%	1.0%
	Moderate	25	14.5%	\$2,924	5.8%	16.4%	19	17.9%	11.4%	\$2,261	7.9%	6.2%	6	9.1%	10.6%	\$663	3.0%	5.8%
	Middle	29	16.9%	\$3,979	7.9%	17.3%	21	19.8%	17.2%	\$2,917	10.2%	12.0%	8	12.1%	17.4%	\$1,062	4.8%	12.1%
	Upper	109	63.4%	\$40,569	80.5%	42.6%	62	58.5%	49.4%	\$22,926	80.5%	57.9%	47	71.2%	50.8%	\$17,643	80.5%	58.0%
	Unknown	2	1.2%	\$1,561	3.1%	0.0%	0	0.0%	18.8%	\$0	0.0%	22.6%	2	3.0%	18.8%	\$1,561	7.1%	23.1%
	Total	172	100.0%	\$50,398	100.0%	100.0%	106	100.0%	100.0%	\$28,469	100.0%	100.0%	66	100.0%	100.0%	\$21,929	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Appendix G

Geographic Distribution of Small Business Loans

Assessment Area: TX - Houston

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2017					2017					
	Bank		Small		Businesses	Count		Agg	Dollar		Agg
	Count		Dollar			Bank			Bank		
	#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
Low	121	15.4%	\$33,191	16.9%	9.9%	121	15.4%	10.1%	\$33,191	16.9%	11.8%
Moderate	210	26.6%	\$52,446	26.8%	19.1%	210	26.6%	18.4%	\$52,446	26.8%	19.8%
Middle	185	23.5%	\$43,915	22.4%	22.7%	185	23.5%	22.3%	\$43,915	22.4%	21.7%
Upper	270	34.3%	\$66,123	33.8%	48.2%	270	34.3%	48.0%	\$66,123	33.8%	45.8%
Unknown	2	0.3%	\$235	0.1%	0.2%	2	0.3%	0.2%	\$235	0.1%	0.2%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.0%	\$0	0.0%	0.7%
Total	788	100.0%	\$195,910	100.0%	100.0%	788	100.0%	100.0%	\$195,910	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TX - Houston

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Total Businesses %	Count			Dollar		
		Count # %		\$ (000s) \$ %			Bank # %		Agg %	Bank \$ (000s) \$ %		Agg \$ %
BUSINESS REVENUE	\$1million or Less	195	24.7%	\$37,453	19.1%	89.2%	195	24.7%	45.8%	\$37,453	19.1%	34.5%
	Over \$1 Million	378	48.0%	\$114,953	58.7%	9.9%	378	48.0%				
	Total Rev. available	573	72.7%	\$152,406	77.8%	99.1%	573	72.7%				
	Rev. Not Known	215	27.3%	\$43,504	22.2%	0.9%	215	27.3%				
	Total	788	100.0%	\$195,910	100.0%	100.0%	788	100.0%				
LOAN SIZE	\$100,000 or Less	355	45.1%	\$21,197	10.8%		355	45.1%	93.9%	\$21,197	10.8%	39.0%
	\$100,001 - \$250,000	183	23.2%	\$36,069	18.4%		183	23.2%	3.0%	\$36,069	18.4%	14.4%
	\$250,001 - \$1 Million	250	31.7%	\$138,644	70.8%		250	31.7%	3.1%	\$138,644	70.8%	46.6%
	Total	788	100.0%	\$195,910	100.0%		788	100.0%	100.0%	\$195,910	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	114	58.5%	\$6,947	18.5%							
	\$100,001 - \$250,000	39	20.0%	\$6,774	18.1%							
	\$250,001 - \$1 Million	42	21.5%	\$23,732	63.4%							
	Total	195	100.0%	\$37,453	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data and 2017 D&B Information

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - Houston

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	23	4.7%	\$1,606	2.9%	5.5%
Moderate	100	20.4%	\$7,162	12.8%	21.2%
Middle	120	24.5%	\$11,239	20.1%	27.0%
Upper	247	50.4%	\$35,948	64.2%	46.3%
Unknown	0	0.0%	\$0	0.0%	0.1%
Total	490	100.0%	\$55,955	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - Houston

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	71	14.5%	\$4,625	0.0%	24.4%
Moderate	85	17.3%	\$7,153	12.8%	16.0%
Middle	99	20.2%	\$8,374	15.0%	16.9%
Upper	234	47.8%	\$35,668	63.7%	42.7%
Unknown	1	0.2%	\$135	0.2%	0.0%
Total	490	100.0%	\$55,955	100.0%	100.0%

Originations & Purchases

Appendix G

Geographic Distribution of HMDA Loans

Assessment Area: TX - Houston

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	5.0%	\$76	1.2%	5.5%	1	5.0%	2.4%	\$76	1.2%	1.8%
	Moderate	4	20.0%	\$883	13.9%	21.2%	4	20.0%	12.8%	\$883	13.9%	8.7%
	Middle	3	15.0%	\$489	7.7%	27.0%	3	15.0%	26.7%	\$489	7.7%	20.7%
	Upper	12	60.0%	\$4,903	77.2%	46.3%	12	60.0%	58.1%	\$4,903	77.2%	68.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	20	100.0%	\$6,351	100.0%	100.0%	20	100.0%	100.0%	\$6,351	100.0%	100.0%
REFINANCE	Low	1	3.7%	\$178	1.1%	5.5%	1	3.7%	2.5%	\$178	1.1%	1.6%
	Moderate	3	11.1%	\$238	1.5%	21.2%	3	11.1%	14.2%	\$238	1.5%	8.9%
	Middle	7	25.9%	\$1,742	11.2%	27.0%	7	25.9%	29.0%	\$1,742	11.2%	21.7%
	Upper	16	59.3%	\$13,404	86.1%	46.3%	16	59.3%	54.3%	\$13,404	86.1%	67.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	27	100.0%	\$15,562	100.0%	100.0%	27	100.0%	100.0%	\$15,562	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	3.8%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	21.2%	0	0.0%	16.1%	\$0	0.0%	9.7%
	Middle	1	50.0%	\$650	41.9%	27.0%	1	50.0%	25.3%	\$650	41.9%	19.2%
	Upper	1	50.0%	\$900	58.1%	46.3%	1	50.0%	54.8%	\$900	58.1%	68.1%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.1%
	Total	2	100.0%	\$1,550	100.0%	100.0%	2	100.0%	100.0%	\$1,550	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	25.9%	0	0.0%	29.2%	\$0	0.0%	21.5%
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	30.7%	\$0	0.0%	16.5%
	Middle	0	0.0%	\$0	0.0%	20.4%	0	0.0%	16.5%	\$0	0.0%	18.3%
	Upper	0	0.0%	\$0	0.0%	25.8%	0	0.0%	23.3%	\$0	0.0%	43.6%
	Unknown	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	4.1%	\$254	1.1%	5.5%	2	4.1%	2.5%	\$254	1.1%	3.5%
	Moderate	7	14.3%	\$1,121	4.8%	21.2%	7	14.3%	13.3%	\$1,121	4.8%	9.5%
	Middle	11	22.4%	\$2,881	12.3%	27.0%	11	22.4%	27.1%	\$2,881	12.3%	20.6%
	Upper	29	59.2%	\$19,207	81.9%	46.3%	29	59.2%	57.0%	\$19,207	81.9%	66.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	49	100.0%	\$23,463	100.0%	100.0%	49	100.0%	100.0%	\$23,463	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix G

Borrower Distribution of HMDA Loans

Assessment Area: TX - Houston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2017					Bank & Aggregate Lending Comparison 2017					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				#	%		\$ (000s)
HOME PURCHASE	Low	1	5.0%	\$130	2.0%	24.4%	1	5.0%	2.8%	\$130	2.0%	1.3%
	Moderate	2	10.0%	\$300	4.7%	16.0%	2	10.0%	12.6%	\$300	4.7%	8.0%
	Middle	6	30.0%	\$833	13.1%	16.9%	6	30.0%	19.6%	\$833	13.1%	15.7%
	Upper	11	55.0%	\$5,088	80.1%	42.7%	11	55.0%	47.2%	\$5,088	80.1%	60.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.9%	\$0	0.0%	14.8%
	Total	20	100.0%	\$6,351	100.0%	100.0%	20	100.0%	100.0%	\$6,351	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	24.4%	0	0.0%	5.1%	\$0	0.0%	2.5%
	Moderate	6	22.2%	\$768	4.9%	16.0%	6	22.2%	10.9%	\$768	4.9%	6.4%
	Middle	6	22.2%	\$1,008	6.5%	16.9%	6	22.2%	17.8%	\$1,008	6.5%	13.0%
	Upper	13	48.1%	\$6,777	43.5%	42.7%	13	48.1%	43.9%	\$6,777	43.5%	57.4%
	Unknown	2	7.4%	\$7,009	45.0%	0.0%	2	7.4%	22.3%	\$7,009	45.0%	20.7%
	Total	27	100.0%	\$15,562	100.0%	100.0%	27	100.0%	100.0%	\$15,562	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.4%	0	0.0%	5.9%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	11.0%	\$0	0.0%	6.5%
	Middle	1	50.0%	\$650	41.9%	16.9%	1	50.0%	16.4%	\$650	41.9%	13.0%
	Upper	1	50.0%	\$900	58.1%	42.7%	1	50.0%	59.4%	\$900	58.1%	72.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.2%	\$0	0.0%	5.2%
	Total	2	100.0%	\$1,550	100.0%	100.0%	2	100.0%	100.0%	\$1,550	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	24.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	2.0%	\$130	0.6%	24.4%	1	2.0%	3.5%	\$130	0.6%	1.5%
	Moderate	8	16.3%	\$1,068	4.6%	16.0%	8	16.3%	12.1%	\$1,068	4.6%	6.9%
	Middle	13	26.5%	\$2,491	10.6%	16.9%	13	26.5%	19.0%	\$2,491	10.6%	13.8%
	Upper	25	51.0%	\$12,765	54.4%	42.7%	25	51.0%	46.8%	\$12,765	54.4%	54.5%
	Unknown	2	4.1%	\$7,009	29.9%	0.0%	2	4.1%	18.6%	\$7,009	29.9%	23.4%
	Total	49	100.0%	\$23,463	100.0%	100.0%	49	100.0%	100.0%	\$23,463	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

Appendix H – Metropolitan Limited Scope Assessment Area Loan Tables

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Fresno MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison									Bank & Aggregate Lending Comparison									
		2015, 2016					2015					2016								
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg							
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %				
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	3.0%	\$0	0.0%	1.6%	0	0.0%	3.6%	\$0	0.0%	1.9%		
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	16.1%	\$0	0.0%	11.0%	0	0.0%	15.8%	\$0	0.0%	10.9%		
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	26.1%	\$0	0.0%	21.4%	0	0.0%	26.8%	\$0	0.0%	22.7%		
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	54.8%	\$0	0.0%	66.0%	0	0.0%	53.8%	\$0	0.0%	64.5%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
REFINANCE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.2%	\$0	0.0%	1.2%	0	0.0%	2.1%	\$0	0.0%	1.1%		
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	13.1%	\$0	0.0%	8.5%	0	0.0%	12.9%	\$0	0.0%	8.4%		
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	23.5%	\$0	0.0%	18.6%	0	0.0%	23.2%	\$0	0.0%	18.6%		
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	61.2%	\$0	0.0%	71.7%	0	0.0%	61.8%	\$0	0.0%	71.9%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.6%	\$0	0.0%	1.9%	0	0.0%	2.4%	\$0	0.0%	1.6%		
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	13.7%	\$0	0.0%	9.3%	0	0.0%	12.7%	\$0	0.0%	9.3%		
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	23.8%	\$0	0.0%	19.2%	0	0.0%	22.3%	\$0	0.0%	17.1%		
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	59.9%	\$0	0.0%	69.5%	0	0.0%	62.7%	\$0	0.0%	72.1%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
MULTI-FAMILY	Multi-Family Units																			
	Low	0	0.0%	\$0	0.0%	17.4%	0	0.0%	20.0%	\$0	0.0%	14.2%	0	0.0%	22.0%	\$0	0.0%	8.6%		
	Moderate	0	0.0%	\$0	0.0%	32.7%	0	0.0%	37.5%	\$0	0.0%	17.5%	0	0.0%	39.4%	\$0	0.0%	30.8%		
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	28.8%	\$0	0.0%	38.9%	0	0.0%	30.3%	\$0	0.0%	48.7%		
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	13.8%	\$0	0.0%	29.4%	0	0.0%	8.3%	\$0	0.0%	11.8%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	2.7%	\$0	0.0%	2.1%	0	0.0%	2.9%	\$0	0.0%	1.9%		
	Moderate	0	0.0%	\$0	0.0%	20.8%	0	0.0%	14.8%	\$0	0.0%	10.3%	0	0.0%	14.5%	\$0	0.0%	10.9%		
	Middle	0	0.0%	\$0	0.0%	27.7%	0	0.0%	24.9%	\$0	0.0%	21.0%	0	0.0%	25.0%	\$0	0.0%	22.2%		
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	57.6%	\$0	0.0%	66.6%	0	0.0%	57.6%	\$0	0.0%	65.0%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		
SMALL BUSINESSES	Small Businesses																			
	Low	2	3.7%	\$1,725	10.9%	9.2%	2	5.4%	6.8%	\$1,725	15.6%	7.3%	0	0.0%	6.1%	\$0	0.0%	6.4%		
	Moderate	4	7.4%	\$1,550	9.8%	22.3%	2	5.4%	21.1%	\$700	6.3%	25.9%	2	11.8%	18.9%	\$850	17.6%	21.3%		
	Middle	20	37.0%	\$7,367	46.4%	26.1%	14	37.8%	25.8%	\$4,587	41.6%	24.7%	6	35.3%	24.2%	\$2,780	57.4%	26.5%		
	Upper	28	51.9%	\$5,227	32.9%	42.4%	19	51.4%	44.5%	\$4,017	36.4%	40.7%	9	52.9%	48.1%	\$1,210	25.0%	43.7%		
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%		
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.6%	\$0	0.0%	1.4%	0	0.0%	2.7%	\$0	0.0%	1.8%		
	Total	54	100.0%	\$15,869	100.0%	100.0%	37	100.0%	100.0%	\$11,029	100.0%	100.0%	17	100.0%	100.0%	\$4,840	100.0%	100.0%		
SMALL FARM	Small Farms																			
	Low	1	25.0%	\$100	10.0%	3.6%	1	50.0%	3.5%	\$100	28.6%	4.2%	0	0.0%	4.3%	\$0	0.0%	2.5%		
	Moderate	0	0.0%	\$0	0.0%	31.1%	0	0.0%	29.6%	\$0	0.0%	32.3%	0	0.0%	29.7%	\$0	0.0%	34.0%		
	Middle	0	0.0%	\$0	0.0%	36.0%	0	0.0%	36.1%	\$0	0.0%	34.5%	0	0.0%	36.7%	\$0	0.0%	38.2%		
	Upper	3	75.0%	\$900	90.0%	29.2%	1	50.0%	27.9%	\$250	71.4%	27.9%	2	100.0%	27.0%	\$650	100.0%	24.2%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%		
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.9%	\$0	0.0%	1.2%	0	0.0%	2.3%	\$0	0.0%	1.0%		
	Total	4	100.0%	\$1,000	100.0%	100.0%	2	100.0%	100.0%	\$350	100.0%	100.0%	2	100.0%	100.0%	\$650	100.0%	100.0%		

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Fresno MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2015						2016					
		Count		Dollar			Count		Dollar		Count		Dollar					
		#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	1.2%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	8.4%	\$0	0.0%	5.1%	0	0.0%	9.1%	\$0	0.0%	5.5%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	19.4%	\$0	0.0%	15.8%	0	0.0%	19.8%	\$0	0.0%	16.1%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	49.6%	\$0	0.0%	59.2%	0	0.0%	49.0%	\$0	0.0%	58.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.2%	\$0	0.0%	19.4%	0	0.0%	20.8%	\$0	0.0%	19.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	2.1%	\$0	0.0%	1.0%	0	0.0%	2.3%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	6.4%	\$0	0.0%	3.7%	0	0.0%	5.8%	\$0	0.0%	3.3%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	12.2%	\$0	0.0%	9.0%	0	0.0%	13.2%	\$0	0.0%	9.7%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	50.2%	\$0	0.0%	55.6%	0	0.0%	52.5%	\$0	0.0%	57.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	29.1%	\$0	0.0%	30.7%	0	0.0%	26.3%	\$0	0.0%	28.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	1.9%	\$0	0.0%	0.9%	0	0.0%	1.2%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	8.2%	\$0	0.0%	6.3%	0	0.0%	6.7%	\$0	0.0%	5.1%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	15.2%	\$0	0.0%	13.5%	0	0.0%	16.0%	\$0	0.0%	13.2%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	66.5%	\$0	0.0%	66.8%	0	0.0%	71.5%	\$0	0.0%	77.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.4%	\$0	0.0%	12.6%	0	0.0%	4.6%	\$0	0.0%	3.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	1.7%	\$0	0.0%	0.7%	0	0.0%	1.7%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	7.5%	\$0	0.0%	4.3%	0	0.0%	7.5%	\$0	0.0%	4.3%
	Middle	0	0.0%	\$0	0.0%	17.1%	0	0.0%	16.0%	\$0	0.0%	12.1%	0	0.0%	16.6%	\$0	0.0%	12.5%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	50.4%	\$0	0.0%	54.9%	0	0.0%	51.3%	\$0	0.0%	55.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.4%	\$0	0.0%	27.9%	0	0.0%	22.9%	\$0	0.0%	26.7%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	4	7.4%	\$1,355	8.5%	91.1%	3	8.1%	49.5%	\$1,325	12.0%	30.5%	1	5.9%	37.8%	\$30	0.6%	26.9%
	Over \$1 Million	37	68.5%	\$11,947	75.3%	8.4%	25	67.6%					12	70.6%				
	Total Rev. available	41	75.9%	\$13,302	83.8%	99.5%	28	75.7%					13	76.5%				
	Rev. Not Known	13	24.1%	\$2,567	16.2%	0.5%	9	24.3%					4	23.5%				
	Total	54	100.0%	\$15,869	100.0%	100.0%	37	100.0%					17	100.0%				
	\$100,000 or Less	21	38.9%	\$901	5.7%		14	37.8%	94.3%	\$536	4.9%	43.5%	7	41.2%	96.0%	\$365	7.5%	54.0%
	\$100,001 - \$250,000	10	18.5%	\$1,966	12.4%		7	18.9%	3.3%	\$1,341	12.2%	16.4%	3	17.6%	2.4%	\$625	12.9%	14.5%
	\$250,001 - \$1 Million	23	42.6%	\$13,002	81.9%		16	43.2%	2.4%	\$9,152	83.0%	40.1%	7	41.2%	1.6%	\$3,850	79.5%	31.5%
	Total	54	100.0%	\$15,869	100.0%		37	100.0%	100.0%	\$11,029	100.0%	100.0%	17	100.0%	100.0%	\$4,840	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	2	50.0%	\$650	65.0%	88.8%	0	0.0%	40.4%	\$0	0.0%	52.0%	2	100.0%	49.4%	\$650	100.0%	48.5%
	Over \$1 Million	1	25.0%	\$100	10.0%	11.1%	1	50.0%					0	0.0%				
	Not Known	1	25.0%	\$250	25.0%	0.1%	1	50.0%					0	0.0%				
	Total	4	100.0%	\$1,000	100.0%	100.0%	2	100.0%					2	100.0%				
	\$100,000 or Less	1	25.0%	\$100	10.0%		1	50.0%	81.0%	\$100	28.6%	28.5%	0	0.0%	78.0%	\$0	0.0%	25.8%
	\$100,001 - \$250,000	2	50.0%	\$400	40.0%		1	50.0%	9.2%	\$250	71.4%	21.3%	1	50.0%	12.9%	\$150	23.1%	28.5%
	\$250,001 - \$500,000	1	25.0%	\$500	50.0%		0	0.0%	9.8%	\$0	0.0%	50.2%	1	50.0%	9.1%	\$500	76.9%	45.7%
	Total	4	100.0%	\$1,000	100.0%		2	100.0%	100.0%	\$350	100.0%	100.0%	2	100.0%	100.0%	\$650	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FRIC Census Data, 2016 D&B info and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Fresno MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	5.0%
Moderate	0	0.0%	\$0	0.0%	20.8%
Middle	0	0.0%	\$0	0.0%	27.7%
Upper	2	100.0%	\$704	100.0%	46.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$704</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Fresno MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	24.7%
Moderate	0	0.0%	\$0	0.0%	16.0%
Middle	1	50.0%	\$179	25.4%	17.1%
Upper	1	50.0%	\$525	74.6%	42.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	2	100.0%	\$704	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison								Bank & Aggregate Lending Comparison											
		2015, 2016								2015						2016					
		Bank				Owner Occupied Units	Count		Dollar		Count	Dollar	Count	Dollar	Count	Dollar					
		Count		Dollar			Bank	Agg	Bank								Agg				
		#	%	\$ (000s)	\$ %				#	%								\$ (000s)	\$ %	#	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	2.5%	\$0	0.0%	1.5%	0	0.0%	2.4%	\$0	0.0%	1.4%			
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	15.8%	\$0	0.0%	11.4%	0	0.0%	16.4%	\$0	0.0%	12.3%			
	Middle	0	0.0%	\$0	0.0%	31.6%	0	0.0%	32.3%	\$0	0.0%	29.4%	0	0.0%	32.8%	\$0	0.0%	30.2%			
	Upper	2	100.0%	\$940	100.0%	47.2%	1	100.0%	49.5%	\$527	100.0%	57.7%	1	100.0%	48.4%	\$413	100.0%	56.1%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	2	100.0%	\$940	100.0%	100.0%	1	100.0%	100.0%	\$527	100.0%	100.0%	1	100.0%	100.0%	\$413	100.0%	100.0%			
REFINANCE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.2%	\$0	0.0%	0.7%	0	0.0%	1.2%	\$0	0.0%	0.7%			
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	12.2%	\$0	0.0%	8.9%	0	0.0%	11.6%	\$0	0.0%	8.5%			
	Middle	1	25.0%	\$181	7.1%	31.6%	1	33.3%	30.8%	\$181	14.2%	26.5%	0	0.0%	29.9%	\$0	0.0%	26.2%			
	Upper	3	75.0%	\$2,352	92.9%	47.2%	2	66.7%	55.8%	\$1,092	85.8%	63.9%	1	100.0%	57.3%	\$1,260	100.0%	64.6%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	4	100.0%	\$2,533	100.0%	100.0%	3	100.0%	100.0%	\$1,273	100.0%	100.0%	1	100.0%	100.0%	\$1,260	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.1%	\$0	0.0%	0.8%	0	0.0%	1.2%	\$0	0.0%	0.8%			
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	12.4%	\$0	0.0%	10.0%	0	0.0%	12.4%	\$0	0.0%	10.1%			
	Middle	0	0.0%	\$0	0.0%	31.6%	0	0.0%	30.5%	\$0	0.0%	27.2%	0	0.0%	32.6%	\$0	0.0%	28.9%			
	Upper	0	0.0%	\$0	0.0%	47.2%	0	0.0%	56.0%	\$0	0.0%	62.0%	0	0.0%	53.9%	\$0	0.0%	60.2%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTI-FAMILY	Multi-Family Units																				
	Low	0	0.0%	\$0	0.0%	10.0%	0	0.0%	23.4%	\$0	0.0%	10.6%	0	0.0%	16.5%	\$0	0.0%	10.2%			
	Moderate	0	0.0%	\$0	0.0%	35.5%	0	0.0%	43.3%	\$0	0.0%	37.2%	0	0.0%	45.7%	\$0	0.0%	34.4%			
	Middle	0	0.0%	\$0	0.0%	36.2%	0	0.0%	27.6%	\$0	0.0%	34.5%	0	0.0%	28.8%	\$0	0.0%	24.1%			
	Upper	0	0.0%	\$0	0.0%	18.3%	0	0.0%	5.7%	\$0	0.0%	17.7%	0	0.0%	9.1%	\$0	0.0%	31.3%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.7%	\$0	0.0%	1.5%	0	0.0%	1.7%	\$0	0.0%	1.4%			
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	13.7%	\$0	0.0%	11.2%	0	0.0%	13.6%	\$0	0.0%	11.0%			
	Middle	1	16.7%	\$181	5.2%	31.6%	1	25.0%	31.4%	\$181	10.1%	28.0%	0	0.0%	31.1%	\$0	0.0%	27.8%			
	Upper	5	83.3%	\$3,292	94.8%	47.2%	3	75.0%	53.2%	\$1,619	89.9%	59.4%	2	100.0%	53.7%	\$1,673	100.0%	59.8%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
SMALL BUSINESSES	Total	6	100.0%	\$3,473	100.0%	100.0%	4	100.0%	100.0%	\$1,800	100.0%	100.0%	2	100.0%	100.0%	\$1,673	100.0%	100.0%			
	Small Businesses																				
	Low	0	0.0%	\$0	0.0%	3.6%	0	0.0%	2.4%	\$0	0.0%	2.8%	0	0.0%	2.3%	\$0	0.0%	2.4%			
	Moderate	20	17.7%	\$5,019	17.2%	21.7%	11	19.3%	20.1%	\$3,194	23.3%	26.3%	9	16.1%	19.4%	\$1,825	11.8%	25.3%			
	Middle	30	26.5%	\$6,398	21.9%	31.5%	15	26.3%	31.4%	\$2,730	19.9%	33.3%	15	26.8%	30.5%	\$3,668	23.6%	32.9%			
	Upper	63	55.8%	\$17,790	60.9%	43.1%	31	54.4%	46.0%	\$7,767	56.7%	37.6%	32	57.1%	47.8%	\$10,023	64.6%	39.4%			
SMALL FARM	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	113	100.0%	\$29,207	100.0%	100.0%	57	100.0%	100.0%	\$13,691	100.0%	100.0%	56	100.0%	100.0%	\$15,516	100.0%	100.0%			
	Small Farms																				
	Low	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.7%	\$0	0.0%	2.4%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	11.4%	0	0.0%	11.8%	\$0	0.0%	10.8%	0	0.0%	16.3%	\$0	0.0%	11.2%			
SMALL FARM	Middle	0	0.0%	\$0	0.0%	34.1%	0	0.0%	38.2%	\$0	0.0%	45.5%	0	0.0%	32.1%	\$0	0.0%	40.1%			
	Upper	0	0.0%	\$0	0.0%	54.0%	0	0.0%	49.3%	\$0	0.0%	41.3%	0	0.0%	51.6%	\$0	0.0%	48.7%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			

Originations & Purchases

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%
		#	%	\$ (000s)	\$ %													
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	1.4%	\$0	0.0%	0.6%	0	0.0%	0.9%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	8.2%	\$0	0.0%	5.0%	0	0.0%	7.9%	\$0	0.0%	4.7%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	21.5%	\$0	0.0%	18.1%	0	0.0%	22.2%	\$0	0.0%	18.5%
	Upper	2	100.0%	\$940	100.0%	43.3%	1	100.0%	48.4%	\$527	100.0%	56.7%	1	100.0%	51.6%	\$413	100.0%	59.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.5%	\$0	0.0%	19.6%	0	0.0%	17.4%	\$0	0.0%	17.2%
	Total	2	100.0%	\$940	100.0%	100.0%	1	100.0%	100.0%	\$527	100.0%	100.0%	1	100.0%	100.0%	\$413	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	2.3%	\$0	0.0%	1.2%	0	0.0%	1.9%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	7.7%	\$0	0.0%	4.9%	0	0.0%	7.8%	\$0	0.0%	5.0%
	Middle	1	25.0%	\$181	7.1%	19.7%	1	33.3%	16.4%	\$181	14.2%	13.5%	0	0.0%	15.9%	\$0	0.0%	13.1%
	Upper	3	75.0%	\$2,352	92.9%	43.3%	2	66.7%	43.6%	\$1,092	85.8%	48.3%	1	100.0%	48.7%	\$1,260	100.0%	53.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	30.0%	\$0	0.0%	32.0%	0	0.0%	25.8%	\$0	0.0%	27.6%
	Total	4	100.0%	\$2,533	100.0%	100.0%	3	100.0%	100.0%	\$1,273	100.0%	100.0%	1	100.0%	100.0%	\$1,260	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	2.8%	\$0	0.0%	1.5%	0	0.0%	2.6%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	11.0%	\$0	0.0%	8.6%	0	0.0%	11.0%	\$0	0.0%	8.3%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	21.1%	\$0	0.0%	20.4%	0	0.0%	21.2%	\$0	0.0%	19.6%
	Upper	0	0.0%	\$0	0.0%	43.3%	0	0.0%	58.5%	\$0	0.0%	62.6%	0	0.0%	61.4%	\$0	0.0%	66.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.5%	\$0	0.0%	6.9%	0	0.0%	3.8%	\$0	0.0%	4.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	19.9%	0	0.0%	1.9%	\$0	0.0%	0.9%	0	0.0%	1.5%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	8.0%	\$0	0.0%	4.8%	0	0.0%	7.9%	\$0	0.0%	4.8%
	Middle	1	16.7%	\$181	5.2%	19.7%	1	25.0%	18.6%	\$181	10.1%	15.0%	0	0.0%	18.5%	\$0	0.0%	14.9%
	Upper	5	83.3%	\$3,292	94.8%	43.3%	3	75.0%	46.1%	\$1,619	89.9%	50.0%	2	100.0%	50.3%	\$1,673	100.0%	54.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.3%	\$0	0.0%	29.3%	0	0.0%	21.7%	\$0	0.0%	25.6%
	Total	6	100.0%	\$3,473	100.0%	100.0%	4	100.0%	100.0%	\$1,800	100.0%	100.0%	2	100.0%	100.0%	\$1,673	100.0%	100.0%
Small Business Revenue	Total Businesses	15	13.3%	\$2,782	9.5%	91.4%	8	14.0%	53.4%	\$1,300	9.5%	31.7%	7	12.5%	44.4%	\$1,482	9.6%	28.9%
	\$1 Million or Less	65	57.5%	\$18,550	63.5%	8.2%	35	61.4%					30	53.6%				
	Over \$1 Million	80	70.8%	\$21,332	73.0%	99.6%	43	75.4%					37	66.1%				
	Total Rev. available	33	29.2%	\$7,875	27.0%	0.5%	14	24.6%					19	33.9%				
	Rev. Not Known																	
	Total	113	100.0%	\$29,207	100.0%	100.0%	57	100.0%					56	100.0%				
Small Business Loan Size	\$100,000 or Less	44	38.9%	\$2,755	9.4%		25	43.9%	95.5%	\$1,627	11.9%	42.4%	19	33.9%	96.4%	\$1,128	7.3%	49.5%
	\$100,001 - \$250,000	29	25.7%	\$5,715	19.6%		15	26.3%	2.0%	\$3,110	22.7%	11.8%	14	25.0%	1.6%	\$2,605	16.8%	10.6%
	\$250,001 - \$1 Million	40	35.4%	\$20,737	71.0%		17	29.8%	2.4%	\$8,954	65.4%	45.9%	23	41.1%	1.9%	\$11,783	75.9%	39.9%
	Total	113	100.0%	\$29,207	100.0%		57	100.0%	100.0%	\$13,691	100.0%	100.0%	56	100.0%	100.0%	\$15,516	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	93.0%	0	0.0%	52.1%	\$0	0.0%	28.3%	0	0.0%	47.8%	\$0	0.0%	21.3%
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	7.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	87.5%	\$0	0.0%	34.7%	0	0.0%	89.1%	\$0	0.0%	35.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.6%	\$0	0.0%	17.6%	0	0.0%	3.8%	\$0	0.0%	11.5%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.9%	\$0	0.0%	47.7%	0	0.0%	7.1%	\$0	0.0%	52.9%
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Inland Empire

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	2.4%
Moderate	4	4.2%	\$491	4.7%	18.8%
Middle	19	20.0%	\$1,410	13.4%	31.6%
Upper	72	75.8%	\$8,650	82.0%	47.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	95	100.0%	\$10,551	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Inland Empire

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	19.9%
Moderate	5	5.3%	\$553	5.2%	17.1%
Middle	9	9.5%	\$635	6.0%	19.7%
Upper	81	85.3%	\$9,363	88.7%	43.3%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>95</i>	<i>100.0%</i>	<i>\$10,551</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%	1.3%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	13.2%	
	Middle	0	0.0%	\$0	0.0%	32.3%	0	0.0%	\$0	0.0%	28.4%	
	Upper	0	0.0%	\$0	0.0%	47.9%	0	0.0%	\$0	0.0%	57.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%	0.5%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	10.2%	
	Middle	0	0.0%	\$0	0.0%	32.3%	0	0.0%	\$0	0.0%	30.2%	
	Upper	1	100.0%	\$644	100.0%	47.9%	1	100.0%	\$644	100.0%	59.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$644	100.0%	100.0%	1	100.0%	\$644	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%	0.9%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	11.9%	
	Middle	0	0.0%	\$0	0.0%	32.3%	0	0.0%	\$0	0.0%	29.4%	
	Upper	0	0.0%	\$0	0.0%	47.9%	0	0.0%	\$0	0.0%	57.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	9.4%	0	0.0%	\$0	0.0%	10.2%	
	Moderate	0	0.0%	\$0	0.0%	40.6%	0	0.0%	\$0	0.0%	33.8%	
	Middle	0	0.0%	\$0	0.0%	31.4%	0	0.0%	\$0	0.0%	41.8%	
	Upper	0	0.0%	\$0	0.0%	18.7%	0	0.0%	\$0	0.0%	14.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%	1.2%	
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	12.3%	
	Middle	0	0.0%	\$0	0.0%	32.3%	0	0.0%	\$0	0.0%	29.9%	
	Upper	1	100.0%	\$644	100.0%	47.9%	1	100.0%	\$644	100.0%	56.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$644	100.0%	100.0%	1	100.0%	\$644	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses											
	Low	4	8.9%	\$705	5.3%	4.9%	4	8.9%	\$705	5.3%	4.3%	
	Moderate	5	11.1%	\$1,100	8.3%	22.2%	5	11.1%	\$1,100	8.3%	28.1%	
	Middle	15	33.3%	\$3,476	26.2%	33.1%	15	33.3%	\$3,476	26.2%	36.2%	
	Upper	21	46.7%	\$8,007	60.3%	39.8%	21	46.7%	\$8,007	60.3%	31.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.1%	
	Total	45	100.0%	\$13,288	100.0%	100.0%	45	100.0%	\$13,288	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	\$0	0.0%	0.1%	
	Moderate	0	0.0%	\$0	0.0%	14.3%	0	0.0%	\$0	0.0%	13.0%	
	Middle	0	0.0%	\$0	0.0%	32.2%	0	0.0%	\$0	0.0%	38.2%	
	Upper	0	0.0%	\$0	0.0%	51.7%	0	0.0%	\$0	0.0%	48.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	

Originations & Purchases

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2017					2017				
		Bank		Families by Family Income			Count		Dollar		
		Count	%	\$ (000s)	\$ %	%	Bank	Agg	\$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	\$0	0.0%	3.9%
	Middle	0	0.0%	\$0	0.0%	18.8%	0	0.0%	\$0	0.0%	17.0%
	Upper	0	0.0%	\$0	0.0%	44.2%	0	0.0%	\$0	0.0%	62.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	16.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	\$0	0.0%	3.8%
	Middle	0	0.0%	\$0	0.0%	18.8%	0	0.0%	\$0	0.0%	9.8%
	Upper	1	100.0%	\$644	100.0%	44.2%	1	100.0%	\$644	100.0%	73.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	11.6%
	Total	1	100.0%	\$644	100.0%	100.0%	1	100.0%	\$644	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	2.4%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	\$0	0.0%	8.4%
	Middle	0	0.0%	\$0	0.0%	18.8%	0	0.0%	\$0	0.0%	20.0%
	Upper	0	0.0%	\$0	0.0%	44.2%	0	0.0%	\$0	0.0%	65.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	3.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.8%	0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	44.2%	0	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	\$0	0.0%	3.8%
	Middle	0	0.0%	\$0	0.0%	18.8%	0	0.0%	\$0	0.0%	12.6%
	Upper	1	100.0%	\$644	100.0%	44.2%	1	100.0%	\$644	100.0%	66.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	16.4%
	Total	1	100.0%	\$644	100.0%	100.0%	1	100.0%	\$644	100.0%	100.0%
Small Business Revenue	Total Businesses										
	\$1 Million or Less	8	17.8%	\$2,230	16.8%	90.4%	8	17.8%	\$2,230	16.8%	28.8%
	Over \$1 Million	27	60.0%	\$8,557	64.4%	9.1%	27	60.0%			
	Total Rev. available	35	77.8%	\$10,787	81.2%	99.5%	35	77.8%			
	Rev. Not Known	10	22.2%	\$2,501	18.8%	0.5%	10	22.2%			
	Total	45	100.0%	\$13,288	100.0%	100.0%	45	100.0%			
Small Business Loan Size	\$100,000 or Less	20	44.4%	\$1,330	10.0%		20	44.4%	\$1,330	10.0%	44.0%
	\$100,001 - \$250,000	6	13.3%	\$1,150	8.7%		6	13.3%	\$1,150	8.7%	12.0%
	\$250,001 - \$1 Million	19	42.2%	\$10,808	81.3%		19	42.2%	\$10,808	81.3%	44.0%
	Total	45	100.0%	\$13,288	100.0%		45	100.0%	\$13,288	100.0%	100.0%
	Total Farms										
	\$1 Million or Less	0	0.0%	\$0	0.0%	92.0%	0	0.0%	\$0	0.0%	29.3%
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	8.0%	0	0.0%			
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%			
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	43.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	15.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	40.6%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%
	Total Farms										
	\$1 Million or Less	0	0.0%	\$0	0.0%	92.0%	0	0.0%	\$0	0.0%	29.3%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Inland Empire

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	2.3%
Moderate	3	6.8%	\$349	6.0%	17.6%
Middle	8	18.2%	\$518	8.9%	32.3%
Upper	33	75.0%	\$4,942	85.1%	47.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	44	100.0%	\$5,809	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Inland Empire

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	20.8%
Moderate	4	9.1%	\$416	7.2%	16.1%
Middle	4	9.1%	\$400	6.9%	18.8%
Upper	36	81.8%	\$4,993	86.0%	44.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	44	100.0%	\$5,809	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Sacramento

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank		Agg			
		#	%	\$ (000s)	\$ %								#	%	%	\$ (000s)	\$ %	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	4.3%	\$0	0.0%	2.7%	0	0.0%	5.1%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	18.6%	\$0	0.0%	12.5%	0	0.0%	19.6%	\$0	0.0%	13.7%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	38.5%	\$0	0.0%	36.6%	0	0.0%	38.2%	\$0	0.0%	36.8%
	Upper	1	100.0%	\$1,065	100.0%	36.6%	1	100.0%	38.7%	\$1,065	100.0%	48.2%	0	0.0%	37.1%	\$0	0.0%	46.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$1,065	100.0%	100.0%	1	100.0%	100.0%	\$1,065	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	3.1%	\$0	0.0%	2.1%	0	0.0%	3.1%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	14.8%	\$0	0.0%	9.9%	0	0.0%	14.7%	\$0	0.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	38.0%	\$0	0.0%	34.8%	0	0.0%	37.7%	\$0	0.0%	34.6%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	44.1%	\$0	0.0%	53.2%	0	0.0%	44.5%	\$0	0.0%	53.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	3.1%	\$0	0.0%	2.0%	0	0.0%	3.5%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	14.8%	\$0	0.0%	10.5%	0	0.0%	16.8%	\$0	0.0%	13.2%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	41.0%	\$0	0.0%	39.0%	0	0.0%	38.2%	\$0	0.0%	35.9%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	41.1%	\$0	0.0%	48.5%	0	0.0%	41.5%	\$0	0.0%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	12.8%	0	0.0%	16.0%	\$0	0.0%	11.3%	0	0.0%	13.4%	\$0	0.0%	6.9%
	Moderate	0	0.0%	\$0	0.0%	36.4%	0	0.0%	38.1%	\$0	0.0%	43.1%	0	0.0%	48.4%	\$0	0.0%	47.9%
	Middle	0	0.0%	\$0	0.0%	35.0%	0	0.0%	34.3%	\$0	0.0%	32.6%	0	0.0%	26.7%	\$0	0.0%	32.6%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	11.5%	\$0	0.0%	13.0%	0	0.0%	11.6%	\$0	0.0%	12.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	3.6%	\$0	0.0%	2.9%	0	0.0%	3.9%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	16.4%	\$0	0.0%	12.8%	0	0.0%	16.8%	\$0	0.0%	13.2%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	38.3%	\$0	0.0%	35.5%	0	0.0%	37.9%	\$0	0.0%	35.5%
	Upper	1	100.0%	\$1,065	100.0%	36.6%	1	100.0%	41.6%	\$1,065	100.0%	48.7%	0	0.0%	41.4%	\$0	0.0%	48.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL BUSINESSES	Total	1	100.0%	\$1,065	100.0%	100.0%	1	100.0%	100.0%	\$1,065	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Small Businesses																	
	Low	11	17.5%	\$3,375	19.2%	7.5%	7	20.6%	7.5%	\$2,410	28.0%	11.7%	4	13.8%	7.0%	\$965	10.8%	9.6%
	Moderate	7	11.1%	\$3,167	18.0%	21.3%	4	11.8%	19.7%	\$1,049	12.2%	22.9%	3	10.3%	17.8%	\$2,118	23.7%	20.6%
	Middle	10	15.9%	\$720	4.1%	38.1%	5	14.7%	36.4%	\$195	2.3%	34.6%	5	17.2%	36.3%	\$525	5.9%	34.2%
	Upper	35	55.6%	\$10,292	58.6%	33.1%	18	52.9%	35.5%	\$4,952	57.5%	29.9%	17	58.6%	37.3%	\$5,340	59.7%	34.3%
SMALL FARM	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.9%	0	0.0%	1.5%	\$0	0.0%	1.3%
	Total	63	100.0%	\$17,554	100.0%	100.0%	34	100.0%	100.0%	\$8,696	100.0%	100.0%	29	100.0%	100.0%	\$8,948	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	2.2%	\$0	0.0%	0.8%	0	0.0%	2.1%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	14.2%	0	0.0%	9.2%	\$0	0.0%	8.2%	0	0.0%	12.6%	\$0	0.0%	12.4%
SMALL FARM	Middle	0	0.0%	\$0	0.0%	45.4%	0	0.0%	45.8%	\$0	0.0%	54.1%	0	0.0%	47.0%	\$0	0.0%	55.4%
	Upper	0	0.0%	\$0	0.0%	37.7%	0	0.0%	42.1%	\$0	0.0%	36.3%	0	0.0%	37.5%	\$0	0.0%	31.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.6%	0	0.0%	0.7%	\$0	0.0%	0.7%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Sacramento

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison																			
		2015, 2016										2015										2016									
		Bank				Families by Family Income	Count		Dollar				Count	Dollar				Count	Dollar												
		Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg	Bank	Agg																			
														#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	3.3%	\$0	0.0%	1.5%	0	0.0%	2.1%	\$0	0.0%	1.0%													
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	15.1%	\$0	0.0%	9.8%	0	0.0%	13.2%	\$0	0.0%	8.3%													
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	21.8%	\$0	0.0%	19.2%	0	0.0%	23.2%	\$0	0.0%	19.6%													
	Upper	1	100.0%	\$1,065	100.0%	39.8%	1	100.0%	41.2%	\$1,065	100.0%	51.3%	0	0.0%	47.7%	\$0	0.0%	57.4%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.7%	\$0	0.0%	18.3%	0	0.0%	13.8%	\$0	0.0%	13.7%													
	Total	1	100.0%	\$1,065	100.0%	100.0%	1	100.0%	100.0%	\$1,065	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
REFINANCE	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	3.4%	\$0	0.0%	1.7%	0	0.0%	2.9%	\$0	0.0%	1.6%													
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	11.6%	\$0	0.0%	7.8%	0	0.0%	10.4%	\$0	0.0%	6.9%													
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	18.5%	\$0	0.0%	15.8%	0	0.0%	19.2%	\$0	0.0%	16.1%													
	Upper	0	0.0%	\$0	0.0%	39.8%	0	0.0%	40.7%	\$0	0.0%	47.0%	0	0.0%	47.0%	\$0	0.0%	53.1%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	25.8%	\$0	0.0%	27.7%	0	0.0%	20.5%	\$0	0.0%	22.4%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	4.9%	\$0	0.0%	3.0%	0	0.0%	3.1%	\$0	0.0%	1.9%													
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	14.7%	\$0	0.0%	11.5%	0	0.0%	14.2%	\$0	0.0%	10.4%													
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	24.0%	\$0	0.0%	23.3%	0	0.0%	24.3%	\$0	0.0%	21.8%													
	Upper	0	0.0%	\$0	0.0%	39.8%	0	0.0%	50.8%	\$0	0.0%	56.9%	0	0.0%	54.5%	\$0	0.0%	60.2%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	5.3%	0	0.0%	3.9%	\$0	0.0%	5.8%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Upper	0	0.0%	\$0	0.0%	39.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.0%	0	0.0%	3.4%	\$0	0.0%	1.6%	0	0.0%	2.6%	\$0	0.0%	1.3%													
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	13.2%	\$0	0.0%	8.3%	0	0.0%	11.6%	\$0	0.0%	7.3%													
	Middle	0	0.0%	\$0	0.0%	20.1%	0	0.0%	20.0%	\$0	0.0%	16.5%	0	0.0%	21.0%	\$0	0.0%	17.0%													
	Upper	1	100.0%	\$1,065	100.0%	39.8%	1	100.0%	41.2%	\$1,065	100.0%	46.4%	0	0.0%	47.5%	\$0	0.0%	52.9%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.2%	\$0	0.0%	27.1%	0	0.0%	17.3%	\$0	0.0%	21.5%													
	Total	1	100.0%	\$1,065	100.0%	100.0%	1	100.0%	100.0%	\$1,065	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
Small Business Revenue	Total Businesses																														
	\$1 Million or Less	9	14.3%	\$562	3.2%	92.4%	8	23.5%	53.8%	\$552	6.4%	37.5%	1	3.4%	40.7%	\$10	0.1%	30.6%													
	Over \$1 Million	41	65.1%	\$14,003	79.8%	7.0%	19	55.9%					22	75.9%																	
	Total Rev. available	50	79.4%	\$14,565	83.0%	99.4%	27	79.4%					23	79.3%																	
	Rev. Not Known	13	20.6%	\$2,989	17.0%	0.6%	7	20.6%					6	20.7%																	
	Total	63	100.0%	\$17,554	100.0%	100.0%	34	100.0%					29	100.0%																	
Small Business Loan Size	\$100,000 or Less	27	42.9%	\$1,506	8.6%		17	50.0%	95.2%	\$1,022	11.9%	44.3%	10	34.5%	96.4%	\$484	5.4%	52.4%													
	\$100,001 - \$250,000	13	20.6%	\$2,750	15.7%		7	20.6%	2.3%	\$1,499	17.4%	12.7%	6	20.7%	1.9%	\$1,251	14.0%	12.2%													
	\$250,001 - \$1 Million	23	36.5%	\$13,298	75.8%		10	29.4%	2.5%	\$6,085	70.7%	43.0%	13	44.8%	1.7%	\$7,213	80.6%	35.4%													
	Total	63	100.0%	\$17,554	100.0%		34	100.0%	100.0%	\$8,606	100.0%	100.0%	29	100.0%	100.0%	\$8,948	100.0%	100.0%													
	Total Farms																														
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	97.8%	0	0.0%	60.9%	\$0	0.0%	34.9%	0	0.0%	64.6%	\$0	0.0%	52.9%													
	Over \$1 Million	0	0.0%	\$0	0.0%	2.2%	0	0.0%					0	0.0%																	
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%																	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%																	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.4%	\$0	0.0%	18.9%	0	0.0%	83.9%	\$0	0.0%	22.9%													
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.2%	\$0	0.0%	23.6%	0	0.0%	8.8%	\$0	0.0%	28.1%													
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	10.3%	\$0	0.0%	57.5%	0	0.0%	7.4%	\$0	0.0%	49.0%													
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Sacramento

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	1	4.8%	\$150	6.4%	4.5%
Moderate	1	4.8%	\$47	2.0%	20.1%
Middle	3	14.3%	\$401	17.2%	38.7%
Upper	16	76.2%	\$1,734	74.4%	36.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	21	100.0%	\$2,332	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Sacramento

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	1	4.8%	\$50	0.0%	23.0%
Moderate	3	14.3%	\$236	10.1%	17.2%
Middle	2	9.5%	\$237	10.2%	20.1%
Upper	14	66.7%	\$1,709	73.3%	39.8%
Unknown	1	4.8%	\$100	4.3%	0.0%
Total	21	100.0%	\$2,332	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Salinas

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison								Bank & Aggregate Lending Comparison											
		2015, 2016								2015						2016					
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar					
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg							
		#	%	\$ (000s)	\$ %										#	%	%	\$ (000s)	\$ %	%	#
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.5%	\$0	0.0%	0.9%	0	0.0%	1.6%	\$0	0.0%	0.9%			
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	12.3%	\$0	0.0%	11.1%	0	0.0%	13.2%	\$0	0.0%	9.4%			
	Middle	2	100.0%	\$976	100.0%	37.8%	1	100.0%	43.9%	\$320	100.0%	34.6%	1	100.0%	43.5%	\$656	100.0%	35.4%			
	Upper	0	0.0%	\$0	0.0%	48.2%	0	0.0%	42.2%	\$0	0.0%	53.3%	0	0.0%	41.6%	\$0	0.0%	54.3%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	2	100.0%	\$976	100.0%	100.0%	1	100.0%	100.0%	\$320	100.0%	100.0%	1	100.0%	100.0%	\$656	100.0%	100.0%			
REFINANCE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.5%	\$0	0.0%	0.7%	0	0.0%	1.2%	\$0	0.0%	0.6%			
	Moderate	1	9.1%	\$145	1.3%	11.9%	1	16.7%	9.9%	\$145	3.7%	6.2%	0	0.0%	10.0%	\$0	0.0%	6.6%			
	Middle	2	18.2%	\$541	4.8%	37.8%	1	16.7%	40.8%	\$228	5.8%	33.3%	1	20.0%	41.3%	\$313	4.3%	33.6%			
	Upper	8	72.7%	\$10,477	93.9%	48.2%	4	66.7%	47.9%	\$3,530	90.4%	59.7%	4	80.0%	47.6%	\$6,947	95.7%	59.3%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	11	100.0%	\$11,163	100.0%	100.0%	6	100.0%	100.0%	\$3,903	100.0%	100.0%	5	100.0%	100.0%	\$7,260	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.3%	\$0	0.0%	0.9%	0	0.0%	1.1%	\$0	0.0%	0.6%			
	Moderate	0	0.0%	\$0	0.0%	11.9%	0	0.0%	14.5%	\$0	0.0%	11.2%	0	0.0%	10.7%	\$0	0.0%	6.5%			
	Middle	0	0.0%	\$0	0.0%	37.8%	0	0.0%	34.4%	\$0	0.0%	24.9%	0	0.0%	42.5%	\$0	0.0%	32.7%			
	Upper	0	0.0%	\$0	0.0%	48.2%	0	0.0%	49.8%	\$0	0.0%	63.0%	0	0.0%	45.7%	\$0	0.0%	60.3%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTI-FAMILY	Multi-Family Units																				
	Low	0	0.0%	\$0	0.0%	8.9%	0	0.0%	13.5%	\$0	0.0%	2.7%	0	0.0%	7.9%	\$0	0.0%	2.5%			
	Moderate	0	0.0%	\$0	0.0%	30.4%	0	0.0%	28.8%	\$0	0.0%	54.4%	0	0.0%	28.9%	\$0	0.0%	34.2%			
	Middle	0	0.0%	\$0	0.0%	42.7%	0	0.0%	36.5%	\$0	0.0%	20.2%	0	0.0%	48.7%	\$0	0.0%	45.2%			
	Upper	0	0.0%	\$0	0.0%	17.9%	0	0.0%	21.2%	\$0	0.0%	22.6%	0	0.0%	14.5%	\$0	0.0%	18.0%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%				
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.5%	\$0	0.0%	0.9%	0	0.0%	1.4%	\$0	0.0%	0.8%			
	Moderate	1	7.7%	\$145	1.2%	11.9%	1	14.3%	11.0%	\$145	3.4%	10.4%	0	0.0%	11.2%	\$0	0.0%	9.2%			
	Middle	4	30.8%	\$1,517	12.5%	37.8%	2	28.6%	41.7%	\$548	13.0%	33.0%	2	33.3%	42.1%	\$969	12.2%	34.8%			
	Upper	8	61.5%	\$10,477	86.3%	48.2%	4	57.1%	45.7%	\$3,530	83.6%	55.6%	4	66.7%	45.3%	\$6,947	87.8%	55.2%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	13	100.0%	\$12,139	100.0%	100.0%	7	100.0%	100.0%	\$4,223	100.0%	100.0%	6	100.0%	100.0%	\$7,916	100.0%	100.0%			
SMALL BUSINESSES	Small Businesses																				
	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	1.4%	\$0	0.0%	0.8%	0	0.0%	1.5%	\$0	0.0%	0.7%			
	Moderate	7	13.7%	\$1,670	11.1%	17.0%	4	16.0%	15.5%	\$910	14.0%	12.3%	3	11.5%	15.3%	\$760	8.9%	12.8%			
	Middle	18	35.3%	\$6,196	41.2%	39.8%	7	28.0%	40.7%	\$2,312	35.7%	43.6%	11	42.3%	41.5%	\$3,884	45.4%	43.3%			
	Upper	26	51.0%	\$7,160	47.7%	41.1%	14	56.0%	41.9%	\$3,255	50.3%	42.9%	12	46.2%	41.3%	\$3,905	45.7%	41.7%			
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	1.4%			
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%				
Total	51	100.0%	\$15,026	100.0%	100.0%	25	100.0%	100.0%	\$6,477	100.0%	100.0%	26	100.0%	100.0%	\$8,549	100.0%	100.0%				
SMALL FARM	Small Farms																				
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.9%	\$0	0.0%	0.1%	0	0.0%	1.7%	\$0	0.0%	0.2%			
	Moderate	4	80.0%	\$1,152	85.2%	8.2%	1	50.0%	9.9%	\$495	71.2%	10.1%	3	100.0%	9.3%	\$657	100.0%	7.3%			
	Middle	0	0.0%	\$0	0.0%	41.6%	0	0.0%	44.1%	\$0	0.0%	50.7%	0	0.0%	53.4%	\$0	0.0%	61.5%			
	Upper	1	20.0%	\$200	14.8%	49.1%	1	50.0%	44.1%	\$200	28.8%	37.6%	0	0.0%	34.7%	\$0	0.0%	29.4%			
	Unknown	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.9%	\$0	0.0%	1.6%	0	0.0%	0.8%	\$0	0.0%	1.5%			
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%				
Total	5	100.0%	\$1,352	100.0%	100.0%	2	100.0%	100.0%	\$695	100.0%	100.0%	3	100.0%	100.0%	\$657	100.0%	100.0%				

Originations & Purchases

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Salinas

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income %	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	3.0%	\$0	0.0%	1.4%	0	0.0%	2.8%	\$0	0.0%	1.2%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	15.6%	\$0	0.0%	10.2%	0	0.0%	14.7%	\$0	0.0%	9.4%
	Upper	2	100.0%	\$976	100.0%	43.1%	1	100.0%	60.2%	\$320	100.0%	66.9%	1	100.0%	68.0%	\$656	100.0%	76.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.8%	\$0	0.0%	21.4%	0	0.0%	14.1%	\$0	0.0%	13.1%
	Total	2	100.0%	\$976	100.0%	100.0%	1	100.0%	100.0%	\$320	100.0%	100.0%	1	100.0%	100.0%	\$656	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	2.0%	\$0	0.0%	0.9%	0	0.0%	1.7%	\$0	0.0%	0.9%
	Moderate	1	9.1%	\$80	0.7%	15.8%	1	16.7%	7.2%	\$80	2.0%	3.8%	0	0.0%	5.9%	\$0	0.0%	3.2%
	Middle	2	18.2%	\$450	4.0%	19.4%	2	33.3%	16.4%	\$450	11.5%	11.3%	0	0.0%	16.3%	\$0	0.0%	11.0%
	Upper	7	63.6%	\$10,383	93.0%	43.1%	3	50.0%	54.1%	\$3,373	86.4%	63.2%	4	80.0%	60.7%	\$7,010	96.6%	68.0%
	Unknown	1	9.1%	\$250	2.2%	0.0%	0	0.0%	20.3%	\$0	0.0%	20.8%	1	20.0%	15.4%	\$250	3.4%	16.8%
	Total	11	100.0%	\$11,163	100.0%	100.0%	6	100.0%	100.0%	\$3,903	100.0%	100.0%	5	100.0%	100.0%	\$7,260	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	1.9%	\$0	0.0%	0.9%	0	0.0%	2.3%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	9.3%	\$0	0.0%	5.6%	0	0.0%	7.7%	\$0	0.0%	3.7%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	23.8%	\$0	0.0%	16.3%	0	0.0%	21.4%	\$0	0.0%	14.0%
	Upper	0	0.0%	\$0	0.0%	43.1%	0	0.0%	58.5%	\$0	0.0%	71.0%	0	0.0%	66.4%	\$0	0.0%	77.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.4%	\$0	0.0%	6.1%	0	0.0%	2.3%	\$0	0.0%	3.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	1.4%	\$0	0.0%	0.6%	0	0.0%	1.3%	\$0	0.0%	0.6%
	Moderate	1	7.7%	\$80	0.7%	15.8%	1	14.3%	5.7%	\$80	1.9%	2.7%	0	0.0%	4.9%	\$0	0.0%	2.3%
	Middle	2	15.4%	\$450	3.7%	19.4%	2	28.6%	16.3%	\$450	10.7%	10.5%	0	0.0%	15.9%	\$0	0.0%	9.9%
	Upper	9	69.2%	\$11,359	93.6%	43.1%	4	57.1%	56.2%	\$3,693	87.4%	62.1%	5	83.3%	62.9%	\$7,666	96.8%	67.5%
	Unknown	1	7.7%	\$250	2.1%	0.0%	0	0.0%	20.4%	\$0	0.0%	24.1%	1	16.7%	15.0%	\$250	3.2%	19.6%
	Total	13	100.0%	\$12,139	100.0%	100.0%	7	100.0%	100.0%	\$4,223	100.0%	100.0%	6	100.0%	100.0%	\$7,916	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	14	27.5%	\$2,291	15.2%	91.8%	6	24.0%	55.7%	\$1,467	22.6%	37.2%	8	30.8%	44.4%	\$824	9.6%	33.0%
	Over \$1 Million	23	45.1%	\$9,850	65.6%	7.7%	11	44.0%					12	46.2%				
	Total Rev. available	37	72.6%	\$12,141	80.8%	99.5%	17	68.0%					20	77.0%				
	Rev. Not Known	14	27.5%	\$2,885	19.2%	0.5%	8	32.0%					6	23.1%				
	Total	51	100.0%	\$15,026	100.0%	100.0%	25	100.0%					26	100.0%				
Small Business Loan Size	\$100,000 or Less	18	35.3%	\$1,124	7.5%		8	32.0%	96.1%	\$525	8.1%	46.1%	10	38.5%	96.8%	\$599	7.0%	56.1%
	\$100,001 - \$250,000	13	25.5%	\$2,800	18.6%		9	36.0%	1.7%	\$1,900	29.3%	9.5%	4	15.4%	1.7%	\$900	10.5%	10.6%
	\$250,001 - \$1 Million	20	39.2%	\$11,102	73.9%		8	32.0%	2.2%	\$4,052	62.6%	44.5%	12	46.2%	1.5%	\$7,050	82.5%	33.3%
	Total	51	100.0%	\$15,026	100.0%		25	100.0%	100.0%	\$6,477	100.0%	100.0%	26	100.0%	100.0%	\$8,549	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	76.2%	0	0.0%	34.2%	\$0	0.0%	13.5%	0	0.0%	39.8%	\$0	0.0%	13.2%
	Over \$1 Million	4	80.0%	\$1,152	85.2%	23.8%	1	50.0%					3	100.0%				
	Not Known	1	20.0%	\$200	14.8%	0.0%	1	50.0%					0	0.0%				
	Total	5	100.0%	\$1,352	100.0%	100.0%	2	100.0%					3	100.0%				
	Total	5	100.0%	\$1,352	100.0%		2	100.0%	100.0%	\$693	100.0%	100.0%	3	100.0%	100.0%	\$657	100.0%	100.0%
Small Farm Loan Size	\$100,000 or Less	1	20.0%	\$12	0.9%		0	0.0%	81.1%	\$0	0.0%	19.2%	1	33.3%	83.1%	\$12	1.8%	19.9%
	\$100,001 - \$250,000	2	40.0%	\$350	25.9%		1	50.0%	5.4%	\$200	28.8%	11.0%	1	33.3%	4.2%	\$150	22.8%	8.7%
	\$250,001 - \$500,000	2	40.0%	\$990	73.2%		1	50.0%	13.5%	\$495	71.2%	69.8%	1	33.3%	12.7%	\$495	75.3%	71.4%
	Total	5	100.0%	\$1,352	100.0%		2	100.0%	100.0%	\$693	100.0%	100.0%	3	100.0%	100.0%	\$657	100.0%	100.0%
	Total	5	100.0%	\$1,352	100.0%		2	100.0%	100.0%	\$693	100.0%	100.0%	3	100.0%	100.0%	\$657	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FFIEC Census Data, 2016 DBS Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Salinas

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	2.1%
Moderate	3	3.4%	\$309	2.0%	11.9%
Middle	28	31.5%	\$3,693	23.8%	37.8%
Upper	58	65.2%	\$11,525	74.2%	48.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	89	100.0%	\$15,527	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Salinas

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	3	3.4%	\$258	0.0%	21.7%
Moderate	5	5.6%	\$468	3.0%	15.8%
Middle	21	23.6%	\$2,569	16.5%	19.4%
Upper	59	66.3%	\$11,432	73.6%	43.1%
Unknown	1	1.1%	\$800	5.2%	0.0%
Total	89	100.0%	\$15,527	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Salinas

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.9%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	11.6%	0	0.0%	12.1%	\$0	0.0%	9.0%
	Middle	0	0.0%	\$0	0.0%	31.0%	0	0.0%	35.1%	\$0	0.0%	28.4%
	Upper	0	0.0%	\$0	0.0%	56.7%	0	0.0%	51.9%	\$0	0.0%	62.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	1.1%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	11.6%	0	0.0%	11.3%	\$0	0.0%	7.3%
	Middle	1	100.0%	\$195	100.0%	31.0%	1	100.0%	35.9%	\$195	100.0%	28.1%
	Upper	0	0.0%	\$0	0.0%	56.7%	0	0.0%	51.7%	\$0	0.0%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$195	100.0%	100.0%	1	100.0%	100.0%	\$195	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	2.3%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	11.6%	0	0.0%	11.2%	\$0	0.0%	6.7%
	Middle	0	0.0%	\$0	0.0%	31.0%	0	0.0%	31.5%	\$0	0.0%	21.7%
	Upper	0	0.0%	\$0	0.0%	56.7%	0	0.0%	55.1%	\$0	0.0%	70.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	5.9%	0	0.0%	7.9%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	24.1%	0	0.0%	22.2%	\$0	0.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	37.5%	0	0.0%	25.4%	\$0	0.0%	45.1%
	Upper	0	0.0%	\$0	0.0%	32.5%	0	0.0%	44.4%	\$0	0.0%	41.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.7%	0	0.0%	1.1%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	11.6%	0	0.0%	11.7%	\$0	0.0%	8.2%
	Middle	1	100.0%	\$195	100.0%	31.0%	1	100.0%	35.2%	\$195	100.0%	28.9%
	Upper	0	0.0%	\$0	0.0%	56.7%	0	0.0%	51.9%	\$0	0.0%	62.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$195	100.0%	100.0%	1	100.0%	100.0%	\$195	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	4.3%	0	0.0%	3.9%	\$0	0.0%	1.9%
	Moderate	3	12.0%	\$1,750	22.1%	10.1%	3	12.0%	9.3%	\$1,750	22.1%	8.3%
	Middle	7	28.0%	\$2,768	35.0%	28.6%	7	28.0%	31.3%	\$2,768	35.0%	31.4%
	Upper	15	60.0%	\$3,400	42.9%	56.5%	15	60.0%	55.1%	\$3,400	42.9%	56.9%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.4%	\$0	0.0%	1.5%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	25	100.0%	\$7,918	100.0%	100.0%	25	100.0%	100.0%	\$7,918	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.9%	\$0	0.0%	1.6%
	Moderate	1	50.0%	\$495	68.8%	7.3%	1	50.0%	9.7%	\$495	68.8%	11.5%
	Middle	1	50.0%	\$225	31.3%	38.5%	1	50.0%	48.7%	\$225	31.3%	59.5%
	Upper	0	0.0%	\$0	0.0%	52.3%	0	0.0%	39.8%	\$0	0.0%	23.2%
	Unknown	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.9%	\$0	0.0%	4.2%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$720	100.0%	100.0%	2	100.0%	100.0%	\$720	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size
Assessment Area: CA - Salinas

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2017					2017				
		Bank		Families by Family Income			Count		Dollar		
		#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.3%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	1.7%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	10.6%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	73.5%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.8%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	2.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	6.7%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	15.8%	\$0	0.0%
	Upper	1	100.0%	\$195	100.0%	43.8%	1	100.0%	63.5%	\$195	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.0%	\$0	0.0%
	Total	1	100.0%	\$195	100.0%	100.0%	1	100.0%	100.0%	\$195	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.5%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	8.1%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	15.7%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	70.3%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	0.0%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	1.2%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	4.6%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	13.5%	\$0	0.0%
	Upper	1	100.0%	\$195	100.0%	43.8%	1	100.0%	67.6%	\$195	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.2%	\$0	0.0%
	Total	1	100.0%	\$195	100.0%	100.0%	1	100.0%	100.0%	\$195	100.0%
Small Business Revenue	Total Businesses										
	\$1 Million or Less	4	16.0%	\$390	4.9%	91.2%	4	16.0%	49.7%	\$390	4.9%
	Over \$1 Million	14	56.0%	\$5,868	74.1%	8.3%	14	56.0%			
	Total Rev. available	18	72.0%	\$6,258	79.0%	99.5%	18	72.0%			
	Rev. Not Known	7	28.0%	\$1,660	21.0%	0.5%	7	28.0%			
	Total	25	100.0%	\$7,918	100.0%	100.0%	25	100.0%			
Small Business Loan Size	Total Businesses										
	\$100,000 or Less	9	36.0%	\$585	7.4%		9	36.0%	96.0%	\$585	7.4%
	\$100,001 - \$250,000	5	20.0%	\$1,000	12.6%		5	20.0%	2.1%	\$1,000	12.6%
	\$250,001 - \$1 Million	11	44.0%	\$6,333	80.0%		11	44.0%	1.9%	\$6,333	80.0%
	Total	25	100.0%	\$7,918	100.0%		25	100.0%	100.0%	\$7,918	100.0%
	Total	25	100.0%	\$7,918	100.0%		25	100.0%	100.0%	\$7,918	100.0%
Small Farm Revenue	Total Farms										
	\$1 Million or Less	0	0.0%	\$0	0.0%	74.2%	0	0.0%	46.0%	\$0	0.0%
	Over \$1 Million	2	100.0%	\$720	100.0%	25.8%	2	100.0%			
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%			
	Total	2	100.0%	\$720	100.0%	100.0%	2	100.0%			
	Total	2	100.0%	\$720	100.0%		2	100.0%	100.0%	\$720	100.0%
Small Farm Loan Size	Total Farms										
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	74.3%	\$0	0.0%
	\$100,001 - \$250,000	1	50.0%	\$225	31.3%		1	50.0%	11.5%	\$225	31.3%
	\$250,001 - \$500,000	1	50.0%	\$495	68.8%		1	50.0%	14.2%	\$495	68.8%
	Total	2	100.0%	\$720	100.0%		2	100.0%	100.0%	\$720	100.0%
	Total	2	100.0%	\$720	100.0%		2	100.0%	100.0%	\$720	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Salinas

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.7%
Moderate	8	16.3%	\$981	12.7%	11.6%
Middle	9	18.4%	\$927	12.0%	31.0%
Upper	32	65.3%	\$5,805	75.3%	56.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>49</i>	<i>100.0%</i>	<i>\$7,713</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Salinas

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	20.5%
Moderate	3	6.1%	\$340	4.4%	17.3%
Middle	10	20.4%	\$1,184	15.4%	18.4%
Upper	36	73.5%	\$6,189	80.2%	43.8%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	49	100.0%	\$7,713	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Diego

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison									
		2015, 2016						2015					2016				
		Bank		Owner Occupied Units		Count		Dollar			Count		Dollar			Count	
		2015		2016		2015		2015			2016		2016			2016	
		Count	Dollar	Count	Dollar	Count	Dollar	Count	Dollar	Count	Dollar	Count	Dollar	Count	Dollar	Count	Dollar
		#	%	\$ (000s)	%	#	%	\$ (000s)	%	\$ (000s)	%	#	%	\$ (000s)	%	#	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.7%	\$0	0.0%	2.5%	0	0.0%	4.0%	\$0	0.0%
	Moderate	2	11.8%	\$649	4.1%	14.0%	2	18.2%	14.2%	\$649	8.9%	10.2%	0	0.0%	14.7%	\$0	0.0%
	Middle	3	17.6%	\$1,371	8.6%	37.3%	3	27.3%	37.6%	\$1,371	18.9%	31.4%	0	0.0%	37.7%	\$0	0.0%
	Upper	12	70.6%	\$13,909	87.3%	45.1%	6	54.5%	44.4%	\$5,236	72.2%	55.9%	6	100.0%	43.6%	\$8,673	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	17	100.0%	\$15,929	100.0%	100.0%	11	100.0%	100.0%	\$7,256	100.0%	100.0%	6	100.0%	100.0%	\$8,673	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.0%	\$0	0.0%	2.0%	0	0.0%	3.2%	\$0	0.0%
	Moderate	1	4.0%	\$102	0.5%	14.0%	0	0.0%	12.8%	\$0	0.0%	9.4%	1	7.1%	12.9%	\$102	0.7%
	Middle	8	32.0%	\$4,975	22.5%	37.3%	5	45.5%	37.0%	\$2,704	40.5%	31.0%	3	21.4%	37.4%	\$2,271	14.7%
	Upper	16	64.0%	\$17,023	77.0%	45.1%	6	54.5%	47.2%	\$3,967	59.5%	57.7%	10	71.4%	46.5%	\$13,056	84.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	25	100.0%	\$22,100	100.0%	100.0%	11	100.0%	100.0%	\$6,671	100.0%	100.0%	14	100.0%	100.0%	\$15,429	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.2%	\$0	0.0%	2.2%	0	0.0%	4.2%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.0%	0	0.0%	13.6%	\$0	0.0%	10.7%	0	0.0%	13.8%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	37.3%	0	0.0%	39.4%	\$0	0.0%	30.7%	0	0.0%	38.1%	\$0	0.0%
	Upper	1	100.0%	\$1,470	100.0%	45.1%	0	0.0%	43.7%	\$0	0.0%	56.4%	1	100.0%	43.9%	\$1,470	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	1	100.0%	\$1,470	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,470	100.0%
MULTI-FAMILY	Multi-Family Units																
	Low	0	0.0%	\$0	0.0%	14.7%	0	0.0%	28.6%	\$0	0.0%	15.3%	0	0.0%	29.4%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	24.5%	0	0.0%	31.9%	\$0	0.0%	30.2%	0	0.0%	31.5%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	33.1%	0	0.0%	26.2%	\$0	0.0%	33.9%	0	0.0%	25.8%	\$0	0.0%
	Upper	1	100.0%	\$1,184	100.0%	27.7%	1	100.0%	13.4%	\$1,184	100.0%	20.6%	0	0.0%	13.3%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	1	100.0%	\$1,184	100.0%	100.0%	1	100.0%	100.0%	\$1,184	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.5%	0	0.0%	3.5%	\$0	0.0%	3.0%	0	0.0%	3.7%	\$0	0.0%
	Moderate	3	6.8%	\$751	1.8%	14.0%	2	8.7%	13.5%	\$649	4.3%	11.0%	1	4.8%	13.7%	\$102	0.4%
	Middle	11	25.0%	\$6,346	15.6%	37.3%	8	34.8%	37.2%	\$4,075	27.0%	31.3%	3	14.3%	37.4%	\$2,271	8.9%
	Upper	30	68.2%	\$33,586	82.6%	45.1%	13	56.5%	45.8%	\$10,387	68.7%	54.7%	17	81.0%	45.2%	\$23,199	90.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	44	100.0%	\$40,683	100.0%	100.0%	23	100.0%	100.0%	\$15,111	100.0%	100.0%	21	100.0%	100.0%	\$25,572	100.0%
SMALL BUSINESSES	Small Businesses																
	Low	8	2.8%	\$817	1.1%	6.0%	4	2.5%	4.9%	\$322	0.8%	5.0%	4	3.1%	4.5%	\$495	1.5%
	Moderate	34	11.8%	\$7,685	10.5%	14.9%	9	5.7%	14.3%	\$1,850	4.6%	15.5%	25	19.2%	13.7%	\$5,835	17.7%
	Middle	80	27.8%	\$18,766	25.6%	34.4%	43	27.2%	32.9%	\$10,488	26.0%	32.2%	37	28.5%	32.8%	\$8,278	25.2%
	Upper	166	57.6%	\$45,970	62.8%	44.6%	102	64.6%	47.8%	\$27,691	68.6%	47.2%	64	49.2%	49.1%	\$18,279	55.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	288	100.0%	\$73,238	100.0%	100.0%	158	100.0%	100.0%	\$40,351	100.0%	100.0%	130	100.0%	100.0%	\$32,887	100.0%
SMALL FARM	Small Farms																
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	1.8%	\$0	0.0%	2.0%	0	0.0%	1.1%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	11.6%	0	0.0%	8.9%	\$0	0.0%	8.3%	0	0.0%	11.1%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	30.6%	0	0.0%	27.2%	\$0	0.0%	16.1%	0	0.0%	27.9%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	55.2%	0	0.0%	62.1%	\$0	0.0%	73.6%	0	0.0%	60.0%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - San Diego

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Families by Family Income	Count			Dollar			Count			Dollar				
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
													#	%	\$ (000s)	\$ %	#	%
HOME PURCHASE	Low	1	5.9%	\$472	3.0%	22.5%	1	9.1%	0.8%	\$472	6.5%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	1	5.9%	\$1,600	10.0%	17.3%	1	9.1%	6.6%	\$1,600	22.1%	3.1%	0	0.0%	5.7%	\$0	0.0%	2.7%
	Middle	2	11.8%	\$1,333	8.4%	18.2%	1	9.1%	18.2%	\$333	4.6%	12.7%	1	16.7%	18.4%	\$1,000	11.5%	12.7%
	Upper	11	64.7%	\$9,724	61.0%	42.0%	7	63.6%	59.2%	\$4,151	57.2%	69.5%	4	66.7%	62.9%	\$5,573	64.3%	72.3%
	Unknown	2	11.8%	\$2,800	17.6%	0.0%	1	9.1%	15.2%	\$700	9.6%	14.4%	1	16.7%	12.3%	\$2,100	24.2%	12.0%
	Total	17	100.0%	\$15,929	100.0%	100.0%	11	100.0%	100.0%	\$7,256	100.0%	100.0%	6	100.0%	100.0%	\$8,673	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	22.5%	0	0.0%	2.2%	\$0	0.0%	1.0%	0	0.0%	1.8%	\$0	0.0%	0.9%
	Moderate	2	8.0%	\$376	1.7%	17.3%	1	9.1%	6.8%	\$274	4.1%	3.7%	1	7.1%	6.5%	\$102	0.7%	3.6%
	Middle	1	4.0%	\$254	1.1%	18.2%	0	0.0%	15.5%	\$0	0.0%	11.1%	1	7.1%	15.9%	\$254	1.6%	11.6%
	Upper	19	76.0%	\$18,333	83.0%	42.0%	8	72.7%	53.8%	\$4,730	70.9%	62.1%	11	78.6%	56.1%	\$13,603	88.2%	63.3%
	Unknown	3	12.0%	\$3,137	14.2%	0.0%	2	18.2%	21.6%	\$1,667	25.0%	22.1%	1	7.1%	19.8%	\$1,470	9.5%	20.7%
	Total	25	100.0%	\$22,100	100.0%	100.0%	11	100.0%	100.0%	\$6,671	100.0%	100.0%	14	100.0%	100.0%	\$15,429	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.5%	0	0.0%	2.9%	\$0	0.0%	1.1%	0	0.0%	2.4%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	9.7%	\$0	0.0%	5.4%	0	0.0%	10.1%	\$0	0.0%	5.8%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	20.0%	\$0	0.0%	14.9%	0	0.0%	21.3%	\$0	0.0%	16.1%
	Upper	1	100.0%	\$1,470	100.0%	42.0%	0	0.0%	60.5%	\$0	0.0%	69.8%	1	100.0%	61.0%	\$1,470	100.0%	71.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.9%	\$0	0.0%	8.8%	0	0.0%	5.2%	\$0	0.0%	5.3%
	Total	1	100.0%	\$1,470	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,470	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$1,184	100.0%	0.0%	1	100.0%	100.0%	\$1,184	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	1	100.0%	\$1,184	100.0%	100.0%	1	100.0%	100.0%	\$1,184	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	2.3%	\$472	1.2%	22.5%	1	4.3%	1.7%	\$472	3.1%	0.7%	0	0.0%	1.5%	\$0	0.0%	0.6%
	Moderate	3	6.8%	\$1,976	4.9%	17.3%	2	8.7%	6.8%	\$1,874	12.4%	3.3%	1	4.8%	6.4%	\$102	0.4%	3.2%
	Middle	3	6.8%	\$1,587	3.9%	18.2%	1	4.3%	16.5%	\$333	2.2%	11.1%	2	9.5%	16.8%	\$1,254	4.9%	11.5%
	Upper	31	70.5%	\$29,527	72.6%	42.0%	15	65.2%	55.6%	\$8,881	58.8%	61.3%	16	76.2%	58.1%	\$20,646	80.7%	63.5%
	Unknown	6	13.6%	\$7,121	17.5%	0.0%	4	17.4%	19.4%	\$3,551	23.5%	23.6%	2	9.5%	17.3%	\$3,570	14.0%	21.1%
	Total	44	100.0%	\$40,683	100.0%	100.0%	23	100.0%	100.0%	\$15,111	100.0%	100.0%	21	100.0%	100.0%	\$25,572	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	85	29.5%	\$12,762	17.4%	91.8%	45	28.5%	52.8%	\$7,087	17.6%	35.3%	40	30.8%	42.1%	\$5,675	17.3%	31.4%
	Over \$1 Million	154	53.5%	\$45,258	61.8%	7.8%	87	55.1%					67	51.5%				
	Total Rev. available	239	83.0%	\$58,020	79.2%	99.6%	132	83.6%					107	82.3%				
	Rev. Not Known	49	17.0%	\$15,218	20.8%	0.4%	26	16.5%					23	17.7%				
	Total	288	100.0%	\$73,238	100.0%	100.0%	158	100.0%					130	100.0%				
Small Business Loan Size	\$100,000 or Less	143	49.7%	\$8,287	11.3%		78	49.4%	95.5%	\$4,386	10.9%	45.3%	65	50.0%	96.5%	\$3,901	11.9%	54.8%
	\$100,001 - \$250,000	51	17.7%	\$10,016	13.7%		26	16.5%	2.2%	\$5,060	12.5%	12.3%	25	19.2%	1.8%	\$4,956	15.1%	11.4%
	\$250,001 - \$1 Million	94	32.6%	\$54,935	75.0%		54	34.2%	2.3%	\$30,905	76.6%	42.4%	40	30.8%	1.6%	\$24,030	73.1%	33.8%
	Total	288	100.0%	\$73,238	100.0%		158	100.0%	100.0%	\$40,351	100.0%	100.0%	130	100.0%	100.0%	\$32,887	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	93.7%	0	0.0%	54.4%	\$0	0.0%	61.5%	0	0.0%	58.9%	\$0	0.0%	50.2%
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	6.3%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	95.9%	\$0	0.0%	61.8%	0	0.0%	93.2%	\$0	0.0%	53.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.0%	\$0	0.0%	17.2%	0	0.0%	4.7%	\$0	0.0%	25.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	1.2%	\$0	0.0%	21.1%	0	0.0%	2.1%	\$0	0.0%	21.3%
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Diego

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	4	1.1%	\$429	0.5%	3.5%
Moderate	23	6.4%	\$1,945	2.5%	14.0%
Middle	110	30.6%	\$17,611	22.4%	37.3%
Upper	223	61.9%	\$58,621	74.6%	45.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	360	100.0%	\$78,606	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Diego

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	3	0.8%	\$309	0.0%	22.5%
Moderate	14	3.9%	\$1,390	1.8%	17.3%
Middle	46	12.8%	\$4,693	6.0%	18.2%
Upper	292	81.1%	\$63,639	81.0%	42.0%
Unknown	5	1.4%	\$8,575	10.9%	0.0%
<i>Total</i>	<i>360</i>	<i>100.0%</i>	<i>\$78,606</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Diego

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2017					2017						
		Bank		Owner Occupied Units		Count	Bank		Dollar		Count	Dollar	
		Count	Dollar	Bank	Agg		Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	1	10.0%	\$332	3.0%	2.9%	1	10.0%	4.0%	\$332	3.0%	2.7%	
	Moderate	0	0.0%	\$0	0.0%	14.7%	0	0.0%	16.8%	\$0	0.0%	11.5%	
	Middle	2	20.0%	\$602	5.4%	34.3%	2	20.0%	35.3%	\$602	5.4%	31.4%	
	Upper	7	70.0%	\$10,205	91.6%	48.1%	7	70.0%	43.9%	\$10,205	91.6%	54.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	10	100.0%	\$11,139	100.0%	100.0%	10	100.0%	100.0%	\$11,139	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	3.7%	\$0	0.0%	3.3%	
	Moderate	0	0.0%	\$0	0.0%	14.7%	0	0.0%	16.0%	\$0	0.0%	19.3%	
	Middle	3	27.3%	\$964	10.9%	34.3%	3	27.3%	34.9%	\$964	10.9%	28.8%	
	Upper	8	72.7%	\$7,850	89.1%	48.1%	8	72.7%	45.5%	\$7,850	89.1%	48.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	11	100.0%	\$8,814	100.0%	100.0%	11	100.0%	100.0%	\$8,814	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	4.9%	\$0	0.0%	3.6%	
	Moderate	0	0.0%	\$0	0.0%	14.7%	0	0.0%	17.0%	\$0	0.0%	12.8%	
	Middle	0	0.0%	\$0	0.0%	34.3%	0	0.0%	36.6%	\$0	0.0%	30.8%	
	Upper	0	0.0%	\$0	0.0%	48.1%	0	0.0%	41.6%	\$0	0.0%	52.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	12.7%	0	0.0%	26.5%	\$0	0.0%	16.8%	
	Moderate	0	0.0%	\$0	0.0%	24.5%	0	0.0%	31.9%	\$0	0.0%	21.5%	
	Middle	0	0.0%	\$0	0.0%	34.2%	0	0.0%	29.5%	\$0	0.0%	34.6%	
	Upper	0	0.0%	\$0	0.0%	28.6%	0	0.0%	12.1%	\$0	0.0%	27.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	4.8%	\$332	1.7%	2.9%	1	4.8%	4.1%	\$332	1.7%	3.9%	
	Moderate	0	0.0%	\$0	0.0%	14.7%	0	0.0%	16.6%	\$0	0.0%	16.3%	
	Middle	5	23.8%	\$1,566	7.8%	34.3%	5	23.8%	35.1%	\$1,566	7.8%	30.2%	
	Upper	15	71.4%	\$18,055	90.5%	48.1%	15	71.4%	44.2%	\$18,055	90.5%	49.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	21	100.0%	\$19,953	100.0%	100.0%	21	100.0%	100.0%	\$19,953	100.0%	100.0%	
SMALL BUSINESSES	Low	2	1.7%	\$550	1.9%	5.2%	2	1.7%	4.7%	\$550	1.9%	4.8%	
	Moderate	16	13.8%	\$4,420	14.9%	14.8%	16	13.8%	13.7%	\$4,420	14.9%	13.4%	
	Middle	50	43.1%	\$10,730	36.3%	34.3%	50	43.1%	34.1%	\$10,730	36.3%	35.9%	
	Upper	48	41.4%	\$13,867	46.9%	45.7%	48	41.4%	47.5%	\$13,867	46.9%	45.9%	
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	116	100.0%	\$29,567	100.0%	100.0%	116	100.0%	100.0%	\$29,567	100.0%	100.0%		
SMALL FARM	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	3.3%	\$0	0.0%	1.1%	
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	17.6%	\$0	0.0%	18.8%	
	Middle	0	0.0%	\$0	0.0%	37.3%	0	0.0%	44.0%	\$0	0.0%	38.9%	
	Upper	0	0.0%	\$0	0.0%	48.0%	0	0.0%	35.2%	\$0	0.0%	41.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%		

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: CA - San Diego

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg
		#	%	\$ (000s)	%	%	#	%	\$ (000s)	%	\$ %	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	\$0	0.0%	0.3%	
	Moderate	2	20.0%	\$442	4.0%	16.7%	2	20.0%	\$442	4.0%	3.0%	
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	\$0	0.0%	13.2%	
	Upper	7	70.0%	\$7,322	65.7%	42.3%	7	70.0%	\$7,322	65.7%	73.0%	
	Unknown	1	10.0%	\$3,375	30.3%	0.0%	1	10.0%	\$3,375	30.3%	10.5%	
	Total	10	100.0%	\$11,139	100.0%	100.0%	10	100.0%	\$11,139	100.0%	100.0%	
REFINANCE	Low	1	9.1%	\$139	1.6%	23.6%	1	9.1%	\$139	1.6%	1.2%	
	Moderate	1	9.1%	\$1,500	17.0%	16.7%	1	9.1%	\$1,500	17.0%	3.7%	
	Middle	1	9.1%	\$353	4.0%	17.4%	1	9.1%	\$353	4.0%	9.0%	
	Upper	8	72.7%	\$6,822	77.4%	42.3%	8	72.7%	\$6,822	77.4%	77.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	8.8%	
	Total	11	100.0%	\$8,814	100.0%	100.0%	11	100.0%	\$8,814	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	\$0	0.0%	2.1%	
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	\$0	0.0%	7.3%	
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	\$0	0.0%	17.7%	
	Upper	0	0.0%	\$0	0.0%	42.3%	0	0.0%	\$0	0.0%	67.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	5.4%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	42.3%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	4.8%	\$139	0.7%	23.6%	1	4.8%	\$139	0.7%	0.8%	
	Moderate	3	14.3%	\$1,942	9.7%	16.7%	3	14.3%	\$1,942	9.7%	3.3%	
	Middle	1	4.8%	\$353	1.8%	17.4%	1	4.8%	\$353	1.8%	10.3%	
	Upper	15	71.4%	\$14,144	70.9%	42.3%	15	71.4%	\$14,144	70.9%	70.3%	
	Unknown	1	4.8%	\$3,375	16.9%	0.0%	1	4.8%	\$3,375	16.9%	15.3%	
	Total	21	100.0%	\$19,953	100.0%	100.0%	21	100.0%	\$19,953	100.0%	100.0%	
Small Business	Total Businesses											
	\$1 Million or Less	27	23.3%	\$4,194	14.2%	91.0%	27	23.3%	\$4,194	14.2%	32.9%	
	Over \$1 Million	65	56.0%	\$19,465	65.8%	8.6%	65	56.0%				
	Total Rev. available	92	79.3%	\$23,659	80.0%	99.6%	92	79.3%				
	Rev. Not Known	24	20.7%	\$5,908	20.0%	0.4%	24	20.7%				
	Total	116	100.0%	\$29,567	100.0%	100.0%	116	100.0%				
	\$100,000 or Less	52	44.8%	\$2,825	9.6%		52	44.8%	\$2,825	9.6%	46.9%	
	\$100,001 - \$250,000	20	17.2%	\$4,085	13.8%		20	17.2%	\$4,085	13.8%	13.0%	
	\$250,001 - \$1 Million	44	37.9%	\$22,657	76.6%		44	37.9%	\$22,657	76.6%	40.1%	
	Total	116	100.0%	\$29,567	100.0%		116	100.0%	\$29,567	100.0%	100.0%	
Small Farm	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	93.7%	0	0.0%	\$0	0.0%	39.9%	
	Over \$1 Million	0	0.0%	\$0	0.0%	6.3%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	76.7%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	13.2%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	10.1%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Diego

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	3	1.9%	\$310	0.9%	2.9%
Moderate	7	4.4%	\$831	2.5%	14.7%
Middle	38	24.1%	\$3,951	11.7%	34.3%
Upper	110	69.6%	\$28,794	85.0%	48.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>158</i>	<i>100.0%</i>	<i>\$33,886</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Diego

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	3	1.9%	\$210	0.0%	23.6%
Moderate	5	3.2%	\$421	1.2%	16.7%
Middle	18	11.4%	\$1,925	5.7%	17.4%
Upper	130	82.3%	\$29,330	86.6%	42.3%
Unknown	2	1.3%	\$2,000	5.9%	0.0%
Total	158	100.0%	\$33,886	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison										
		2015, 2016						2015					2016					
		Bank				Owner	Count		Dollar			Count		Dollar				
		Count		Dollar		Occupied Units	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %	%									\$ (000s)	\$ %	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	7.3%	\$0	0.0%	4.8%	0	0.0%	7.5%	\$0	0.0%	4.7%
	Moderate	2	20.0%	\$1,620	11.4%	14.8%	2	28.6%	15.9%	\$1,620	23.9%	11.6%	0	0.0%	16.7%	\$0	0.0%	12.2%
	Middle	4	40.0%	\$3,274	23.0%	37.6%	4	57.1%	36.5%	\$3,274	48.2%	31.7%	0	0.0%	36.9%	\$0	0.0%	32.6%
	Upper	4	40.0%	\$9,317	65.6%	42.5%	1	14.3%	40.2%	\$1,897	27.9%	51.9%	3	100.0%	38.9%	\$7,420	100.0%	50.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$14,211	100.0%	100.0%	7	100.0%	100.0%	\$6,791	100.0%	100.0%	3	100.0%	100.0%	\$7,420	100.0%	100.0%
REFINANCE	Low	1	3.2%	\$175	0.8%	5.1%	0	0.0%	4.3%	\$0	0.0%	2.9%	1	5.3%	4.4%	\$175	1.3%	3.1%
	Moderate	4	12.9%	\$1,115	4.8%	14.8%	2	16.7%	13.8%	\$351	3.8%	10.1%	2	10.5%	13.8%	\$764	5.5%	10.3%
	Middle	8	25.8%	\$3,482	15.1%	37.6%	3	25.0%	37.6%	\$1,570	17.1%	32.3%	5	26.3%	37.7%	\$1,912	13.7%	32.7%
	Upper	18	58.1%	\$18,344	79.4%	42.5%	7	58.3%	44.3%	\$7,238	79.0%	54.7%	11	57.9%	44.0%	\$11,106	79.6%	53.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	31	100.0%	\$23,116	100.0%	100.0%	12	100.0%	100.0%	\$9,159	100.0%	100.0%	19	100.0%	100.0%	\$13,957	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	5.0%	\$0	0.0%	3.5%	0	0.0%	5.4%	\$0	0.0%	3.6%
	Moderate	0	0.0%	\$0	0.0%	14.8%	0	0.0%	15.2%	\$0	0.0%	10.9%	0	0.0%	15.2%	\$0	0.0%	10.6%
	Middle	0	0.0%	\$0	0.0%	37.6%	0	0.0%	36.8%	\$0	0.0%	30.7%	0	0.0%	36.0%	\$0	0.0%	29.9%
	Upper	0	0.0%	\$0	0.0%	42.5%	0	0.0%	43.0%	\$0	0.0%	54.9%	0	0.0%	43.5%	\$0	0.0%	55.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	1	100.0%	\$1,827	100.0%	23.4%	0	0.0%	21.1%	\$0	0.0%	21.8%	1	100.0%	22.8%	\$1,827	100.0%	25.0%
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	28.0%	\$0	0.0%	21.1%	0	0.0%	26.2%	\$0	0.0%	19.0%
	Middle	0	0.0%	\$0	0.0%	31.7%	0	0.0%	29.6%	\$0	0.0%	33.3%	0	0.0%	27.8%	\$0	0.0%	33.3%
	Upper	0	0.0%	\$0	0.0%	23.0%	0	0.0%	21.3%	\$0	0.0%	23.8%	0	0.0%	23.2%	\$0	0.0%	22.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$1,827	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,827	100.0%	100.0%
HMDA TOTALS	Low	2	4.8%	\$2,002	5.1%	5.1%	0	0.0%	5.4%	\$0	0.0%	5.0%	2	8.7%	5.5%	\$2,002	8.6%	5.0%
	Moderate	6	14.3%	\$2,735	7.0%	14.8%	4	21.1%	14.7%	\$1,971	12.4%	11.5%	2	8.7%	14.8%	\$764	3.3%	11.4%
	Middle	12	28.6%	\$6,756	17.3%	37.6%	7	36.8%	37.1%	\$4,844	30.4%	32.1%	5	21.7%	37.3%	\$1,912	8.2%	32.6%
	Upper	22	52.4%	\$27,661	70.6%	42.5%	8	42.1%	42.7%	\$9,135	57.3%	51.5%	14	60.9%	42.4%	\$18,526	79.8%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	42	100.0%	\$39,154	100.0%	100.0%	19	100.0%	100.0%	\$15,950	100.0%	100.0%	23	100.0%	100.0%	\$23,204	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	122	16.4%	\$25,932	15.9%	13.2%	72	17.0%	11.5%	\$14,924	16.6%	14.2%	50	15.6%	10.4%	\$11,008	15.1%	13.6%
	Moderate	88	11.8%	\$22,369	13.7%	15.2%	47	11.1%	15.3%	\$10,186	11.3%	15.0%	41	12.8%	15.1%	\$12,183	16.7%	14.0%
	Middle	191	25.7%	\$42,223	25.9%	32.0%	104	24.5%	33.4%	\$21,112	23.5%	29.4%	87	27.2%	33.8%	\$21,111	29.0%	29.8%
	Upper	343	46.1%	\$72,342	44.4%	39.6%	201	47.4%	39.6%	\$43,799	48.7%	41.2%	142	44.4%	40.4%	\$28,543	39.2%	42.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.2%
Total	744	100.0%	\$162,866	100.0%	100.0%	424	100.0%	100.0%	\$90,021	100.0%	100.0%	320	100.0%	100.0%	\$72,845	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	6.6%	0	0.0%	9.0%	\$0	0.0%	16.1%	0	0.0%	6.3%	\$0	0.0%	5.3%
	Moderate	0	0.0%	\$0	0.0%	12.8%	0	0.0%	7.2%	\$0	0.0%	2.7%	0	0.0%	10.9%	\$0	0.0%	14.6%
	Middle	0	0.0%	\$0	0.0%	26.9%	0	0.0%	31.1%	\$0	0.0%	15.6%	0	0.0%	27.6%	\$0	0.0%	24.1%
	Upper	0	0.0%	\$0	0.0%	53.6%	0	0.0%	52.7%	\$0	0.0%	65.7%	0	0.0%	55.2%	\$0	0.0%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank		Families by Family Income	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
													#	%	\$ (000s)	\$ %	%	#
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	1.4%	\$0	0.0%	0.5%	0	0.0%	1.1%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	7.1%	\$0	0.0%	3.1%	0	0.0%	7.1%	\$0	0.0%	3.1%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	15.0%	\$0	0.0%	9.7%	0	0.0%	15.9%	\$0	0.0%	10.1%
	Upper	8	80.0%	\$7,841	55.2%	41.1%	7	100.0%	60.3%	\$6,791	100.0%	72.2%	1	33.3%	65.2%	\$1,050	14.2%	75.8%
	Unknown	2	20.0%	\$6,370	44.8%	0.0%	0	0.0%	16.3%	\$0	0.0%	14.5%	2	66.7%	10.6%	\$6,370	85.8%	10.6%
	Total	10	100.0%	\$14,211	100.0%	100.0%	7	100.0%	100.0%	\$6,791	100.0%	100.0%	3	100.0%	100.0%	\$7,420	100.0%	100.0%
REFINANCE	Low	2	6.5%	\$2,019	8.7%	23.8%	2	16.7%	3.1%	\$2,019	22.0%	1.3%	0	0.0%	2.9%	\$0	0.0%	1.4%
	Moderate	2	6.5%	\$313	1.4%	16.4%	0	0.0%	9.3%	\$0	0.0%	5.1%	2	10.5%	10.0%	\$313	2.2%	5.7%
	Middle	4	12.9%	\$1,081	4.7%	18.7%	2	16.7%	17.6%	\$515	5.6%	12.9%	2	10.5%	19.3%	\$566	4.1%	14.3%
	Upper	21	67.7%	\$17,492	75.7%	41.1%	6	50.0%	54.6%	\$4,414	48.2%	65.5%	15	78.9%	57.4%	\$13,078	93.7%	67.7%
	Unknown	2	6.5%	\$2,211	9.6%	0.0%	2	16.7%	15.4%	\$2,211	24.1%	15.2%	0	0.0%	10.4%	\$0	0.0%	10.9%
	Total	31	100.0%	\$23,116	100.0%	100.0%	12	100.0%	100.0%	\$9,159	100.0%	100.0%	19	100.0%	100.0%	\$13,957	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	3.6%	\$0	0.0%	1.3%	0	0.0%	3.8%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	11.0%	\$0	0.0%	5.8%	0	0.0%	11.9%	\$0	0.0%	6.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	19.4%	\$0	0.0%	13.3%	0	0.0%	20.4%	\$0	0.0%	14.2%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	58.5%	\$0	0.0%	71.0%	0	0.0%	60.1%	\$0	0.0%	72.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.5%	\$0	0.0%	8.6%	0	0.0%	3.7%	\$0	0.0%	5.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$1,827	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,827	100.0%	100.0%
	Total	1	100.0%	\$1,827	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,827	100.0%	100.0%
HMDA TOTALS	Low	2	4.8%	\$2,019	5.2%	23.8%	2	10.5%	2.6%	\$2,019	12.7%	0.9%	0	0.0%	2.5%	\$0	0.0%	1.0%
	Moderate	2	4.8%	\$313	0.8%	16.4%	0	0.0%	8.6%	\$0	0.0%	4.1%	2	8.7%	9.2%	\$313	1.3%	4.6%
	Middle	4	9.5%	\$1,081	2.8%	18.7%	2	10.5%	16.7%	\$515	3.2%	10.9%	2	8.7%	18.2%	\$566	2.4%	12.1%
	Upper	29	69.0%	\$25,333	64.7%	41.1%	13	68.4%	55.8%	\$11,205	70.3%	63.0%	16	69.6%	59.0%	\$14,128	60.9%	66.1%
	Unknown	5	11.9%	\$10,408	26.6%	0.0%	2	10.5%	16.3%	\$2,211	13.9%	21.1%	3	13.0%	11.1%	\$8,197	35.3%	16.2%
	Total	42	100.0%	\$39,154	100.0%	100.0%	19	100.0%	100.0%	\$15,950	100.0%	100.0%	23	100.0%	100.0%	\$23,204	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	141	19.0%	\$22,502	13.8%	90.2%	81	19.1%	50.8%	\$12,191	13.5%	34.8%	60	18.8%	38.6%	\$10,311	14.2%	30.0%
	Over \$1 Million	433	58.2%	\$114,093	70.1%	9.3%	272	64.2%					161	50.3%				
	Total Rev. available	574	77.2%	\$136,595	83.9%	99.5%	353	83.3%					221	69.1%				
	Rev. Not Known	170	22.8%	\$26,271	16.1%	0.5%	71	16.7%					99	30.9%				
	Total	744	100.0%	\$162,866	100.0%	100.0%	424	100.0%					320	100.0%				
Small Business Loan Size	\$100,000 or Less	397	53.4%	\$21,265	13.1%		236	55.7%	95.7%	\$12,038	13.4%	46.9%	161	50.3%	96.7%	\$9,227	12.7%	54.5%
	\$100,001 - \$250,000	163	21.9%	\$30,362	18.6%		85	20.0%	2.1%	\$15,588	17.3%	11.4%	78	24.4%	1.6%	\$14,774	20.3%	9.8%
	\$250,001 - \$1 Million	184	24.7%	\$111,239	68.3%		103	24.3%	2.2%	\$62,395	69.3%	41.7%	81	25.3%	1.7%	\$48,844	67.1%	35.7%
	Total	744	100.0%	\$162,866	100.0%		424	100.0%	100.0%	\$90,021	100.0%	100.0%	320	100.0%	100.0%	\$72,845	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.3%	0	0.0%	52.1%	\$0	0.0%	40.9%	0	0.0%	46.6%	\$0	0.0%	32.7%
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	4.4%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.2%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	91.6%	\$0	0.0%	42.8%	0	0.0%	95.4%	\$0	0.0%	62.8%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.6%	\$0	0.0%	13.8%	0	0.0%	2.9%	\$0	0.0%	16.2%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.8%	\$0	0.0%	43.5%	0	0.0%	1.7%	\$0	0.0%	21.0%
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Francisco Bay

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	10	1.2%	\$2,163	1.0%	5.1%
Moderate	80	9.6%	\$14,561	7.0%	14.8%
Middle	267	32.1%	\$58,046	28.0%	37.6%
Upper	474	57.0%	\$132,534	63.9%	42.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	831	100.0%	\$207,304	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Francisco Bay

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	17	2.0%	\$2,397	0.0%	23.8%
Moderate	45	5.4%	\$6,719	3.2%	16.4%
Middle	115	13.8%	\$17,485	8.4%	18.7%
Upper	651	78.3%	\$174,103	84.0%	41.1%
Unknown	3	0.4%	\$6,600	3.2%	0.0%
<i>Total</i>	<i>831</i>	<i>100.0%</i>	<i>\$207,304</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	\$0	0.0%	4.3%	
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	\$0	0.0%	15.5%	
	Middle	0	0.0%	\$0	0.0%	32.8%	0	0.0%	\$0	0.0%	29.6%	
	Upper	1	100.0%	\$1,580	100.0%	45.3%	1	100.0%	\$1,580	100.0%	50.3%	
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%	0.4%	
	Total	1	100.0%	\$1,580	100.0%	100.0%	1	100.0%	\$1,580	100.0%	100.0%	
REFINANCE	Low	1	7.1%	\$360	2.3%	5.0%	1	7.1%	\$360	2.3%	6.0%	
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	\$0	0.0%	15.9%	
	Middle	2	14.3%	\$1,268	8.0%	32.8%	2	14.3%	\$1,268	8.0%	30.1%	
	Upper	11	78.6%	\$14,275	89.8%	45.3%	11	78.6%	\$14,275	89.8%	47.9%	
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%	0.2%	
	Total	14	100.0%	\$15,903	100.0%	100.0%	14	100.0%	\$15,903	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	\$0	0.0%	4.1%	
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	\$0	0.0%	13.0%	
	Middle	1	100.0%	\$1,400	100.0%	32.8%	1	100.0%	\$1,400	100.0%	28.7%	
	Upper	0	0.0%	\$0	0.0%	45.3%	0	0.0%	\$0	0.0%	54.1%	
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%	0.3%	
	Total	1	100.0%	\$1,400	100.0%	100.0%	1	100.0%	\$1,400	100.0%	100.0%	
MULTI-FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	19.8%	0	0.0%	\$0	0.0%	22.8%	
	Moderate	0	0.0%	\$0	0.0%	23.9%	0	0.0%	\$0	0.0%	20.4%	
	Middle	0	0.0%	\$0	0.0%	26.7%	0	0.0%	\$0	0.0%	23.5%	
	Upper	0	0.0%	\$0	0.0%	27.7%	0	0.0%	\$0	0.0%	30.6%	
	Unknown	0	0.0%	\$0	0.0%	1.9%	0	0.0%	\$0	0.0%	2.6%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	6.3%	\$360	1.9%	5.0%	1	6.3%	\$360	1.9%	6.3%	
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	\$0	0.0%	15.9%	
	Middle	3	18.8%	\$2,668	14.1%	32.8%	3	18.8%	\$2,668	14.1%	29.4%	
	Upper	12	75.0%	\$15,855	84.0%	45.3%	12	75.0%	\$15,855	84.0%	48.0%	
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%	0.4%	
	Total	16	100.0%	\$18,883	100.0%	100.0%	16	100.0%	\$18,883	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses											
	Low	41	13.9%	\$10,357	13.2%	11.3%	41	13.9%	\$10,357	13.2%	13.2%	
	Moderate	51	17.3%	\$16,040	20.4%	16.9%	51	17.3%	\$16,040	20.4%	16.5%	
	Middle	76	25.9%	\$20,980	26.7%	28.4%	76	25.9%	\$20,980	26.7%	26.0%	
	Upper	124	42.2%	\$30,659	39.0%	42.7%	124	42.2%	\$30,659	39.0%	43.5%	
	Unknown	2	0.7%	\$650	0.8%	0.7%	2	0.7%	\$650	0.8%	0.7%	
	Total	294	100.0%	\$78,686	100.0%	100.0%	294	100.0%	\$78,686	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	6.9%	0	0.0%	\$0	0.0%	7.4%	
	Moderate	0	0.0%	\$0	0.0%	12.7%	0	0.0%	\$0	0.0%	4.7%	
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	\$0	0.0%	17.4%	
	Upper	0	0.0%	\$0	0.0%	56.9%	0	0.0%	\$0	0.0%	70.4%	
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg
		#	%				#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	0.9%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	6.3%	\$0	0.0%	2.7%
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	15.4%	\$0	0.0%	9.2%
	Upper	1	100.0%	\$1,580	100.0%	41.4%	1	100.0%	67.1%	\$1,580	100.0%	78.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.2%	\$0	0.0%	9.5%
	Total	1	100.0%	\$1,580	100.0%	100.0%	1	100.0%	100.0%	\$1,580	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	5.2%	\$0	0.0%	1.7%
	Moderate	1	7.1%	\$2,585	16.3%	15.9%	1	7.1%	12.6%	\$2,585	16.3%	4.8%
	Middle	3	21.4%	\$1,343	8.4%	18.0%	3	21.4%	20.1%	\$1,343	8.4%	10.2%
	Upper	8	57.1%	\$8,375	52.7%	41.4%	8	57.1%	51.8%	\$8,375	52.7%	75.9%
	Unknown	2	14.3%	\$3,600	22.6%	0.0%	2	14.3%	10.3%	\$3,600	22.6%	7.5%
	Total	14	100.0%	\$15,903	100.0%	100.0%	14	100.0%	100.0%	\$15,903	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	4.9%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	14.2%	\$0	0.0%	7.9%
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	21.9%	\$0	0.0%	15.9%
	Upper	1	100.0%	\$1,400	100.0%	41.4%	1	100.0%	54.5%	\$1,400	100.0%	67.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.4%	\$0	0.0%	6.4%
	Total	1	100.0%	\$1,400	100.0%	100.0%	1	100.0%	100.0%	\$1,400	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	24.7%	0	0.0%	3.4%	\$0	0.0%	1.1%
	Moderate	1	6.3%	\$2,585	13.7%	15.9%	1	6.3%	10.0%	\$2,585	13.7%	3.8%
	Middle	3	18.8%	\$1,343	7.1%	18.0%	3	18.8%	18.1%	\$1,343	7.1%	9.4%
	Upper	10	62.5%	\$11,355	60.1%	41.4%	10	62.5%	57.5%	\$11,355	60.1%	71.9%
	Unknown	2	12.5%	\$3,600	19.1%	0.0%	2	12.5%	11.1%	\$3,600	19.1%	13.8%
	Total	16	100.0%	\$18,883	100.0%	100.0%	16	100.0%	100.0%	\$18,883	100.0%	100.0%
Small Business	Total Businesses											
	\$1 Million or Less	42	14.3%	\$6,326	8.0%	89.2%	42	14.3%	53.7%	\$6,326	8.0%	34.6%
	Over \$1 Million	163	55.4%	\$55,373	70.4%	10.3%	163	55.4%				
	Total Rev. available	205	69.7%	\$61,699	78.4%	99.5%	205	69.7%				
	Rev. Not Known	89	30.3%	\$16,987	21.6%	0.5%	89	30.3%				
	Total	294	100.0%	\$78,686	100.0%	100.0%	294	100.0%				
	Total Farms											
	\$100,000 or Less	139	47.3%	\$7,973	10.1%		139	47.3%	95.6%	\$7,973	10.1%	47.3%
	\$100,001 - \$250,000	65	22.1%	\$12,553	16.0%		65	22.1%	2.2%	\$12,553	16.0%	11.9%
	\$250,001 - \$1 Million	90	30.6%	\$58,160	73.9%		90	30.6%	2.2%	\$58,160	73.9%	40.7%
	Total	294	100.0%	\$78,686	100.0%		294	100.0%	100.0%	\$78,686	100.0%	100.0%
Small Farm	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	94.9%	0	0.0%	52.0%	\$0	0.0%	38.1%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.9%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Total Farms											
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	94.3%	\$0	0.0%	55.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.1%	\$0	0.0%	14.4%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	30.6%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Francisco Bay

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	14	3.9%	\$2,339	2.7%	5.0%
Moderate	51	14.3%	\$8,546	10.0%	16.8%
Middle	102	28.7%	\$19,203	22.5%	32.8%
Upper	189	53.1%	\$55,404	64.8%	45.3%
Unknown	0	0.0%	\$0	0.0%	0.2%
Total	356	100.0%	\$85,492	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Francisco Bay

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	11	3.1%	\$816	0.0%	24.7%
Moderate	29	8.1%	\$3,183	3.7%	15.9%
Middle	77	21.6%	\$13,726	16.1%	18.0%
Upper	235	66.0%	\$64,842	75.8%	41.4%
Unknown	4	1.1%	\$2,925	3.4%	0.0%
Total	356	100.0%	\$85,492	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Jose

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison																			
		2015, 2016										2015										2016									
		Bank					Owner Occupied Units	Count					Dollar					Count					Dollar								
		Count		Dollar				Bank		Agg	Bank			Agg	Bank		Agg	Bank			Agg										
		#	%	\$ (000s)	\$ %	%		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %												
HOME PURCHASE	Low	1	14.3%	\$776	6.4%	4.5%	1	33.3%	5.6%	\$776	21.0%	3.7%	0	0.0%	6.7%	\$0	0.0%	4.4%													
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	22.5%	\$0	0.0%	16.4%	0	0.0%	22.3%	\$0	0.0%	16.6%													
	Middle	1	14.3%	\$435	3.6%	39.0%	1	33.3%	41.7%	\$435	11.8%	37.1%	0	0.0%	42.2%	\$0	0.0%	38.1%													
	Upper	5	71.4%	\$10,967	90.1%	38.6%	1	33.3%	30.2%	\$2,480	67.2%	42.8%	4	100.0%	28.8%	\$8,487	100.0%	41.0%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Total	7	100.0%	\$12,178	100.0%	100.0%	3	100.0%	100.0%	\$3,691	100.0%	100.0%	4	100.0%	100.0%	\$8,487	100.0%	100.0%													
REFINANCE	Low	1	6.7%	\$155	1.1%	4.5%	1	16.7%	4.5%	\$155	3.1%	3.0%	0	0.0%	4.5%	\$0	0.0%	3.1%													
	Moderate	1	6.7%	\$284	1.9%	17.9%	1	16.7%	18.5%	\$284	5.6%	14.0%	0	0.0%	19.4%	\$0	0.0%	15.0%													
	Middle	6	40.0%	\$3,352	23.0%	39.0%	2	33.3%	40.2%	\$1,527	30.1%	35.7%	4	44.4%	40.4%	\$1,825	19.2%	36.3%													
	Upper	7	46.7%	\$10,777	74.0%	38.6%	2	33.3%	36.8%	\$3,100	61.2%	47.3%	5	55.6%	35.8%	\$7,677	80.8%	45.6%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Total	15	100.0%	\$14,568	100.0%	100.0%	6	100.0%	100.0%	\$5,066	100.0%	100.0%	9	100.0%	100.0%	\$9,502	100.0%	100.0%													
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.5%	0	0.0%	5.5%	\$0	0.0%	3.2%	0	0.0%	4.4%	\$0	0.0%	2.8%													
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	16.9%	\$0	0.0%	11.0%	0	0.0%	16.6%	\$0	0.0%	11.7%													
	Middle	1	100.0%	\$1,709	100.0%	39.0%	1	100.0%	37.9%	\$1,709	100.0%	29.8%	0	0.0%	39.8%	\$0	0.0%	32.9%													
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	39.7%	\$0	0.0%	56.0%	0	0.0%	39.2%	\$0	0.0%	52.5%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Total	1	100.0%	\$1,709	100.0%	100.0%	1	100.0%	100.0%	\$1,709	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
MULTI-FAMILY	Multi-Family Units																														
	Low	0	0.0%	\$0	0.0%	10.2%	0	0.0%	22.1%	\$0	0.0%	17.3%	0	0.0%	15.7%	\$0	0.0%	5.7%													
	Moderate	0	0.0%	\$0	0.0%	31.9%	0	0.0%	29.8%	\$0	0.0%	35.9%	0	0.0%	35.8%	\$0	0.0%	29.1%													
	Middle	0	0.0%	\$0	0.0%	39.7%	0	0.0%	30.5%	\$0	0.0%	34.2%	0	0.0%	36.5%	\$0	0.0%	52.2%													
	Upper	0	0.0%	\$0	0.0%	18.1%	0	0.0%	17.6%	\$0	0.0%	12.6%	0	0.0%	11.9%	\$0	0.0%	13.0%													
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
	Low	2	8.7%	\$931	3.3%	4.5%	2	20.0%	5.0%	\$931	8.9%	4.1%	0	0.0%	5.1%	\$0	0.0%	3.6%													
	Moderate	1	4.3%	\$284	1.0%	17.9%	1	10.0%	19.7%	\$284	2.7%	15.9%	0	0.0%	20.0%	\$0	0.0%	16.1%													
	Middle	8	34.8%	\$5,496	19.3%	39.0%	4	40.0%	40.5%	\$3,671	35.1%	35.9%	4	30.8%	40.8%	\$1,825	10.1%	37.6%													
	Upper	12	52.2%	\$21,744	76.4%	38.6%	3	30.0%	34.9%	\$5,580	53.3%	44.2%	9	69.2%	34.1%	\$16,164	89.9%	42.7%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
SMALL BUSINESSES	Total	23	100.0%	\$28,455	100.0%	100.0%	10	100.0%	100.0%	\$10,466	100.0%	100.0%	13	100.0%	100.0%	\$17,989	100.0%	100.0%													
	Small Businesses																														
	Low	67	8.3%	\$15,346	8.7%	6.1%	36	7.7%	5.4%	\$7,784	7.8%	6.4%	31	9.1%	5.5%	\$7,562	9.8%	6.1%													
	Moderate	246	30.4%	\$55,663	31.5%	20.6%	152	32.5%	21.9%	\$34,508	34.7%	25.7%	94	27.5%	21.6%	\$21,155	27.3%	24.9%													
	Middle	252	31.1%	\$57,727	32.6%	35.2%	138	29.6%	36.3%	\$31,018	31.2%	33.6%	114	33.3%	36.7%	\$26,709	34.5%	34.5%													
	Upper	244	30.2%	\$48,250	27.3%	38.0%	141	30.2%	36.4%	\$26,202	26.3%	34.2%	103	30.1%	36.2%	\$22,048	28.5%	34.5%													
SMALL FARM	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Total	809	100.0%	\$176,986	100.0%	100.0%	467	100.0%	100.0%	\$99,512	100.0%	100.0%	342	100.0%	100.0%	\$77,474	100.0%	100.0%													
	Small Farms																														
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	1.0%	\$0	0.0%	0.4%	0	0.0%	2.8%	\$0	0.0%	0.9%													
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	18.6%	\$0	0.0%	19.8%	0	0.0%	21.7%	\$0	0.0%	23.6%													
SMALL FARM	Middle	0	0.0%	\$0	0.0%	32.1%	0	0.0%	40.2%	\$0	0.0%	39.8%	0	0.0%	31.1%	\$0	0.0%	31.4%													
	Upper	0	0.0%	\$0	0.0%	48.3%	0	0.0%	40.2%	\$0	0.0%	40.1%	0	0.0%	44.3%	\$0	0.0%	44.1%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													

Originations & Purchases

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - San Jose

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison												
		2015, 2016					2015						2016						
		Bank				Families by Family Income	Count			Dollar			Count			Dollar			
		Count		Dollar			Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	
		#	%	\$ (000s)	\$ %														#
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	1.1%	\$0	0.0%	0.3%	0	0.0%	1.1%	\$0	0.0%	0.3%	
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	6.3%	\$0	0.0%	2.9%	0	0.0%	5.7%	\$0	0.0%	2.5%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	18.1%	\$0	0.0%	12.5%	0	0.0%	17.5%	\$0	0.0%	11.7%	
	Upper	5	71.4%	\$10,967	90.1%	41.1%	1	33.3%	62.0%	\$2,480	67.2%	72.9%	4	100.0%	67.8%	\$8,487	100.0%	78.0%	
	Unknown	2	28.6%	\$1,211	9.9%	0.0%	2	66.7%	12.6%	\$1,211	32.8%	11.4%	0	0.0%	8.0%	\$0	0.0%	7.4%	
	Total	7	100.0%	\$12,178	100.0%	100.0%	3	100.0%	100.0%	\$3,691	100.0%	100.0%	4	100.0%	100.0%	\$8,487	100.0%	100.0%	
REFINANCE	Low	1	6.7%	\$155	1.1%	23.4%	1	16.7%	3.0%	\$155	3.1%	1.3%	0	0.0%	2.4%	\$0	0.0%	1.2%	
	Moderate	1	6.7%	\$1,750	12.0%	16.2%	0	0.0%	9.4%	\$0	0.0%	5.5%	1	11.1%	8.9%	\$1,750	18.4%	5.3%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	18.9%	\$0	0.0%	14.6%	0	0.0%	19.0%	\$0	0.0%	14.6%	
	Upper	12	80.0%	\$11,663	80.1%	41.1%	4	66.7%	55.1%	\$3,911	77.2%	65.5%	8	88.9%	60.4%	\$7,752	81.6%	70.0%	
	Unknown	1	6.7%	\$1,000	6.9%	0.0%	1	16.7%	13.6%	\$1,000	19.7%	13.2%	0	0.0%	9.3%	\$0	0.0%	9.0%	
	Total	15	100.0%	\$14,568	100.0%	100.0%	6	100.0%	100.0%	\$5,066	100.0%	100.0%	9	100.0%	100.0%	\$9,502	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	4.4%	\$0	0.0%	1.5%	0	0.0%	4.5%	\$0	0.0%	1.8%	
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	12.5%	\$0	0.0%	6.7%	0	0.0%	11.8%	\$0	0.0%	6.6%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	19.1%	\$0	0.0%	13.1%	0	0.0%	20.4%	\$0	0.0%	15.2%	
	Upper	1	100.0%	\$1,709	100.0%	41.1%	1	100.0%	57.9%	\$1,709	100.0%	73.5%	0	0.0%	60.9%	\$0	0.0%	73.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.0%	\$0	0.0%	5.2%	0	0.0%	2.3%	\$0	0.0%	3.2%	
	Total	1	100.0%	\$1,709	100.0%	100.0%	1	100.0%	100.0%	\$1,709	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	41.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	4.3%	\$155	0.5%	23.4%	1	10.0%	2.5%	\$155	1.5%	0.9%	0	0.0%	2.2%	\$0	0.0%	0.9%	
	Moderate	1	4.3%	\$1,750	6.2%	16.2%	0	0.0%	8.6%	\$0	0.0%	4.4%	1	7.7%	8.2%	\$1,750	9.7%	4.2%	
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	18.6%	\$0	0.0%	13.0%	0	0.0%	18.6%	\$0	0.0%	13.0%	
	Upper	18	78.3%	\$24,339	85.5%	41.1%	6	60.0%	56.9%	\$8,100	77.4%	64.4%	12	92.3%	61.9%	\$16,239	90.3%	68.6%	
	Unknown	3	13.0%	\$2,211	7.8%	0.0%	3	30.0%	13.5%	\$2,211	21.1%	17.3%	0	0.0%	9.1%	\$0	0.0%	13.3%	
	Total	23	100.0%	\$28,455	100.0%	100.0%	10	100.0%	100.0%	\$10,466	100.0%	100.0%	13	100.0%	100.0%	\$17,989	100.0%	100.0%	
Small Business Revenue	Total Businesses						125	26.8%	52.6%	\$15,904	16.0%	34.8%	62	18.1%	39.7%	\$10,877	14.0%	30.6%	
	\$1 Million or Less	187	23.1%	\$26,781	15.1%	90.4%													
	Over \$1 Million	393	48.6%	\$107,024	60.5%	9.2%		232	49.7%					161	47.1%				
	Total Rev. available	580	71.7%	\$133,805	75.6%	99.6%		357	76.5%					223	65.2%				
	Rev. Not Known	229	28.3%	\$43,181	24.4%	0.3%		110	23.6%					119	34.8%				
	Total	809	100.0%	\$176,986	100.0%	100.0%		467	100.0%					342	100.0%				
Small Business Loan Size	\$100,000 or Less	412	50.9%	\$22,638	12.8%			242	51.8%	95.9%	\$13,310	13.4%	47.2%	170	49.7%	96.8%	\$9,328	12.0%	55.3%
	\$100,001 - \$250,000	193	23.9%	\$36,939	20.9%			109	23.3%	2.0%	\$20,672	20.8%	11.5%	84	24.6%	1.6%	\$16,267	21.0%	10.0%
	\$250,001 - \$1 Million	204	25.2%	\$117,409	66.3%			116	24.8%	2.2%	\$65,530	65.9%	41.4%	88	25.7%	1.6%	\$51,879	67.0%	34.7%
	Total	809	100.0%	\$176,986	100.0%			467	100.0%	100.0%	\$99,512	100.0%	100.0%	342	100.0%	100.0%	\$77,474	100.0%	100.0%
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	93.8%		0	0.0%	46.4%	\$0	0.0%	21.7%	0	0.0%	55.7%	\$0	0.0%	33.8%
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	6.2%		0	0.0%				0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%		0	0.0%				0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%		0	0.0%				0	0.0%					
	\$100,000 or Less	0	0.0%	\$0	0.0%			0	0.0%	91.8%	\$0	0.0%	52.9%	0	0.0%	90.6%	\$0	0.0%	48.2%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%			0	0.0%	4.1%	\$0	0.0%	12.0%	0	0.0%	8.5%	\$0	0.0%	40.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%			0	0.0%	4.1%	\$0	0.0%	35.1%	0	0.0%	0.9%	\$0	0.0%	11.5%
Total	0	0.0%	\$0	0.0%			0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FRIC Census Data, 2016 D&B info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Jose

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				
	Bank		Owner Occupied Units		
	Count	Dollar			
	#	%	\$ (000s)	\$ %	%
Low	10	2.0%	\$1,156	0.8%	4.5%
Moderate	57	11.5%	\$9,611	6.8%	17.9%
Middle	186	37.4%	\$44,019	31.1%	39.0%
Upper	244	49.1%	\$86,534	61.2%	38.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>497</i>	<i>100.0%</i>	<i>\$141,320</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Jose

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				
	Bank		Families by Family Income		
	Count	Dollar			
	#	%	\$ (000s)	\$ %	%
Low	19	3.8%	\$1,953	0.0%	23.4%
Moderate	28	5.6%	\$3,558	2.5%	16.2%
Middle	68	13.7%	\$12,139	8.6%	19.4%
Upper	376	75.7%	\$119,413	84.5%	41.1%
Unknown	6	1.2%	\$4,257	3.0%	0.0%
<i>Total</i>	<i>497</i>	<i>100.0%</i>	<i>\$141,320</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - San Jose

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	6.2%	\$0	0.0%	6.9%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	20.1%	\$0	0.0%	13.3%
	Middle	0	0.0%	\$0	0.0%	36.6%	0	0.0%	40.7%	\$0	0.0%	34.7%
	Upper	2	100.0%	\$1,944	100.0%	43.5%	2	100.0%	33.0%	\$1,944	100.0%	45.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$1,944	100.0%	100.0%	2	100.0%	100.0%	\$1,944	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	5.3%	\$0	0.0%	8.2%
	Moderate	1	10.0%	\$153	2.0%	15.5%	1	10.0%	17.9%	\$153	2.0%	10.5%
	Middle	1	10.0%	\$760	9.8%	36.6%	1	10.0%	37.4%	\$760	9.8%	37.5%
	Upper	8	80.0%	\$6,839	88.2%	43.5%	8	80.0%	39.3%	\$6,839	88.2%	43.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$7,752	100.0%	100.0%	10	100.0%	100.0%	\$7,752	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	4.4%	\$0	0.0%	3.3%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	15.9%	\$0	0.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	36.6%	0	0.0%	38.0%	\$0	0.0%	32.0%
	Upper	0	0.0%	\$0	0.0%	43.5%	0	0.0%	41.7%	\$0	0.0%	54.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	12.1%	0	0.0%	20.1%	\$0	0.0%	8.9%
	Moderate	0	0.0%	\$0	0.0%	22.7%	0	0.0%	27.2%	\$0	0.0%	25.2%
	Middle	0	0.0%	\$0	0.0%	41.9%	0	0.0%	36.1%	\$0	0.0%	38.7%
	Upper	0	0.0%	\$0	0.0%	23.3%	0	0.0%	16.7%	\$0	0.0%	27.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	5.7%	\$0	0.0%	7.5%
	Moderate	1	8.3%	\$153	1.6%	15.5%	1	8.3%	18.7%	\$153	1.6%	12.6%
	Middle	1	8.3%	\$760	7.8%	36.6%	1	8.3%	38.8%	\$760	7.8%	36.2%
	Upper	10	83.3%	\$8,783	90.6%	43.5%	10	83.3%	36.8%	\$8,783	90.6%	43.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	12	100.0%	\$9,696	100.0%	100.0%	12	100.0%	100.0%	\$9,696	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	19	6.1%	\$3,181	4.3%	5.7%	19	6.1%	5.7%	\$3,181	4.3%	7.1%
	Moderate	65	20.9%	\$14,500	19.8%	17.1%	65	20.9%	18.7%	\$14,500	19.8%	21.6%
	Middle	121	38.9%	\$31,572	43.1%	35.7%	121	38.9%	37.5%	\$31,572	43.1%	36.1%
	Upper	106	34.1%	\$23,991	32.8%	41.5%	106	34.1%	38.0%	\$23,991	32.8%	35.2%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	311	100.0%	\$73,244	100.0%	100.0%	311	100.0%	100.0%	\$73,244	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	3.4%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	12.7%	\$0	0.0%	12.8%
	Middle	0	0.0%	\$0	0.0%	34.7%	0	0.0%	39.8%	\$0	0.0%	41.8%
	Upper	0	0.0%	\$0	0.0%	46.0%	0	0.0%	44.1%	\$0	0.0%	43.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size
Assessment Area: CA - San Jose

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ (000s)	\$ %	Agg %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	1.0%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	5.2%	\$0	0.0%	2.1%
	Middle	0	0.0%	\$0	0.0%	18.5%	0	0.0%	16.5%	\$0	0.0%	10.2%
	Upper	2	100.0%	\$1,944	100.0%	42.2%	2	100.0%	69.7%	\$1,944	100.0%	80.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.7%	\$0	0.0%	6.5%
	Total	2	100.0%	\$1,944	100.0%	100.0%	2	100.0%	100.0%	\$1,944	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	4.3%	\$0	0.0%	1.7%
	Moderate	3	30.0%	\$658	8.5%	15.5%	3	30.0%	11.3%	\$658	8.5%	5.3%
	Middle	1	10.0%	\$500	6.4%	18.5%	1	10.0%	20.3%	\$500	6.4%	12.4%
	Upper	6	60.0%	\$6,594	85.1%	42.2%	6	60.0%	55.0%	\$6,594	85.1%	73.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.0%	\$0	0.0%	7.5%
	Total	10	100.0%	\$7,752	100.0%	100.0%	10	100.0%	100.0%	\$7,752	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	4.7%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	11.0%	\$0	0.0%	6.2%
	Middle	0	0.0%	\$0	0.0%	18.5%	0	0.0%	22.2%	\$0	0.0%	15.9%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	59.3%	\$0	0.0%	72.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	3.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	3.0%	\$0	0.0%	1.1%
	Moderate	3	25.0%	\$658	6.8%	15.5%	3	25.0%	8.7%	\$658	6.8%	3.6%
	Middle	1	8.3%	\$500	5.2%	18.5%	1	8.3%	18.8%	\$500	5.2%	10.8%
	Upper	8	66.7%	\$8,538	88.1%	42.2%	8	66.7%	60.8%	\$8,538	88.1%	71.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.7%	\$0	0.0%	13.0%
	Total	12	100.0%	\$9,696	100.0%	100.0%	12	100.0%	100.0%	\$9,696	100.0%	100.0%
Small Business	Total Businesses											
	\$1 Million or Less	42	13.5%	\$5,632	7.7%	89.5%	42	13.5%	54.3%	\$5,632	7.7%	36.1%
	Over \$1 Million	148	47.6%	\$48,251	65.9%	10.2%	148	47.6%				
	Total Rev. available	190	61.1%	\$53,883	73.6%	99.7%	190	61.1%				
	Rev. Not Known	121	38.9%	\$19,361	26.4%	0.4%	121	38.9%				
	Total	311	100.0%	\$73,244	100.0%	100.0%	311	100.0%				
	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	93.9%	0	0.0%	50.0%	\$0	0.0%	42.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	6.1%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
Small Farm	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	95.8%	\$0	0.0%	73.8%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.2%	\$0	0.0%	26.2%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFEC Census Data, 2017 D&S Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Jose

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	4	1.8%	\$483	0.6%	4.4%
Moderate	22	9.9%	\$3,927	5.3%	15.5%
Middle	79	35.6%	\$17,780	23.9%	36.6%
Upper	117	52.7%	\$52,346	70.2%	43.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	222	100.0%	\$74,536	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - San Jose

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	7	3.2%	\$728	0.0%	23.8%
Moderate	15	6.8%	\$2,835	3.8%	15.5%
Middle	31	14.0%	\$5,335	7.2%	18.5%
Upper	165	74.3%	\$60,507	81.2%	42.2%
Unknown	4	1.8%	\$5,131	6.9%	0.0%
Total	222	100.0%	\$74,536	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Ventura

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison								Bank & Aggregate Lending Comparison											
		2015, 2016								2015						2016					
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar							
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg							
		#	%	\$ (000s)	\$ %										#	%	\$ (000s)	\$ %	#	%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	2.0%	\$0	0.0%	1.1%	0	0.0%	2.0%	\$0	0.0%	1.2%			
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	15.5%	\$0	0.0%	11.3%	0	0.0%	16.3%	\$0	0.0%	11.8%			
	Middle	1	100.0%	\$1,100	100.0%	36.3%	0	0.0%	39.3%	\$0	0.0%	34.1%	1	100.0%	40.6%	\$1,100	100.0%	35.8%			
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	43.2%	\$0	0.0%	53.4%	0	0.0%	41.1%	\$0	0.0%	51.2%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	1	100.0%	\$1,100	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,100	100.0%	100.0%			
REFINANCE	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.7%	\$0	0.0%	1.1%	0	0.0%	1.5%	\$0	0.0%	1.0%			
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	14.1%	\$0	0.0%	10.2%	0	0.0%	13.9%	\$0	0.0%	10.5%			
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	38.6%	\$0	0.0%	33.2%	0	0.0%	38.8%	\$0	0.0%	34.0%			
	Upper	2	100.0%	\$556	100.0%	45.0%	0	0.0%	45.5%	\$0	0.0%	55.5%	2	100.0%	45.7%	\$556	100.0%	54.4%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	2	100.0%	\$556	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$556	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.6%	\$0	0.0%	1.4%	0	0.0%	1.7%	\$0	0.0%	1.2%			
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	17.9%	\$0	0.0%	13.8%	0	0.0%	15.6%	\$0	0.0%	10.7%			
	Middle	0	0.0%	\$0	0.0%	36.3%	0	0.0%	37.3%	\$0	0.0%	33.3%	0	0.0%	35.6%	\$0	0.0%	28.8%			
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	43.2%	\$0	0.0%	51.5%	0	0.0%	47.1%	\$0	0.0%	59.2%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTI-FAMILY	Multi-Family Units																				
	Low	0	0.0%	\$0	0.0%	9.0%	0	0.0%	11.0%	\$0	0.0%	4.8%	0	0.0%	24.0%	\$0	0.0%	14.0%			
	Moderate	0	0.0%	\$0	0.0%	37.5%	0	0.0%	58.5%	\$0	0.0%	44.6%	0	0.0%	45.3%	\$0	0.0%	21.5%			
	Middle	0	0.0%	\$0	0.0%	39.4%	0	0.0%	18.3%	\$0	0.0%	44.7%	0	0.0%	14.7%	\$0	0.0%	18.8%			
	Upper	0	0.0%	\$0	0.0%	14.2%	0	0.0%	12.2%	\$0	0.0%	5.9%	0	0.0%	16.0%	\$0	0.0%	45.7%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%				
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.8%	0	0.0%	1.8%	\$0	0.0%	1.2%	0	0.0%	1.7%	\$0	0.0%	1.7%			
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	14.9%	\$0	0.0%	11.6%	0	0.0%	14.8%	\$0	0.0%	11.4%			
	Middle	1	33.3%	\$1,100	66.4%	36.3%	0	0.0%	38.8%	\$0	0.0%	33.9%	1	33.3%	39.2%	\$1,100	66.4%	33.8%			
	Upper	2	66.7%	\$556	33.6%	45.0%	0	0.0%	44.6%	\$0	0.0%	53.3%	2	66.7%	44.3%	\$556	33.6%	53.1%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	3	100.0%	\$1,656	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	3	100.0%	100.0%	\$1,656	100.0%	100.0%			
SMALL BUSINESSES	Small Businesses																				
	Low	0	0.0%	\$0	0.0%	3.7%	0	0.0%	3.4%	\$0	0.0%	6.2%	0	0.0%	3.2%	\$0	0.0%	5.1%			
	Moderate	4	12.9%	\$1,450	18.0%	18.9%	2	10.5%	16.8%	\$800	13.7%	19.7%	2	16.7%	15.7%	\$650	29.6%	18.6%			
	Middle	13	41.9%	\$2,457	30.5%	35.2%	8	42.1%	35.1%	\$2,047	35.0%	36.4%	5	41.7%	33.9%	\$410	18.7%	35.8%			
	Upper	14	45.2%	\$4,137	51.4%	42.2%	9	47.4%	44.7%	\$3,002	51.3%	37.6%	5	41.7%	47.2%	\$1,135	51.7%	40.4%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%				
Total	31	100.0%	\$8,044	100.0%	100.0%	19	100.0%	100.0%	\$5,849	100.0%	100.0%	12	100.0%	100.0%	\$2,195	100.0%	100.0%				
SMALL FARM	Small Farms																				
	Low	0	0.0%	\$0	0.0%	10.4%	0	0.0%	9.7%	\$0	0.0%	15.7%	0	0.0%	11.6%	\$0	0.0%	20.6%			
	Moderate	0	0.0%	\$0	0.0%	21.1%	0	0.0%	17.9%	\$0	0.0%	16.9%	0	0.0%	21.3%	\$0	0.0%	13.6%			
	Middle	0	0.0%	\$0	0.0%	38.0%	0	0.0%	38.1%	\$0	0.0%	37.9%	0	0.0%	41.3%	\$0	0.0%	41.7%			
	Upper	0	0.0%	\$0	0.0%	30.5%	0	0.0%	34.3%	\$0	0.0%	29.4%	0	0.0%	25.8%	\$0	0.0%	24.1%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%				
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%				

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: CA - Ventura

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
							2015						2016					
							Count			Dollar			Count			Dollar		
		Count	%	Dollar	%	Families by Family Income	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	1.3%	\$0	0.0%	0.5%	0	0.0%	1.4%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	8.8%	\$0	0.0%	4.9%	0	0.0%	8.5%	\$0	0.0%	4.9%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	21.3%	\$0	0.0%	16.8%	0	0.0%	24.1%	\$0	0.0%	19.0%
	Upper	1	100.0%	\$1,100	100.0%	42.1%	0	0.0%	52.9%	\$0	0.0%	62.7%	1	100.0%	53.2%	\$1,100	100.0%	62.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.7%	\$0	0.0%	15.1%	0	0.0%	12.8%	\$0	0.0%	12.8%
	Total	1	100.0%	\$1,100	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,100	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	3.2%	\$0	0.0%	1.5%	0	0.0%	3.1%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	10.5%	\$0	0.0%	6.6%	0	0.0%	11.2%	\$0	0.0%	7.4%
	Middle	2	100.0%	\$556	100.0%	20.2%	0	0.0%	20.4%	\$0	0.0%	16.6%	2	100.0%	21.7%	\$556	100.0%	18.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	46.3%	\$0	0.0%	55.0%	0	0.0%	47.8%	\$0	0.0%	56.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	19.6%	\$0	0.0%	20.3%	0	0.0%	16.1%	\$0	0.0%	17.0%
	Total	2	100.0%	\$556	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$556	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	5.0%	\$0	0.0%	2.3%	0	0.0%	5.8%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	14.0%	\$0	0.0%	11.1%	0	0.0%	14.8%	\$0	0.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	24.2%	\$0	0.0%	21.2%	0	0.0%	23.6%	\$0	0.0%	19.7%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	51.5%	\$0	0.0%	59.4%	0	0.0%	51.8%	\$0	0.0%	63.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%	5.9%	0	0.0%	4.0%	\$0	0.0%	4.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	2.6%	\$0	0.0%	1.1%	0	0.0%	2.7%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	16.7%	0	0.0%	10.0%	\$0	0.0%	5.9%	0	0.0%	10.5%	\$0	0.0%	6.3%
	Middle	2	66.7%	\$556	33.6%	20.2%	0	0.0%	20.8%	\$0	0.0%	16.3%	2	66.7%	22.4%	\$556	33.6%	17.6%
	Upper	1	33.3%	\$1,100	66.4%	42.1%	0	0.0%	48.5%	\$0	0.0%	56.5%	1	33.3%	49.5%	\$1,100	66.4%	56.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.0%	\$0	0.0%	20.2%	0	0.0%	14.9%	\$0	0.0%	18.9%
	Total	3	100.0%	\$1,656	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	3	100.0%	100.0%	\$1,656	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	11	35.5%	\$1,399	17.4%	92.0%	8	42.1%	55.1%	\$1,139	19.5%	37.0%	3	25.0%	40.9%	\$260	11.8%	32.1%
	Over \$1 Million	10	32.3%	\$3,100	38.5%	7.6%	7	36.8%					3	25.0%				
	Total Rev. available	21	67.8%	\$4,499	55.9%	99.6%	15	78.9%					6	50.0%				
	Rev. Not Known	10	32.3%	\$3,545	44.1%	0.4%	4	21.1%					6	50.0%				
	Total	31	100.0%	\$8,044	100.0%	100.0%	19	100.0%					12	100.0%				
Small Business Loan Size	Total Businesses																	
	\$100,000 or Less	16	51.6%	\$954	11.9%		9	47.4%	96.4%	\$504	8.6%	52.8%	7	58.3%	97.1%	\$450	20.5%	58.7%
	\$100,001 - \$250,000	6	19.4%	\$1,250	15.5%		3	15.8%	1.9%	\$550	9.4%	12.6%	3	25.0%	1.4%	\$700	31.9%	9.7%
	\$250,001 - \$1 Million	9	29.0%	\$5,840	72.6%		7	36.8%	1.7%	\$4,795	82.0%	34.6%	2	16.7%	1.4%	\$1,045	47.6%	31.6%
	Total	31	100.0%	\$8,044	100.0%		19	100.0%	100.0%	\$5,849	100.0%	100.0%	12	100.0%	100.0%	\$2,195	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	84.2%	0	0.0%	35.8%	\$0	0.0%	36.2%	0	0.0%	36.8%	\$0	0.0%	34.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	15.8%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Farm Loan Size	Total Farms																	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	88.8%	\$0	0.0%	39.1%	0	0.0%	86.5%	\$0	0.0%	27.9%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.5%	\$0	0.0%	30.1%	0	0.0%	6.5%	\$0	0.0%	21.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.7%	\$0	0.0%	30.7%	0	0.0%	7.1%	\$0	0.0%	51.1%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Ventura

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	1.8%
Moderate	2	3.2%	\$275	2.9%	16.9%
Middle	15	24.2%	\$1,290	13.5%	36.3%
Upper	45	72.6%	\$7,965	83.6%	45.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>62</i>	<i>100.0%</i>	<i>\$9,530</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Ventura

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	1	1.6%	\$100	0.0%	21.0%
Moderate	6	9.7%	\$674	7.1%	16.7%
Middle	10	16.1%	\$957	10.0%	20.2%
Upper	45	72.6%	\$7,799	81.8%	42.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>62</i>	<i>100.0%</i>	<i>\$9,530</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: CA - Ventura

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	0.8%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	21.3%	\$0	0.0%	20.2%
	Middle	0	0.0%	\$0	0.0%	35.6%	0	0.0%	36.1%	\$0	0.0%	36.6%
	Upper	1	100.0%	\$1,484	100.0%	44.6%	1	100.0%	41.8%	\$1,484	100.0%	42.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$1,484	100.0%	100.0%	1	100.0%	100.0%	\$1,484	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	1.5%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	20.0%	\$0	0.0%	14.2%
	Middle	0	0.0%	\$0	0.0%	35.6%	0	0.0%	36.8%	\$0	0.0%	47.5%
	Upper	1	100.0%	\$4,000	100.0%	44.6%	1	100.0%	41.7%	\$4,000	100.0%	37.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$4,000	100.0%	100.0%	1	100.0%	100.0%	\$4,000	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	1.4%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	18.4%	\$0	0.0%	15.8%
	Middle	1	100.0%	\$1,400	100.0%	35.6%	1	100.0%	38.9%	\$1,400	100.0%	36.4%
	Upper	0	0.0%	\$0	0.0%	44.6%	0	0.0%	41.3%	\$0	0.0%	46.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$1,400	100.0%	100.0%	1	100.0%	100.0%	\$1,400	100.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	7.0%	0	0.0%	20.4%	\$0	0.0%	7.9%
	Moderate	0	0.0%	\$0	0.0%	47.0%	0	0.0%	44.4%	\$0	0.0%	40.9%
	Middle	1	100.0%	\$600	100.0%	29.4%	1	100.0%	25.9%	\$600	100.0%	45.7%
	Upper	0	0.0%	\$0	0.0%	16.6%	0	0.0%	9.3%	\$0	0.0%	5.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$600	100.0%	100.0%	1	100.0%	100.0%	\$600	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	1.3%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	20.6%	\$0	0.0%	17.8%
	Middle	2	50.0%	\$2,000	26.7%	35.6%	2	50.0%	36.6%	\$2,000	26.7%	42.2%
	Upper	2	50.0%	\$5,484	73.3%	44.6%	2	50.0%	41.6%	\$5,484	73.3%	39.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$7,484	100.0%	100.0%	4	100.0%	100.0%	\$7,484	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	1	7.1%	\$400	18.2%	4.5%	1	7.1%	5.6%	\$400	18.2%	10.7%
	Moderate	2	14.3%	\$325	14.8%	21.2%	2	14.3%	19.1%	\$325	14.8%	17.9%
	Middle	3	21.4%	\$375	17.1%	32.8%	3	21.4%	33.3%	\$375	17.1%	35.7%
	Upper	8	57.1%	\$1,095	49.9%	41.5%	8	57.1%	41.9%	\$1,095	49.9%	35.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$2,195	100.0%	100.0%	14	100.0%	100.0%	\$2,195	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	6.9%	0	0.0%	14.0%	\$0	0.0%	22.2%
	Moderate	0	0.0%	\$0	0.0%	25.4%	0	0.0%	24.7%	\$0	0.0%	24.8%
	Middle	0	0.0%	\$0	0.0%	36.6%	0	0.0%	38.0%	\$0	0.0%	31.9%
	Upper	0	0.0%	\$0	0.0%	31.1%	0	0.0%	23.3%	\$0	0.0%	21.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: CA - Ventura

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2017					2017				
		Bank		Families by Family Income			Count		Dollar		
		Count	%	Dollar \$ (000s)	%		Bank	%	Agg	Bank \$ (000s)	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.9%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	6.8%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	21.4%	\$0	0.0%
	Upper	1	100.0%	\$1,484	100.0%	42.4%	1	100.0%	58.9%	\$1,484	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.1%	\$0	0.0%
	Total	1	100.0%	\$1,484	100.0%	100.0%	1	100.0%	100.0%	\$1,484	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	4.1%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	11.9%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	21.8%	\$0	0.0%
	Upper	1	100.0%	\$4,000	100.0%	42.4%	1	100.0%	49.3%	\$4,000	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.9%	\$0	0.0%
	Total	1	100.0%	\$4,000	100.0%	100.0%	1	100.0%	100.0%	\$4,000	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	4.6%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	14.9%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	23.8%	\$0	0.0%
	Upper	1	100.0%	\$1,400	100.0%	42.4%	1	100.0%	53.2%	\$1,400	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%
	Total	1	100.0%	\$1,400	100.0%	100.0%	1	100.0%	100.0%	\$1,400	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	42.4%	0	0.0%	0.0%	\$0	0.0%
	Unknown	1	100.0%	\$600	100.0%	0.0%	1	100.0%	100.0%	\$600	100.0%
	Total	1	100.0%	\$600	100.0%	100.0%	1	100.0%	100.0%	\$600	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	2.7%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	9.8%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	21.7%	\$0	0.0%
	Upper	3	75.0%	\$6,884	92.0%	42.4%	3	75.0%	53.3%	\$6,884	92.0%
	Unknown	1	25.0%	\$600	8.0%	0.0%	1	25.0%	12.3%	\$600	8.0%
	Total	4	100.0%	\$7,484	100.0%	100.0%	4	100.0%	100.0%	\$7,484	100.0%
Small Business Revenue	Total Businesses										
	\$1 Million or Less	2	14.3%	\$390	17.8%	91.3%	2	14.3%	50.3%	\$390	17.8%
	Over \$1 Million	5	35.7%	\$925	42.1%	8.2%	5	35.7%			
	Total Rev. available	7	50.0%	\$1,315	59.9%	99.5%	7	50.0%			
	Rev. Not Known	7	50.0%	\$880	40.1%	0.5%	7	50.0%			
	Total	14	100.0%	\$2,195	100.0%	100.0%	14	100.0%			
Small Business Loan Size	Total Businesses										
	\$100,000 or Less	7	50.0%	\$505	23.0%		7	50.0%	95.5%	\$505	23.0%
	\$100,001 - \$250,000	6	42.9%	\$1,290	58.8%		6	42.9%	2.3%	\$1,290	58.8%
	\$250,001 - \$1 Million	1	7.1%	\$400	18.2%		1	7.1%	2.2%	\$400	18.2%
	Total	14	100.0%	\$2,195	100.0%		14	100.0%	100.0%	\$2,195	100.0%
	Total	14	100.0%	\$2,195	100.0%		14	100.0%	100.0%	\$2,195	100.0%
Small Farm Revenue	Total Farms										
	\$1 Million or Less	0	0.0%	\$0	0.0%	83.7%	0	0.0%	44.0%	\$0	0.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	16.3%	0	0.0%			
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%			
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%
Small Farm Loan Size	Total Farms										
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	90.0%	\$0	0.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.0%	\$0	0.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.0%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: CA - Ventura

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	1.7%
Moderate	1	3.4%	\$70	1.4%	18.1%
Middle	5	17.2%	\$741	15.1%	35.6%
Upper	23	79.3%	\$4,104	83.5%	44.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	29	100.0%	\$4,915	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: CA - Ventura

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	21.7%
Moderate	1	3.4%	\$48	1.0%	16.5%
Middle	4	13.8%	\$232	4.7%	19.5%
Upper	24	82.8%	\$4,635	94.3%	42.4%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	29	100.0%	\$4,915	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Fort Lauderdale-West Palm Beach

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison										
		2015, 2016						2015					2016					
		Bank			Owner Occupied Units	Count		Dollar			Count		Dollar					
		Count		Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	
HOME PURCHASE	Low	2	2.6%	\$804	3.9%	2.1%	1	2.6%	1.1%	\$184	1.5%	0.7%	1	2.5%	1.3%	\$620	7.3%	1.0%
	Moderate	39	50.0%	\$5,780	28.0%	25.5%	19	50.0%	19.5%	\$2,942	24.2%	12.1%	20	50.0%	21.5%	\$2,838	33.4%	14.2%
	Middle	25	32.1%	\$6,421	31.1%	37.8%	12	31.6%	39.8%	\$3,348	27.5%	33.1%	13	32.5%	40.0%	\$3,073	36.2%	33.9%
	Upper	12	15.4%	\$7,674	37.1%	34.6%	6	15.8%	39.5%	\$5,707	46.9%	54.0%	6	15.0%	37.2%	\$1,967	23.1%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	78	100.0%	\$20,679	100.0%	100.0%	38	100.0%	100.0%	\$12,181	100.0%	100.0%	40	100.0%	100.0%	\$8,498	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	0.8%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.6%
	Moderate	23	46.9%	\$3,471	28.8%	25.5%	11	45.8%	15.7%	\$1,257	33.6%	9.6%	12	48.0%	14.9%	\$2,214	26.7%	9.2%
	Middle	16	32.7%	\$5,037	41.8%	37.8%	9	37.5%	36.9%	\$1,146	30.6%	30.0%	7	28.0%	36.9%	\$3,891	46.8%	29.8%
	Upper	10	20.4%	\$3,540	29.4%	34.6%	4	16.7%	46.6%	\$1,339	35.8%	60.0%	6	24.0%	47.4%	\$2,201	26.5%	60.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	49	100.0%	\$12,048	100.0%	100.0%	24	100.0%	100.0%	\$3,742	100.0%	100.0%	25	100.0%	100.0%	\$8,306	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.1%	\$0	0.0%	1.2%	0	0.0%	1.0%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	25.5%	0	0.0%	18.0%	\$0	0.0%	8.6%	0	0.0%	18.7%	\$0	0.0%	9.8%
	Middle	0	0.0%	\$0	0.0%	37.8%	0	0.0%	39.0%	\$0	0.0%	30.0%	0	0.0%	35.8%	\$0	0.0%	26.9%
	Upper	0	0.0%	\$0	0.0%	34.6%	0	0.0%	41.9%	\$0	0.0%	60.2%	0	0.0%	44.4%	\$0	0.0%	62.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	11.1%	\$0	0.0%	7.3%	0	0.0%	9.8%	\$0	0.0%	4.1%
	Moderate	0	0.0%	\$0	0.0%	34.5%	0	0.0%	34.0%	\$0	0.0%	23.7%	0	0.0%	34.8%	\$0	0.0%	20.1%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	32.3%	\$0	0.0%	40.6%	0	0.0%	36.0%	\$0	0.0%	51.5%
	Upper	0	0.0%	\$0	0.0%	21.8%	0	0.0%	22.6%	\$0	0.0%	28.3%	0	0.0%	19.5%	\$0	0.0%	24.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	2	1.6%	\$804	2.5%	2.1%	1	1.6%	1.1%	\$184	1.2%	1.1%	1	1.5%	1.2%	\$620	3.7%	1.2%
	Moderate	62	48.8%	\$9,251	28.3%	25.5%	30	48.4%	18.2%	\$4,199	26.4%	12.0%	32	49.2%	19.1%	\$5,052	30.1%	13.3%
	Middle	41	32.3%	\$11,458	35.0%	37.8%	21	33.9%	38.8%	\$4,494	28.2%	32.6%	20	30.8%	38.7%	\$6,964	41.4%	34.5%
	Upper	22	17.3%	\$11,214	34.3%	34.6%	10	16.1%	42.0%	\$7,046	44.3%	54.3%	12	18.5%	41.0%	\$4,168	24.8%	51.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	127	100.0%	\$32,727	100.0%	100.0%	62	100.0%	100.0%	\$15,923	100.0%	100.0%	65	100.0%	100.0%	\$16,804	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	3	2.2%	\$400	1.2%	3.3%	0	0.0%	3.6%	\$0	0.0%	5.2%	3	4.8%	3.4%	\$400	2.7%	5.1%
	Moderate	37	26.6%	\$8,299	25.9%	21.9%	23	30.3%	20.9%	\$5,118	30.2%	23.6%	14	22.2%	20.6%	\$3,181	21.1%	23.5%
	Middle	49	35.3%	\$15,674	48.9%	33.9%	24	31.6%	32.3%	\$7,733	45.6%	31.7%	25	39.7%	32.0%	\$7,941	52.6%	30.7%
	Upper	45	32.4%	\$7,370	23.0%	40.8%	25	32.9%	42.7%	\$3,880	22.9%	38.9%	20	31.7%	43.6%	\$3,490	23.1%	40.2%
	Unknown	5	3.6%	\$285	0.9%	0.1%	4	5.3%	0.1%	\$210	1.2%	0.3%	1	1.6%	0.1%	\$75	0.5%	0.2%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.4%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.3%
Total	139	100.0%	\$32,028	100.0%	100.0%	76	100.0%	100.0%	\$16,941	100.0%	100.0%	63	100.0%	100.0%	\$15,087	100.0%	100.0%	
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.7%	0	0.0%	0.7%	\$0	0.0%	3.1%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	14.2%	0	0.0%	9.9%	\$0	0.0%	4.3%	0	0.0%	9.7%	\$0	0.0%	6.7%
	Middle	0	0.0%	\$0	0.0%	30.0%	0	0.0%	28.2%	\$0	0.0%	15.3%	0	0.0%	29.0%	\$0	0.0%	25.0%
	Upper	0	0.0%	\$0	0.0%	53.0%	0	0.0%	60.6%	\$0	0.0%	76.6%	0	0.0%	60.0%	\$0	0.0%	67.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.8%	0	0.0%	0.7%	\$0	0.0%	0.9%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: FL - Fort Lauderdale-West Palm Beach

PRODUCT TYPE	Borrower income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison									
		2015, 2016										2015									
		Bank					Families by Family Income					Count					Dollar				
		Count		Dollar			Count		Dollar			Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	%	%	#	%	%	%	%	#	%	\$ (000s)	%	%	#	%	\$ (000s)	%	%
HOME PURCHASE	Low	10	12.8%	\$857	4.1%	21.9%	5	13.2%	2.9%	\$467	3.8%	1.1%	5	12.5%	2.4%	\$390	4.6%	0.9%			
	Moderate	31	39.7%	\$4,344	21.0%	17.8%	12	31.6%	14.0%	\$1,521	12.5%	7.6%	19	47.5%	13.7%	\$2,823	33.2%	7.7%			
	Middle	17	21.8%	\$2,914	14.1%	19.5%	12	31.6%	19.5%	\$2,123	17.4%	14.5%	5	12.5%	20.9%	\$791	9.3%	15.8%			
	Upper	17	21.8%	\$7,729	37.4%	40.8%	8	21.1%	46.7%	\$4,500	36.9%	60.7%	9	22.5%	48.7%	\$3,229	38.0%	61.7%			
	Unknown	3	3.8%	\$4,835	23.4%	0.0%	1	2.6%	17.0%	\$3,570	29.3%	16.0%	2	5.0%	14.3%	\$1,265	14.9%	13.9%			
	Total	78	100.0%	\$20,679	100.0%	100.0%	38	100.0%	100.0%	\$12,181	100.0%	100.0%	40	100.0%	100.0%	\$8,498	100.0%	100.0%			
REFINANCE	Low	4	8.2%	\$316	2.6%	21.9%	4	16.7%	4.0%	\$316	8.4%	1.8%	0	0.0%	3.5%	\$0	0.0%	1.5%			
	Moderate	16	32.7%	\$2,198	18.2%	17.8%	6	25.0%	10.1%	\$781	20.9%	5.5%	10	40.0%	9.3%	\$1,417	17.1%	5.0%			
	Middle	10	20.4%	\$1,238	10.3%	19.5%	8	33.3%	16.6%	\$833	22.3%	11.8%	2	8.0%	16.9%	\$405	4.9%	11.7%			
	Upper	19	38.8%	\$8,296	68.9%	40.8%	6	25.0%	46.3%	\$1,812	48.4%	59.0%	13	52.0%	50.7%	\$6,484	78.1%	62.7%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	23.0%	\$0	0.0%	21.9%	0	0.0%	19.6%	\$0	0.0%	19.2%			
	Total	49	100.0%	\$12,048	100.0%	100.0%	24	100.0%	100.0%	\$3,742	100.0%	100.0%	25	100.0%	100.0%	\$8,306	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	4.8%	\$0	0.0%	1.0%	0	0.0%	4.4%	\$0	0.0%	1.6%			
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	13.0%	\$0	0.0%	6.2%	0	0.0%	13.3%	\$0	0.0%	6.6%			
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	20.8%	\$0	0.0%	13.7%	0	0.0%	20.0%	\$0	0.0%	12.8%			
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	55.8%	\$0	0.0%	67.7%	0	0.0%	58.8%	\$0	0.0%	73.2%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.6%	\$0	0.0%	11.5%	0	0.0%	3.5%	\$0	0.0%	5.8%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
HMDA TOTALS	Low	14	11.0%	\$1,173	3.6%	21.9%	9	14.5%	3.3%	\$783	4.9%	1.2%	5	7.7%	2.9%	\$390	2.3%	1.0%			
	Moderate	47	37.0%	\$6,542	20.0%	17.8%	18	29.0%	12.6%	\$2,302	14.5%	6.4%	29	44.6%	12.1%	\$4,240	25.2%	6.0%			
	Middle	27	21.3%	\$4,152	12.7%	19.5%	20	32.3%	18.5%	\$2,956	18.6%	12.7%	7	10.8%	19.4%	\$1,196	7.1%	12.7%			
	Upper	36	28.3%	\$16,025	49.0%	40.8%	14	22.6%	46.7%	\$6,312	39.6%	56.4%	22	33.8%	49.7%	\$9,713	57.8%	55.3%			
	Unknown	3	2.4%	\$4,835	14.8%	0.0%	1	1.6%	19.0%	\$3,570	22.4%	23.2%	2	3.1%	16.0%	\$1,265	7.5%	25.1%			
	Total	127	100.0%	\$32,727	100.0%	100.0%	62	100.0%	100.0%	\$15,923	100.0%	100.0%	65	100.0%	100.0%	\$16,804	100.0%	100.0%			
Small Business Revenue	Total Businesses																				
	\$1 Million or Less	37	26.6%	\$6,583	20.6%	93.0%	22	28.9%	56.8%	\$2,772	16.4%	35.8%	15	23.8%	47.7%	\$3,811	25.3%	32.2%			
	Over \$1 Million	53	38.1%	\$16,431	51.3%	6.0%	30	39.5%					23	36.5%							
	Total Rev. available	90	64.7%	\$23,014	71.9%	99.0%	52	68.4%					38	60.3%							
	Rev. Not Known	49	35.3%	\$9,014	28.1%	1.0%	24	31.6%					25	39.7%							
	Total	139	100.0%	\$32,028	100.0%	100.0%	76	100.0%					63	100.0%							
Small Business Loan Size	\$100,000 or Less	74	53.2%	\$4,182	13.1%		42	55.3%	96.6%	\$2,341	13.8%	49.5%	32	50.8%	96.3%	\$1,841	12.2%	52.0%			
	\$100,001 - \$250,000	30	21.6%	\$5,956	18.6%		16	21.1%	1.7%	\$3,120	18.4%	12.1%	14	22.2%	2.0%	\$2,836	18.8%	13.1%			
	\$250,001 - \$1 Million	35	25.2%	\$21,890	68.3%		18	23.7%	1.7%	\$11,480	67.8%	38.4%	17	27.0%	1.7%	\$10,410	69.0%	34.9%			
	Total	139	100.0%	\$32,028	100.0%		76	100.0%	100.0%	\$16,941	100.0%	100.0%	63	100.0%	100.0%	\$15,087	100.0%	100.0%			
	Total Farms																				
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.5%	0	0.0%	50.7%	\$0	0.0%	49.5%	0	0.0%	53.1%	\$0	0.0%	55.0%			
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	4.4%	0	0.0%					0	0.0%							
	Not Known	0	0.0%	\$0	0.0%	0.1%	0	0.0%					0	0.0%							
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%							
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	91.5%	\$0	0.0%	42.2%	0	0.0%	93.8%	\$0	0.0%	45.9%			
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	4.9%	\$0	0.0%	21.2%	0	0.0%	3.4%	\$0	0.0%	19.1%			
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	3.5%	\$0	0.0%	36.6%	0	0.0%	2.8%	\$0	0.0%	35.1%			
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			

Origination & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FRIEC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: FL - Fort Lauderdale-West Palm Beach

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	2.1%
Moderate	5	7.1%	\$425	2.3%	25.5%
Middle	18	25.7%	\$5,559	30.0%	37.8%
Upper	47	67.1%	\$12,554	67.7%	34.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>70</i>	<i>100.0%</i>	<i>\$18,538</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: FL - Fort Lauderdale-West Palm Beach

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	5	7.1%	\$440	0.0%	21.9%
Moderate	4	5.7%	\$3,500	18.9%	17.8%
Middle	6	8.6%	\$500	2.7%	19.5%
Upper	55	78.6%	\$14,098	76.0%	40.8%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>70</i>	<i>100.0%</i>	<i>\$18,538</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Fort Lauderdale-West Palm Beach

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2017					2017						
		Bank		Owner Occupied Units			Count		Dollar				
		Count		Dollar	%		Bank	Agg	Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	%		#	%	\$ (000s)	%	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.8%	0	0.0%	\$0	0.0%	2.1%		
	Moderate	3	33.3%	\$425	10.0%	24.6%	3	33.3%	\$425	10.0%	15.9%		
	Middle	4	44.4%	\$2,370	55.9%	33.8%	4	44.4%	\$2,370	55.9%	30.7%		
	Upper	2	22.2%	\$1,448	34.1%	38.6%	2	22.2%	\$1,448	34.1%	51.0%		
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.3%		
	Total	9	100.0%	\$4,243	100.0%	100.0%	9	100.0%	\$4,243	100.0%	100.0%		
REFINANCE	Low	0	0.0%	\$0	0.0%	2.8%	0	0.0%	\$0	0.0%	1.2%		
	Moderate	0	0.0%	\$0	0.0%	24.6%	0	0.0%	\$0	0.0%	12.0%		
	Middle	3	50.0%	\$303	1.9%	33.8%	3	50.0%	\$303	1.9%	31.8%		
	Upper	3	50.0%	\$15,388	98.1%	38.6%	3	50.0%	\$15,388	98.1%	54.2%		
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.8%		
	Total	6	100.0%	\$15,691	100.0%	100.0%	6	100.0%	\$15,691	100.0%	100.0%		
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.8%	0	0.0%	\$0	0.0%	3.5%		
	Moderate	0	0.0%	\$0	0.0%	24.6%	0	0.0%	\$0	0.0%	11.4%		
	Middle	0	0.0%	\$0	0.0%	33.8%	0	0.0%	\$0	0.0%	29.0%		
	Upper	0	0.0%	\$0	0.0%	38.6%	0	0.0%	\$0	0.0%	54.8%		
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	1.3%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%		
MULTIFAMILY	Multi-Family Units												
	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	\$0	0.0%	10.2%		
	Moderate	0	0.0%	\$0	0.0%	33.8%	0	0.0%	\$0	0.0%	22.1%		
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	\$0	0.0%	46.5%		
	Upper	0	0.0%	\$0	0.0%	27.3%	0	0.0%	\$0	0.0%	21.1%		
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.1%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%		
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.8%	0	0.0%	\$0	0.0%	2.5%		
	Moderate	3	20.0%	\$425	2.1%	24.6%	3	20.0%	\$425	2.1%	15.2%		
	Middle	7	46.7%	\$2,673	13.4%	33.8%	7	46.7%	\$2,673	13.4%	32.0%		
	Upper	5	33.3%	\$16,836	84.5%	38.6%	5	33.3%	\$16,836	84.5%	49.8%		
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	\$0	0.0%	0.5%		
	Total	15	100.0%	\$19,934	100.0%	100.0%	15	100.0%	\$19,934	100.0%	100.0%		
SMALL BUSINESSES	Small Businesses												
	Low	4	6.5%	\$1,095	8.3%	4.8%	4	6.5%	\$1,095	8.3%	8.1%		
	Moderate	17	27.4%	\$3,437	26.0%	22.2%	17	27.4%	\$3,437	26.0%	23.8%		
	Middle	15	24.2%	\$3,278	24.8%	31.1%	15	24.2%	\$3,278	24.8%	27.8%		
	Upper	25	40.3%	\$5,347	40.4%	41.6%	25	40.3%	\$5,347	40.4%	39.6%		
	Unknown	1	1.6%	\$75	0.6%	0.3%	1	1.6%	\$75	0.6%	0.5%		
	Total	62	100.0%	\$13,232	100.0%	100.0%	62	100.0%	\$13,232	100.0%	100.0%		
SMALL FARM	Small Farms												
	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	\$0	0.0%	0.7%		
	Moderate	0	0.0%	\$0	0.0%	14.0%	0	0.0%	\$0	0.0%	19.4%		
	Middle	0	0.0%	\$0	0.0%	29.1%	0	0.0%	\$0	0.0%	27.2%		
	Upper	0	0.0%	\$0	0.0%	52.4%	0	0.0%	\$0	0.0%	51.8%		
	Unknown	0	0.0%	\$0	0.0%	0.6%	0	0.0%	\$0	0.0%	0.0%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%		

Originations & Purchases

2017 FFIEC Census Data, 2017 D&B info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: FL - Fort Lauderdale-West Palm Beach

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	Dollar	Count	Dollar	%	Bank	Agg	Bank	Agg	Bank	Agg
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	\$0	0.0%	1.0%	1.0%
	Moderate	2	22.2%	\$193	4.5%	17.4%	2	22.2%	\$193	4.5%	7.9%	7.9%
	Middle	2	22.2%	\$824	19.4%	18.4%	2	22.2%	\$824	19.4%	16.1%	16.1%
	Upper	5	55.6%	\$3,226	76.0%	41.6%	5	55.6%	\$3,226	76.0%	60.2%	60.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	14.9%	14.9%
	Total	9	100.0%	\$4,243	100.0%	100.0%	9	100.0%	\$4,243	100.0%	100.0%	100.0%
REFINANCE	Low	2	33.3%	\$203	1.3%	22.6%	2	33.3%	\$203	1.3%	2.3%	2.3%
	Moderate	2	33.3%	\$180	1.1%	17.4%	2	33.3%	\$180	1.1%	7.0%	7.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	\$0	0.0%	13.8%	13.8%
	Upper	2	33.3%	\$15,308	97.6%	41.6%	2	33.3%	\$15,308	97.6%	60.4%	60.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	16.5%	16.5%
	Total	6	100.0%	\$15,691	100.0%	100.0%	6	100.0%	\$15,691	100.0%	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	\$0	0.0%	1.7%	1.7%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	\$0	0.0%	7.7%	7.7%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	\$0	0.0%	14.6%	14.6%
	Upper	0	0.0%	\$0	0.0%	41.6%	0	0.0%	\$0	0.0%	68.5%	68.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	7.5%	7.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.6%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	2	13.3%	\$203	1.0%	22.6%	2	13.3%	\$203	1.0%	1.3%	1.3%
	Moderate	4	26.7%	\$373	1.9%	17.4%	4	26.7%	\$373	1.9%	7.1%	7.1%
	Middle	2	13.3%	\$824	4.1%	18.4%	2	13.3%	\$824	4.1%	14.3%	14.3%
	Upper	7	46.7%	\$18,534	93.0%	41.6%	7	46.7%	\$18,534	93.0%	56.2%	56.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	21.1%	21.1%
	Total	15	100.0%	\$19,934	100.0%	100.0%	15	100.0%	\$19,934	100.0%	100.0%	100.0%
Small Business Revenue	Total Businesses											
	\$1 Million or Less	12	19.4%	\$2,465	18.6%	92.2%	12	19.4%	\$2,465	18.6%	34.7%	34.7%
	Over \$1 Million	30	48.4%	\$7,684	58.1%	6.8%	30	48.4%				
	Total Rev. available	42	67.8%	\$10,149	76.7%	99.0%	42	67.8%				
	Rev. Not Known	20	32.3%	\$3,083	23.3%	1.0%	20	32.3%				
	Total	62	100.0%	\$13,232	100.0%	100.0%	62	100.0%				
Small Business Loan Size	\$100,000 or Less	27	43.5%	\$1,545	11.7%		27	43.5%	\$1,545	11.7%	49.5%	49.5%
	\$100,001 - \$250,000	18	29.0%	\$3,670	27.7%		18	29.0%	\$3,670	27.7%	14.0%	14.0%
	\$250,001 - \$1 Million	17	27.4%	\$8,017	60.6%		17	27.4%	\$8,017	60.6%	36.5%	36.5%
	Total	62	100.0%	\$13,232	100.0%		62	100.0%	\$13,232	100.0%	100.0%	100.0%
Small Farm Revenue	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.2%	0	0.0%	\$0	0.0%	50.5%	50.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.8%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%		0	0.0%				
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	62.6%	62.6%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	18.1%	18.1%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	19.3%	19.3%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%	100.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%	100.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue, 2017 FFEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: FL - Fort Lauderdale-West Palm Beach

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	1	4.2%	\$159	2.7%	2.8%
Moderate	3	12.5%	\$370	6.3%	24.6%
Middle	7	29.2%	\$947	16.1%	33.8%
Upper	13	54.2%	\$4,395	74.9%	38.6%
Unknown	0	0.0%	\$0	0.0%	0.1%
<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>\$5,871</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: FL - Fort Lauderdale-West Palm Beach

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	1	4.2%	\$100	0.0%	22.6%
Moderate	4	16.7%	\$382	6.5%	17.4%
Middle	2	8.3%	\$184	3.1%	18.4%
Upper	15	62.5%	\$4,505	76.7%	41.6%
Unknown	2	8.3%	\$700	11.9%	0.0%
Total	24	100.0%	\$5,871	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Sarasota

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2015					2015					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar	%		Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	\$0	0.0%	0.1%	
	Moderate	0	0.0%	\$0	0.0%	24.2%	0	0.0%	\$0	0.0%	12.6%	
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	\$0	0.0%	36.6%	
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	\$0	0.0%	50.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	\$0	0.0%	0.2%	
	Moderate	0	0.0%	\$0	0.0%	24.2%	0	0.0%	\$0	0.0%	12.2%	
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	\$0	0.0%	37.5%	
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	\$0	0.0%	50.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	\$0	0.0%	0.1%	
	Moderate	0	0.0%	\$0	0.0%	24.2%	0	0.0%	\$0	0.0%	12.9%	
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	\$0	0.0%	41.1%	
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	\$0	0.0%	45.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	1.1%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	\$0	0.0%	64.0%	
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	\$0	0.0%	1.4%	
	Upper	0	0.0%	\$0	0.0%	58.9%	0	0.0%	\$0	0.0%	34.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	\$0	0.0%	0.1%	
	Moderate	0	0.0%	\$0	0.0%	24.2%	0	0.0%	\$0	0.0%	12.7%	
	Middle	0	0.0%	\$0	0.0%	45.3%	0	0.0%	\$0	0.0%	36.8%	
	Upper	0	0.0%	\$0	0.0%	29.5%	0	0.0%	\$0	0.0%	50.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	\$0	0.0%	1.6%	
	Moderate	1	33.3%	\$100	25.0%	28.1%	1	33.3%	\$100	25.0%	35.0%	
	Middle	2	66.7%	\$300	75.0%	42.0%	2	66.7%	\$300	75.0%	27.9%	
	Upper	0	0.0%	\$0	0.0%	29.0%	0	0.0%	\$0	0.0%	35.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	3	100.0%	\$400	100.0%	100.0%	3	100.0%	\$400	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	11.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	46.6%	0	0.0%	\$0	0.0%	92.7%	
	Upper	0	0.0%	\$0	0.0%	42.5%	0	0.0%	\$0	0.0%	7.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	

Originations & Purchases

2015 FRIEC Census Data, 2015 D&B Info, and 2010 ACS Data

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**
Assessment Area: FL - Sarasota

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2015					2015					
		Bank		Families by Family Income			Count		Dollar			
		Count	%	\$ (000s)	\$ %	%	#	%	Bank \$ (000s)	Agg \$ %	Bank \$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	4.6%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	14.4%	\$0	0.0%	7.4%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	17.9%	\$0	0.0%	12.0%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	48.8%	\$0	0.0%	65.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.2%	\$0	0.0%	13.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	6.8%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	13.6%	\$0	0.0%	7.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	19.1%	\$0	0.0%	12.5%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	44.4%	\$0	0.0%	62.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.2%	\$0	0.0%	15.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	9.3%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	23.6%	\$0	0.0%	11.5%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	23.1%	\$0	0.0%	13.0%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	40.3%	\$0	0.0%	71.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.7%	\$0	0.0%	1.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	5.6%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	14.4%	\$0	0.0%	7.3%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	18.5%	\$0	0.0%	12.1%
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	46.8%	\$0	0.0%	64.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.7%	\$0	0.0%	14.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Business Loan Size	Total Businesses											
	\$1 Million or Less	1	33.3%	\$50	12.5%	95.1%	1	33.3%	55.9%	\$50	12.5%	38.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.8%	0	0.0%				
	Total Rev. available	1	33.3%	\$50	12.5%	99.9%	1	33.3%				
	Rev. Not Known	2	66.7%	\$350	87.5%	0.1%	2	66.7%				
	Total	3	100.0%	\$400	100.0%	100.0%	3	100.0%				
	\$100,000 or Less	2	66.7%	\$150	37.5%		2	66.7%	95.0%	\$150	37.5%	38.5%
	\$100,001 - \$250,000	1	33.3%	\$250	62.5%		1	33.3%	2.4%	\$250	62.5%	14.6%
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	46.9%
	Total	3	100.0%	\$400	100.0%		3	100.0%	100.0%	\$400	100.0%	100.0%
Small Farm Loan Size	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.3%	0	0.0%	60.0%	\$0	0.0%	87.2%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.7%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.0%	\$0	0.0%	18.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	20.0%	\$0	0.0%	81.6%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2015 FFIEC Census Data, 2015 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: FL - Sarasota

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	1.0%
Moderate	0	0.0%	\$0	0.0%	24.2%
Middle	1	50.0%	\$70	17.1%	45.3%
Upper	1	50.0%	\$340	82.9%	29.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	2	100.0%	\$410	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: FL - Sarasota

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015				Families by Family Income %
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	1	50.0%	\$70	0.0%	20.6%
Moderate	0	0.0%	\$0	0.0%	18.3%
Middle	0	0.0%	\$0	0.0%	19.4%
Upper	1	50.0%	\$340	82.9%	41.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	2	100.0%	\$410	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: FL - Stuart

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2015					2015					
		Bank		Owner Occupied Units			Count		Dollar			
		Count					Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	4.9%	\$0	0.0%	2.2%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	52.3%	\$0	0.0%	47.7%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	42.8%	\$0	0.0%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	4.0%	\$0	0.0%	1.7%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	55.0%	\$0	0.0%	44.4%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	41.0%	\$0	0.0%	53.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	8.2%	\$0	0.0%	1.3%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	55.7%	\$0	0.0%	58.3%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	36.1%	\$0	0.0%	40.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	13.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	50.4%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	35.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.7%	0	0.0%	4.7%	\$0	0.0%	2.0%
	Middle	0	0.0%	\$0	0.0%	53.4%	0	0.0%	53.5%	\$0	0.0%	48.1%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	41.8%	\$0	0.0%	49.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	9	81.8%	\$4,018	95.3%	21.9%	9	81.8%	29.6%	\$4,018	95.3%	42.5%
	Middle	2	18.2%	\$200	4.7%	49.5%	2	18.2%	43.4%	\$200	4.7%	32.5%
	Upper	0	0.0%	\$0	0.0%	28.6%	0	0.0%	26.9%	\$0	0.0%	25.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$4,218	100.0%	100.0%	11	100.0%	100.0%	\$4,218	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	31.6%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Middle	0	0.0%	\$0	0.0%	36.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	31.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2015 FRIC Census Data, 2015 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: FL - Stuart

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2015					2015					
		Bank				Families by Family Income %	Count		Dollar			
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	1.8%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	8.9%	\$0	0.0%	4.3%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	12.8%	\$0	0.0%	8.8%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	60.3%	\$0	0.0%	70.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.2%	\$0	0.0%	16.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	4.4%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	7.2%	\$0	0.0%	3.4%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	12.2%	\$0	0.0%	7.9%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	58.8%	\$0	0.0%	71.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.5%	\$0	0.0%	15.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	6.6%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	18.0%	\$0	0.0%	9.5%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	16.4%	\$0	0.0%	13.2%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	57.4%	\$0	0.0%	75.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	1.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	14.5%	0	0.0%	2.9%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	19.2%	0	0.0%	8.7%	\$0	0.0%	4.0%
	Middle	0	0.0%	\$0	0.0%	19.4%	0	0.0%	12.7%	\$0	0.0%	8.4%
	Upper	0	0.0%	\$0	0.0%	47.0%	0	0.0%	59.5%	\$0	0.0%	69.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.3%	\$0	0.0%	17.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Business	Total Businesses											
	\$1 Million or Less	3	27.3%	\$250	5.9%	93.2%	3	27.3%	\$2.3%	\$250	5.9%	44.3%
	Over \$1 Million	6	54.5%	\$1,968	46.7%	6.5%	6	54.5%				
	Total Rev. available	9	81.8%	\$2,218	52.6%	99.7%	9	81.8%				
	Rev. Not Known	2	18.2%	\$2,000	47.4%	0.2%	2	18.2%				
	Total	11	100.0%	\$4,218	100.0%	100.0%	11	100.0%				
	\$100,000 or Less	5	45.5%	\$400	9.5%		5	45.5%	93.8%	\$400	9.5%	38.5%
	\$100,001 - \$250,000	1	9.1%	\$150	3.6%		1	9.1%	2.6%	\$150	3.6%	12.6%
	\$250,001 - \$1 Million	5	45.5%	\$3,668	87.0%		5	45.5%	3.6%	\$3,668	87.0%	48.8%
Total	11	100.0%	\$4,218	100.0%		11	100.0%	100.0%	\$4,218	100.0%	100.0%	
Small Farm	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.0%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2015 FFIEC Census Data, 2015 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: FL - Stuart

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	6.7%
Middle	0	0.0%	\$0	0.0%	53.4%
Upper	0	0.0%	\$0	0.0%	39.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: FL - Stuart

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	14.5%
Moderate	0	0.0%	\$0	0.0%	19.2%
Middle	0	0.0%	\$0	0.0%	19.4%
Upper	0	0.0%	\$0	0.0%	47.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison																			
		2015, 2016										2015										2016									
		Bank					Owner Occupied Units	Count			Dollar			Count					Dollar												
		Count		Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg																
		#	%	\$ (000s)	\$ %	%										#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %				
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	2.0%	\$0	0.0%	1.2%	0	0.0%	2.9%	\$0	0.0%	1.8%													
	Moderate	3	15.8%	\$360	8.3%	14.9%	1	9.1%	12.9%	\$154	7.8%	8.3%	2	25.0%	15.0%	\$206	8.8%	9.9%													
	Middle	14	73.7%	\$2,599	60.0%	51.9%	10	90.9%	55.3%	\$1,831	92.2%	51.0%	4	50.0%	54.7%	\$768	32.7%	51.4%													
	Upper	2	10.5%	\$1,373	31.7%	29.3%	0	0.0%	29.7%	\$0	0.0%	39.4%	2	25.0%	27.5%	\$1,373	58.5%	37.0%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Total	19	100.0%	\$4,332	100.0%	100.0%	11	100.0%	100.0%	\$1,985	100.0%	100.0%	8	100.0%	100.0%	\$2,347	100.0%	100.0%													
REFINANCE	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	1.6%	\$0	0.0%	1.1%	0	0.0%	1.7%	\$0	0.0%	1.1%													
	Moderate	2	8.0%	\$161	2.8%	14.9%	2	11.8%	10.2%	\$161	4.5%	6.4%	0	0.0%	9.4%	\$0	0.0%	6.2%													
	Middle	10	40.0%	\$2,610	46.0%	51.9%	6	35.3%	52.5%	\$1,411	39.1%	47.3%	4	50.0%	52.3%	\$1,199	58.1%	47.6%													
	Upper	13	52.0%	\$2,899	51.1%	29.3%	9	52.9%	35.7%	\$2,035	56.4%	45.2%	4	50.0%	36.6%	\$864	41.9%	45.1%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Total	25	100.0%	\$5,670	100.0%	100.0%	17	100.0%	100.0%	\$3,607	100.0%	100.0%	8	100.0%	100.0%	\$2,063	100.0%	100.0%													
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	2.1%	\$0	0.0%	0.5%	0	0.0%	1.8%	\$0	0.0%	0.4%													
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	9.7%	\$0	0.0%	5.8%	0	0.0%	8.9%	\$0	0.0%	5.1%													
	Middle	1	100.0%	\$10	100.0%	51.9%	1	100.0%	51.8%	\$10	100.0%	38.6%	0	0.0%	56.5%	\$0	0.0%	45.8%													
	Upper	0	0.0%	\$0	0.0%	29.3%	0	0.0%	36.4%	\$0	0.0%	55.1%	0	0.0%	32.8%	\$0	0.0%	48.6%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Total	1	100.0%	\$10	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
MULTI-FAMILY	Multi-Family Units																														
	Low	0	0.0%	\$0	0.0%	20.0%	0	0.0%	6.1%	\$0	0.0%	3.4%	0	0.0%	20.7%	\$0	0.0%	9.2%													
	Moderate	0	0.0%	\$0	0.0%	30.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	20.7%	\$0	0.0%	50.6%													
	Middle	1	50.0%	\$1,150	62.2%	36.3%	0	0.0%	72.7%	\$0	0.0%	91.3%	1	50.0%	44.8%	\$1,150	62.2%	33.5%													
	Upper	1	50.0%	\$700	37.8%	13.1%	0	0.0%	21.2%	\$0	0.0%	5.4%	1	50.0%	13.8%	\$700	37.8%	6.7%													
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
HMDA TOTALS	Total	2	100.0%	\$1,850	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$1,850	100.0%	100.0%													
	Low	0	0.0%	\$0	0.0%	4.0%	0	0.0%	1.8%	\$0	0.0%	1.3%	0	0.0%	2.3%	\$0	0.0%	1.8%													
	Moderate	5	10.6%	\$521	4.4%	14.9%	3	10.3%	11.5%	\$315	5.6%	7.1%	2	11.1%	12.1%	\$206	3.3%	10.4%													
	Middle	26	55.3%	\$6,369	53.7%	51.9%	17	58.6%	53.9%	\$3,252	58.1%	50.7%	9	50.0%	53.6%	\$3,117	49.8%	48.6%													
	Upper	16	34.0%	\$4,972	41.9%	29.3%	9	31.0%	32.8%	\$2,035	36.3%	41.0%	7	38.9%	32.0%	\$2,937	46.9%	39.2%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
SMALL BUSINESSES	Total	47	100.0%	\$11,862	100.0%	100.0%	29	100.0%	100.0%	\$5,602	100.0%	100.0%	18	100.0%	100.0%	\$6,260	100.0%	100.0%													
	Small Businesses																														
	Low	29	6.7%	\$9,170	9.4%	4.5%	16	6.7%	3.2%	\$4,725	8.8%	2.5%	13	6.7%	3.0%	\$4,445	10.3%	3.4%													
	Moderate	55	12.6%	\$11,122	11.4%	11.7%	33	13.8%	11.2%	\$6,333	11.7%	8.3%	22	11.3%	10.7%	\$4,789	11.1%	8.7%													
	Middle	216	49.7%	\$51,320	52.8%	50.1%	118	49.2%	50.5%	\$30,148	55.9%	57.3%	98	50.3%	50.1%	\$21,172	49.0%	55.5%													
	Upper	135	31.0%	\$25,525	26.3%	32.6%	73	30.4%	34.1%	\$12,697	23.6%	31.3%	62	31.8%	35.0%	\$12,828	29.7%	31.8%													
	Unknown	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.3%													
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.5%	0	0.0%	1.0%	\$0	0.0%	0.3%													
SMALL FARM	Total	435	100.0%	\$97,137	100.0%	100.0%	240	100.0%	100.0%	\$53,903	100.0%	100.0%	195	100.0%	100.0%	\$43,234	100.0%	100.0%													
	Small Farms																														
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Moderate	0	0.0%	\$0	0.0%	0.9%	0	0.0%	1.9%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Middle	3	100.0%	\$538	100.0%	74.7%	1	100.0%	81.1%	\$30	100.0%	91.6%	2	100.0%	69.2%	\$508	100.0%	88.0%													
	Upper	0	0.0%	\$0	0.0%	23.5%	0	0.0%	17.0%	\$0	0.0%	7.8%	0	0.0%	30.8%	\$0	0.0%	12.0%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
Total	3	100.0%	\$538	100.0%	100.0%	1	100.0%	100.0%	\$30	100.0%	100.0%	2	100.0%	100.0%	\$508	100.0%	100.0%														

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison									
		2015, 2016						2015						2016							
		Bank				Families by Family Income %	Count		Dollar			Count			Dollar						
		Count	Dollar		Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg								
			#	%										\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	4	21.1%	\$499	11.5%	21.7%	2	18.2%	9.0%	\$191	9.6%	4.4%	2	25.0%	10.9%	\$308	13.1%	5.3%			
	Moderate	1	5.3%	\$70	1.6%	16.9%	0	0.0%	19.8%	\$0	0.0%	14.2%	1	12.5%	24.2%	\$70	3.0%	18.1%			
	Middle	8	42.1%	\$1,416	32.7%	21.4%	5	45.5%	22.5%	\$800	40.3%	20.9%	3	37.5%	22.6%	\$616	26.2%	21.6%			
	Upper	6	31.6%	\$2,347	54.2%	40.0%	4	36.4%	35.0%	\$994	50.1%	47.4%	2	25.0%	32.7%	\$1,353	57.6%	45.8%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.7%	\$0	0.0%	13.2%	0	0.0%	9.6%	\$0	0.0%	9.2%			
	Total	19	100.0%	\$4,332	100.0%	100.0%	11	100.0%	100.0%	\$1,985	100.0%	100.0%	8	100.0%	100.0%	\$2,347	100.0%	100.0%			
REFINANCE	Low	1	4.0%	\$37	0.7%	21.7%	1	5.9%	5.9%	\$37	1.0%	3.0%	0	0.0%	7.1%	\$0	0.0%	4.0%			
	Moderate	4	16.0%	\$620	10.9%	16.9%	3	17.6%	14.9%	\$505	14.0%	9.9%	1	12.5%	18.2%	\$115	5.6%	12.8%			
	Middle	4	16.0%	\$686	12.1%	21.4%	2	11.8%	21.6%	\$303	8.4%	18.8%	2	25.0%	22.8%	\$383	18.6%	20.8%			
	Upper	16	64.0%	\$4,327	76.3%	40.0%	11	64.7%	41.1%	\$2,762	76.6%	51.6%	5	62.5%	39.5%	\$1,565	75.9%	50.7%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.5%	\$0	0.0%	16.7%	0	0.0%	12.4%	\$0	0.0%	11.7%			
	Total	25	100.0%	\$5,670	100.0%	100.0%	17	100.0%	100.0%	\$3,607	100.0%	100.0%	8	100.0%	100.0%	\$2,063	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	8.2%	\$0	0.0%	4.3%	0	0.0%	10.2%	\$0	0.0%	3.8%			
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	18.1%	\$0	0.0%	10.7%	0	0.0%	20.6%	\$0	0.0%	13.7%			
	Middle	1	100.0%	\$10	100.0%	21.4%	1	100.0%	30.3%	\$10	100.0%	23.1%	0	0.0%	22.9%	\$0	0.0%	20.1%			
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	39.3%	\$0	0.0%	55.7%	0	0.0%	42.9%	\$0	0.0%	57.7%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	6.1%	0	0.0%	3.4%	\$0	0.0%	4.8%			
	Total	1	100.0%	\$10	100.0%	100.0%	1	100.0%	100.0%	\$10	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	16.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Middle	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Unknown	2	100.0%	\$1,850	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$1,850	100.0%	100.0%			
	Total	2	100.0%	\$1,850	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$1,850	100.0%	100.0%			
HMDA TOTALS	Low	5	10.6%	\$536	4.5%	21.7%	3	10.3%	7.5%	\$228	4.1%	3.6%	2	11.1%	9.1%	\$308	4.9%	4.4%			
	Moderate	5	10.6%	\$690	5.8%	16.9%	3	10.3%	17.4%	\$505	9.0%	11.6%	2	11.1%	21.1%	\$185	3.0%	14.7%			
	Middle	13	27.7%	\$2,112	17.8%	21.4%	8	27.6%	22.3%	\$1,113	19.9%	19.1%	5	27.8%	22.7%	\$999	16.0%	20.0%			
	Upper	22	46.8%	\$6,674	56.3%	40.0%	15	51.7%	38.0%	\$3,756	67.0%	47.5%	7	38.9%	36.3%	\$2,918	46.6%	45.7%			
	Unknown	2	4.3%	\$1,850	15.6%	0.0%	0	0.0%	14.8%	\$0	0.0%	18.3%	2	11.1%	10.8%	\$1,850	29.6%	15.3%			
	Total	47	100.0%	\$11,862	100.0%	100.0%	29	100.0%	100.0%	\$5,602	100.0%	100.0%	18	100.0%	100.0%	\$6,260	100.0%	100.0%			
Small Business Revenue	Total Businesses																				
	\$1 Million or Less	154	35.4%	\$19,136	19.7%	90.2%	84	35.0%	46.6%	\$8,854	16.4%	37.6%	70	35.9%	41.9%	\$10,282	23.8%	33.7%			
	Over \$1 Million	195	44.8%	\$63,149	65.0%	9.2%	113	47.1%					82	42.1%							
	Total Rev. available	349	80.2%	\$82,285	84.7%	99.4%	197	82.1%					152	78.0%							
	Rev. Not Known	86	19.8%	\$14,852	15.3%	0.6%	43	17.9%					43	22.1%							
	Total	435	100.0%	\$97,137	100.0%	100.0%	240	100.0%					195	100.0%							
	\$100,000 or Less	235	54.0%	\$12,691	13.1%		130	54.2%	93.6%	\$6,768	12.6%	35.1%	105	53.8%	94.8%	\$5,923	13.7%	41.3%			
	\$100,001 - \$250,000	85	19.5%	\$16,177	16.7%		47	19.6%	3.0%	\$9,123	16.9%	14.5%	38	19.5%	2.4%	\$7,054	16.3%	12.9%			
	\$250,001 - \$1 Million	115	26.4%	\$68,269	70.3%		63	26.3%	3.4%	\$38,012	70.5%	50.4%	52	26.7%	2.8%	\$30,257	70.0%	45.8%			
	Total	435	100.0%	\$97,137	100.0%		240	100.0%	100.0%	\$53,903	100.0%	100.0%	195	100.0%	100.0%	\$43,234	100.0%	100.0%			
Small Farm Revenue	Total Farms																				
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.8%	0	0.0%	45.3%	\$0	0.0%	71.3%	0	0.0%	38.5%	\$0	0.0%	46.0%			
	Over \$1 Million	0	0.0%	\$0	0.0%	1.2%	0	0.0%					0	0.0%							
	Not Known	3	100.0%	\$538	100.0%	0.0%	1	100.0%					2	100.0%							
	Total	3	100.0%	\$538	100.0%	100.0%	1	100.0%					2	100.0%							
	\$100,000 or Less	2	66.7%	\$60	11.2%		1	100.0%	84.9%	\$30	100.0%	34.5%	1	50.0%	90.4%	\$30	5.9%	31.4%			
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	9.4%	\$0	0.0%	26.3%	0	0.0%	5.8%	\$0	0.0%	29.6%			
	\$250,001 - \$500,000	1	33.3%	\$478	88.8%		0	0.0%	5.7%	\$0	0.0%	39.2%	1	50.0%	3.8%	\$478	94.1%	38.9%			
	Total	3	100.0%	\$538	100.0%		1	100.0%	100.0%	\$30	100.0%	100.0%	2	100.0%	100.0%	\$508	100.0%	100.0%			

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Ann Arbor MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	6	1.7%	\$624	1.4%	4.0%
Moderate	23	6.3%	\$1,574	3.5%	14.9%
Middle	176	48.5%	\$18,577	41.8%	51.9%
Upper	158	43.5%	\$23,644	53.2%	29.3%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	363	100.0%	\$44,419	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Ann Arbor MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	41	11.3%	\$2,928	0.0%	21.7%
Moderate	62	17.1%	\$6,308	14.2%	16.9%
Middle	99	27.3%	\$9,834	22.1%	21.4%
Upper	161	44.4%	\$25,349	57.1%	40.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>363</i>	<i>100.0%</i>	<i>\$44,419</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count					Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	6.6%	0	0.0%	8.0%	\$0	0.0%	4.3%
	Moderate	4	40.0%	\$479	29.4%	12.0%	4	40.0%	14.3%	\$479	29.4%	10.1%
	Middle	4	40.0%	\$920	56.4%	44.7%	4	40.0%	44.7%	\$920	56.4%	41.6%
	Upper	2	20.0%	\$232	14.2%	36.5%	2	20.0%	32.6%	\$232	14.2%	43.4%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.6%
	Total	10	100.0%	\$1,631	100.0%	100.0%	10	100.0%	100.0%	\$1,631	100.0%	100.0%
REFINANCE	Low	1	14.3%	\$90	7.6%	6.6%	1	14.3%	5.4%	\$90	7.6%	3.0%
	Moderate	0	0.0%	\$0	0.0%	12.0%	0	0.0%	11.4%	\$0	0.0%	7.8%
	Middle	2	28.6%	\$185	15.5%	44.7%	2	28.6%	46.6%	\$185	15.5%	37.1%
	Upper	4	57.1%	\$916	76.9%	36.5%	4	57.1%	36.2%	\$916	76.9%	45.1%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.4%
	Total	7	100.0%	\$1,191	100.0%	100.0%	7	100.0%	100.0%	\$1,191	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	6.6%	0	0.0%	5.1%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	12.0%	0	0.0%	12.7%	\$0	0.0%	7.1%
	Middle	0	0.0%	\$0	0.0%	44.7%	0	0.0%	45.7%	\$0	0.0%	37.1%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	36.1%	\$0	0.0%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	0.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	28.1%	0	0.0%	41.9%	\$0	0.0%	33.9%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	2.3%	\$0	0.0%	4.5%
	Middle	0	0.0%	\$0	0.0%	34.6%	0	0.0%	39.5%	\$0	0.0%	44.9%
	Upper	0	0.0%	\$0	0.0%	11.8%	0	0.0%	9.3%	\$0	0.0%	9.7%
	Unknown	0	0.0%	\$0	0.0%	6.8%	0	0.0%	7.0%	\$0	0.0%	7.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	5.9%	\$90	3.2%	6.6%	1	5.9%	7.0%	\$90	3.2%	6.5%
	Moderate	4	23.5%	\$479	17.0%	12.0%	4	23.5%	13.1%	\$479	17.0%	8.8%
	Middle	6	35.3%	\$1,105	39.2%	44.7%	6	35.3%	45.4%	\$1,105	39.2%	42.4%
	Upper	6	35.3%	\$1,148	40.7%	36.5%	6	35.3%	34.1%	\$1,148	40.7%	41.2%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	1.1%
	Total	17	100.0%	\$2,822	100.0%	100.0%	17	100.0%	100.0%	\$2,822	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	18	10.6%	\$5,394	12.9%	8.1%	18	10.6%	6.9%	\$5,394	12.9%	8.0%
	Moderate	11	6.5%	\$2,300	5.5%	9.0%	11	6.5%	8.5%	\$2,300	5.5%	4.8%
	Middle	72	42.4%	\$15,617	37.2%	43.2%	72	42.4%	45.2%	\$15,617	37.2%	47.9%
	Upper	55	32.4%	\$14,791	35.3%	33.7%	55	32.4%	33.6%	\$14,791	35.3%	31.6%
	Unknown	14	8.2%	\$3,835	9.1%	6.0%	14	8.2%	5.2%	\$3,835	9.1%	7.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.6%	\$0	0.0%	0.6%
	Total	170	100.0%	\$41,937	100.0%	100.0%	170	100.0%	100.0%	\$41,937	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	4	100.0%	\$423	100.0%	67.0%	4	100.0%	65.9%	\$423	100.0%	70.6%
	Upper	0	0.0%	\$0	0.0%	29.1%	0	0.0%	34.1%	\$0	0.0%	29.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$423	100.0%	100.0%	4	100.0%	100.0%	\$423	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Dollar		Families by Family Income %	Count		Dollar		Agg %	Agg %
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	\$0	0.0%	7.8%	3.4%
	Moderate	2	20.0%	\$335	20.5%	17.0%	2	20.0%	\$335	20.5%	19.1%	13.2%
	Middle	6	60.0%	\$675	41.4%	19.6%	6	60.0%	\$675	41.4%	24.0%	21.4%
	Upper	2	20.0%	\$621	38.1%	40.7%	2	20.0%	\$621	38.1%	36.3%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	12.8%	12.1%
	Total	10	100.0%	\$1,631	100.0%	100.0%	10	100.0%	\$1,631	100.0%	100.0%	100.0%
REFINANCE	Low	2	28.6%	\$205	17.2%	22.7%	2	28.6%	\$205	17.2%	8.9%	4.9%
	Moderate	2	28.6%	\$261	21.9%	17.0%	2	28.6%	\$261	21.9%	18.2%	12.9%
	Middle	1	14.3%	\$70	5.9%	19.6%	1	14.3%	\$70	5.9%	22.3%	19.6%
	Upper	2	28.6%	\$655	55.0%	40.7%	2	28.6%	\$655	55.0%	39.2%	51.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	11.4%	11.4%
	Total	7	100.0%	\$1,191	100.0%	100.0%	7	100.0%	\$1,191	100.0%	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	\$0	0.0%	10.0%	5.1%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	\$0	0.0%	17.2%	10.6%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	\$0	0.0%	25.4%	17.9%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	\$0	0.0%	44.9%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	2.5%	6.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.7%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	\$0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	2	11.8%	\$205	7.3%	22.7%	2	11.8%	\$205	7.3%	8.3%	3.6%
	Moderate	4	23.5%	\$596	21.1%	17.0%	4	23.5%	\$596	21.1%	18.6%	11.9%
	Middle	7	41.2%	\$745	26.4%	19.6%	7	41.2%	\$745	26.4%	23.4%	18.8%
	Upper	4	23.5%	\$1,276	45.2%	40.7%	4	23.5%	\$1,276	45.2%	37.9%	46.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	11.9%	19.5%
	Total	17	100.0%	\$2,822	100.0%	100.0%	17	100.0%	\$2,822	100.0%	100.0%	100.0%
Small Business Revenue	Total Businesses											
	\$1 Million or Less	47	27.6%	\$8,214	19.6%	89.3%	47	27.6%	\$8,214	19.6%	52.8%	36.7%
	Over \$1 Million	84	49.4%	\$27,359	65.2%	10.1%	84	49.4%				
	Total Rev. available	131	77.0%	\$35,573	84.8%	99.4%	131	77.0%				
	Rev. Not Known	39	22.9%	\$6,364	15.2%	0.7%	39	22.9%				
	Total	170	100.0%	\$41,937	100.0%	100.0%	170	100.0%				
Small Business Loan Size	\$100,000 or Less	82	48.2%	\$4,475	10.7%		82	48.2%	\$4,475	10.7%	93.8%	35.3%
	\$100,001 - \$250,000	35	20.6%	\$6,561	15.6%		35	20.6%	\$6,561	15.6%	2.7%	12.9%
	\$250,001 - \$1 Million	53	31.2%	\$30,901	73.7%		53	31.2%	\$30,901	73.7%	3.5%	51.8%
	Total	170	100.0%	\$41,937	100.0%		170	100.0%	\$41,937	100.0%	100.0%	100.0%
	Total Farms											
	\$1 Million or Less	2	50.0%	\$275	65.0%	99.0%	2	50.0%	\$275	65.0%	53.7%	79.0%
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	1.0%	0	0.0%				
	Not Known	2	50.0%	\$148	35.0%	0.0%	2	50.0%				
	Total	4	100.0%	\$423	100.0%	100.0%	4	100.0%				
	\$100,000 or Less	2	50.0%	\$60	14.2%		2	50.0%	\$60	14.2%	92.7%	49.6%
	\$100,001 - \$250,000	2	50.0%	\$363	85.8%		2	50.0%	\$363	85.8%	6.1%	37.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	1.2%	13.4%
	Total	4	100.0%	\$423	100.0%		4	100.0%	\$423	100.0%	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Ann Arbor MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	2	1.4%	\$115	0.5%	6.6%
Moderate	10	6.9%	\$747	3.3%	12.0%
Middle	64	44.1%	\$8,203	36.6%	44.7%
Upper	68	46.9%	\$13,153	58.7%	36.5%
Unknown	1	0.7%	\$200	0.9%	0.2%
Total	145	100.0%	\$22,418	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Ann Arbor MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	16	11.0%	\$1,230	0.0%	22.7%
Moderate	31	21.4%	\$3,375	15.1%	17.0%
Middle	24	16.6%	\$2,667	11.9%	19.6%
Upper	72	49.7%	\$14,696	65.6%	40.7%
Unknown	2	1.4%	\$450	2.0%	0.0%
Total	145	100.0%	\$22,418	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison											
		2015, 2016						2015						2016					
		Bank			Owner Occupied Units			Count			Dollar			Count			Dollar		
		Count		\$ (000s)	\$ %	#	% %	#	% %	% %	\$ (000s)	\$ %	\$ %	#	% %	% %	\$ (000s)	\$ %	\$ %
		#	%																
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.4%		\$0	0.0%	0.9%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	2	25.0%	\$117	12.0%	22.4%	0	0.0%	17.6%		\$0	0.0%	10.7%	2	28.6%	19.2%	\$117	13.4%	12.1%
	Middle	1	12.5%	\$100	10.3%	38.9%	1	100.0%	33.7%		\$100	100.0%	34.0%	0	0.0%	35.0%	\$0	0.0%	34.8%
	Upper	5	62.5%	\$758	77.7%	33.7%	0	0.0%	47.2%		\$0	0.0%	54.4%	5	71.4%	45.1%	\$758	86.6%	52.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$975	100.0%	100.0%	1	100.0%	100.0%		\$100	100.0%	100.0%	7	100.0%	100.0%	\$875	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.4%		\$0	0.0%	3.0%	0	0.0%	1.0%	\$0	0.0%	0.4%
	Moderate	1	11.1%	\$43	2.0%	22.4%	0	0.0%	14.7%		\$0	0.0%	9.2%	1	20.0%	13.2%	\$43	2.7%	7.9%
	Middle	1	11.1%	\$89	4.0%	38.9%	1	25.0%	41.8%		\$89	14.4%	40.7%	0	0.0%	41.4%	\$0	0.0%	39.5%
	Upper	7	77.8%	\$2,067	94.0%	33.7%	3	75.0%	42.2%		\$531	85.6%	47.1%	4	80.0%	44.3%	\$1,536	97.3%	52.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$2,199	100.0%	100.0%	4	100.0%	100.0%		\$620	100.0%	100.0%	5	100.0%	100.0%	\$1,579	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.7%		\$0	0.0%	0.4%	0	0.0%	1.3%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	22.4%	0	0.0%	20.7%		\$0	0.0%	10.5%	0	0.0%	15.2%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	38.9%	0	0.0%	36.4%		\$0	0.0%	35.2%	0	0.0%	43.8%	\$0	0.0%	43.5%
	Upper	0	0.0%	\$0	0.0%	33.7%	0	0.0%	41.2%		\$0	0.0%	54.0%	0	0.0%	39.7%	\$0	0.0%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%		\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																		
	Low	0	0.0%	\$0	0.0%	9.7%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	30.5%	0	0.0%	20.0%		\$0	0.0%	2.2%	0	0.0%	25.0%	\$0	0.0%	5.8%
	Middle	0	0.0%	\$0	0.0%	42.9%	0	0.0%	60.0%		\$0	0.0%	96.0%	0	0.0%	25.0%	\$0	0.0%	2.6%
	Upper	0	0.0%	\$0	0.0%	16.9%	0	0.0%	20.0%		\$0	0.0%	1.8%	0	0.0%	50.0%	\$0	0.0%	91.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	1.4%		\$0	0.0%	1.7%	0	0.0%	0.9%	\$0	0.0%	0.3%
	Moderate	3	17.6%	\$160	5.0%	22.4%	0	0.0%	16.7%		\$0	0.0%	9.7%	3	25.0%	16.5%	\$160	6.5%	10.2%
	Middle	2	11.8%	\$189	6.0%	38.9%	2	40.0%	37.3%		\$189	26.3%	40.0%	0	0.0%	38.3%	\$0	0.0%	36.6%
	Upper	12	70.6%	\$2,825	89.0%	33.7%	3	60.0%	44.6%		\$531	73.8%	48.6%	9	75.0%	44.3%	\$2,294	93.5%	52.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$3,174	100.0%	100.0%	5	100.0%	100.0%		\$720	100.0%	100.0%	12	100.0%	100.0%	\$2,454	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																		
	Low	16	8.6%	\$2,402	5.3%	8.0%	8	7.7%	9.8%		\$1,147	4.7%	18.6%	8	9.6%	8.3%	\$1,255	6.0%	10.1%
	Moderate	93	49.7%	\$25,292	56.2%	20.9%	50	48.1%	25.1%		\$12,248	50.7%	21.6%	43	51.8%	21.6%	\$13,044	62.6%	21.7%
	Middle	40	21.4%	\$11,300	25.1%	39.3%	25	24.0%	34.5%		\$7,541	31.2%	35.5%	15	18.1%	37.6%	\$3,759	18.0%	41.6%
	Upper	38	20.3%	\$6,019	13.4%	31.7%	21	20.2%	29.1%		\$3,239	13.4%	24.0%	17	20.5%	31.5%	\$2,780	13.3%	26.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL FARM	Small Farms																		
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	9.7%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	14.7%	\$0	0.0%	7.3%
	Middle	0	0.0%	\$0	0.0%	62.1%	0	0.0%	60.7%		\$0	0.0%	76.2%	0	0.0%	41.2%	\$0	0.0%	40.2%
	Upper	0	0.0%	\$0	0.0%	27.7%	0	0.0%	39.3%		\$0	0.0%	23.8%	0	0.0%	44.1%	\$0	0.0%	52.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL FARM	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%		\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%		\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg		Bank	Agg		Bank	Agg	
Borrower Income Levels		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	2	25.0%	\$134	13.7%	21.0%	0	0.0%	7.2%	\$0	0.0%	3.9%	2	28.6%	6.9%	\$134	15.3%	3.7%
	Moderate	3	37.5%	\$292	29.9%	18.1%	0	0.0%	21.8%	\$0	0.0%	15.2%	3	42.9%	24.9%	\$292	33.4%	17.6%
	Middle	1	12.5%	\$100	10.3%	20.5%	1	100.0%	24.4%	\$100	100.0%	22.8%	0	0.0%	20.7%	\$0	0.0%	20.0%
	Upper	1	12.5%	\$417	42.8%	40.4%	0	0.0%	32.8%	\$0	0.0%	45.7%	1	14.3%	32.5%	\$417	47.7%	46.1%
	Unknown	1	12.5%	\$32	3.3%	0.0%	0	0.0%	13.8%	\$0	0.0%	12.4%	1	14.3%	15.1%	\$32	3.7%	12.7%
	Total	8	100.0%	\$975	100.0%	100.0%	1	100.0%	100.0%	\$100	100.0%	100.0%	7	100.0%	100.0%	\$875	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	6.6%	\$0	0.0%	3.8%	0	0.0%	7.0%	\$0	0.0%	3.5%
	Moderate	2	22.2%	\$226	10.3%	18.1%	1	25.0%	14.5%	\$183	29.5%	9.2%	1	20.0%	14.7%	\$43	2.7%	10.0%
	Middle	2	22.2%	\$181	8.2%	20.5%	1	25.0%	20.8%	\$89	14.4%	16.8%	1	20.0%	19.5%	\$92	5.8%	16.6%
	Upper	5	55.6%	\$1,792	81.5%	40.4%	2	50.0%	40.7%	\$348	56.1%	49.4%	3	60.0%	39.9%	\$1,444	91.5%	48.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.4%	\$0	0.0%	20.8%	0	0.0%	19.0%	\$0	0.0%	22.0%
	Total	9	100.0%	\$2,199	100.0%	100.0%	4	100.0%	100.0%	\$620	100.0%	100.0%	5	100.0%	100.0%	\$1,579	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	8.5%	\$0	0.0%	3.6%	0	0.0%	9.4%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	17.7%	\$0	0.0%	11.0%	0	0.0%	19.2%	\$0	0.0%	13.5%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	23.8%	\$0	0.0%	19.4%	0	0.0%	25.3%	\$0	0.0%	19.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	46.9%	\$0	0.0%	58.9%	0	0.0%	41.8%	\$0	0.0%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.1%	\$0	0.0%	7.1%	0	0.0%	4.4%	\$0	0.0%	9.8%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	11.8%	\$134	4.2%	21.0%	0	0.0%	7.0%	\$0	0.0%	3.7%	2	16.7%	7.1%	\$134	5.5%	3.6%
	Moderate	5	29.4%	\$518	16.3%	18.1%	1	20.0%	18.4%	\$183	25.4%	11.8%	4	33.3%	20.4%	\$335	13.7%	14.3%
	Middle	3	17.6%	\$281	8.9%	20.5%	2	40.0%	22.8%	\$189	26.3%	19.1%	1	8.3%	20.6%	\$92	3.7%	18.4%
	Upper	6	35.3%	\$2,209	69.6%	40.4%	2	40.0%	37.3%	\$348	48.3%	45.2%	4	33.3%	36.1%	\$1,861	75.8%	46.6%
	Unknown	1	5.9%	\$32	1.0%	0.0%	0	0.0%	14.4%	\$0	0.0%	20.3%	1	8.3%	15.8%	\$32	1.3%	17.1%
	Total	17	100.0%	\$3,174	100.0%	100.0%	5	100.0%	100.0%	\$720	100.0%	100.0%	12	100.0%	100.0%	\$2,454	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	61	32.6%	\$8,334	18.5%	88.6%	37	35.6%	38.2%	\$5,168	21.4%	29.2%	24	28.9%	40.9%	\$3,166	15.2%	35.5%
	Over \$1 Million	96	51.3%	\$32,260	71.7%	10.1%	50	48.1%					46	55.4%				
	Total Rev. available	157	83.9%	\$40,594	90.2%	98.7%	87	83.7%					70	84.3%				
	Rev. Not Known	30	16.0%	\$4,419	9.8%	1.3%	17	16.3%					13	15.7%				
	Total	187	100.0%	\$45,013	100.0%	100.0%	104	100.0%					83	100.0%				
Small Business Loan Size	\$100,000 or Less	105	56.1%	\$6,225	13.8%		57	54.8%	91.0%	\$3,333	13.8%	29.6%	48	57.8%	91.1%	\$2,892	13.9%	28.8%
	\$100,001 - \$250,000	29	15.5%	\$5,120	11.4%		17	16.3%	4.2%	\$3,095	12.8%	16.1%	12	14.5%	4.8%	\$2,025	9.7%	18.6%
	\$250,001 - \$1 Million	53	28.3%	\$33,668	74.8%		30	28.8%	4.8%	\$17,747	73.4%	54.3%	23	27.7%	4.0%	\$15,921	76.4%	52.6%
	Total	187	100.0%	\$45,013	100.0%		104	100.0%	100.0%	\$24,175	100.0%	100.0%	83	100.0%	100.0%	\$20,838	100.0%	100.0%
	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	96.3%	0	0.0%	17.9%	\$0	0.0%	40.4%	0	0.0%	26.5%	\$0	0.0%	40.7%
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	3.7%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	71.4%	\$0	0.0%	15.2%	0	0.0%	85.3%	\$0	0.0%	30.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	14.3%	\$0	0.0%	28.8%	0	0.0%	8.8%	\$0	0.0%	36.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	14.3%	\$0	0.0%	55.9%	0	0.0%	5.9%	\$0	0.0%	32.6%
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Origination & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Battle Creek MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	1	1.1%	\$32	0.4%	4.9%
Moderate	10	11.0%	\$436	5.9%	22.4%
Middle	31	34.1%	\$2,199	29.6%	38.9%
Upper	49	53.8%	\$4,761	64.1%	33.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>91</i>	<i>100.0%</i>	<i>\$7,428</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Battle Creek MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	13	14.3%	\$574	0.0%	21.0%
Moderate	19	20.9%	\$1,178	15.9%	18.1%
Middle	14	15.4%	\$898	12.1%	20.5%
Upper	44	48.4%	\$4,603	62.0%	40.4%
Unknown	1	1.1%	\$175	2.4%	0.0%
<i>Total</i>	<i>91</i>	<i>100.0%</i>	<i>\$7,428</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.7%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	21.1%	0	0.0%	20.0%	\$0	0.0%	11.9%
	Middle	0	0.0%	\$0	0.0%	42.7%	0	0.0%	37.6%	\$0	0.0%	36.9%
	Upper	3	100.0%	\$630	100.0%	31.0%	3	100.0%	40.7%	\$630	100.0%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$630	100.0%	100.0%	3	100.0%	100.0%	\$630	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	2.6%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	21.1%	0	0.0%	17.4%	\$0	0.0%	11.0%
	Middle	0	0.0%	\$0	0.0%	42.7%	0	0.0%	41.5%	\$0	0.0%	42.6%
	Upper	0	0.0%	\$0	0.0%	31.0%	0	0.0%	38.5%	\$0	0.0%	45.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	3.5%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	21.1%	0	0.0%	21.7%	\$0	0.0%	15.5%
	Middle	0	0.0%	\$0	0.0%	42.7%	0	0.0%	40.7%	\$0	0.0%	42.4%
	Upper	0	0.0%	\$0	0.0%	31.0%	0	0.0%	34.2%	\$0	0.0%	40.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	10.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	36.5%	0	0.0%	40.0%	\$0	0.0%	12.7%
	Middle	0	0.0%	\$0	0.0%	29.5%	0	0.0%	20.0%	\$0	0.0%	1.4%
	Upper	0	0.0%	\$0	0.0%	23.8%	0	0.0%	40.0%	\$0	0.0%	85.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	2.2%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	21.1%	0	0.0%	19.4%	\$0	0.0%	11.8%
	Middle	0	0.0%	\$0	0.0%	42.7%	0	0.0%	39.2%	\$0	0.0%	37.9%
	Upper	3	100.0%	\$630	100.0%	31.0%	3	100.0%	39.1%	\$630	100.0%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$630	100.0%	100.0%	3	100.0%	100.0%	\$630	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	9	12.5%	\$1,905	13.9%	7.1%	9	12.5%	7.9%	\$1,905	13.9%	8.7%
	Moderate	35	48.6%	\$7,431	54.3%	24.5%	35	48.6%	26.2%	\$7,431	54.3%	26.5%
	Middle	7	9.7%	\$1,170	8.6%	36.2%	7	9.7%	34.9%	\$1,170	8.6%	32.3%
	Upper	21	29.2%	\$3,176	23.2%	32.2%	21	29.2%	30.2%	\$3,176	23.2%	32.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.8%	\$0	0.0%	0.2%
	Total	72	100.0%	\$13,682	100.0%	100.0%	72	100.0%	100.0%	\$13,682	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	2.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	74.3%	0	0.0%	69.6%	\$0	0.0%	65.1%
	Upper	0	0.0%	\$0	0.0%	22.9%	0	0.0%	30.4%	\$0	0.0%	34.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count			Dollar		
		Count	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	6.7%	\$0	0.0%	3.7%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	24.9%	\$0	0.0%	17.5%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	21.6%	\$0	0.0%	19.6%
	Upper	3	100.0%	\$630	100.0%	40.9%	3	100.0%	32.6%	\$630	100.0%	45.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.2%	\$0	0.0%	13.3%
	Total	3	100.0%	\$630	100.0%	100.0%	3	100.0%	100.0%	\$630	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	8.4%	\$0	0.0%	4.5%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	18.1%	\$0	0.0%	11.9%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	20.4%	\$0	0.0%	18.6%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	36.5%	\$0	0.0%	46.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.6%	\$0	0.0%	18.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	11.2%	\$0	0.0%	4.6%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	23.3%	\$0	0.0%	14.2%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	21.9%	\$0	0.0%	17.4%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	41.9%	\$0	0.0%	55.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.6%	\$0	0.0%	8.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	7.9%	\$0	0.0%	3.9%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	22.5%	\$0	0.0%	15.1%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	21.2%	\$0	0.0%	18.6%
	Upper	3	100.0%	\$630	100.0%	40.9%	3	100.0%	35.0%	\$630	100.0%	45.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.4%	\$0	0.0%	17.4%
	Total	3	100.0%	\$630	100.0%	100.0%	3	100.0%	100.0%	\$630	100.0%	100.0%
Small Business Revenue	Total Businesses											
	\$1 Million or Less	20	27.8%	\$2,211	16.2%	87.1%	20	27.8%	40.4%	\$2,211	16.2%	30.6%
	Over \$1 Million	42	58.3%	\$9,930	72.6%	11.5%	42	58.3%				
	Total Rev. available	62	86.1%	\$12,141	88.8%	98.6%	62	86.1%				
	Rev. Not Known	10	13.9%	\$1,541	11.3%	1.5%	10	13.9%				
	Total	72	100.0%	\$13,682	100.0%	100.0%	72	100.0%				
Small Business Loan Size	Total Businesses											
	\$100,000 or Less	41	56.9%	\$2,443	17.9%		41	56.9%	91.4%	\$2,443	17.9%	29.8%
	\$100,001 - \$250,000	17	23.6%	\$2,949	21.6%		17	23.6%	4.3%	\$2,949	21.6%	16.7%
	\$250,001 - \$1 Million	14	19.4%	\$8,290	60.6%		14	19.4%	4.4%	\$8,290	60.6%	53.5%
	Total	72	100.0%	\$13,682	100.0%		72	100.0%	100.0%	\$13,682	100.0%	100.0%
	Total	72	100.0%	\$13,682	100.0%		72	100.0%	100.0%	\$13,682	100.0%	100.0%
Small Farm Revenue	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.7%	0	0.0%	41.3%	\$0	0.0%	70.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	4.3%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
Small Farm Loan Size	Total Farms											
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	73.9%	\$0	0.0%	9.7%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	19.6%	\$0	0.0%	59.5%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.5%	\$0	0.0%	30.9%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Battle Creek MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	5.2%
Moderate	5	14.7%	\$157	5.3%	21.1%
Middle	10	29.4%	\$822	28.0%	42.7%
Upper	19	55.9%	\$1,960	66.7%	31.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	34	100.0%	\$2,939	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Battle Creek MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	5	14.7%	\$215	0.0%	21.7%
Moderate	8	23.5%	\$770	26.2%	17.8%
Middle	8	23.5%	\$600	20.4%	19.6%
Upper	13	38.2%	\$1,354	46.1%	40.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>34</i>	<i>100.0%</i>	<i>\$2,939</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Fenton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %										#	%	%	\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	34.3%	\$0	0.0%	26.8%	0	0.0%	32.1%	\$0	0.0%	25.9%
	Upper	0	0.0%	\$0	0.0%	65.2%	0	0.0%	65.7%	\$0	0.0%	73.2%	0	0.0%	67.9%	\$0	0.0%	74.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	30.2%	\$0	0.0%	23.7%	0	0.0%	28.4%	\$0	0.0%	22.2%
	Upper	3	100.0%	\$385	100.0%	65.2%	1	100.0%	69.8%	\$132	100.0%	76.3%	2	100.0%	71.6%	\$253	100.0%	77.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$385	100.0%	100.0%	1	100.0%	100.0%	\$132	100.0%	100.0%	2	100.0%	100.0%	\$253	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	100.0%	\$3	100.0%	34.8%	1	100.0%	31.3%	\$3	100.0%	26.7%	0	0.0%	25.6%	\$0	0.0%	18.7%
	Upper	0	0.0%	\$0	0.0%	65.2%	0	0.0%	68.7%	\$0	0.0%	73.3%	0	0.0%	74.4%	\$0	0.0%	81.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$3	100.0%	100.0%	1	100.0%	100.0%	\$3	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	48.0%	0	0.0%	50.0%	\$0	0.0%	35.7%	0	0.0%	66.7%	\$0	0.0%	40.4%
	Upper	0	0.0%	\$0	0.0%	52.0%	0	0.0%	50.0%	\$0	0.0%	64.3%	0	0.0%	33.3%	\$0	0.0%	59.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	25.0%	\$3	0.8%	34.8%	1	50.0%	32.5%	\$3	2.2%	25.7%	0	0.0%	30.2%	\$0	0.0%	24.2%
	Upper	3	75.0%	\$385	99.2%	65.2%	1	50.0%	67.5%	\$132	97.8%	74.3%	2	100.0%	69.8%	\$253	100.0%	75.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL BUSINESSES	Total	4	100.0%	\$388	100.0%	100.0%	2	100.0%	100.0%	\$135	100.0%	100.0%	2	100.0%	100.0%	\$253	100.0%	100.0%
	Small Businesses																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	12	48.0%	\$2,347	44.7%	41.9%	8	53.3%	43.0%	\$987	45.5%	47.8%	4	40.0%	41.3%	\$1,360	44.1%	40.5%
	Upper	13	52.0%	\$2,905	55.3%	58.1%	7	46.7%	57.0%	\$1,180	54.5%	52.2%	6	60.0%	58.7%	\$1,725	55.9%	59.5%
SMALL FARM	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	25	100.0%	\$5,252	100.0%	100.0%	15	100.0%	100.0%	\$2,167	100.0%	100.0%	10	100.0%	100.0%	\$3,085	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL FARM	Middle	0	0.0%	\$0	0.0%	49.1%	0	0.0%	50.0%	\$0	0.0%	35.7%	0	0.0%	60.0%	\$0	0.0%	89.1%
	Upper	0	0.0%	\$0	0.0%	50.9%	0	0.0%	50.0%	\$0	0.0%	64.3%	0	0.0%	40.0%	\$0	0.0%	10.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Fenton

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison											
		2015, 2016						2015						2016					
		Bank				Families by Family Income	Count		Dollar		Count				Dollar				
		Count		Dollar															
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	1.8%	\$0	0.0%	1.0%	0	0.0%	2.0%	\$0	0.0%	0.8%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	12.2%	\$0	0.0%	7.4%	0	0.0%	10.6%	\$0	0.0%	6.2%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	22.0%	\$0	0.0%	17.8%	0	0.0%	21.8%	\$0	0.0%	16.4%	
	Upper	0	0.0%	\$0	0.0%	54.9%	0	0.0%	45.7%	\$0	0.0%	57.3%	0	0.0%	49.2%	\$0	0.0%	61.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.2%	\$0	0.0%	16.5%	0	0.0%	16.4%	\$0	0.0%	14.7%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	2.2%	\$0	0.0%	1.3%	0	0.0%	1.4%	\$0	0.0%	0.9%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	9.8%	\$0	0.0%	6.4%	0	0.0%	8.8%	\$0	0.0%	4.8%	
	Middle	2	66.7%	\$299	77.7%	22.4%	1	100.0%	15.7%	\$132	100.0%	12.2%	1	50.0%	15.8%	\$167	66.0%	10.3%	
	Upper	1	33.3%	\$86	22.3%	54.9%	0	0.0%	54.8%	\$0	0.0%	61.8%	1	50.0%	57.8%	\$86	34.0%	67.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.5%	\$0	0.0%	18.3%	0	0.0%	16.2%	\$0	0.0%	16.3%	
	Total	3	100.0%	\$385	100.0%	100.0%	1	100.0%	100.0%	\$132	100.0%	100.0%	2	100.0%	100.0%	\$253	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	2.0%	\$0	0.0%	1.6%	0	0.0%	3.8%	\$0	0.0%	1.1%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	10.1%	\$0	0.0%	4.3%	0	0.0%	7.5%	\$0	0.0%	3.8%	
	Middle	1	100.0%	\$3	100.0%	22.4%	1	100.0%	16.2%	\$3	100.0%	14.1%	0	0.0%	22.6%	\$0	0.0%	25.8%	
	Upper	0	0.0%	\$0	0.0%	54.9%	0	0.0%	69.7%	\$0	0.0%	79.5%	0	0.0%	66.2%	\$0	0.0%	69.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$3	100.0%	100.0%	1	100.0%	100.0%	\$3	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	54.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	9.1%	0	0.0%	2.0%	\$0	0.0%	1.1%	0	0.0%	1.8%	\$0	0.0%	0.9%	
	Moderate	0	0.0%	\$0	0.0%	13.6%	0	0.0%	11.1%	\$0	0.0%	6.8%	0	0.0%	9.7%	\$0	0.0%	5.5%	
	Middle	3	75.0%	\$302	77.8%	22.4%	2	100.0%	19.1%	\$135	100.0%	15.1%	1	50.0%	19.3%	\$167	66.0%	13.9%	
	Upper	1	25.0%	\$86	22.2%	54.9%	0	0.0%	50.5%	\$0	0.0%	58.6%	1	50.0%	53.6%	\$86	34.0%	64.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.3%	\$0	0.0%	18.3%	0	0.0%	15.6%	\$0	0.0%	15.4%	
	Total	4	100.0%	\$388	100.0%	100.0%	2	100.0%	100.0%	\$135	100.0%	100.0%	2	100.0%	100.0%	\$253	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	5	20.0%	\$812	15.5%	92.1%	3	20.0%	45.6%	\$412	19.0%	36.3%	2	20.0%	44.5%	\$400	13.0%	33.0%	
	Over \$1 Million	10	40.0%	\$2,540	48.4%	7.1%	6	40.0%					4	40.0%					
	Total Rev. available	15	60.0%	\$3,352	63.9%	99.2%	9	60.0%					6	60.0%					
	Rev. Not Known	10	40.0%	\$1,900	36.2%	0.8%	6	40.0%					4	40.0%					
	Total	25	100.0%	\$5,252	100.0%	100.0%	15	100.0%					10	100.0%					
Small Business Loan Size	Total Farms																		
	\$100,000 or Less	11	44.0%	\$622	11.8%		7	46.7%	92.8%	\$362	16.7%	30.0%	4	40.0%	94.2%	\$260	8.4%	38.2%	
	\$100,001 - \$250,000	9	36.0%	\$1,855	35.3%		6	40.0%	3.3%	\$1,205	55.6%	15.2%	3	30.0%	3.1%	\$650	21.1%	17.7%	
	\$250,001 - \$1 Million	5	20.0%	\$2,775	52.8%		2	13.3%	3.8%	\$600	27.7%	54.7%	3	30.0%	2.7%	\$2,175	70.5%	44.1%	
	Total	25	100.0%	\$5,252	100.0%		15	100.0%	100.0%	\$2,167	100.0%	100.0%	10	100.0%	100.0%	\$3,085	100.0%	100.0%	
Small Farm Revenue	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	100.0%	0	0.0%	50.0%	\$0	0.0%	67.2%	0	0.0%	60.0%	\$0	0.0%	89.1%	
	Over \$1 Million	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
Small Farm Loan Size	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	83.3%	\$0	0.0%	38.8%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	16.7%	\$0	0.0%	61.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Fenton

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%
Middle	0	0.0%	\$0	0.0%	34.8%
Upper	9	100.0%	\$722	100.0%	65.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	9	100.0%	\$722	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Fenton

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	9.1%
Moderate	1	11.1%	\$70	9.7%	13.6%
Middle	3	33.3%	\$85	11.8%	22.4%
Upper	5	55.6%	\$567	78.5%	54.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$722</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Fenton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	22.7%	\$0	0.0%	17.0%
	Upper	2	100.0%	\$542	100.0%	81.1%	2	100.0%	77.3%	\$542	100.0%	83.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$542	100.0%	100.0%	2	100.0%	100.0%	\$542	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	16.9%	\$0	0.0%	13.5%
	Upper	0	0.0%	\$0	0.0%	81.1%	0	0.0%	83.1%	\$0	0.0%	86.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	20.0%	\$0	0.0%	12.4%
	Upper	0	0.0%	\$0	0.0%	81.1%	0	0.0%	80.0%	\$0	0.0%	87.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	47.3%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	52.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	20.4%	\$0	0.0%	16.2%
	Upper	2	100.0%	\$542	100.0%	81.1%	2	100.0%	79.6%	\$542	100.0%	83.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$542	100.0%	100.0%	2	100.0%	100.0%	\$542	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	5	45.5%	\$1,809	60.1%	31.8%	5	45.5%	32.0%	\$1,809	60.1%	41.1%
	Upper	6	54.5%	\$1,200	39.9%	68.2%	6	54.5%	68.0%	\$1,200	39.9%	58.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$3,009	100.0%	100.0%	11	100.0%	100.0%	\$3,009	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	3.9%	0	0.0%	4.8%	\$0	0.0%	1.4%
	Upper	0	0.0%	\$0	0.0%	96.1%	0	0.0%	95.2%	\$0	0.0%	98.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**
Assessment Area: MI - Fenton

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2017					2017				
		Bank		Families by Family Income			Count		Dollar		
		Count	%	\$ (000s)	%		Bank	Agg	\$ (000s)	%	Agg
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	12.9%	0	0.0%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	11.0%	0	0.0%	\$0	0.0%	5.9%
	Middle	1	50.0%	\$210	38.7%	19.3%	1	50.0%	\$210	38.7%	13.9%
	Upper	1	50.0%	\$332	61.3%	56.8%	1	50.0%	\$332	61.3%	66.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	13.8%
	Total	2	100.0%	\$542	100.0%	100.0%	2	100.0%	\$542	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	12.9%	0	0.0%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	11.0%	0	0.0%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	\$0	0.0%	14.1%
	Upper	0	0.0%	\$0	0.0%	56.8%	0	0.0%	\$0	0.0%	62.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	15.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	12.9%	0	0.0%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	11.0%	0	0.0%	\$0	0.0%	4.5%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	\$0	0.0%	7.1%
	Upper	0	0.0%	\$0	0.0%	56.8%	0	0.0%	\$0	0.0%	84.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	1.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	12.9%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	11.0%	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	56.8%	0	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	12.9%	0	0.0%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	11.0%	0	0.0%	\$0	0.0%	6.2%
	Middle	1	50.0%	\$210	38.7%	19.3%	1	50.0%	\$210	38.7%	13.7%
	Upper	1	50.0%	\$332	61.3%	56.8%	1	50.0%	\$332	61.3%	65.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	14.5%
	Total	2	100.0%	\$542	100.0%	100.0%	2	100.0%	\$542	100.0%	100.0%
Small Business Loan Size	Total Businesses										
	\$1 Million or Less	2	18.2%	\$400	13.3%	91.0%	2	18.2%	\$400	13.3%	37.2%
	Over \$1 Million	4	36.4%	\$1,190	39.5%	8.2%	4	36.4%			
	Total Rev. available	6	54.6%	\$1,590	52.8%	99.2%	6	54.6%			
	Rev. Not Known	5	45.5%	\$1,419	47.2%	0.8%	5	45.5%			
	Total	11	100.0%	\$3,009	100.0%	100.0%	11	100.0%			
	\$100,000 or Less	4	36.4%	\$290	9.6%		4	36.4%	\$290	9.6%	41.9%
	\$100,001 - \$250,000	3	27.3%	\$604	20.1%		3	27.3%	\$604	20.1%	23.2%
	\$250,001 - \$1 Million	4	36.4%	\$2,115	70.3%		4	36.4%	\$2,115	70.3%	34.9%
	Total	11	100.0%	\$3,009	100.0%		11	100.0%	\$3,009	100.0%	100.0%
Small Farm Loan Size	Total Farms										
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.1%	0	0.0%	\$0	0.0%	45.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.9%	0	0.0%			
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%			
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Fenton

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%
Middle	2	33.3%	\$120	24.2%	18.9%
Upper	4	66.7%	\$376	75.8%	81.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$496</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Fenton

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	1	16.7%	\$50	0.0%	12.9%
Moderate	3	50.0%	\$236	47.6%	11.0%
Middle	0	0.0%	\$0	0.0%	19.3%
Upper	2	33.3%	\$210	42.3%	56.8%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$496</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Grand Rapids-Wyoming

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank			Owner Occupied Units	Count			Dollar			Count			Dollar			
		Count		Dollar		Bank	Agg	%	Bank	Agg	%	Bank	Agg	%				
		#	%	\$ (000s)											\$ %	#	%	\$ (000s)
HOME PURCHASE	Low	1	1.9%	\$109	1.3%	2.4%	0	0.0%	1.9%	\$0	0.0%	1.2%	1	3.4%	2.4%	\$109	2.3%	1.5%
	Moderate	8	15.4%	\$919	11.1%	13.2%	0	0.0%	13.5%	\$0	0.0%	8.7%	8	27.6%	14.7%	\$919	19.7%	9.7%
	Middle	26	50.0%	\$3,490	42.3%	53.7%	14	60.9%	52.8%	\$1,794	50.0%	46.6%	12	41.4%	52.2%	\$1,696	36.4%	46.8%
	Upper	17	32.7%	\$3,738	45.3%	30.7%	9	39.1%	31.8%	\$1,797	50.0%	43.5%	8	27.6%	30.8%	\$1,941	41.6%	42.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	52	100.0%	\$8,256	100.0%	100.0%	23	100.0%	100.0%	\$3,591	100.0%	100.0%	29	100.0%	100.0%	\$4,665	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.2%	\$0	0.0%	0.7%	0	0.0%	1.4%	\$0	0.0%	0.8%
	Moderate	3	7.7%	\$229	3.1%	13.2%	1	4.8%	9.7%	\$80	2.9%	6.3%	2	11.1%	10.0%	\$149	3.2%	6.3%
	Middle	20	51.3%	\$2,185	29.4%	53.7%	10	47.6%	49.7%	\$1,112	40.9%	43.2%	10	55.6%	49.8%	\$1,073	22.7%	43.6%
	Upper	16	41.0%	\$5,028	67.6%	30.7%	10	47.6%	39.3%	\$1,526	56.1%	49.8%	6	33.3%	38.8%	\$3,502	74.1%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	39	100.0%	\$7,442	100.0%	100.0%	21	100.0%	100.0%	\$2,718	100.0%	100.0%	18	100.0%	100.0%	\$4,724	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.4%	0	0.0%	1.1%	\$0	0.0%	0.6%	0	0.0%	1.6%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	13.2%	0	0.0%	12.2%	\$0	0.0%	9.2%	0	0.0%	11.7%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	53.7%	0	0.0%	51.1%	\$0	0.0%	41.8%	0	0.0%	49.2%	\$0	0.0%	38.8%
	Upper	1	100.0%	\$7	100.0%	30.7%	1	100.0%	35.6%	\$7	100.0%	48.4%	0	0.0%	37.5%	\$0	0.0%	52.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$7	100.0%	100.0%	1	100.0%	100.0%	\$7	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	9.4%	\$0	0.0%	8.7%	0	0.0%	5.5%	\$0	0.0%	9.0%
	Moderate	0	0.0%	\$0	0.0%	30.6%	0	0.0%	43.8%	\$0	0.0%	34.5%	0	0.0%	41.1%	\$0	0.0%	35.0%
	Middle	0	0.0%	\$0	0.0%	54.0%	0	0.0%	35.9%	\$0	0.0%	38.5%	0	0.0%	43.8%	\$0	0.0%	45.6%
	Upper	0	0.0%	\$0	0.0%	9.9%	0	0.0%	10.9%	\$0	0.0%	18.3%	0	0.0%	9.6%	\$0	0.0%	10.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Low	1	1.1%	\$109	0.7%	2.4%	0	0.0%	1.6%	\$0	0.0%	1.3%	1	2.1%	2.0%	\$109	1.2%	1.5%
	Moderate	11	12.0%	\$1,148	7.3%	13.2%	1	2.2%	12.0%	\$80	1.3%	8.8%	10	21.3%	12.6%	\$1,068	11.4%	9.5%
	Middle	46	50.0%	\$5,675	36.1%	53.7%	24	53.3%	51.5%	\$2,906	46.0%	44.9%	22	46.8%	51.0%	\$2,769	29.5%	45.2%
	Upper	34	37.0%	\$8,773	55.9%	30.7%	20	44.4%	35.0%	\$3,330	52.7%	45.0%	14	29.8%	34.4%	\$5,443	58.0%	43.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL BUSINESSES	Total	92	100.0%	\$15,705	100.0%	100.0%	45	100.0%	100.0%	\$6,316	100.0%	100.0%	47	100.0%	100.0%	\$9,339	100.0%	100.0%
	Small Businesses																	
	Low	66	12.5%	\$20,989	14.6%	3.9%	40	13.8%	4.4%	\$12,789	16.9%	6.8%	26	10.9%	4.0%	\$8,200	12.0%	6.5%
	Moderate	83	15.7%	\$21,991	15.3%	15.5%	47	16.3%	14.3%	\$12,964	17.2%	16.7%	36	15.1%	13.2%	\$9,027	13.2%	16.3%
	Middle	211	40.0%	\$60,401	42.0%	48.7%	114	39.4%	46.2%	\$30,941	41.0%	45.1%	97	40.6%	45.1%	\$29,460	43.1%	45.4%
	Upper	168	31.8%	\$40,403	28.1%	31.9%	88	30.4%	34.1%	\$18,804	24.9%	31.3%	80	33.5%	36.7%	\$21,599	31.6%	31.6%
SMALL FARM	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.9%	\$0	0.0%	0.1%	0	0.0%	1.0%	\$0	0.0%	0.2%
	Total	528	100.0%	\$143,784	100.0%	100.0%	289	100.0%	100.0%	\$75,498	100.0%	100.0%	239	100.0%	100.0%	\$68,286	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.9%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.5%	0	0.0%	1.4%	\$0	0.0%	2.2%	0	0.0%	1.9%	\$0	0.0%	2.6%
TOTAL	Middle	0	0.0%	\$0	0.0%	67.7%	0	0.0%	65.6%	\$0	0.0%	64.3%	0	0.0%	68.0%	\$0	0.0%	63.3%
	Upper	0	0.0%	\$0	0.0%	30.5%	0	0.0%	32.1%	\$0	0.0%	33.2%	0	0.0%	29.7%	\$0	0.0%	34.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data, 2015 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Grand Rapids-Wyoming

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison											
		2015, 2016						2015						2016					
		Bank		Families by Family Income		Count		Dollar		Count		Dollar		Count		Dollar		Count	
		#	%	\$ (000s)	%	#	%	\$ (000s)	%	#	%	\$ (000s)	%	#	%	\$ (000s)	%	#	%
		%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%
HOME PURCHASE	Low	4	7.7%	\$265	3.2%	19.1%	2	8.7%	10.0%	\$118	3.3%	5.5%	2	6.9%	8.9%	\$147	3.2%	4.9%	
	Moderate	17	32.7%	\$1,974	23.9%	17.9%	6	26.1%	23.6%	\$784	21.8%	17.1%	11	37.9%	22.9%	\$1,190	25.5%	16.7%	
	Middle	10	19.2%	\$1,286	15.6%	22.3%	6	26.1%	21.0%	\$695	19.4%	19.7%	4	13.8%	21.8%	\$591	12.7%	20.1%	
	Upper	21	40.4%	\$4,731	57.3%	40.7%	9	39.1%	29.6%	\$1,994	55.5%	43.2%	12	41.4%	31.2%	\$2,737	58.7%	44.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.7%	\$0	0.0%	14.5%	0	0.0%	15.2%	\$0	0.0%	14.1%	
	Total	52	100.0%	\$8,256	100.0%	100.0%	23	100.0%	100.0%	\$3,591	100.0%	100.0%	29	100.0%	100.0%	\$4,665	100.0%	100.0%	
REFINANCE	Low	6	15.4%	\$493	6.6%	19.1%	2	9.5%	6.3%	\$181	6.7%	3.4%	4	22.2%	5.9%	\$312	6.6%	3.0%	
	Moderate	14	35.9%	\$1,425	19.1%	17.9%	7	33.3%	17.3%	\$765	28.1%	11.7%	7	38.9%	16.3%	\$660	14.0%	10.9%	
	Middle	7	17.9%	\$783	10.5%	22.3%	7	33.3%	20.7%	\$783	28.8%	17.3%	0	0.0%	21.6%	\$0	0.0%	18.2%	
	Upper	12	30.8%	\$4,741	63.7%	40.7%	5	23.8%	34.7%	\$989	36.4%	46.3%	7	38.9%	37.2%	\$3,752	79.4%	48.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.9%	\$0	0.0%	21.4%	0	0.0%	19.0%	\$0	0.0%	19.1%	
	Total	39	100.0%	\$7,442	100.0%	100.0%	21	100.0%	100.0%	\$2,718	100.0%	100.0%	18	100.0%	100.0%	\$4,724	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	9.2%	\$0	0.0%	5.2%	0	0.0%	7.5%	\$0	0.0%	3.6%	
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	20.7%	\$0	0.0%	14.2%	0	0.0%	19.9%	\$0	0.0%	12.6%	
	Middle	1	100.0%	\$7	100.0%	22.3%	1	100.0%	24.7%	\$7	100.0%	20.1%	0	0.0%	26.1%	\$0	0.0%	20.8%	
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	42.4%	\$0	0.0%	55.5%	0	0.0%	43.6%	\$0	0.0%	56.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.1%	\$0	0.0%	5.0%	0	0.0%	2.9%	\$0	0.0%	6.2%	
	Total	1	100.0%	\$7	100.0%	100.0%	1	100.0%	100.0%	\$7	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	10	10.9%	\$758	4.8%	19.1%	4	8.9%	8.5%	\$299	4.7%	4.5%	6	12.8%	7.6%	\$459	4.9%	3.9%	
	Moderate	31	33.7%	\$3,399	21.6%	17.9%	13	28.9%	20.9%	\$1,549	24.5%	14.4%	18	38.3%	20.0%	\$1,850	19.7%	13.6%	
	Middle	18	19.6%	\$2,076	13.2%	22.3%	14	31.1%	21.0%	\$1,485	23.5%	18.0%	4	8.5%	22.0%	\$591	6.3%	18.5%	
	Upper	33	35.9%	\$9,472	60.3%	40.7%	14	31.1%	32.2%	\$2,983	47.2%	43.0%	19	40.4%	34.3%	\$6,489	69.1%	44.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.3%	\$0	0.0%	20.2%	0	0.0%	16.1%	\$0	0.0%	19.6%	
	Total	92	100.0%	\$15,705	100.0%	100.0%	43	100.0%	100.0%	\$6,316	100.0%	100.0%	47	100.0%	100.0%	\$9,389	100.0%	100.0%	
Small Business Revenue	Total Businesses																		
	\$1 Million or Less	110	20.8%	\$20,464	14.2%	86.8%	59	20.4%	41.7%	\$10,867	14.4%	28.3%	51	21.3%	39.0%	\$9,597	14.1%	28.2%	
	Over \$1 Million	316	59.8%	\$108,440	75.4%	12.5%	163	56.4%					153	64.0%					
	Total Rev. available	426	80.6%	\$128,904	89.6%	99.3%	222	76.8%					204	85.3%					
	Rev. Not Known	102	19.3%	\$14,880	10.3%	0.6%	67	23.2%					35	14.6%					
	Total	528	100.0%	\$143,784	100.0%	100.0%	289	100.0%					239	100.0%					
Small Business Loan Size	\$100,000 or Less	243	46.0%	\$13,727	9.5%		135	46.7%	83.7%	\$7,645	10.1%	19.5%	108	45.2%	85.7%	\$6,082	8.9%	22.7%	
	\$100,001 - \$250,000	100	18.9%	\$18,610	12.9%		60	20.8%	7.4%	\$10,820	14.3%	16.6%	40	16.7%	6.6%	\$7,790	11.4%	16.8%	
	\$250,001 - \$1 Million	185	35.0%	\$111,447	77.5%		94	32.5%	8.9%	\$57,033	75.5%	63.9%	91	38.1%	7.7%	\$54,414	79.7%	60.5%	
	Total	528	100.0%	\$143,784	100.0%		289	100.0%	100.0%	\$75,498	100.0%	100.0%	239	100.0%	100.0%	\$68,286	100.0%	100.0%	
	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	91.7%	0	0.0%	45.1%	\$0	0.0%	60.5%	0	0.0%	52.5%	\$0	0.0%	57.3%	
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	8.3%	0	0.0%					0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	76.3%	\$0	0.0%	21.8%	0	0.0%	75.3%	\$0	0.0%	20.9%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	12.1%	\$0	0.0%	24.2%	0	0.0%	10.8%	\$0	0.0%	21.5%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	11.6%	\$0	0.0%	54.0%	0	0.0%	13.9%	\$0	0.0%	57.6%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Grand Rapids-Wyoming

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	4	1.1%	\$148	0.4%	2.4%
Moderate	19	5.3%	\$1,419	3.8%	13.2%
Middle	173	48.5%	\$15,571	41.7%	53.7%
Upper	161	45.1%	\$20,164	54.1%	30.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	357	100.0%	\$37,302	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Grand Rapids-Wyoming

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	37	10.4%	\$1,697	0.0%	19.1%
Moderate	81	22.7%	\$6,573	17.6%	17.9%
Middle	77	21.6%	\$7,424	19.9%	22.3%
Upper	161	45.1%	\$21,508	57.7%	40.7%
Unknown	1	0.3%	\$100	0.3%	0.0%
<i>Total</i>	<i>357</i>	<i>100.0%</i>	<i>\$37,302</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Grand Rapids-Wyoming

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2017					2017						
		Bank		Owner Occupied Units			Count		Dollar		Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	5.0%	\$88	2.6%	2.2%	1	5.0%	2.6%	\$88	2.6%	1.3%	
	Moderate	5	25.0%	\$775	22.6%	12.6%	5	25.0%	15.6%	\$775	22.6%	10.9%	
	Middle	10	50.0%	\$1,638	47.7%	53.7%	10	50.0%	52.9%	\$1,638	47.7%	49.7%	
	Upper	4	20.0%	\$931	27.1%	31.6%	4	20.0%	28.9%	\$931	27.1%	38.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	20	100.0%	\$3,432	100.0%	100.0%	20	100.0%	100.0%	\$3,432	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	1.7%	\$0	0.0%	0.8%	
	Moderate	6	20.7%	\$541	12.9%	12.6%	6	20.7%	12.6%	\$541	12.9%	8.4%	
	Middle	17	58.6%	\$2,098	50.1%	53.7%	17	58.6%	53.9%	\$2,098	50.1%	49.6%	
	Upper	6	20.7%	\$1,546	36.9%	31.6%	6	20.7%	31.8%	\$1,546	36.9%	41.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	29	100.0%	\$4,185	100.0%	100.0%	29	100.0%	100.0%	\$4,185	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	2.0%	\$0	0.0%	1.1%	
	Moderate	0	0.0%	\$0	0.0%	12.6%	0	0.0%	12.7%	\$0	0.0%	7.9%	
	Middle	0	0.0%	\$0	0.0%	53.7%	0	0.0%	53.2%	\$0	0.0%	48.1%	
	Upper	1	100.0%	\$770	100.0%	31.6%	1	100.0%	32.1%	\$770	100.0%	42.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$770	100.0%	100.0%	1	100.0%	100.0%	\$770	100.0%	100.0%	
MULTIFAMILY	Multi-Family Units												
	Low	0	0.0%	\$0	0.0%	8.0%	0	0.0%	12.8%	\$0	0.0%	30.4%	
	Moderate	0	0.0%	\$0	0.0%	27.9%	0	0.0%	30.8%	\$0	0.0%	14.7%	
	Middle	0	0.0%	\$0	0.0%	50.2%	0	0.0%	48.7%	\$0	0.0%	25.0%	
	Upper	0	0.0%	\$0	0.0%	13.9%	0	0.0%	7.7%	\$0	0.0%	29.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	2.0%	\$88	1.0%	2.2%	1	2.0%	2.3%	\$88	1.0%	2.6%	
	Moderate	11	22.0%	\$1,316	15.7%	12.6%	11	22.0%	14.5%	\$1,316	15.7%	10.2%	
	Middle	27	54.0%	\$3,736	44.5%	53.7%	27	54.0%	53.2%	\$3,736	44.5%	48.4%	
	Upper	11	22.0%	\$3,247	38.7%	31.6%	11	22.0%	30.0%	\$3,247	38.7%	38.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	50	100.0%	\$8,387	100.0%	100.0%	50	100.0%	100.0%	\$8,387	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses												
	Low	14	6.5%	\$3,991	6.1%	3.0%	14	6.5%	3.5%	\$3,991	6.1%	5.1%	
	Moderate	38	17.5%	\$13,672	21.0%	13.4%	38	17.5%	13.8%	\$13,672	21.0%	15.3%	
	Middle	87	40.1%	\$27,226	41.9%	49.9%	87	40.1%	48.8%	\$27,226	41.9%	49.9%	
	Upper	78	35.9%	\$20,134	31.0%	33.7%	78	35.9%	33.2%	\$20,134	31.0%	29.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	217	100.0%	\$65,023	100.0%	100.0%	217	100.0%	100.0%	\$65,023	100.0%	100.0%	
SMALL FARM	Small Farms												
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	1.9%	0	0.0%	3.7%	\$0	0.0%	0.8%	
	Middle	0	0.0%	\$0	0.0%	67.4%	0	0.0%	63.1%	\$0	0.0%	76.0%	
	Upper	1	100.0%	\$200	100.0%	30.7%	1	100.0%	32.8%	\$200	100.0%	23.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$200	100.0%	100.0%	1	100.0%	100.0%	\$200	100.0%	100.0%	

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: MI - Grand Rapids-Wyoming

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Families by Family Income %	Count			Dollar		
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	7.8%	\$0	0.0%	4.2%
	Moderate	12	60.0%	\$1,715	50.0%	17.6%	12	60.0%	21.2%	\$1,715	50.0%	15.0%
	Middle	2	10.0%	\$334	9.7%	22.2%	2	10.0%	22.6%	\$334	9.7%	20.1%
	Upper	6	30.0%	\$1,383	40.3%	41.2%	6	30.0%	33.1%	\$1,383	40.3%	46.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.3%	\$0	0.0%	14.7%
	Total	20	100.0%	\$3,432	100.0%	100.0%	20	100.0%	100.0%	\$3,432	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	9.0%	\$0	0.0%	5.1%
	Moderate	21	72.4%	\$2,521	60.2%	17.6%	21	72.4%	19.4%	\$2,521	60.2%	14.4%
	Middle	3	10.3%	\$240	5.7%	22.2%	3	10.3%	22.5%	\$240	5.7%	20.1%
	Upper	5	17.2%	\$1,424	34.0%	41.2%	5	17.2%	31.8%	\$1,424	34.0%	43.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.3%	\$0	0.0%	17.4%
	Total	29	100.0%	\$4,185	100.0%	100.0%	29	100.0%	100.0%	\$4,185	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	7.1%	\$0	0.0%	4.5%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	19.5%	\$0	0.0%	14.1%
	Middle	0	0.0%	\$0	0.0%	22.2%	0	0.0%	27.9%	\$0	0.0%	23.0%
	Upper	1	100.0%	\$770	100.0%	41.2%	1	100.0%	42.5%	\$770	100.0%	54.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	4.3%
	Total	1	100.0%	\$770	100.0%	100.0%	1	100.0%	100.0%	\$770	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	19.1%	0	0.0%	8.1%	\$0	0.0%	4.3%
	Moderate	33	66.0%	\$4,236	50.5%	17.6%	33	66.0%	20.5%	\$4,236	50.5%	14.1%
	Middle	5	10.0%	\$574	6.8%	22.2%	5	10.0%	22.9%	\$574	6.8%	19.2%
	Upper	12	24.0%	\$3,577	42.6%	41.2%	12	24.0%	33.4%	\$3,577	42.6%	43.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.2%	\$0	0.0%	19.1%
	Total	50	100.0%	\$8,387	100.0%	100.0%	50	100.0%	100.0%	\$8,387	100.0%	100.0%
Small Business Revenue	Total Businesses											
	\$1 Million or Less	36	16.6%	\$6,770	10.4%	85.6%	36	16.6%	45.2%	\$6,770	10.4%	28.0%
	Over \$1 Million	151	69.6%	\$53,826	82.8%	13.7%	151	69.6%				
	Total Rev. available	187	86.2%	\$60,596	93.2%	99.3%	187	86.2%				
	Rev. Not Known	30	13.8%	\$4,427	6.8%	0.7%	30	13.8%				
	Total	217	100.0%	\$65,023	100.0%	100.0%	217	100.0%				
Small Business Loan Size	\$100,000 or Less	96	44.2%	\$5,550	8.5%		96	44.2%	83.6%	\$5,550	8.5%	19.1%
	\$100,001 - \$250,000	39	18.0%	\$6,806	10.5%		39	18.0%	7.5%	\$6,806	10.5%	17.1%
	\$250,001 - \$1 Million	82	37.8%	\$52,667	81.0%		82	37.8%	8.9%	\$52,667	81.0%	63.8%
	Total	217	100.0%	\$65,023	100.0%		217	100.0%	100.0%	\$65,023	100.0%	100.0%
	Total Farms											
Small Farm Revenue	\$1 Million or Less	0	0.0%	\$0	0.0%	91.0%	0	0.0%	47.8%	\$0	0.0%	45.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	9.0%	0	0.0%				
	Not Known	1	100.0%	\$200	100.0%	0.0%	1	100.0%				
	Total	1	100.0%	\$200	100.0%	100.0%	1	100.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	78.4%	\$0	0.0%	21.7%
	\$100,001 - \$250,000	1	100.0%	\$200	100.0%		1	100.0%	11.9%	\$200	100.0%	28.1%
Small Farm Loan Size	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	9.7%	\$0	0.0%	50.2%
	Total	1	100.0%	\$200	100.0%		1	100.0%	100.0%	\$200	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Grand Rapids-Wyoming

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	3	2.3%	\$288	1.9%	2.2%
Moderate	12	9.4%	\$1,114	7.4%	12.6%
Middle	57	44.5%	\$6,447	43.0%	53.7%
Upper	56	43.8%	\$7,133	47.6%	31.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>128</i>	<i>100.0%</i>	<i>\$14,982</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Grand Rapids-Wyoming

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	17	13.3%	\$1,069	0.0%	19.1%
Moderate	24	18.8%	\$1,867	12.5%	17.6%
Middle	20	15.6%	\$1,834	12.2%	22.2%
Upper	67	52.3%	\$10,212	68.2%	41.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	128	100.0%	\$14,982	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison								Bank & Aggregate Lending Comparison											
		2015, 2016								2015						2016					
		Bank				Owner Occupied Units	Count		Dollar		Count	Dollar	Count	Dollar	Count	Dollar					
		Count		Dollar			Bank	Agg	Bank	Agg											
		#	%	\$ (000s)	\$ %												#	%	\$ (000s)	\$ %	#
HOME PURCHASE	Low	1	4.8%	\$66	2.5%	6.4%	1	12.5%	2.5%	\$66	6.4%	1.4%	0	0.0%	3.2%	\$0	0.0%	1.4%			
	Moderate	3	14.3%	\$139	5.4%	10.0%	1	12.5%	7.0%	\$55	5.3%	3.6%	2	15.4%	9.2%	\$84	5.4%	4.7%			
	Middle	9	42.9%	\$1,184	45.6%	54.7%	3	37.5%	55.6%	\$399	38.4%	56.1%	6	46.2%	57.3%	\$785	50.4%	57.5%			
	Upper	8	38.1%	\$1,208	46.5%	28.9%	3	37.5%	34.9%	\$519	50.0%	38.9%	5	38.5%	30.4%	\$689	44.2%	36.3%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	21	100.0%	\$2,597	100.0%	100.0%	8	100.0%	100.0%	\$1,039	100.0%	100.0%	13	100.0%	100.0%	\$1,558	100.0%	100.0%			
REFINANCE	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	2.3%	\$0	0.0%	1.4%	0	0.0%	2.6%	\$0	0.0%	1.2%			
	Moderate	1	4.5%	\$41	1.7%	10.0%	1	12.5%	5.6%	\$41	3.4%	3.4%	0	0.0%	6.1%	\$0	0.0%	3.1%			
	Middle	8	36.4%	\$728	29.8%	54.7%	3	37.5%	56.2%	\$312	26.2%	54.6%	5	35.7%	54.9%	\$416	33.2%	53.8%			
	Upper	13	59.1%	\$1,676	68.5%	28.9%	4	50.0%	35.9%	\$838	70.4%	40.6%	9	64.3%	36.4%	\$838	66.8%	41.9%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	22	100.0%	\$2,445	100.0%	100.0%	8	100.0%	100.0%	\$1,191	100.0%	100.0%	14	100.0%	100.0%	\$1,254	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	6.4%	0	0.0%	4.8%	\$0	0.0%	1.6%	0	0.0%	2.3%	\$0	0.0%	3.0%			
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	6.7%	\$0	0.0%	3.6%	0	0.0%	7.0%	\$0	0.0%	3.4%			
	Middle	0	0.0%	\$0	0.0%	54.7%	0	0.0%	53.7%	\$0	0.0%	47.4%	0	0.0%	62.6%	\$0	0.0%	56.0%			
	Upper	1	100.0%	\$5	100.0%	28.9%	0	0.0%	34.9%	\$0	0.0%	47.3%	1	100.0%	28.0%	\$5	100.0%	37.6%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	1	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%			
MULTI-FAMILY	Multi-Family Units																				
	Low	0	0.0%	\$0	0.0%	25.5%	0	0.0%	20.0%	\$0	0.0%	10.9%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	20.0%	\$0	0.0%	72.4%	0	0.0%	66.7%	\$0	0.0%	98.5%			
	Middle	1	100.0%	\$168	100.0%	37.4%	0	0.0%	40.0%	\$0	0.0%	10.8%	1	100.0%	0.0%	\$168	100.0%	0.0%			
	Upper	0	0.0%	\$0	0.0%	10.0%	0	0.0%	20.0%	\$0	0.0%	5.9%	0	0.0%	33.3%	\$0	0.0%	1.5%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
Total	1	100.0%	\$168	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$168	100.0%	100.0%				
HMDA TOTALS	Low	1	2.2%	\$66	1.3%	6.4%	1	6.3%	2.7%	\$66	3.0%	1.5%	0	0.0%	2.9%	\$0	0.0%	1.3%			
	Moderate	4	8.9%	\$180	3.5%	10.0%	2	12.5%	6.4%	\$96	4.3%	4.0%	2	6.9%	7.9%	\$84	2.8%	6.1%			
	Middle	18	40.0%	\$2,080	39.9%	54.7%	6	37.5%	55.6%	\$711	31.9%	54.9%	12	41.4%	56.9%	\$1,369	45.9%	54.8%			
	Upper	22	48.9%	\$2,889	55.4%	28.9%	7	43.8%	35.2%	\$1,357	60.9%	39.6%	15	51.7%	32.4%	\$1,532	51.3%	37.8%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	45	100.0%	\$5,215	100.0%	100.0%	16	100.0%	100.0%	\$2,230	100.0%	100.0%	29	100.0%	100.0%	\$2,985	100.0%	100.0%			
SMALL BUSINESSES	Small Businesses																				
	Low	117	29.1%	\$29,098	31.8%	13.5%	69	31.1%	16.0%	\$15,243	32.8%	29.6%	48	26.7%	14.0%	\$13,855	30.8%	27.0%			
	Moderate	66	16.4%	\$13,885	15.2%	13.1%	37	16.7%	15.1%	\$6,918	14.9%	21.5%	29	16.1%	14.3%	\$6,967	15.5%	17.9%			
	Middle	140	34.8%	\$30,061	32.9%	46.8%	74	33.3%	41.9%	\$13,966	30.1%	28.2%	66	36.7%	42.0%	\$16,095	35.8%	31.1%			
	Upper	79	19.7%	\$18,432	20.1%	26.6%	42	18.9%	25.2%	\$10,334	22.2%	20.1%	37	20.6%	28.6%	\$8,098	18.0%	23.4%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	0.5%	0	0.0%	1.1%	\$0	0.0%	0.5%			
Total	402	100.0%	\$91,476	100.0%	100.0%	222	100.0%	100.0%	\$46,461	100.0%	100.0%	180	100.0%	100.0%	\$45,015	100.0%	100.0%				
SMALL FARM	Small Farms																				
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Middle	7	70.0%	\$1,328	67.1%	60.8%	3	60.0%	58.6%	\$718	67.2%	86.6%	4	80.0%	59.5%	\$610	67.0%	60.6%			
	Upper	3	30.0%	\$650	32.9%	37.7%	2	40.0%	41.4%	\$350	32.8%	13.4%	1	20.0%	40.5%	\$300	33.0%	39.4%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
Total	10	100.0%	\$1,978	100.0%	100.0%	5	100.0%	100.0%	\$1,068	100.0%	100.0%	5	100.0%	100.0%	\$910	100.0%	100.0%				

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison									
		2015, 2016					2015					2016									
		Bank				Families by Family Income %	Count			Dollar		Count			Dollar						
		Count	Dollar	Count	Agg		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg							
															#	%	\$ (000s)	\$ %	#	%	\$ (000s)
HOME PURCHASE	Low	1	4.8%	\$43	1.7%	20.7%	0	0.0%	5.5%	\$0	0.0%	2.9%	1	7.7%	8.1%	\$43	2.8%	4.0%			
	Moderate	8	38.1%	\$709	27.3%	18.3%	3	37.5%	22.1%	\$211	20.3%	14.6%	5	38.5%	23.6%	\$498	32.0%	17.2%			
	Middle	6	28.6%	\$641	24.7%	21.3%	2	25.0%	23.2%	\$284	27.3%	22.0%	4	30.8%	23.3%	\$357	22.9%	23.2%			
	Upper	6	28.6%	\$1,204	46.4%	39.7%	3	37.5%	32.1%	\$544	52.4%	42.9%	3	23.1%	29.3%	\$660	42.4%	42.0%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.1%	\$0	0.0%	17.6%	0	0.0%	15.8%	\$0	0.0%	13.7%			
	Total	21	100.0%	\$2,597	100.0%	100.0%	8	100.0%	100.0%	\$1,039	100.0%	100.0%	13	100.0%	100.0%	\$1,558	100.0%	100.0%			
REFINANCE	Low	1	4.5%	\$41	1.7%	20.7%	1	12.5%	5.0%	\$41	3.4%	2.6%	0	0.0%	6.8%	\$0	0.0%	3.4%			
	Moderate	6	27.3%	\$450	18.4%	18.3%	1	12.5%	13.7%	\$68	5.7%	9.3%	5	35.7%	13.4%	\$382	30.5%	9.4%			
	Middle	6	27.3%	\$533	21.8%	21.3%	2	25.0%	19.9%	\$208	17.5%	16.5%	4	28.6%	19.8%	\$325	25.9%	17.8%			
	Upper	9	40.9%	\$1,421	58.1%	39.7%	4	50.0%	39.9%	\$874	73.4%	48.1%	5	35.7%	40.4%	\$547	43.6%	48.9%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.4%	\$0	0.0%	23.5%	0	0.0%	19.7%	\$0	0.0%	20.4%			
	Total	22	100.0%	\$2,445	100.0%	100.0%	8	100.0%	100.0%	\$1,191	100.0%	100.0%	14	100.0%	100.0%	\$1,254	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	12.6%	\$0	0.0%	5.8%	0	0.0%	9.8%	\$0	0.0%	3.6%			
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	15.0%	\$0	0.0%	10.9%	0	0.0%	20.2%	\$0	0.0%	13.2%			
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	24.0%	\$0	0.0%	16.0%	0	0.0%	27.0%	\$0	0.0%	22.5%			
	Upper	1	100.0%	\$5	100.0%	39.7%	0	0.0%	44.2%	\$0	0.0%	59.8%	1	100.0%	41.6%	\$5	100.0%	59.4%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.3%	\$0	0.0%	7.6%	0	0.0%	1.5%	\$0	0.0%	1.4%			
	Total	1	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%			
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Unknown	1	100.0%	\$168	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$168	100.0%	100.0%			
	Total	1	100.0%	\$168	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$168	100.0%	100.0%			
HMDA TOTALS	Low	2	4.4%	\$84	1.6%	20.7%	1	6.3%	6.0%	\$41	1.8%	2.9%	1	3.4%	7.7%	\$43	1.4%	3.7%			
	Moderate	14	31.1%	\$1,159	22.2%	18.3%	4	25.0%	18.2%	\$279	12.5%	12.3%	10	34.5%	19.4%	\$880	29.5%	13.6%			
	Middle	12	26.7%	\$1,174	22.5%	21.3%	4	25.0%	22.0%	\$492	22.1%	19.5%	8	27.6%	22.3%	\$682	22.8%	20.6%			
	Upper	16	35.6%	\$2,630	50.4%	39.7%	7	43.8%	36.2%	\$1,418	63.6%	45.2%	9	31.0%	34.6%	\$1,212	40.6%	44.5%			
	Unknown	1	2.2%	\$168	3.2%	0.0%	0	0.0%	17.6%	\$0	0.0%	20.1%	1	3.4%	15.9%	\$168	5.6%	17.7%			
	Total	45	100.0%	\$5,215	100.0%	100.0%	16	100.0%	100.0%	\$2,230	100.0%	100.0%	29	100.0%	100.0%	\$2,985	100.0%	100.0%			
Small Business Revenue	Total Businesses																				
	\$1 Million or Less	118	29.4%	\$17,078	18.7%	88.4%	64	28.8%	41.5%	\$8,480	18.3%	28.8%	54	30.0%	43.7%	\$8,598	19.1%	29.5%			
	Over \$1 Million	176	43.8%	\$55,853	61.1%	10.6%	99	44.6%					77	42.8%							
	Total Rev. available	294	73.2%	\$72,931	79.8%	99.0%	163	73.4%					131	72.8%							
	Rev. Not Known	108	26.9%	\$18,545	20.3%	1.0%	59	26.6%					49	27.2%							
	Total	402	100.0%	\$91,476	100.0%	100.0%	222	100.0%					180	100.0%							
Small Business Loan Size	\$100,000 or Less	178	44.3%	\$10,641	11.6%		99	44.6%	94.2%	\$5,954	12.8%	34.2%	79	43.9%	94.4%	\$4,687	10.4%	40.8%			
	\$100,001 - \$250,000	111	27.6%	\$21,297	23.3%		67	30.2%	3.1%	\$12,797	27.5%	17.8%	44	24.4%	3.5%	\$8,500	18.9%	20.6%			
	\$250,001 - \$1 Million	113	28.1%	\$39,538	65.1%		56	25.2%	2.7%	\$27,710	59.6%	48.1%	57	31.7%	2.1%	\$31,828	70.7%	38.7%			
	Total	402	100.0%	\$91,476	100.0%		222	100.0%	100.0%	\$46,461	100.0%	100.0%	180	100.0%	100.0%	\$45,015	100.0%	100.0%			
	Total Farms																				
	\$1 Million or Less	7	70.0%	\$1,868	94.4%	98.6%	4	80.0%	31.0%	\$1,018	95.3%	73.1%	3	60.0%	26.2%	\$850	93.4%	35.9%			
Small Farm Revenue	Over \$1 Million	1	10.0%	\$45	2.3%	1.4%	0	0.0%					1	20.0%							
	Not Known	2	20.0%	\$65	3.3%	0.0%	1	20.0%					1	20.0%							
	Total	10	100.0%	\$1,978	100.0%	100.0%	5	100.0%					5	100.0%							
	\$100,000 or Less	5	50.0%	\$310	15.7%		2	40.0%	93.1%	\$150	14.0%	34.5%	3	60.0%	92.9%	\$160	17.6%	34.8%			
	\$100,001 - \$250,000	1	10.0%	\$168	8.5%		1	20.0%	3.4%	\$168	15.7%	23.5%	0	0.0%	4.8%	\$0	0.0%	37.5%			
	\$250,001 - \$500,000	4	40.0%	\$1,500	75.8%		2	40.0%	3.4%	\$750	70.2%	42.0%	2	40.0%	2.4%	\$750	82.4%	27.7%			
Total	10	100.0%	\$1,978	100.0%		5	100.0%	100.0%	\$1,068	100.0%	100.0%	5	100.0%	100.0%	\$910	100.0%	100.0%				

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Jackson MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	4	1.9%	\$135	0.9%	6.4%
Moderate	8	3.9%	\$192	1.3%	10.0%
Middle	114	55.3%	\$7,805	51.8%	54.7%
Upper	80	38.8%	\$6,927	46.0%	28.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	206	100.0%	\$15,059	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Jackson MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	26	12.6%	\$939	0.0%	20.7%
Moderate	44	21.4%	\$2,451	16.3%	18.3%
Middle	52	25.2%	\$3,791	25.2%	21.3%
Upper	84	40.8%	\$7,878	52.3%	39.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	206	100.0%	\$15,059	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	10.0%	\$39	2.8%	5.7%	1	10.0%	3.4%	\$39	2.8%	1.6%
	Moderate	1	10.0%	\$89	6.5%	15.6%	1	10.0%	15.7%	\$89	6.5%	10.9%
	Middle	4	40.0%	\$412	30.1%	53.7%	4	40.0%	53.6%	\$412	30.1%	53.9%
	Upper	4	40.0%	\$831	60.6%	25.0%	4	40.0%	27.3%	\$831	60.6%	33.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	10	100.0%	\$1,371	100.0%	100.0%	10	100.0%	100.0%	\$1,371	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.7%	0	0.0%	2.1%	\$0	0.0%	0.8%
	Moderate	2	28.6%	\$194	30.6%	15.6%	2	28.6%	13.5%	\$194	30.6%	9.3%
	Middle	3	42.9%	\$243	38.3%	53.7%	3	42.9%	51.8%	\$243	38.3%	49.7%
	Upper	2	28.6%	\$198	31.2%	25.0%	2	28.6%	32.7%	\$198	31.2%	40.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	7	100.0%	\$635	100.0%	100.0%	7	100.0%	100.0%	\$635	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.7%	0	0.0%	3.7%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	13.1%	\$0	0.0%	9.4%
	Middle	1	50.0%	\$53	25.5%	53.7%	1	50.0%	54.4%	\$53	25.5%	49.4%
	Upper	1	50.0%	\$155	74.5%	25.0%	1	50.0%	28.8%	\$155	74.5%	39.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$208	100.0%	100.0%	2	100.0%	100.0%	\$208	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	11.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	43.9%	0	0.0%	25.0%	\$0	0.0%	19.7%
	Middle	0	0.0%	\$0	0.0%	29.0%	0	0.0%	50.0%	\$0	0.0%	64.7%
	Upper	0	0.0%	\$0	0.0%	15.9%	0	0.0%	25.0%	\$0	0.0%	15.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	5.3%	\$39	1.8%	5.7%	1	5.3%	3.0%	\$39	1.8%	1.3%
	Moderate	3	15.8%	\$283	12.8%	15.6%	3	15.8%	14.7%	\$283	12.8%	10.3%
	Middle	8	42.1%	\$708	32.0%	53.7%	8	42.1%	53.1%	\$708	32.0%	52.4%
	Upper	7	36.8%	\$1,184	53.5%	25.0%	7	36.8%	29.2%	\$1,184	53.5%	36.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	19	100.0%	\$2,214	100.0%	100.0%	19	100.0%	100.0%	\$2,214	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	37	19.4%	\$10,893	23.3%	9.5%	37	19.4%	9.3%	\$10,893	23.3%	9.7%
	Moderate	71	37.2%	\$16,295	34.9%	25.6%	71	37.2%	28.5%	\$16,295	34.9%	33.1%
	Middle	50	26.2%	\$12,016	25.7%	43.1%	50	26.2%	40.4%	\$12,016	25.7%	42.5%
	Upper	33	17.3%	\$7,502	16.1%	21.7%	33	17.3%	21.0%	\$7,502	16.1%	14.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.8%	\$0	0.0%	0.3%
	Total	191	100.0%	\$46,706	100.0%	100.0%	191	100.0%	100.0%	\$46,706	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	100.0%	\$450	100.0%	2.7%	1	100.0%	0.0%	\$450	100.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	71.9%	0	0.0%	65.8%	\$0	0.0%	82.5%
	Upper	0	0.0%	\$0	0.0%	24.9%	0	0.0%	34.2%	\$0	0.0%	17.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$450	100.0%	100.0%	1	100.0%	100.0%	\$450	100.0%	100.0%

Originations & Purchases

2017 FRBC Census Data, 2017 D&S Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	%	Dollar \$ (000s)	%	%	#	%	Agg %	Bank \$ (000s)	%	Agg %
HOME PURCHASE	Low	2	20.0%	\$180	13.1%	22.3%	2	20.0%	8.2%	\$180	13.1%	4.1%
	Moderate	2	20.0%	\$214	15.6%	17.5%	2	20.0%	20.5%	\$214	15.6%	14.2%
	Middle	3	30.0%	\$232	16.9%	20.2%	3	30.0%	25.1%	\$232	16.9%	23.0%
	Upper	3	30.0%	\$745	54.3%	40.0%	3	30.0%	32.5%	\$745	54.3%	43.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.8%	\$0	0.0%	14.8%
	Total	10	100.0%	\$1,371	100.0%	100.0%	10	100.0%	100.0%	\$1,371	100.0%	100.0%
REFINANCE	Low	1	14.3%	\$104	16.4%	22.3%	1	14.3%	7.2%	\$104	16.4%	3.8%
	Moderate	2	28.6%	\$109	17.2%	17.5%	2	28.6%	18.1%	\$109	17.2%	13.0%
	Middle	2	28.6%	\$228	35.9%	20.2%	2	28.6%	21.4%	\$228	35.9%	18.2%
	Upper	2	28.6%	\$194	30.6%	40.0%	2	28.6%	38.0%	\$194	30.6%	48.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.4%	\$0	0.0%	16.5%
	Total	7	100.0%	\$635	100.0%	100.0%	7	100.0%	100.0%	\$635	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.3%	0	0.0%	11.0%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	17.5%	\$0	0.0%	9.7%
	Middle	1	50.0%	\$53	25.5%	20.2%	1	50.0%	23.7%	\$53	25.5%	19.2%
	Upper	1	50.0%	\$155	74.5%	40.0%	1	50.0%	44.8%	\$155	74.5%	59.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.1%	\$0	0.0%	6.8%
	Total	2	100.0%	\$208	100.0%	100.0%	2	100.0%	100.0%	\$208	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	15.8%	\$284	12.8%	22.3%	3	15.8%	8.2%	\$284	12.8%	4.0%
	Moderate	4	21.1%	\$323	14.6%	17.5%	4	21.1%	19.4%	\$323	14.6%	13.6%
	Middle	6	31.6%	\$513	23.2%	20.2%	6	31.6%	23.8%	\$513	23.2%	21.3%
	Upper	6	31.6%	\$1,094	49.4%	40.0%	6	31.6%	35.5%	\$1,094	49.4%	45.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.1%	\$0	0.0%	15.2%
	Total	19	100.0%	\$2,214	100.0%	100.0%	19	100.0%	100.0%	\$2,214	100.0%	100.0%
Small Business Revenue	Total Businesses											
	\$1 Million or Less	60	31.4%	\$9,077	19.4%	87.1%	60	31.4%	46.5%	\$9,077	19.4%	35.3%
	Over \$1 Million	85	44.5%	\$28,333	60.7%	11.9%	85	44.5%				
	Total Rev. available	145	75.9%	\$37,410	80.1%	99.0%	145	75.9%				
	Rev. Not Known	46	24.1%	\$9,296	19.9%	1.0%	46	24.1%				
	Total	191	100.0%	\$46,706	100.0%	100.0%	191	100.0%				
Small Business Loan Size	Total Businesses											
	\$100,000 or Less	81	42.4%	\$5,468	11.7%		81	42.4%	94.0%	\$5,468	11.7%	36.7%
	\$100,001 - \$250,000	47	24.6%	\$8,735	18.7%		47	24.6%	3.7%	\$8,735	18.7%	20.3%
	\$250,001 - \$1 Million	63	33.0%	\$32,503	69.6%		63	33.0%	2.3%	\$32,503	69.6%	43.0%
	Total	191	100.0%	\$46,706	100.0%		191	100.0%	100.0%	\$46,706	100.0%	100.0%
Small Farm Revenue	Total Farms											
	\$1 Million or Less	1	100.0%	\$450	100.0%	97.9%	1	100.0%	36.8%	\$450	100.0%	64.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.1%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	1	100.0%	\$450	100.0%	100.0%	1	100.0%				
Small Farm Loan Size	Total Farms											
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	89.5%	\$0	0.0%	32.1%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	7.9%	\$0	0.0%	31.7%
	\$250,001 - \$500,000	1	100.0%	\$450	100.0%		1	100.0%	2.6%	\$450	100.0%	36.2%
	Total	1	100.0%	\$450	100.0%		1	100.0%	100.0%	\$450	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Jackson MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	2	2.0%	\$50	0.7%	5.7%
Moderate	10	10.2%	\$706	9.3%	15.6%
Middle	51	52.0%	\$3,983	52.4%	53.7%
Upper	35	35.7%	\$2,861	37.6%	25.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	98	100.0%	\$7,600	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Jackson MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	13	13.3%	\$779	0.0%	22.3%
Moderate	26	26.5%	\$1,770	23.3%	17.5%
Middle	29	29.6%	\$2,383	31.4%	20.2%
Upper	30	30.6%	\$2,668	35.1%	40.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	98	100.0%	\$7,600	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank			Owner Occupied Units	Count		Dollar			Count		Dollar					
		Count	Dollar			Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %			
			#	%												%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.0%	\$0	0.0%	0.9%	0	0.0%	2.5%	\$0	0.0%	1.0%
	Moderate	4	16.0%	\$233	9.5%	17.2%	4	16.0%	13.2%	\$233	9.5%	7.3%	0	0.0%	13.1%	\$0	0.0%	7.3%
	Middle	16	64.0%	\$1,427	58.2%	42.1%	16	64.0%	44.4%	\$1,427	58.2%	40.0%	0	0.0%	45.4%	\$0	0.0%	41.5%
	Upper	5	20.0%	\$792	32.3%	35.7%	5	20.0%	40.3%	\$792	32.3%	51.8%	0	0.0%	39.0%	\$0	0.0%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	25	100.0%	\$2,452	100.0%	100.0%	25	100.0%	100.0%	\$2,452	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.6%	\$0	0.0%	1.3%	0	0.0%	2.5%	\$0	0.0%	1.1%
	Moderate	1	5.9%	\$90	4.3%	17.2%	0	0.0%	10.1%	\$0	0.0%	6.0%	1	20.0%	9.6%	\$90	13.5%	5.9%
	Middle	9	52.9%	\$1,069	51.6%	42.1%	7	58.3%	42.0%	\$762	54.4%	37.7%	2	40.0%	41.3%	\$307	45.9%	36.6%
	Upper	7	41.2%	\$912	44.0%	35.7%	5	41.7%	45.3%	\$640	45.6%	55.0%	2	40.0%	46.5%	\$272	40.7%	56.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.4%
	Total	17	100.0%	\$2,071	100.0%	100.0%	12	100.0%	100.0%	\$1,402	100.0%	100.0%	5	100.0%	100.0%	\$669	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.9%	0	0.0%	2.7%	\$0	0.0%	1.3%	0	0.0%	4.6%	\$0	0.0%	1.9%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	17.3%	\$0	0.0%	8.8%	0	0.0%	14.8%	\$0	0.0%	6.6%
	Middle	0	0.0%	\$0	0.0%	42.1%	0	0.0%	41.6%	\$0	0.0%	37.5%	0	0.0%	44.3%	\$0	0.0%	39.5%
	Upper	0	0.0%	\$0	0.0%	35.7%	0	0.0%	38.5%	\$0	0.0%	52.4%	0	0.0%	36.2%	\$0	0.0%	51.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	1	50.0%	\$2,175	19.5%	8.1%	1	100.0%	5.1%	\$2,175	100.0%	8.3%	0	0.0%	6.5%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	29.2%	0	0.0%	53.8%	\$0	0.0%	43.2%	0	0.0%	32.5%	\$0	0.0%	16.9%
	Middle	1	50.0%	\$9,000	80.5%	39.7%	0	0.0%	28.2%	\$0	0.0%	26.3%	1	100.0%	36.4%	\$9,000	100.0%	42.9%
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	12.8%	\$0	0.0%	22.2%	0	0.0%	23.4%	\$0	0.0%	38.0%
	Unknown	0	0.0%	\$0	0.0%	3.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	0.5%
Total	2	100.0%	\$11,175	100.0%	100.0%	1	100.0%	100.0%	\$2,175	100.0%	100.0%	1	100.0%	100.0%	\$9,000	100.0%	100.0%	
HMDA TOTALS	Low	1	2.3%	\$2,175	13.9%	4.9%	1	2.6%	2.3%	\$2,175	36.1%	1.6%	0	0.0%	2.8%	\$0	0.0%	1.2%
	Moderate	5	11.4%	\$323	2.1%	17.2%	4	10.5%	12.7%	\$233	3.9%	9.5%	1	16.7%	12.2%	\$90	0.9%	8.4%
	Middle	26	59.1%	\$11,496	73.2%	42.1%	23	60.5%	43.1%	\$2,189	36.3%	38.0%	3	50.0%	43.7%	\$9,307	96.3%	40.0%
	Upper	12	27.3%	\$1,704	10.9%	35.7%	10	26.3%	41.8%	\$1,432	23.8%	50.8%	2	33.3%	41.2%	\$272	2.8%	50.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.2%
	Total	44	100.0%	\$15,698	100.0%	100.0%	38	100.0%	100.0%	\$6,029	100.0%	100.0%	6	100.0%	100.0%	\$9,669	100.0%	100.0%
SMALL BUSINESSES	Small Businesses																	
	Low	6	2.6%	\$1,070	2.5%	4.7%	4	3.0%	5.5%	\$670	2.7%	6.4%	2	2.2%	6.3%	\$400	2.3%	8.0%
	Moderate	96	42.3%	\$15,339	36.0%	24.6%	55	41.0%	23.6%	\$8,094	32.6%	27.6%	41	44.1%	23.5%	\$7,245	40.8%	25.3%
	Middle	62	27.3%	\$13,901	32.6%	34.6%	37	27.6%	33.0%	\$8,742	35.2%	30.4%	25	26.9%	31.6%	\$5,159	29.0%	28.3%
	Upper	57	25.1%	\$11,465	26.9%	34.5%	34	25.4%	36.4%	\$6,617	26.7%	33.2%	23	24.7%	37.5%	\$4,848	27.3%	37.5%
	Unknown	6	2.6%	\$801	1.9%	1.7%	4	3.0%	1.5%	\$686	2.8%	2.3%	2	2.2%	1.1%	\$115	0.6%	0.9%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	227	100.0%	\$42,576	100.0%	100.0%	134	100.0%	100.0%	\$24,809	100.0%	100.0%	93	100.0%	100.0%	\$17,767	100.0%	100.0%
SMALL FARM	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	7.4%	0	0.0%	6.7%	\$0	0.0%	2.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	44.2%	0	0.0%	46.7%	\$0	0.0%	13.1%	0	0.0%	48.4%	\$0	0.0%	38.1%
	Upper	0	0.0%	\$0	0.0%	46.5%	0	0.0%	46.7%	\$0	0.0%	84.4%	0	0.0%	48.4%	\$0	0.0%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison											
		2015, 2016						2015						2016					
		Bank				Families by Family Income	Count		Dollar				Count		Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
		#	%	\$ (000s)	\$ %										#	%	%	\$ (000s)	\$ %
HOME PURCHASE	Low	6	24.0%	\$329	13.4%	21.8%	6	24.0%	9.3%	\$329	13.4%	4.4%	0	0.0%	8.9%	\$0	0.0%	4.2%	
	Moderate	12	48.0%	\$966	39.4%	17.1%	12	48.0%	22.8%	\$966	39.4%	16.0%	0	0.0%	22.2%	\$0	0.0%	16.1%	
	Middle	1	4.0%	\$147	6.0%	20.4%	1	4.0%	22.1%	\$147	6.0%	21.0%	0	0.0%	24.1%	\$0	0.0%	22.1%	
	Upper	6	24.0%	\$1,010	41.2%	40.8%	6	24.0%	31.7%	\$1,010	41.2%	44.7%	0	0.0%	33.8%	\$0	0.0%	47.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.2%	\$0	0.0%	13.8%	0	0.0%	11.0%	\$0	0.0%	10.1%	
	Total	25	100.0%	\$2,452	100.0%	100.0%	25	100.0%	100.0%	\$2,452	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	5.1%	\$0	0.0%	2.5%	0	0.0%	5.4%	\$0	0.0%	2.8%	
	Moderate	7	41.2%	\$800	38.6%	17.1%	7	58.3%	14.3%	\$800	57.1%	9.4%	0	0.0%	13.0%	\$0	0.0%	8.2%	
	Middle	3	17.6%	\$399	19.3%	20.4%	1	8.3%	20.3%	\$127	9.1%	17.6%	2	40.0%	20.6%	\$272	40.7%	17.2%	
	Upper	7	41.2%	\$872	42.1%	40.8%	4	33.3%	39.8%	\$475	33.9%	49.8%	3	60.0%	42.4%	\$397	59.3%	53.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	20.7%	\$0	0.0%	20.6%	0	0.0%	18.6%	\$0	0.0%	18.3%	
	Total	17	100.0%	\$2,071	100.0%	100.0%	12	100.0%	100.0%	\$1,402	100.0%	100.0%	5	100.0%	100.0%	\$669	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	8.1%	\$0	0.0%	3.6%	0	0.0%	8.4%	\$0	0.0%	2.9%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	21.4%	\$0	0.0%	13.1%	0	0.0%	21.5%	\$0	0.0%	12.3%	
	Middle	0	0.0%	\$0	0.0%	20.4%	0	0.0%	26.8%	\$0	0.0%	17.9%	0	0.0%	25.7%	\$0	0.0%	21.0%	
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	39.7%	\$0	0.0%	60.0%	0	0.0%	43.0%	\$0	0.0%	60.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	5.5%	0	0.0%	1.4%	\$0	0.0%	2.9%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	2	100.0%	\$11,175	100.0%	0.0%	1	100.0%	100.0%	\$2,175	100.0%	100.0%	1	100.0%	100.0%	\$9,000	100.0%	100.0%	
	Total	2	100.0%	\$11,175	100.0%	100.0%	1	100.0%	100.0%	\$2,175	100.0%	100.0%	1	100.0%	100.0%	\$9,000	100.0%	100.0%	
HMDA TOTALS	Low	6	13.6%	\$329	2.1%	21.8%	6	15.8%	7.5%	\$329	5.5%	3.4%	0	0.0%	7.5%	\$0	0.0%	3.0%	
	Moderate	19	43.2%	\$1,766	11.2%	17.1%	19	50.0%	19.3%	\$1,766	29.3%	12.2%	0	0.0%	18.7%	\$0	0.0%	10.7%	
	Middle	4	9.1%	\$546	3.5%	20.4%	2	5.3%	21.9%	\$274	4.5%	18.1%	2	33.3%	22.9%	\$272	2.8%	16.8%	
	Upper	13	29.5%	\$1,882	12.0%	40.8%	10	26.3%	35.6%	\$1,485	24.6%	43.7%	3	50.0%	37.9%	\$397	4.1%	42.3%	
	Unknown	2	4.5%	\$11,175	71.2%	0.0%	1	2.6%	15.6%	\$2,175	36.1%	22.7%	1	16.7%	13.0%	\$9,000	93.1%	27.2%	
	Total	44	100.0%	\$15,698	100.0%	100.0%	38	100.0%	100.0%	\$6,029	100.0%	100.0%	6	100.0%	100.0%	\$9,669	100.0%	100.0%	
Small Business	Total Businesses																		
	\$1 Million or Less	46	20.3%	\$4,017	9.4%	88.8%	28	20.9%	45.9%	\$2,105	8.5%	35.7%	18	19.4%	43.9%	\$1,912	10.8%	32.5%	
	Over \$1 Million	112	49.3%	\$22,071	51.8%	10.2%	67	50.0%					45	48.4%					
	Total Rev. available	158	69.6%	\$26,088	61.2%	99.0%	95	70.9%					63	67.8%					
	Rev. Not Known	69	30.4%	\$16,488	38.7%	1.0%	39	29.1%					30	32.3%					
	Total	227	100.0%	\$42,576	100.0%	100.0%	134	100.0%					93	100.0%					
	\$100,000 or Less	134	59.0%	\$7,088	16.6%		77	57.5%	89.1%	\$3,820	15.4%	28.7%	57	61.3%	89.4%	\$3,268	18.4%	29.4%	
	\$100,001 - \$250,000	45	19.8%	\$8,773	20.6%		30	22.4%	5.5%	\$5,729	23.1%	19.4%	15	16.1%	5.8%	\$3,044	17.1%	21.0%	
	\$250,001 - \$1 Million	48	21.1%	\$26,715	62.7%		27	20.1%	5.4%	\$15,260	61.5%	51.8%	21	22.6%	4.8%	\$11,455	64.5%	49.6%	
	Total	227	100.0%	\$42,576	100.0%		134	100.0%	100.0%	\$24,809	100.0%	100.0%	93	100.0%	100.0%	\$17,767	100.0%	100.0%	
Small Farm	Total Farms																		
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.3%	0	0.0%	30.0%	\$0	0.0%	60.8%	0	0.0%	29.0%	\$0	0.0%	47.2%	
	Over \$1 Million	0	0.0%	\$0	0.0%	2.7%	0	0.0%					0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%					
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	96.7%	\$0	0.0%	78.7%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	3.3%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Lansing-East Lansing

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	2	1.8%	\$92	1.2%	4.9%
Moderate	17	15.5%	\$848	10.7%	17.2%
Middle	42	38.2%	\$2,528	31.8%	42.1%
Upper	49	44.5%	\$4,481	56.4%	35.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	110	100.0%	\$7,949	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Lansing-East Lansing

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	14	12.7%	\$550	0.0%	21.8%
Moderate	21	19.1%	\$1,305	16.4%	17.1%
Middle	23	20.9%	\$1,473	18.5%	20.4%
Upper	52	47.3%	\$4,621	58.1%	40.8%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>110</i>	<i>100.0%</i>	<i>\$7,949</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	3.6%	\$0	0.0%	1.5%
	Moderate	2	33.3%	\$111	14.1%	18.4%	2	33.3%	17.7%	\$111	14.1%	9.6%
	Middle	2	33.3%	\$326	41.4%	35.4%	2	33.3%	36.0%	\$326	41.4%	32.6%
	Upper	2	33.3%	\$350	44.5%	40.8%	2	33.3%	42.4%	\$350	44.5%	55.9%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.4%
	Total	6	100.0%	\$787	100.0%	100.0%	6	100.0%	100.0%	\$787	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	2.8%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	18.4%	0	0.0%	13.9%	\$0	0.0%	7.7%
	Middle	1	50.0%	\$64	27.2%	35.4%	1	50.0%	35.0%	\$64	27.2%	31.4%
	Upper	1	50.0%	\$171	72.8%	40.8%	1	50.0%	47.9%	\$171	72.8%	57.9%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	1.8%
	Total	2	100.0%	\$235	100.0%	100.0%	2	100.0%	100.0%	\$235	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	3.4%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	18.4%	0	0.0%	16.3%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	35.4%	0	0.0%	36.9%	\$0	0.0%	33.6%
	Upper	0	0.0%	\$0	0.0%	40.8%	0	0.0%	43.1%	\$0	0.0%	56.5%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	16.2%	0	0.0%	19.1%	\$0	0.0%	19.5%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	31.9%	\$0	0.0%	9.9%
	Middle	0	0.0%	\$0	0.0%	31.3%	0	0.0%	27.7%	\$0	0.0%	16.4%
	Upper	0	0.0%	\$0	0.0%	29.7%	0	0.0%	19.1%	\$0	0.0%	52.5%
	Unknown	0	0.0%	\$0	0.0%	2.3%	0	0.0%	2.1%	\$0	0.0%	1.7%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	3.4%	\$0	0.0%	3.2%
	Moderate	2	25.0%	\$111	10.9%	18.4%	2	25.0%	16.5%	\$111	10.9%	9.0%
	Middle	3	37.5%	\$390	38.2%	35.4%	3	37.5%	35.8%	\$390	38.2%	30.8%
	Upper	3	37.5%	\$521	51.0%	40.8%	3	37.5%	43.9%	\$521	51.0%	56.1%
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.9%
	Total	8	100.0%	\$1,022	100.0%	100.0%	8	100.0%	100.0%	\$1,022	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	15	17.2%	\$1,967	12.6%	9.6%	15	17.2%	13.1%	\$1,967	12.6%	16.8%
	Moderate	19	21.8%	\$2,852	18.3%	18.9%	19	21.8%	17.5%	\$2,852	18.3%	16.8%
	Middle	20	23.0%	\$4,132	26.5%	29.6%	20	23.0%	25.7%	\$4,132	26.5%	25.0%
	Upper	31	35.6%	\$6,531	41.9%	39.3%	31	35.6%	42.0%	\$6,531	41.9%	38.4%
	Unknown	2	2.3%	\$115	0.7%	2.6%	2	2.3%	1.7%	\$115	0.7%	2.9%
	Total	87	100.0%	\$15,597	100.0%	100.0%	87	100.0%	100.0%	\$15,597	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	3.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	6.3%	0	0.0%	5.1%	\$0	0.0%	1.7%
	Middle	0	0.0%	\$0	0.0%	36.5%	0	0.0%	41.0%	\$0	0.0%	13.0%
	Upper	0	0.0%	\$0	0.0%	52.4%	0	0.0%	53.8%	\$0	0.0%	85.3%
	Unknown	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Origination & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending

by Revenue & Loan Size

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	\$ %	Agg	\$ %
HOME PURCHASE	Low	2	33.3%	\$111	14.1%	22.6%	2	33.3%	9.9%	\$111	14.1%	4.8%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	22.1%	\$0	0.0%	15.7%
	Middle	1	16.7%	\$148	18.8%	19.1%	1	16.7%	23.2%	\$148	18.8%	21.4%
	Upper	3	50.0%	\$528	67.1%	41.2%	3	50.0%	33.8%	\$528	67.1%	46.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.0%	\$0	0.0%	11.2%
	Total	6	100.0%	\$787	100.0%	100.0%	6	100.0%	100.0%	\$787	100.0%	100.0%
REFINANCE	Low	1	50.0%	\$64	27.2%	22.6%	1	50.0%	7.0%	\$64	27.2%	3.5%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	15.6%	\$0	0.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	23.2%	\$0	0.0%	19.8%
	Upper	1	50.0%	\$171	72.8%	41.2%	1	50.0%	39.8%	\$171	72.8%	50.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.4%	\$0	0.0%	16.0%
	Total	2	100.0%	\$235	100.0%	100.0%	2	100.0%	100.0%	\$235	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	7.1%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	22.8%	\$0	0.0%	14.6%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	26.2%	\$0	0.0%	19.2%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	42.6%	\$0	0.0%	59.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	3.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	3	37.5%	\$175	17.1%	22.6%	3	37.5%	8.6%	\$175	17.1%	3.9%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	20.3%	\$0	0.0%	12.7%
	Middle	1	12.5%	\$148	14.5%	19.1%	1	12.5%	23.6%	\$148	14.5%	18.9%
	Upper	4	50.0%	\$699	68.4%	41.2%	4	50.0%	36.7%	\$699	68.4%	43.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.8%	\$0	0.0%	20.5%
	Total	8	100.0%	\$1,022	100.0%	100.0%	8	100.0%	100.0%	\$1,022	100.0%	100.0%
Small Business	Total Businesses											
	\$1 Million or Less	21	24.1%	\$1,575	10.1%	87.6%	21	24.1%	47.6%	\$1,575	10.1%	28.5%
	Over \$1 Million	44	50.6%	\$9,222	59.1%	11.4%	44	50.6%				
	Total Rev. available	65	74.7%	\$10,797	69.2%	99.0%	65	74.7%				
	Rev. Not Known	22	25.3%	\$4,800	30.8%	1.0%	22	25.3%				
	Total	87	100.0%	\$15,597	100.0%	100.0%	87	100.0%				
	Total Farms											
	\$100,000 or Less	55	63.2%	\$3,131	20.1%		55	63.2%	90.2%	\$3,131	20.1%	30.3%
	\$100,001 - \$250,000	15	17.2%	\$2,896	18.6%		15	17.2%	5.2%	\$2,896	18.6%	20.1%
	\$250,001 - \$1 Million	17	19.5%	\$9,570	61.4%		17	19.5%	4.6%	\$9,570	61.4%	49.6%
	Total	87	100.0%	\$15,597	100.0%		87	100.0%	100.0%	\$15,597	100.0%	100.0%
Small Farm	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.4%	0	0.0%	46.2%	\$0	0.0%	75.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.6%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	97.4%	\$0	0.0%	74.0%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.6%	\$0	0.0%	26.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%
	Total Farms											

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Lansing-East Lansing

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	1	2.6%	\$18	0.6%	5.2%
Moderate	5	12.8%	\$238	8.2%	18.4%
Middle	13	33.3%	\$659	22.6%	35.4%
Upper	20	51.3%	\$2,003	68.6%	40.8%
Unknown	0	0.0%	\$0	0.0%	0.2%
Total	39	100.0%	\$2,918	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Lansing-East Lansing

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	8	20.5%	\$263	0.0%	22.6%
Moderate	8	20.5%	\$461	15.8%	17.1%
Middle	8	20.5%	\$567	19.4%	19.1%
Upper	14	35.9%	\$1,547	53.0%	41.2%
Unknown	1	2.6%	\$80	2.7%	0.0%
Total	39	100.0%	\$2,918	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Midland MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison								Bank & Aggregate Lending Comparison											
		2015, 2016								2015						2016					
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar					
		Count		Dollar			#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
		#	%	\$ (000s)	\$ %																
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	1.1%	\$0	0.0%	0.6%	0	0.0%	0.8%	\$0	0.0%	0.5%			
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	10.8%	\$0	0.0%	5.9%	0	0.0%	12.5%	\$0	0.0%	7.4%			
	Middle	0	0.0%	\$0	0.0%	46.3%	0	0.0%	41.5%	\$0	0.0%	38.9%	0	0.0%	38.2%	\$0	0.0%	36.4%			
	Upper	0	0.0%	\$0	0.0%	39.2%	0	0.0%	46.5%	\$0	0.0%	54.7%	0	0.0%	48.5%	\$0	0.0%	55.7%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
REFINANCE	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	1.9%	\$0	0.0%	0.9%	0	0.0%	1.6%	\$0	0.0%	1.9%			
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	9.9%	\$0	0.0%	6.8%	0	0.0%	9.3%	\$0	0.0%	5.8%			
	Middle	2	100.0%	\$1,570	100.0%	46.3%	2	100.0%	44.6%	\$1,570	100.0%	42.6%	0	0.0%	44.4%	\$0	0.0%	42.7%			
	Upper	0	0.0%	\$0	0.0%	39.2%	0	0.0%	43.7%	\$0	0.0%	49.7%	0	0.0%	44.7%	\$0	0.0%	49.6%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	2	100.0%	\$1,570	100.0%	100.0%	2	100.0%	100.0%	\$1,570	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	0.7%	\$0	0.0%	0.2%	0	0.0%	1.8%	\$0	0.0%	0.8%			
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	11.1%	\$0	0.0%	9.4%	0	0.0%	13.2%	\$0	0.0%	4.7%			
	Middle	0	0.0%	\$0	0.0%	46.3%	0	0.0%	45.9%	\$0	0.0%	44.4%	0	0.0%	46.7%	\$0	0.0%	33.6%			
	Upper	0	0.0%	\$0	0.0%	39.2%	0	0.0%	42.2%	\$0	0.0%	46.0%	0	0.0%	38.3%	\$0	0.0%	60.8%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTI-FAMILY	Multi-Family Units																				
	Low	0	0.0%	\$0	0.0%	5.8%	0	0.0%	33.3%	\$0	0.0%	58.2%	0	0.0%	33.3%	\$0	0.0%	4.3%			
	Moderate	0	0.0%	\$0	0.0%	28.9%	0	0.0%	66.7%	\$0	0.0%	41.8%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Middle	0	0.0%	\$0	0.0%	24.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	33.3%	\$0	0.0%	1.7%			
	Upper	0	0.0%	\$0	0.0%	40.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	33.3%	\$0	0.0%	94.0%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
	Low	0	0.0%	\$0	0.0%	2.0%	0	0.0%	1.4%	\$0	0.0%	0.8%	0	0.0%	1.3%	\$0	0.0%	1.1%			
	Moderate	0	0.0%	\$0	0.0%	12.5%	0	0.0%	10.6%	\$0	0.0%	6.4%	0	0.0%	11.3%	\$0	0.0%	6.5%			
	Middle	2	100.0%	\$1,570	100.0%	46.3%	2	100.0%	42.8%	\$1,570	100.0%	40.2%	0	0.0%	41.2%	\$0	0.0%	37.5%			
	Upper	0	0.0%	\$0	0.0%	39.2%	0	0.0%	45.2%	\$0	0.0%	52.5%	0	0.0%	46.3%	\$0	0.0%	54.9%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
SMALL BUSINESSES	Total	2	100.0%	\$1,570	100.0%	100.0%	2	100.0%	100.0%	\$1,570	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
	Small Businesses																				
	Low	16	27.6%	\$4,680	25.9%	4.3%	10	25.6%	8.4%	\$2,956	22.6%	22.9%	6	31.6%	7.4%	\$1,724	34.7%	11.6%			
	Moderate	5	8.6%	\$300	1.7%	18.0%	3	7.7%	15.8%	\$200	1.5%	17.6%	2	10.5%	15.1%	\$100	2.0%	16.5%			
	Middle	22	37.9%	\$11,270	62.4%	36.9%	16	41.0%	33.7%	\$8,627	65.9%	25.5%	6	31.6%	36.3%	\$2,643	53.2%	37.3%			
	Upper	15	25.9%	\$1,815	10.0%	40.8%	10	25.6%	40.8%	\$1,310	10.0%	33.8%	5	26.3%	40.7%	\$505	10.2%	34.4%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	0.2%	0	0.0%	0.5%	\$0	0.0%	0.2%			
Total	58	100.0%	\$18,065	100.0%	100.0%	39	100.0%	100.0%	\$13,093	100.0%	100.0%	19	100.0%	100.0%	\$4,972	100.0%	100.0%				
SMALL FARM	Small Farms																				
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	20.9%	0	0.0%	4.3%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Middle	2	100.0%	\$100	100.0%	62.7%	1	100.0%	91.5%	\$50	100.0%	97.7%	1	100.0%	93.6%	\$50	100.0%	98.6%			
	Upper	0	0.0%	\$0	0.0%	16.4%	0	0.0%	4.3%	\$0	0.0%	1.6%	0	0.0%	6.4%	\$0	0.0%	1.4%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	2	100.0%	\$100	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%			

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Midland MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison																			
		2015, 2016										2015										2016									
		Bank					Families by Family Income %	Count			Dollar			Count			Dollar														
		Count		Dollar				Bank	Agg	%	Bank	Agg	%	Bank	Agg	%	Bank	Agg	%												
		#	%	\$ (000s)	\$ %	%														#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	11.4%	\$0	0.0%	5.7%	0	0.0%	14.1%	\$0	0.0%	6.8%													
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	21.4%	\$0	0.0%	14.7%	0	0.0%	20.4%	\$0	0.0%	15.0%													
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	21.6%	\$0	0.0%	20.3%	0	0.0%	22.5%	\$0	0.0%	20.2%													
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	31.0%	\$0	0.0%	46.8%	0	0.0%	33.3%	\$0	0.0%	49.5%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.6%	\$0	0.0%	12.5%	0	0.0%	9.7%	\$0	0.0%	8.5%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
REFINANCE	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	8.0%	\$0	0.0%	4.3%	0	0.0%	8.4%	\$0	0.0%	4.2%													
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	18.9%	\$0	0.0%	13.1%	0	0.0%	15.1%	\$0	0.0%	9.7%													
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	22.0%	\$0	0.0%	20.0%	0	0.0%	17.7%	\$0	0.0%	14.6%													
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	33.8%	\$0	0.0%	46.3%	0	0.0%	42.7%	\$0	0.0%	55.9%													
	Unknown	2	100.0%	\$1,570	100.0%	0.0%	2	100.0%	17.2%	\$1,570	100.0%	16.2%	0	0.0%	16.2%	\$0	0.0%	15.6%													
	Total	2	100.0%	\$1,570	100.0%	100.0%	2	100.0%	100.0%	\$1,570	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	4.4%	\$0	0.0%	0.8%	0	0.0%	13.2%	\$0	0.0%	3.2%													
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	19.3%	\$0	0.0%	12.4%	0	0.0%	16.8%	\$0	0.0%	8.2%													
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	22.2%	\$0	0.0%	16.6%	0	0.0%	24.0%	\$0	0.0%	15.0%													
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	45.9%	\$0	0.0%	58.2%	0	0.0%	41.9%	\$0	0.0%	64.2%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.1%	\$0	0.0%	12.0%	0	0.0%	4.2%	\$0	0.0%	9.3%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.7%	0	0.0%	9.7%	\$0	0.0%	5.1%	0	0.0%	11.8%	\$0	0.0%	5.5%													
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	20.4%	\$0	0.0%	14.0%	0	0.0%	18.1%	\$0	0.0%	12.3%													
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	21.7%	\$0	0.0%	20.1%	0	0.0%	20.7%	\$0	0.0%	17.3%													
	Upper	0	0.0%	\$0	0.0%	41.7%	0	0.0%	32.9%	\$0	0.0%	46.9%	0	0.0%	37.5%	\$0	0.0%	51.2%													
	Unknown	2	100.0%	\$1,570	100.0%	0.0%	2	100.0%	15.3%	\$1,570	100.0%	14.0%	0	0.0%	11.9%	\$0	0.0%	13.8%													
	Total	2	100.0%	\$1,570	100.0%	100.0%	2	100.0%	100.0%	\$1,570	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
Small Business Revenue	Total Businesses																														
	\$1 Million or Less	17	29.3%	\$2,143	11.9%	89.6%	12	30.8%	49.2%	\$1,769	13.5%	41.1%	5	26.3%	50.8%	\$374	7.5%	44.5%													
	Over \$1 Million	34	58.6%	\$15,025	83.2%	8.9%	25	64.1%					9	47.4%																	
	Total Rev. available	51	87.9%	\$17,168	95.1%	98.5%	37	94.9%					14	73.7%																	
	Rev. Not Known	7	12.1%	\$897	5.0%	1.4%	2	5.1%					5	26.3%																	
	Total	58	100.0%	\$18,065	100.0%	100.0%	39	100.0%					19	100.0%																	
Small Business Loan Size	\$100,000 or Less	24	41.4%	\$1,292	7.2%		15	38.5%	89.7%	\$880	6.7%	25.7%	9	47.4%	89.7%	\$412	8.3%	31.4%													
	\$100,001 - \$250,000	16	27.6%	\$3,045	16.9%		10	25.6%	4.8%	\$1,935	14.8%	16.4%	6	31.6%	5.9%	\$1,110	22.3%	20.9%													
	\$250,001 - \$1 Million	18	31.0%	\$13,728	76.0%		14	35.9%	5.4%	\$10,278	78.5%	57.9%	4	21.1%	4.4%	\$3,450	69.4%	47.7%													
	Total	58	100.0%	\$18,065	100.0%		39	100.0%	100.0%	\$13,093	100.0%	100.0%	19	100.0%	100.0%	\$4,972	100.0%	100.0%													
	Total Farms																														
Small Farm Revenue	\$1 Million or Less	2	100.0%	\$100	100.0%	98.2%	1	100.0%	72.3%	\$50	100.0%	69.3%	1	100.0%	80.9%	\$50	100.0%	86.7%													
	Over \$1 Million	0	0.0%	\$0	0.0%	1.8%	0	0.0%					0	0.0%																	
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%																	
	Total	2	100.0%	\$100	100.0%	100.0%	1	100.0%					1	100.0%																	
	\$100,000 or Less	2	100.0%	\$100	100.0%		1	100.0%	74.5%	\$50	100.0%	39.1%	1	100.0%	83.0%	\$50	100.0%	40.2%													
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	23.4%	\$0	0.0%	52.3%	0	0.0%	10.6%	\$0	0.0%	31.0%													
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	8.6%	0	0.0%	6.4%	\$0	0.0%	28.8%													
Total	2	100.0%	\$100	100.0%		1	100.0%	100.0%	\$50	100.0%	100.0%	1	100.0%	100.0%	\$50	100.0%	100.0%														

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Midland MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	1	2.4%	\$50	1.5%	2.0%
Moderate	2	4.8%	\$119	3.6%	12.5%
Middle	18	42.9%	\$1,223	36.7%	46.3%
Upper	21	50.0%	\$1,939	58.2%	39.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	42	100.0%	\$3,331	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Midland MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	4	9.5%	\$107	0.0%	20.7%
Moderate	11	26.2%	\$669	20.1%	17.7%
Middle	13	31.0%	\$770	23.1%	20.0%
Upper	14	33.3%	\$1,785	53.6%	41.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	42	100.0%	\$3,331	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Midland MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	\$0	0.0%	1.0%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	\$0	0.0%	11.1%	
	Middle	1	100.0%	\$128	100.0%	44.7%	1	100.0%	\$128	100.0%	39.1%	
	Upper	0	0.0%	\$0	0.0%	36.1%	0	0.0%	\$0	0.0%	48.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$128	100.0%	100.0%	1	100.0%	\$128	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	\$0	0.0%	0.9%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	\$0	0.0%	11.0%	
	Middle	0	0.0%	\$0	0.0%	44.7%	0	0.0%	\$0	0.0%	41.9%	
	Upper	0	0.0%	\$0	0.0%	36.1%	0	0.0%	\$0	0.0%	46.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	\$0	0.0%	0.1%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	\$0	0.0%	13.6%	
	Middle	0	0.0%	\$0	0.0%	44.7%	0	0.0%	\$0	0.0%	41.6%	
	Upper	0	0.0%	\$0	0.0%	36.1%	0	0.0%	\$0	0.0%	44.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
MULTI-FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	3.3%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	31.1%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	25.5%	0	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	40.1%	0	0.0%	\$0	0.0%	100.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	\$0	0.0%	0.9%	
	Moderate	0	0.0%	\$0	0.0%	17.5%	0	0.0%	\$0	0.0%	10.8%	
	Middle	1	100.0%	\$128	100.0%	44.7%	1	100.0%	\$128	100.0%	38.7%	
	Upper	0	0.0%	\$0	0.0%	36.1%	0	0.0%	\$0	0.0%	49.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$128	100.0%	100.0%	1	100.0%	\$128	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses											
	Low	7	35.0%	\$1,764	28.4%	4.5%	7	35.0%	\$1,764	28.4%	14.5%	
	Moderate	2	10.0%	\$100	1.6%	22.0%	2	10.0%	\$100	1.6%	15.9%	
	Middle	4	20.0%	\$1,599	25.7%	33.7%	4	20.0%	\$1,599	25.7%	24.1%	
	Upper	7	35.0%	\$2,754	44.3%	39.8%	7	35.0%	\$2,754	44.3%	45.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.2%	
	Total	20	100.0%	\$6,217	100.0%	100.0%	20	100.0%	\$6,217	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	26.1%	0	0.0%	\$0	0.0%	0.5%	
	Middle	1	100.0%	\$50	100.0%	57.6%	1	100.0%	\$50	100.0%	96.0%	
	Upper	0	0.0%	\$0	0.0%	16.3%	0	0.0%	\$0	0.0%	3.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$50	100.0%	100.0%	1	100.0%	\$50	100.0%	100.0%	

Originations & Purchases

2017 FRIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: MI - Midland MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	10.8%	\$0	0.0%	5.4%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	19.1%	\$0	0.0%	12.6%
	Middle	1	100.0%	\$128	100.0%	20.7%	1	100.0%	22.4%	\$128	100.0%	20.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	35.5%	\$0	0.0%	50.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.2%	\$0	0.0%	11.2%
	Total	1	100.0%	\$128	100.0%	100.0%	1	100.0%	100.0%	\$128	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	10.1%	\$0	0.0%	5.2%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	15.5%	\$0	0.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	20.5%	\$0	0.0%	16.5%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	36.7%	\$0	0.0%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.2%	\$0	0.0%	17.7%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	8.5%	\$0	0.0%	4.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	19.5%	\$0	0.0%	13.3%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	23.3%	\$0	0.0%	21.7%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	46.2%	\$0	0.0%	58.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	2.4%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	10.4%	\$0	0.0%	5.1%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	18.1%	\$0	0.0%	11.6%
	Middle	1	100.0%	\$128	100.0%	20.7%	1	100.0%	22.0%	\$128	100.0%	18.5%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	36.8%	\$0	0.0%	49.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.7%	\$0	0.0%	15.4%
	Total	1	100.0%	\$128	100.0%	100.0%	1	100.0%	100.0%	\$128	100.0%	100.0%
Small Business Revenue	Total Businesses											
	\$1 Million or Less	4	20.0%	\$350	5.6%	88.4%	4	20.0%	54.6%	\$350	5.6%	47.5%
	Over \$1 Million	13	65.0%	\$5,677	91.3%	10.1%	13	65.0%				
	Total Rev. available	17	85.0%	\$6,027	96.9%	98.5%	17	85.0%				
	Rev. Not Known	3	15.0%	\$190	3.1%	1.5%	3	15.0%				
	Total	20	100.0%	\$6,217	100.0%	100.0%	20	100.0%				
Small Business Loan Size	\$100,000 or Less	9	45.0%	\$406	6.5%		9	45.0%	90.3%	\$406	6.5%	31.6%
	\$100,001 - \$250,000	5	25.0%	\$932	15.0%		5	25.0%	5.5%	\$932	15.0%	21.8%
	\$250,001 - \$1 Million	6	30.0%	\$4,879	78.5%		6	30.0%	4.3%	\$4,879	78.5%	46.6%
	Total	20	100.0%	\$6,217	100.0%		20	100.0%	100.0%	\$6,217	100.0%	100.0%
Small Farm Revenue	Total Farms											
	\$1 Million or Less	1	100.0%	\$50	100.0%	97.9%	1	100.0%	67.4%	\$50	100.0%	72.2%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.1%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	1	100.0%	\$50	100.0%	100.0%	1	100.0%				
Small Farm Loan Size	\$100,000 or Less	1	100.0%	\$50	100.0%		1	100.0%	86.0%	\$50	100.0%	43.3%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	14.0%	\$0	0.0%	56.7%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$50	100.0%		1	100.0%	100.0%	\$50	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Midland MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	1.7%
Moderate	0	0.0%	\$0	0.0%	17.5%
Middle	3	50.0%	\$271	44.7%	44.7%
Upper	3	50.0%	\$335	55.3%	36.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	6	100.0%	\$606	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Midland MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	20.1%
Moderate	0	0.0%	\$0	0.0%	17.7%
Middle	2	33.3%	\$100	16.5%	20.7%
Upper	4	66.7%	\$506	83.5%	41.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	6	100.0%	\$606	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank		Agg			
		#	%	\$ (000s)	\$ %								%	%	\$ (000s)	\$ %	%	#
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.2%
	Moderate	1	4.2%	\$71	3.0%	17.1%	0	0.0%	11.2%	\$0	0.0%	6.2%	1	11.1%	12.1%	\$71	7.3%	7.2%
	Middle	13	54.2%	\$1,026	43.9%	51.3%	7	46.7%	55.0%	\$431	31.5%	53.0%	6	66.7%	54.4%	\$595	61.5%	52.9%
	Upper	10	41.7%	\$1,239	53.0%	30.1%	8	53.3%	33.3%	\$937	68.5%	40.6%	2	22.2%	33.0%	\$302	31.2%	39.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	24	100.0%	\$2,336	100.0%	100.0%	15	100.0%	100.0%	\$1,368	100.0%	100.0%	9	100.0%	100.0%	\$968	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.7%	\$0	0.0%	0.3%	0	0.0%	1.0%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	9.0%	\$0	0.0%	5.4%	0	0.0%	8.3%	\$0	0.0%	4.7%
	Middle	11	57.9%	\$1,054	39.2%	51.3%	7	70.0%	53.8%	\$524	33.6%	51.5%	4	44.4%	52.0%	\$530	46.8%	48.7%
	Upper	8	42.1%	\$1,637	60.8%	30.1%	3	30.0%	36.5%	\$1,035	66.4%	42.8%	5	55.6%	38.7%	\$602	53.2%	46.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	19	100.0%	\$2,691	100.0%	100.0%	10	100.0%	100.0%	\$1,559	100.0%	100.0%	9	100.0%	100.0%	\$1,132	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	17.1%	0	0.0%	14.1%	\$0	0.0%	6.5%	0	0.0%	8.5%	\$0	0.0%	4.9%
	Middle	0	0.0%	\$0	0.0%	51.3%	0	0.0%	48.8%	\$0	0.0%	44.0%	0	0.0%	52.1%	\$0	0.0%	52.0%
	Upper	0	0.0%	\$0	0.0%	30.1%	0	0.0%	37.1%	\$0	0.0%	49.5%	0	0.0%	38.6%	\$0	0.0%	42.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	55.9%	0	0.0%	25.0%	\$0	0.0%	2.6%	0	0.0%	22.2%	\$0	0.0%	30.3%
	Middle	0	0.0%	\$0	0.0%	27.3%	0	0.0%	50.0%	\$0	0.0%	8.5%	0	0.0%	66.7%	\$0	0.0%	67.9%
	Upper	0	0.0%	\$0	0.0%	11.0%	0	0.0%	25.0%	\$0	0.0%	88.9%	0	0.0%	11.1%	\$0	0.0%	1.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Low	0	0.0%	\$0	0.0%	1.6%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	1	2.3%	\$71	1.4%	17.1%	0	0.0%	10.5%	\$0	0.0%	5.9%	1	5.6%	10.5%	\$71	3.4%	6.9%
	Middle	24	55.8%	\$2,080	41.4%	51.3%	14	56.0%	54.3%	\$955	32.6%	51.8%	10	55.6%	53.4%	\$1,125	53.6%	51.8%
	Upper	18	41.9%	\$2,876	57.2%	30.1%	11	44.0%	34.7%	\$1,972	67.4%	42.0%	7	38.9%	35.4%	\$904	43.0%	41.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL BUSINESSES	Total	43	100.0%	\$5,027	100.0%	100.0%	25	100.0%	100.0%	\$2,927	100.0%	100.0%	18	100.0%	100.0%	\$2,100	100.0%	100.0%
	Small Businesses																	
	Low	18	10.1%	\$4,248	10.2%	4.4%	9	9.4%	7.6%	\$2,031	9.2%	10.1%	9	11.0%	6.8%	\$2,217	11.2%	9.7%
	Moderate	54	30.3%	\$13,613	32.5%	20.4%	26	27.1%	22.3%	\$6,827	30.9%	21.0%	28	34.1%	19.3%	\$6,786	34.3%	19.5%
	Middle	49	27.5%	\$10,595	25.3%	44.7%	28	29.2%	43.0%	\$5,727	25.9%	48.9%	21	25.6%	44.8%	\$4,868	24.6%	48.0%
	Upper	57	32.0%	\$13,388	32.0%	30.4%	33	34.4%	26.6%	\$7,496	33.9%	19.9%	24	29.3%	28.5%	\$5,892	29.8%	22.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.6%	\$0	0.0%	0.1%	0	0.0%	0.6%	\$0	0.0%	0.2%
SMALL FARM	Total	178	100.0%	\$41,844	100.0%	100.0%	96	100.0%	100.0%	\$22,081	100.0%	100.0%	82	100.0%	100.0%	\$19,763	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.6%	\$0	0.0%	0.1%
	Middle	0	0.0%	\$0	0.0%	82.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	92.1%	\$0	0.0%	96.9%
	Upper	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.3%	\$0	0.0%	3.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

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

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison																			
		2015, 2016										2015										2016									
		Bank					Families by Family Income	Count			Dollar			Count					Dollar												
		Count	Dollar		#	%		#	%	#	%	#	%	#	%	#	%														
			\$ (000s)	\$ %														\$ (000s)	\$ %	\$ (000s)	\$ %	\$ (000s)	\$ %	\$ (000s)	\$ %						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %															
HOME PURCHASE	Low	6	25.0%	\$330	14.1%	21.1%	5	33.3%	8.2%	\$270	19.7%	4.3%	1	11.1%	7.2%	\$60	6.2%	3.6%													
	Moderate	11	45.8%	\$1,018	43.6%	17.9%	7	46.7%	23.1%	\$587	42.9%	16.8%	4	44.4%	21.3%	\$431	44.5%	15.3%													
	Middle	1	4.2%	\$64	2.7%	21.2%	0	0.0%	20.6%	\$0	0.0%	20.1%	1	11.1%	22.4%	\$64	6.6%	20.9%													
	Upper	6	25.0%	\$924	39.6%	39.7%	3	20.0%	25.2%	\$511	37.4%	37.6%	3	33.3%	26.9%	\$413	42.7%	39.1%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.9%	\$0	0.0%	21.2%	0	0.0%	22.1%	\$0	0.0%	21.0%													
	Total	24	100.0%	\$2,336	100.0%	100.0%	13	100.0%	100.0%	\$1,368	100.0%	100.0%	9	100.0%	100.0%	\$968	100.0%	100.0%													
REFINANCE	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	5.9%	\$0	0.0%	2.9%	0	0.0%	6.9%	\$0	0.0%	3.6%													
	Moderate	7	36.8%	\$445	16.5%	17.9%	3	30.0%	17.3%	\$161	10.3%	12.0%	4	44.4%	12.1%	\$284	25.1%	8.0%													
	Middle	6	31.6%	\$496	18.4%	21.2%	3	30.0%	19.8%	\$220	14.1%	16.6%	3	33.3%	20.0%	\$276	24.4%	16.4%													
	Upper	6	31.6%	\$1,750	65.0%	39.7%	4	40.0%	32.3%	\$1,178	75.6%	41.9%	2	22.2%	37.3%	\$572	50.5%	47.2%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.6%	\$0	0.0%	26.5%	0	0.0%	23.7%	\$0	0.0%	24.8%													
	Total	19	100.0%	\$2,691	100.0%	100.0%	10	100.0%	100.0%	\$1,559	100.0%	100.0%	9	100.0%	100.0%	\$1,132	100.0%	100.0%													
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	8.5%	\$0	0.0%	3.6%	0	0.0%	5.4%	\$0	0.0%	3.6%													
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	24.4%	\$0	0.0%	20.6%	0	0.0%	17.4%	\$0	0.0%	12.7%													
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	24.4%	\$0	0.0%	22.0%	0	0.0%	26.3%	\$0	0.0%	23.9%													
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	41.8%	\$0	0.0%	51.6%	0	0.0%	45.6%	\$0	0.0%	52.6%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.9%	\$0	0.0%	2.2%	0	0.0%	5.4%	\$0	0.0%	7.2%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Middle	0	0.0%	\$0	0.0%	21.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%													
HMDA TOTALS	Low	6	14.0%	\$330	6.6%	21.1%	5	20.0%	7.3%	\$270	9.2%	3.7%	1	5.6%	7.0%	\$60	2.9%	3.5%													
	Moderate	18	41.9%	\$1,463	29.1%	17.9%	10	40.0%	20.9%	\$748	25.6%	14.9%	8	44.4%	17.5%	\$715	34.0%	12.2%													
	Middle	7	16.3%	\$560	11.1%	21.2%	3	12.0%	20.4%	\$220	7.5%	18.6%	4	22.2%	21.6%	\$340	16.2%	18.7%													
	Upper	12	27.9%	\$2,674	53.2%	39.7%	7	28.0%	28.6%	\$1,689	57.7%	39.1%	5	27.8%	31.7%	\$985	46.9%	41.2%													
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.7%	\$0	0.0%	23.7%	0	0.0%	22.1%	\$0	0.0%	24.4%													
	Total	43	100.0%	\$5,027	100.0%	100.0%	25	100.0%	100.0%	\$2,927	100.0%	100.0%	18	100.0%	100.0%	\$2,100	100.0%	100.0%													
Small Business Revenue	Total Businesses																														
	\$1 Million or Less	40	22.5%	\$6,726	16.1%	88.7%	20	20.8%	42.8%	\$2,867	13.0%	32.6%	20	24.4%	45.0%	\$3,859	19.5%	41.3%													
	Over \$1 Million	113	63.5%	\$31,649	75.6%	10.5%	66	68.8%					47	57.3%																	
	Total Rev. available	153	86.0%	\$38,375	91.7%	99.2%	86	89.6%					67	81.7%																	
	Rev. Not Known	25	14.0%	\$3,469	8.3%	0.8%	10	10.4%					15	18.3%																	
	Total	178	100.0%	\$41,844	100.0%	100.0%	96	100.0%					82	100.0%																	
Small Business Loan Size	\$100,000 or Less	78	43.8%	\$4,385	10.5%		44	45.8%	88.1%	\$2,553	11.6%	27.5%	34	41.5%	88.7%	\$1,832	9.3%	29.3%													
	\$100,001 - \$250,000	47	26.4%	\$8,675	20.7%		23	24.0%	6.1%	\$4,193	19.0%	19.6%	24	29.3%	5.7%	\$4,482	22.7%	19.8%													
	\$250,001 - \$1 Million	53	29.8%	\$28,784	68.8%		29	30.2%	5.9%	\$15,335	69.4%	52.8%	24	29.3%	5.6%	\$13,449	68.1%	50.9%													
	Total	178	100.0%	\$41,844	100.0%		96	100.0%	100.0%	\$22,081	100.0%	100.0%	82	100.0%	100.0%	\$19,763	100.0%	100.0%													
	Total Farms																														
	\$1 Million or Less	0	0.0%	\$0	0.0%	95.2%	0	0.0%	28.0%	\$0	0.0%	13.5%	0	0.0%	36.8%	\$0	0.0%	28.7%													
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	4.8%	0	0.0%					0	0.0%																	
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%																	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%																	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	80.0%	\$0	0.0%	24.9%	0	0.0%	86.8%	\$0	0.0%	30.2%													
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	16.0%	\$0	0.0%	50.0%	0	0.0%	10.5%	\$0	0.0%	44.2%													
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	4.0%	\$0	0.0%	25.1%	0	0.0%	2.6%	\$0	0.0%	25.6%													
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%														

Origination & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Muskegon MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	1	0.8%	\$5	0.0%	1.6%
Moderate	16	13.6%	\$527	5.0%	17.1%
Middle	46	39.0%	\$3,889	36.8%	51.3%
Upper	55	46.6%	\$6,136	58.1%	30.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>118</i>	<i>100.0%</i>	<i>\$10,557</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Muskegon MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	9	7.6%	\$255	0.0%	21.1%
Moderate	28	23.7%	\$1,482	14.0%	17.9%
Middle	28	23.7%	\$1,818	17.2%	21.2%
Upper	53	44.9%	\$7,002	66.3%	39.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	118	100.0%	\$10,557	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	1.4%	\$0	0.0%	0.5%
	Moderate	1	11.1%	\$49	4.9%	18.8%	1	11.1%	16.5%	\$49	4.9%	11.2%
	Middle	5	55.6%	\$520	52.3%	41.9%	5	55.6%	44.7%	\$520	52.3%	43.2%
	Upper	3	33.3%	\$425	42.8%	34.3%	3	33.3%	37.5%	\$425	42.8%	45.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	9	100.0%	\$994	100.0%	100.0%	9	100.0%	100.0%	\$994	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	1.0%	\$0	0.0%	0.4%
	Moderate	1	12.5%	\$86	14.7%	18.8%	1	12.5%	14.7%	\$86	14.7%	9.6%
	Middle	3	37.5%	\$196	33.4%	41.9%	3	37.5%	44.6%	\$196	33.4%	43.0%
	Upper	4	50.0%	\$305	52.0%	34.3%	4	50.0%	39.6%	\$305	52.0%	47.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	8	100.0%	\$587	100.0%	100.0%	8	100.0%	100.0%	\$587	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	3.2%	\$0	0.0%	3.6%
	Moderate	0	0.0%	\$0	0.0%	18.8%	0	0.0%	18.6%	\$0	0.0%	10.9%
	Middle	0	0.0%	\$0	0.0%	41.9%	0	0.0%	42.0%	\$0	0.0%	37.8%
	Upper	0	0.0%	\$0	0.0%	34.3%	0	0.0%	36.2%	\$0	0.0%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	14.4%	0	0.0%	16.7%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	44.0%	0	0.0%	58.3%	\$0	0.0%	25.1%
	Middle	0	0.0%	\$0	0.0%	16.2%	0	0.0%	8.3%	\$0	0.0%	35.0%
	Upper	0	0.0%	\$0	0.0%	25.5%	0	0.0%	16.7%	\$0	0.0%	38.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.0%	0	0.0%	1.4%	\$0	0.0%	0.6%
	Moderate	2	11.8%	\$135	8.5%	18.8%	2	11.8%	16.1%	\$135	8.5%	11.0%
	Middle	8	47.1%	\$716	45.3%	41.9%	8	47.1%	44.4%	\$716	45.3%	42.8%
	Upper	7	41.2%	\$730	46.2%	34.3%	7	41.2%	38.0%	\$730	46.2%	45.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	17	100.0%	\$1,581	100.0%	100.0%	17	100.0%	100.0%	\$1,581	100.0%	100.0%
SMALL BUSINESSES	Small Businesses											
	Low	7	9.9%	\$1,742	10.1%	8.1%	7	9.9%	8.7%	\$1,742	10.1%	11.6%
	Moderate	26	36.6%	\$5,928	34.3%	19.9%	26	36.6%	25.3%	\$5,928	34.3%	22.8%
	Middle	8	11.3%	\$1,461	8.5%	37.3%	8	11.3%	32.3%	\$1,461	8.5%	32.0%
	Upper	30	42.3%	\$8,152	47.2%	34.6%	30	42.3%	33.5%	\$8,152	47.2%	33.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	71	100.0%	\$17,283	100.0%	100.0%	71	100.0%	100.0%	\$17,283	100.0%	100.0%
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.8%	0	0.0%	3.6%	\$0	0.0%	0.3%
	Middle	0	0.0%	\$0	0.0%	67.5%	0	0.0%	64.3%	\$0	0.0%	95.4%
	Upper	0	0.0%	\$0	0.0%	31.7%	0	0.0%	32.1%	\$0	0.0%	4.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2017					Bank & Aggregate Lending Comparison 2017					
		Bank		Families by Family Income			Count		Dollar			
		Count	Dollar	%	%	%	Bank	Agg	Bank	Agg	Bank	Agg
		#	\$ (000s)				#	%			\$ (000s)	\$ %
HOME PURCHASE	Low	1	\$100	11.1%	10.1%	21.7%	1	11.1%	6.5%	\$100	10.1%	3.4%
	Moderate	4	\$392	44.4%	39.4%	17.0%	4	44.4%	21.0%	\$392	39.4%	14.7%
	Middle	2	\$124	22.2%	12.5%	20.6%	2	22.2%	22.5%	\$124	12.5%	21.0%
	Upper	2	\$378	22.2%	38.0%	40.7%	2	22.2%	30.2%	\$378	38.0%	42.5%
	Unknown	0	\$0	0.0%	0.0%	0.0%	0	0.0%	19.9%	\$0	0.0%	18.3%
	Total	9	\$994	100.0%	100.0%	100.0%	9	100.0%	100.0%	\$994	100.0%	100.0%
REFINANCE	Low	1	\$62	12.5%	10.6%	21.7%	1	12.5%	6.3%	\$62	10.6%	3.3%
	Moderate	4	\$265	50.0%	45.1%	17.0%	4	50.0%	15.7%	\$265	45.1%	11.2%
	Middle	2	\$174	25.0%	29.6%	20.6%	2	25.0%	22.9%	\$174	29.6%	19.7%
	Upper	1	\$86	12.5%	14.7%	40.7%	1	12.5%	33.0%	\$86	14.7%	42.9%
	Unknown	0	\$0	0.0%	0.0%	0.0%	0	0.0%	22.1%	\$0	0.0%	23.0%
	Total	8	\$587	100.0%	100.0%	100.0%	8	100.0%	100.0%	\$587	100.0%	100.0%
HOME IMPROVEMENT	Low	0	\$0	0.0%	0.0%	21.7%	0	0.0%	10.6%	\$0	0.0%	4.0%
	Moderate	0	\$0	0.0%	0.0%	17.0%	0	0.0%	18.9%	\$0	0.0%	13.4%
	Middle	0	\$0	0.0%	0.0%	20.6%	0	0.0%	26.3%	\$0	0.0%	24.2%
	Upper	0	\$0	0.0%	0.0%	40.7%	0	0.0%	42.3%	\$0	0.0%	53.9%
	Unknown	0	\$0	0.0%	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	4.5%
	Total	0	\$0	0.0%	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	\$0	0.0%	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	\$0	0.0%	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	\$0	0.0%	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	\$0	0.0%	0.0%	40.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	\$0	0.0%	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	\$0	0.0%	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	2	\$162	11.8%	10.2%	21.7%	2	11.8%	6.6%	\$162	10.2%	3.3%
	Moderate	8	\$657	47.1%	41.6%	17.0%	8	47.1%	19.1%	\$657	41.6%	13.3%
	Middle	4	\$298	23.5%	18.8%	20.6%	4	23.5%	22.8%	\$298	18.8%	20.3%
	Upper	3	\$464	17.6%	29.3%	40.7%	3	17.6%	31.7%	\$464	29.3%	42.1%
	Unknown	0	\$0	0.0%	0.0%	0.0%	0	0.0%	19.7%	\$0	0.0%	21.0%
	Total	17	\$1,581	100.0%	100.0%	100.0%	17	100.0%	100.0%	\$1,581	100.0%	100.0%
Small Business	Total Businesses											
	\$1 Million or Less	15	\$2,749	21.1%	15.9%	87.4%	15	21.1%	46.4%	\$2,749	15.9%	31.1%
	Over \$1 Million	39	\$11,597	54.9%	67.1%	11.7%	39	54.9%				
	Total Rev. available	54	\$14,346	76.0%	83.0%	99.1%	54	76.0%				
	Rev. Not Known	17	\$2,937	23.9%	17.0%	0.9%	17	23.9%				
	Total	71	\$17,283	100.0%	100.0%	100.0%	71	100.0%				
	Total Farms											
	\$100,000 or Less	31	\$1,810	43.7%	10.5%		31	43.7%	88.4%	\$1,810	10.5%	28.3%
	\$100,001 - \$250,000	20	\$3,483	28.2%	20.2%		20	28.2%	6.0%	\$3,483	20.2%	19.2%
	\$250,001 - \$1 Million	20	\$11,990	28.2%	69.4%		20	28.2%	5.6%	\$11,990	69.4%	52.4%
	Total	71	\$17,283	100.0%	100.0%		71	100.0%	100.0%	\$17,283	100.0%	100.0%
Small Farm	Total Farms											
	\$1 Million or Less	0	\$0	0.0%	0.0%	93.9%	0	0.0%	39.3%	\$0	0.0%	21.8%
	Over \$1 Million	0	\$0	0.0%	0.0%	6.1%	0	0.0%				
	Not Known	0	\$0	0.0%	0.0%	0.0%	0	0.0%				
	Total	0	\$0	0.0%	0.0%	100.0%	0	0.0%				
	\$100,000 or Less	0	\$0	0.0%	0.0%		0	0.0%	82.1%	\$0	0.0%	28.3%
	\$100,001 - \$250,000	0	\$0	0.0%	0.0%		0	0.0%	10.7%	\$0	0.0%	30.4%
	\$250,001 - \$500,000	0	\$0	0.0%	0.0%		0	0.0%	7.1%	\$0	0.0%	41.4%
	Total	0	\$0	0.0%	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Muskegon MSA

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	1	2.2%	\$9	0.2%	5.0%
Moderate	3	6.5%	\$200	4.4%	18.8%
Middle	17	37.0%	\$1,541	34.2%	41.9%
Upper	25	54.3%	\$2,754	61.1%	34.3%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	46	100.0%	\$4,504	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Muskegon MSA

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	4	8.7%	\$124	0.0%	21.7%
Moderate	9	19.6%	\$502	11.1%	17.0%
Middle	8	17.4%	\$469	10.4%	20.6%
Upper	25	54.3%	\$3,409	75.7%	40.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>46</i>	<i>100.0%</i>	<i>\$4,504</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - Austin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison								Bank & Aggregate Lending Comparison											
		2015, 2016								2015						2016					
		Bank				Owner Occupied Units	Count		Dollar		Count	Agg	Dollar		Count	Agg	Dollar		Agg		
		Count		Dollar			Bank	Agg	Bank				Bank	Agg			Bank			Agg	
		#	%	\$ (000s)	\$ %				\$ (000s)	\$ %							\$ (000s)	\$ %			\$ (000s)
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	3.8%	\$0	0.0%	3.0%	0	0.0%	4.0%	\$0	0.0%	3.4%			
	Moderate	2	10.5%	\$280	2.4%	17.2%	1	7.1%	16.9%	\$140	1.5%	12.6%	1	20.0%	18.7%	\$140	7.1%	14.5%			
	Middle	3	15.8%	\$728	6.3%	32.9%	1	7.1%	35.7%	\$176	1.9%	30.5%	2	40.0%	35.3%	\$552	28.0%	30.6%			
	Upper	14	73.7%	\$10,474	91.2%	44.3%	12	85.7%	43.7%	\$9,196	96.7%	53.9%	2	40.0%	42.0%	\$1,278	64.9%	51.5%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	19	100.0%	\$11,482	100.0%	100.0%	14	100.0%	100.0%	\$9,512	100.0%	100.0%	5	100.0%	100.0%	\$1,970	100.0%	100.0%			
REFINANCE	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	3.9%	\$0	0.0%	2.8%	0	0.0%	3.6%	\$0	0.0%	2.7%			
	Moderate	6	23.1%	\$727	5.0%	17.2%	2	22.2%	13.9%	\$209	6.1%	9.7%	4	23.5%	13.5%	\$518	4.6%	9.6%			
	Middle	6	23.1%	\$947	6.5%	32.9%	4	44.4%	32.9%	\$600	17.6%	25.0%	2	11.8%	32.5%	\$347	3.1%	25.2%			
	Upper	14	53.8%	\$12,983	88.6%	44.3%	3	33.3%	49.4%	\$2,603	76.3%	62.5%	11	64.7%	50.4%	\$10,380	92.3%	62.5%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	26	100.0%	\$14,657	100.0%	100.0%	9	100.0%	100.0%	\$3,412	100.0%	100.0%	17	100.0%	100.0%	\$11,245	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	4.7%	\$0	0.0%	3.2%	0	0.0%	4.0%	\$0	0.0%	3.0%			
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	14.4%	\$0	0.0%	11.0%	0	0.0%	14.5%	\$0	0.0%	11.0%			
	Middle	0	0.0%	\$0	0.0%	32.9%	0	0.0%	30.1%	\$0	0.0%	20.7%	0	0.0%	33.7%	\$0	0.0%	26.2%			
	Upper	0	0.0%	\$0	0.0%	44.3%	0	0.0%	50.8%	\$0	0.0%	65.0%	0	0.0%	47.8%	\$0	0.0%	59.8%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTIFAMILY	Multi-Family Units																				
	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	28.5%	\$0	0.0%	17.5%	0	0.0%	24.7%	\$0	0.0%	19.9%			
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	27.8%	\$0	0.0%	19.3%	0	0.0%	27.4%	\$0	0.0%	23.3%			
	Middle	0	0.0%	\$0	0.0%	28.5%	0	0.0%	25.3%	\$0	0.0%	42.7%	0	0.0%	28.1%	\$0	0.0%	25.5%			
	Upper	0	0.0%	\$0	0.0%	21.0%	0	0.0%	18.4%	\$0	0.0%	20.5%	0	0.0%	19.9%	\$0	0.0%	31.3%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
	Low	0	0.0%	\$0	0.0%	5.5%	0	0.0%	3.9%	\$0	0.0%	4.2%	0	0.0%	3.9%	\$0	0.0%	4.7%			
	Moderate	8	17.8%	\$1,007	3.9%	17.2%	3	13.0%	15.8%	\$349	2.7%	12.3%	5	22.7%	16.8%	\$658	5.0%	13.8%			
	Middle	9	20.0%	\$1,675	6.4%	32.9%	5	21.7%	34.5%	\$776	6.0%	29.8%	4	18.2%	34.2%	\$899	6.8%	28.5%			
	Upper	28	62.2%	\$23,457	89.7%	44.3%	15	65.2%	45.8%	\$11,799	91.3%	53.7%	13	59.1%	45.1%	\$11,658	88.2%	53.1%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
SMALL BUSINESSES	Total	45	100.0%	\$26,139	100.0%	100.0%	23	100.0%	100.0%	\$12,924	100.0%	100.0%	22	100.0%	100.0%	\$13,215	100.0%	100.0%			
	Small Businesses																				
	Low	40	8.9%	\$9,159	9.2%	6.4%	20	8.2%	7.0%	\$2,872	5.3%	8.3%	20	9.8%	7.1%	\$6,287	14.1%	8.2%			
	Moderate	68	15.2%	\$16,800	16.9%	16.3%	39	16.0%	16.9%	\$11,141	20.4%	18.3%	29	14.2%	16.2%	\$5,659	12.7%	17.2%			
	Middle	87	19.5%	\$22,641	22.8%	27.2%	47	19.3%	26.6%	\$13,460	24.7%	24.8%	40	19.6%	26.7%	\$9,181	20.6%	25.2%			
	Upper	252	56.4%	\$50,591	51.0%	50.0%	137	56.4%	48.2%	\$27,110	49.7%	47.7%	115	56.4%	48.6%	\$23,481	52.6%	48.4%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%			
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	0.8%	0	0.0%	1.4%	\$0	0.0%	0.9%			
SMALL FARM	Total	447	100.0%	\$99,191	100.0%	100.0%	243	100.0%	100.0%	\$54,583	100.0%	100.0%	204	100.0%	100.0%	\$44,608	100.0%	100.0%			
	Small Farms																				
	Low	0	0.0%	\$0	0.0%	3.1%	0	0.0%	2.5%	\$0	0.0%	1.8%	0	0.0%	1.7%	\$0	0.0%	0.9%			
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	24.5%	\$0	0.0%	30.9%	0	0.0%	24.0%	\$0	0.0%	25.7%			
	Middle	0	0.0%	\$0	0.0%	24.7%	0	0.0%	35.0%	\$0	0.0%	30.8%	0	0.0%	38.3%	\$0	0.0%	31.5%			
	Upper	0	0.0%	\$0	0.0%	56.1%	0	0.0%	38.0%	\$0	0.0%	36.5%	0	0.0%	36.0%	\$0	0.0%	41.9%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%				

Originations & Purchases

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX - Austin

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison									
		2015, 2016					2015					2016									
		Bank		Families by Family Income	Count		Dollar		Count		Dollar										
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg									
													#	%	\$ (000s)	\$ %	#	%	\$ (000s)	\$ %	#
HOME PURCHASE	Low	1	5.3%	\$300	2.6%	21.8%	0	0.0%	2.8%	\$0	0.0%	1.3%	1	20.0%	2.2%	\$300	15.2%	1.0%			
	Moderate	2	10.5%	\$868	7.6%	17.0%	1	7.1%	12.9%	\$176	1.9%	8.4%	1	20.0%	12.8%	\$692	35.1%	8.4%			
	Middle	2	10.5%	\$357	3.1%	19.3%	2	14.3%	19.7%	\$357	3.8%	16.4%	0	0.0%	19.9%	\$0	0.0%	16.6%			
	Upper	14	73.7%	\$9,957	86.7%	42.0%	11	78.6%	48.0%	\$8,979	94.4%	58.5%	3	60.0%	52.1%	\$978	49.6%	62.1%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	16.6%	\$0	0.0%	15.4%	0	0.0%	13.1%	\$0	0.0%	11.9%			
	Total	19	100.0%	\$11,482	100.0%	100.0%	14	100.0%	100.0%	\$9,512	100.0%	100.0%	5	100.0%	100.0%	\$1,970	100.0%	100.0%			
REFINANCE	Low	1	3.8%	\$78	0.5%	21.8%	1	11.1%	3.5%	\$78	2.3%	1.6%	0	0.0%	3.0%	\$0	0.0%	1.5%			
	Moderate	3	11.5%	\$414	2.8%	17.0%	1	11.1%	11.6%	\$147	4.3%	6.8%	2	11.8%	11.1%	\$267	2.4%	6.6%			
	Middle	6	23.1%	\$886	6.0%	19.3%	3	33.3%	18.1%	\$432	12.7%	13.5%	3	17.6%	17.0%	\$454	4.0%	12.6%			
	Upper	15	57.7%	\$11,139	76.1%	42.0%	4	44.4%	48.2%	\$2,755	80.7%	59.8%	11	64.7%	50.9%	\$8,404	74.7%	62.1%			
	Unknown	1	3.8%	\$2,120	14.5%	0.0%	0	0.0%	18.7%	\$0	0.0%	18.2%	1	5.9%	18.0%	\$2,120	18.9%	17.2%			
	Total	26	100.0%	\$14,657	100.0%	100.0%	9	100.0%	100.0%	\$3,412	100.0%	100.0%	17	100.0%	100.0%	\$11,245	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	3.9%	\$0	0.0%	1.5%	0	0.0%	4.3%	\$0	0.0%	2.4%			
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	12.2%	\$0	0.0%	6.4%	0	0.0%	13.3%	\$0	0.0%	7.9%			
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	20.1%	\$0	0.0%	14.6%	0	0.0%	19.7%	\$0	0.0%	14.9%			
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	60.6%	\$0	0.0%	70.8%	0	0.0%	60.4%	\$0	0.0%	71.0%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.3%	\$0	0.0%	6.7%	0	0.0%	2.3%	\$0	0.0%	3.8%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	21.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Upper	0	0.0%	\$0	0.0%	42.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
HMDA TOTALS	Low	2	4.4%	\$378	1.4%	21.8%	1	4.3%	3.1%	\$78	0.6%	1.3%	1	4.5%	2.6%	\$300	2.3%	1.1%			
	Moderate	5	11.1%	\$1,282	4.9%	17.0%	2	8.7%	12.4%	\$323	2.5%	7.2%	3	13.6%	12.2%	\$959	7.3%	7.1%			
	Middle	8	17.8%	\$1,243	4.8%	19.3%	5	21.7%	19.1%	\$789	6.1%	14.1%	3	13.6%	18.9%	\$454	3.4%	13.9%			
	Upper	29	64.4%	\$21,116	80.8%	42.0%	15	65.2%	48.4%	\$11,734	90.8%	54.1%	14	63.6%	51.9%	\$9,382	71.0%	56.6%			
	Unknown	1	2.2%	\$2,120	8.1%	0.0%	0	0.0%	17.1%	\$0	0.0%	23.3%	1	4.5%	14.5%	\$2,120	16.0%	21.3%			
	Total	45	100.0%	\$26,139	100.0%	100.0%	23	100.0%	100.0%	\$12,924	100.0%	100.0%	22	100.0%	100.0%	\$13,215	100.0%	100.0%			
Small Business Revenue	Total Businesses																				
	\$1 Million or Less	96	21.5%	\$14,883	15.0%	91.4%	53	21.8%	49.9%	\$8,553	15.7%	36.7%	43	21.1%	41.1%	\$6,330	14.2%	35.0%			
	Over \$1 Million	224	50.1%	\$69,628	70.2%	7.4%	113	46.5%					111	54.4%							
	Total Rev. available	320	71.6%	\$84,511	85.2%	98.8%	166	68.3%					154	75.5%							
	Rev. Not Known	127	28.4%	\$14,680	14.8%	1.2%	77	31.7%					50	24.5%							
	Total	447	100.0%	\$99,191	100.0%	100.0%	243	100.0%					204	100.0%							
Small Business Loan Size	\$100,000 or Less	258	57.7%	\$11,916	12.0%		140	57.6%	94.2%	\$6,474	11.9%	40.0%	118	57.8%	94.9%	\$5,442	12.2%	43.9%			
	\$100,001 - \$250,000	69	15.4%	\$13,237	13.3%		38	15.6%	2.8%	\$7,165	13.1%	14.2%	31	15.2%	2.4%	\$6,072	13.6%	12.8%			
	\$250,001 - \$1 Million	120	26.8%	\$74,038	74.6%		65	26.7%	3.0%	\$40,944	75.0%	45.7%	55	27.0%	2.6%	\$33,094	74.2%	43.4%			
	Total	447	100.0%	\$99,191	100.0%		243	100.0%	100.0%	\$54,583	100.0%	100.0%	204	100.0%	100.0%	\$44,608	100.0%	100.0%			
	Total Farms																				
	\$1 Million or Less	0	0.0%	\$0	0.0%	99.1%	0	0.0%	55.2%	\$0	0.0%	67.6%	0	0.0%	57.1%	\$0	0.0%	65.7%			
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	0.9%	0	0.0%					0	0.0%							
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%							
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%							
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	86.5%	\$0	0.0%	34.7%	0	0.0%	86.3%	\$0	0.0%	35.4%			
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	8.0%	\$0	0.0%	26.3%	0	0.0%	9.1%	\$0	0.0%	33.3%			
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.5%	\$0	0.0%	39.0%	0	0.0%	4.6%	\$0	0.0%	31.3%			
Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%				

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - Austin

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	6	3.4%	\$504	1.8%	5.5%
Moderate	21	11.7%	\$1,788	6.3%	17.2%
Middle	47	26.3%	\$3,901	13.8%	32.9%
Upper	104	58.1%	\$22,018	77.9%	44.3%
Unknown	1	0.6%	\$50	0.2%	0.0%
Total	179	100.0%	\$28,261	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - Austin

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	17	9.5%	\$1,632	0.0%	21.8%
Moderate	16	8.9%	\$1,259	4.5%	17.0%
Middle	28	15.6%	\$2,463	8.7%	19.3%
Upper	118	65.9%	\$22,907	81.1%	42.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	179	100.0%	\$28,261	100.0%	100.0%

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - Austin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2017					2017						
		Bank		Owner Occupied Units			Count		Dollar				
		Count		Dollar			Bank	Agg	Bank		Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	4.8%	0	0.0%	4.3%	\$0	0.0%	3.8%	
	Moderate	2	20.0%	\$246	2.3%	15.5%	2	20.0%	13.7%	\$246	2.3%	10.3%	
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	38.7%	\$0	0.0%	33.1%	
	Upper	8	80.0%	\$10,324	97.7%	44.7%	8	80.0%	43.0%	\$10,324	97.7%	52.4%	
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.3%	
	Total	10	100.0%	\$10,570	100.0%	100.0%	10	100.0%	100.0%	\$10,570	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	4.8%	0	0.0%	3.8%	\$0	0.0%	3.0%	
	Moderate	1	9.1%	\$820	12.4%	15.5%	1	9.1%	14.0%	\$820	12.4%	9.0%	
	Middle	4	36.4%	\$484	7.3%	34.8%	4	36.4%	38.0%	\$484	7.3%	30.0%	
	Upper	6	54.5%	\$5,320	80.3%	44.7%	6	54.5%	44.0%	\$5,320	80.3%	57.8%	
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.2%	
	Total	11	100.0%	\$6,624	100.0%	100.0%	11	100.0%	100.0%	\$6,624	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.8%	0	0.0%	4.1%	\$0	0.0%	3.6%	
	Moderate	0	0.0%	\$0	0.0%	15.5%	0	0.0%	13.2%	\$0	0.0%	8.6%	
	Middle	0	0.0%	\$0	0.0%	34.8%	0	0.0%	36.3%	\$0	0.0%	26.4%	
	Upper	1	100.0%	\$1,243	100.0%	44.7%	1	100.0%	46.2%	\$1,243	100.0%	61.1%	
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.2%	
	Total	1	100.0%	\$1,243	100.0%	100.0%	1	100.0%	100.0%	\$1,243	100.0%	100.0%	
MULTIFAMILY	Multi-Family Units												
	Low	1	100.0%	\$11,909	100.0%	22.4%	1	100.0%	20.8%	\$11,909	100.0%	13.8%	
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	20.8%	\$0	0.0%	15.4%	
	Middle	0	0.0%	\$0	0.0%	34.3%	0	0.0%	35.0%	\$0	0.0%	49.2%	
	Upper	0	0.0%	\$0	0.0%	24.9%	0	0.0%	20.8%	\$0	0.0%	19.8%	
	Unknown	0	0.0%	\$0	0.0%	2.8%	0	0.0%	2.5%	\$0	0.0%	1.9%	
	Total	1	100.0%	\$11,909	100.0%	100.0%	1	100.0%	100.0%	\$11,909	100.0%	100.0%	
HMDA TOTALS	Low	1	4.3%	\$11,909	39.2%	4.8%	1	4.3%	4.2%	\$11,909	39.2%	4.6%	
	Moderate	3	13.0%	\$1,066	3.5%	15.5%	3	13.0%	13.7%	\$1,066	3.5%	10.5%	
	Middle	4	17.4%	\$484	1.6%	34.8%	4	17.4%	38.4%	\$484	1.6%	33.9%	
	Upper	15	65.2%	\$16,887	55.6%	44.7%	15	65.2%	43.3%	\$16,887	55.6%	50.7%	
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.4%	
	Total	23	100.0%	\$30,346	100.0%	100.0%	23	100.0%	100.0%	\$30,346	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses												
	Low	24	13.0%	\$7,247	17.5%	6.8%	24	13.0%	7.7%	\$7,247	17.5%	8.7%	
	Moderate	23	12.4%	\$8,223	19.8%	12.4%	23	12.4%	13.0%	\$8,223	19.8%	12.1%	
	Middle	39	21.1%	\$8,787	21.2%	29.8%	39	21.1%	31.0%	\$8,787	21.2%	30.6%	
	Upper	99	53.5%	\$17,266	41.6%	49.6%	99	53.5%	46.2%	\$17,266	41.6%	46.7%	
	Unknown	0	0.0%	\$0	0.0%	1.4%	0	0.0%	1.0%	\$0	0.0%	1.2%	
	Total	185	100.0%	\$41,523	100.0%	100.0%	185	100.0%	100.0%	\$41,523	100.0%	100.0%	
SMALL FARM	Small Farms												
	Low	0	0.0%	\$0	0.0%	4.6%	0	0.0%	4.7%	\$0	0.0%	4.9%	
	Moderate	0	0.0%	\$0	0.0%	9.8%	0	0.0%	11.8%	\$0	0.0%	9.8%	
	Middle	0	0.0%	\$0	0.0%	29.2%	0	0.0%	48.1%	\$0	0.0%	57.2%	
	Upper	0	0.0%	\$0	0.0%	56.2%	0	0.0%	34.0%	\$0	0.0%	27.8%	
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.5%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**
Assessment Area: TX - Austin

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison				
		2017					2017				
		Bank		Families by Family Income			Count		Dollar		
		Count	%	\$ (000s)	\$ %	%	Bank	Agg	\$ (000s)	\$ %	Agg \$ %
HOME PURCHASE	Low	1	10.0%	\$110	1.0%	22.6%	1	10.0%	\$110	1.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	\$0	0.0%	9.2%
	Middle	3	30.0%	\$681	6.4%	19.3%	3	30.0%	\$681	6.4%	17.1%
	Upper	6	60.0%	\$9,779	92.5%	42.1%	6	60.0%	\$9,779	92.5%	60.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	11.4%
	Total	10	100.0%	\$10,570	100.0%	100.0%	10	100.0%	\$10,570	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	\$0	0.0%	2.5%
	Moderate	5	45.5%	\$689	10.4%	16.0%	5	45.5%	\$689	10.4%	9.0%
	Middle	1	9.1%	\$102	1.5%	19.3%	1	9.1%	\$102	1.5%	14.2%
	Upper	5	45.5%	\$5,833	88.1%	42.1%	5	45.5%	\$5,833	88.1%	58.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	16.0%
	Total	11	100.0%	\$6,624	100.0%	100.0%	11	100.0%	\$6,624	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	\$0	0.0%	9.1%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	\$0	0.0%	16.0%
	Upper	1	100.0%	\$1,243	100.0%	42.1%	1	100.0%	\$1,243	100.0%	67.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	4.4%
	Total	1	100.0%	\$1,243	100.0%	100.0%	1	100.0%	\$1,243	100.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.6%	0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.3%	0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$11,909	100.0%	0.0%	1	100.0%	\$11,909	100.0%	100.0%
	Total	1	100.0%	\$11,909	100.0%	100.0%	1	100.0%	\$11,909	100.0%	100.0%
HMDA TOTALS	Low	1	4.3%	\$110	0.4%	22.6%	1	4.3%	\$110	0.4%	1.7%
	Moderate	5	21.7%	\$689	2.3%	16.0%	5	21.7%	\$689	2.3%	8.3%
	Middle	4	17.4%	\$783	2.6%	19.3%	4	17.4%	\$783	2.6%	15.0%
	Upper	12	52.2%	\$16,855	55.5%	42.1%	12	52.2%	\$16,855	55.5%	54.7%
	Unknown	1	4.3%	\$11,909	39.2%	0.0%	1	4.3%	\$11,909	39.2%	20.4%
	Total	23	100.0%	\$30,346	100.0%	100.0%	23	100.0%	\$30,346	100.0%	100.0%
Small Business Revenue	Total Businesses										
	\$1 Million or Less	26	14.1%	\$4,539	10.9%	90.5%	26	14.1%	\$4,539	10.9%	39.0%
	Over \$1 Million	102	55.1%	\$28,918	69.6%	8.2%	102	55.1%			
	Total Rev. available	128	69.2%	\$33,457	80.5%	98.7%	128	69.2%			
	Rev. Not Known	57	30.8%	\$8,066	19.4%	1.2%	57	30.8%			
	Total	185	100.0%	\$41,523	100.0%	100.0%	185	100.0%			
Small Business Loan Size	\$100,000 or Less	109	58.9%	\$5,071	12.2%		109	58.9%	\$5,071	12.2%	40.9%
	\$100,001 - \$250,000	26	14.1%	\$5,175	12.5%		26	14.1%	\$5,175	12.5%	13.4%
	\$250,001 - \$1 Million	50	27.0%	\$31,277	75.3%		50	27.0%	\$31,277	75.3%	45.7%
	Total	185	100.0%	\$41,523	100.0%		185	100.0%	\$41,523	100.0%	100.0%
	Total Farms										
	\$1 Million or Less	0	0.0%	\$0	0.0%	99.0%	0	0.0%	\$0	0.0%	75.4%
Small Farm Revenue	Over \$1 Million	0	0.0%	\$0	0.0%	1.0%	0	0.0%			
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%			
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	42.5%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	33.3%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	24.2%
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - Austin

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	4.8%
Moderate	6	8.1%	\$405	3.6%	15.5%
Middle	23	31.1%	\$2,458	22.0%	34.8%
Upper	45	60.8%	\$8,298	74.3%	44.7%
Unknown	0	0.0%	\$0	0.0%	0.2%
Total	74	100.0%	\$11,161	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - Austin

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	6	8.1%	\$293	0.0%	22.6%
Moderate	9	12.2%	\$741	6.6%	16.0%
Middle	13	17.6%	\$1,101	9.9%	19.3%
Upper	45	60.8%	\$7,996	71.6%	42.1%
Unknown	1	1.4%	\$1,030	9.2%	0.0%
<i>Total</i>	<i>74</i>	<i>100.0%</i>	<i>\$11,161</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - San Antonio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank				Owner Occupied Units	Count		Dollar			Count		Dollar				
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %										#	%	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.6%	\$0	0.0%	1.0%	0	0.0%	1.7%	\$0	0.0%	1.2%
	Moderate	3	50.0%	\$292	17.3%	25.9%	3	75.0%	11.7%	\$292	71.0%	6.9%	0	0.0%	12.1%	\$0	0.0%	7.7%
	Middle	0	0.0%	\$0	0.0%	32.3%	0	0.0%	34.3%	\$0	0.0%	26.1%	0	0.0%	34.2%	\$0	0.0%	26.6%
	Upper	3	50.0%	\$1,399	82.7%	36.6%	1	25.0%	52.4%	\$119	29.0%	65.9%	2	100.0%	52.0%	\$1,280	100.0%	64.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$1,691	100.0%	100.0%	4	100.0%	100.0%	\$411	100.0%	100.0%	2	100.0%	100.0%	\$1,280	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.5%	\$0	0.0%	0.8%	0	0.0%	1.6%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	25.9%	0	0.0%	11.9%	\$0	0.0%	7.0%	0	0.0%	11.3%	\$0	0.0%	6.7%
	Middle	3	50.0%	\$303	30.8%	32.3%	2	50.0%	33.4%	\$207	26.8%	24.3%	1	50.0%	33.4%	\$96	45.3%	25.0%
	Upper	3	50.0%	\$681	69.2%	36.6%	2	50.0%	53.1%	\$565	73.2%	67.9%	1	50.0%	53.7%	\$116	54.7%	67.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$984	100.0%	100.0%	4	100.0%	100.0%	\$772	100.0%	100.0%	2	100.0%	100.0%	\$212	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	4.5%	\$0	0.0%	3.0%	0	0.0%	4.6%	\$0	0.0%	3.3%
	Moderate	2	100.0%	\$46	100.0%	25.9%	2	100.0%	20.0%	\$46	100.0%	10.2%	0	0.0%	21.2%	\$0	0.0%	10.5%
	Middle	0	0.0%	\$0	0.0%	32.3%	0	0.0%	27.4%	\$0	0.0%	21.9%	0	0.0%	27.2%	\$0	0.0%	21.9%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	48.1%	\$0	0.0%	64.9%	0	0.0%	46.9%	\$0	0.0%	64.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$46	100.0%	100.0%	2	100.0%	100.0%	\$46	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	7.4%	0	0.0%	15.3%	\$0	0.0%	3.1%	0	0.0%	8.3%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	35.6%	0	0.0%	36.9%	\$0	0.0%	24.2%	0	0.0%	45.8%	\$0	0.0%	35.7%
	Middle	0	0.0%	\$0	0.0%	31.6%	0	0.0%	27.0%	\$0	0.0%	28.9%	0	0.0%	27.5%	\$0	0.0%	29.6%
	Upper	0	0.0%	\$0	0.0%	25.4%	0	0.0%	20.7%	\$0	0.0%	43.8%	0	0.0%	18.3%	\$0	0.0%	31.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.7%	\$0	0.0%	1.1%	0	0.0%	1.8%	\$0	0.0%	1.3%
	Moderate	5	35.7%	\$338	12.4%	25.9%	5	50.0%	12.0%	\$338	27.5%	8.2%	0	0.0%	12.2%	\$0	0.0%	9.4%
	Middle	3	21.4%	\$303	11.1%	32.3%	2	20.0%	33.8%	\$207	16.8%	25.8%	1	25.0%	33.7%	\$96	6.4%	26.3%
	Upper	6	42.9%	\$2,080	76.4%	36.6%	3	30.0%	52.5%	\$684	55.7%	64.9%	3	75.0%	52.3%	\$1,396	93.6%	62.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
SMALL BUSINESSES	Total	14	100.0%	\$2,721	100.0%	100.0%	10	100.0%	100.0%	\$1,229	100.0%	100.0%	4	100.0%	100.0%	\$1,492	100.0%	100.0%
	Small Businesses																	
	Low	19	12.3%	\$5,610	13.6%	5.2%	10	13.5%	5.7%	\$2,825	13.7%	6.8%	9	11.3%	5.5%	\$2,785	13.6%	7.8%
	Moderate	39	25.3%	\$12,097	29.4%	21.7%	15	20.3%	20.3%	\$4,052	19.7%	19.0%	24	30.0%	20.5%	\$8,045	39.2%	19.9%
	Middle	40	26.0%	\$9,183	22.3%	30.2%	18	24.3%	27.2%	\$5,203	25.2%	27.9%	22	27.5%	26.8%	\$3,980	19.4%	26.4%
	Upper	56	36.4%	\$14,265	34.7%	42.7%	31	41.9%	45.3%	\$8,540	41.4%	45.3%	25	31.3%	45.7%	\$5,725	27.9%	44.7%
SMALL FARM	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.4%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.7%	0	0.0%	1.4%	\$0	0.0%	0.8%
	Total	154	100.0%	\$41,153	100.0%	100.0%	74	100.0%	100.0%	\$20,620	100.0%	100.0%	80	100.0%	100.0%	\$20,535	100.0%	100.0%
	Small Farms																	
	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	3.8%	\$0	0.0%	5.9%	0	0.0%	2.6%	\$0	0.0%	4.8%
	Moderate	0	0.0%	\$0	0.0%	11.8%	0	0.0%	21.7%	\$0	0.0%	9.0%	0	0.0%	19.0%	\$0	0.0%	19.5%
TOTAL	Middle	0	0.0%	\$0	0.0%	31.0%	0	0.0%	34.0%	\$0	0.0%	32.1%	0	0.0%	26.7%	\$0	0.0%	28.5%
	Upper	0	0.0%	\$0	0.0%	54.5%	0	0.0%	39.6%	\$0	0.0%	52.7%	0	0.0%	47.4%	\$0	0.0%	46.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.5%	0	0.0%	4.3%	\$0	0.0%	1.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix H

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX - San Antonio

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison										Bank & Aggregate Lending Comparison									
		2015, 2016										2015					2016				
		Bank				Families by Family Income %	Count			Dollar		Count			Dollar						
		Count	Dollar	Bank	Agg		Bank	Agg	Bank	Agg	Bank	Agg									
													#	%	\$ (000s)	\$ %	#	%	\$ (000s)	\$ %	#
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	3.3%	\$0	0.0%	1.4%	0	0.0%	2.8%	\$0	0.0%	1.2%			
	Moderate	1	16.7%	\$93	5.5%	17.2%	1	25.0%	13.2%	\$93	22.6%	8.5%	0	0.0%	10.9%	\$0	0.0%	7.0%			
	Middle	2	33.3%	\$199	11.8%	19.2%	2	50.0%	21.8%	\$199	48.4%	18.8%	0	0.0%	22.4%	\$0	0.0%	18.8%			
	Upper	2	33.3%	\$959	56.7%	39.9%	1	25.0%	41.5%	\$119	29.0%	53.9%	1	50.0%	44.2%	\$840	65.6%	56.0%			
	Unknown	1	16.7%	\$440	26.0%	0.0%	0	0.0%	20.2%	\$0	0.0%	17.4%	1	50.0%	19.7%	\$440	34.4%	17.1%			
	Total	6	100.0%	\$1,691	100.0%	100.0%	4	100.0%	100.0%	\$411	100.0%	100.0%	2	100.0%	100.0%	\$1,280	100.0%	100.0%			
REFINANCE	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	4.0%	\$0	0.0%	1.7%	0	0.0%	3.1%	\$0	0.0%	1.3%			
	Moderate	1	16.7%	\$96	9.8%	17.2%	0	0.0%	9.6%	\$0	0.0%	5.2%	1	50.0%	7.3%	\$96	45.3%	3.8%			
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	16.5%	\$0	0.0%	11.4%	0	0.0%	13.4%	\$0	0.0%	9.0%			
	Upper	5	83.3%	\$888	90.2%	39.9%	4	100.0%	37.9%	\$772	100.0%	46.6%	1	50.0%	37.6%	\$116	54.7%	43.3%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	32.0%	\$0	0.0%	35.1%	0	0.0%	38.7%	\$0	0.0%	42.6%			
	Total	6	100.0%	\$984	100.0%	100.0%	4	100.0%	100.0%	\$772	100.0%	100.0%	2	100.0%	100.0%	\$212	100.0%	100.0%			
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	8.3%	\$0	0.0%	2.3%	0	0.0%	8.6%	\$0	0.0%	2.1%			
	Moderate	2	100.0%	\$46	100.0%	17.2%	2	100.0%	12.8%	\$46	100.0%	6.7%	0	0.0%	13.6%	\$0	0.0%	6.9%			
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	20.4%	\$0	0.0%	14.1%	0	0.0%	17.8%	\$0	0.0%	11.7%			
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	52.3%	\$0	0.0%	69.4%	0	0.0%	55.7%	\$0	0.0%	73.8%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.2%	\$0	0.0%	7.5%	0	0.0%	4.3%	\$0	0.0%	5.5%			
	Total	2	100.0%	\$46	100.0%	100.0%	2	100.0%	100.0%	\$46	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%			
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.7%	0	0.0%	3.7%	\$0	0.0%	1.4%	0	0.0%	3.1%	\$0	0.0%	1.2%			
	Moderate	4	28.6%	\$235	8.6%	17.2%	3	30.0%	12.0%	\$139	11.3%	7.0%	1	25.0%	9.7%	\$96	6.4%	5.6%			
	Middle	2	14.3%	\$199	7.3%	19.2%	2	20.0%	20.0%	\$199	16.2%	15.5%	0	0.0%	19.2%	\$0	0.0%	14.7%			
	Upper	7	50.0%	\$1,847	67.9%	39.9%	5	50.0%	40.6%	\$891	72.5%	48.3%	2	50.0%	42.3%	\$956	64.1%	48.7%			
	Unknown	1	7.1%	\$440	16.2%	0.0%	0	0.0%	23.8%	\$0	0.0%	27.7%	1	25.0%	25.7%	\$440	29.5%	29.8%			
	Total	14	100.0%	\$2,721	100.0%	100.0%	10	100.0%	100.0%	\$1,229	100.0%	100.0%	4	100.0%	100.0%	\$1,492	100.0%	100.0%			
Small Business Revenue	Total Businesses																				
	\$1 Million or Less	46	29.9%	\$11,525	28.0%	91.7%	21	28.4%	47.0%	\$3,795	18.4%	32.5%	25	31.3%	40.4%	\$7,730	37.6%	30.3%			
	Over \$1 Million	69	44.8%	\$19,597	47.6%	7.6%	33	44.6%					36	45.0%							
	Total Rev. available	115	74.7%	\$31,122	75.6%	99.3%	54	73.0%					61	76.3%							
	Rev. Not Known	39	25.3%	\$10,033	24.4%	0.8%	20	27.0%					19	23.8%							
	Total	154	100.0%	\$41,155	100.0%	100.0%	74	100.0%					80	100.0%							
Small Business Loan Size	Total Businesses																				
	\$100,000 or Less	69	44.8%	\$3,509	8.5%		36	48.6%	92.2%	\$1,807	8.8%	34.5%	33	41.3%	93.6%	\$1,702	8.3%	38.9%			
	\$100,001 - \$250,000	34	22.1%	\$6,605	16.0%		12	16.2%	3.9%	\$2,315	11.2%	16.4%	22	27.5%	3.2%	\$4,290	20.9%	15.1%			
	\$250,001 - \$1 Million	51	33.1%	\$31,041	75.4%		26	35.1%	3.9%	\$16,498	80.0%	49.1%	25	31.3%	3.2%	\$14,543	70.8%	46.0%			
	Total	154	100.0%	\$41,155	100.0%		74	100.0%	100.0%	\$20,620	100.0%	100.0%	80	100.0%	100.0%	\$20,535	100.0%	100.0%			
	Total	154	100.0%	\$41,155	100.0%		74	100.0%	100.0%	\$20,620	100.0%	100.0%	80	100.0%	100.0%	\$20,535	100.0%	100.0%			
Small Farm Revenue	Total Farms																				
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.9%	0	0.0%	58.5%	\$0	0.0%	83.2%	0	0.0%	54.3%	\$0	0.0%	63.0%			
	Over \$1 Million	0	0.0%	\$0	0.0%	1.1%	0	0.0%					0	0.0%							
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%							
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%					0	0.0%							
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
Small Farm Loan Size	Total Farms																				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	86.8%	\$0	0.0%	32.0%	0	0.0%	87.1%	\$0	0.0%	37.5%			
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	6.6%	\$0	0.0%	16.8%	0	0.0%	8.6%	\$0	0.0%	31.5%			
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	6.6%	\$0	0.0%	51.2%	0	0.0%	4.3%	\$0	0.0%	31.0%			
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			
	Total	0	0.0%	\$0	0.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%			

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - San Antonio

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	5	11.9%	\$166	3.7%	5.2%
Moderate	4	9.5%	\$154	3.4%	25.9%
Middle	12	28.6%	\$661	14.6%	32.3%
Upper	21	50.0%	\$3,532	78.3%	36.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	42	100.0%	\$4,513	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - San Antonio

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	7	16.7%	\$380	0.0%	23.7%
Moderate	8	19.0%	\$481	10.7%	17.2%
Middle	7	16.7%	\$342	7.6%	19.2%
Upper	19	45.2%	\$2,310	51.2%	39.9%
Unknown	1	2.4%	\$1,000	22.2%	0.0%
<i>Total</i>	<i>42</i>	<i>100.0%</i>	<i>\$4,513</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix H

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - San Antonio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2017					2017						
		Bank		Owner Occupied Units			Count		Dollar		Agg		
		Count	Dollar	Count	Dollar	%	Bank	Agg	Bank	Agg	Bank	Agg	%
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	\$0	0.0%	0.7%		
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	\$0	0.0%	9.3%		
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	\$0	0.0%	26.0%		
	Upper	1	100.0%	\$132	100.0%	40.4%	1	100.0%	\$132	100.0%	64.0%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%		
	Total	1	100.0%	\$132	100.0%	100.0%	1	100.0%	\$132	100.0%	100.0%		
REFINANCE	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	\$0	0.0%	0.9%		
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	\$0	0.0%	9.9%		
	Middle	1	100.0%	\$84	100.0%	27.4%	1	100.0%	\$84	100.0%	24.8%		
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	\$0	0.0%	64.5%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%		
	Total	1	100.0%	\$84	100.0%	100.0%	1	100.0%	\$84	100.0%	100.0%		
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	\$0	0.0%	2.0%		
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	\$0	0.0%	16.0%		
	Middle	0	0.0%	\$0	0.0%	27.4%	0	0.0%	\$0	0.0%	20.1%		
	Upper	0	0.0%	\$0	0.0%	40.4%	0	0.0%	\$0	0.0%	61.9%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%		
MULTIFAMILY	Multi-Family Units												
	Low	0	0.0%	\$0	0.0%	7.0%	0	0.0%	\$0	0.0%	5.1%		
	Moderate	0	0.0%	\$0	0.0%	38.4%	0	0.0%	\$0	0.0%	26.7%		
	Middle	0	0.0%	\$0	0.0%	30.5%	0	0.0%	\$0	0.0%	39.4%		
	Upper	0	0.0%	\$0	0.0%	24.1%	0	0.0%	\$0	0.0%	28.8%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%		
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	\$0	0.0%	1.2%		
	Moderate	0	0.0%	\$0	0.0%	27.1%	0	0.0%	\$0	0.0%	11.3%		
	Middle	1	50.0%	\$84	38.9%	27.4%	1	50.0%	\$84	38.9%	27.1%		
	Upper	1	50.0%	\$132	61.1%	40.4%	1	50.0%	\$132	61.1%	60.4%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%		
	Total	2	100.0%	\$216	100.0%	100.0%	2	100.0%	\$216	100.0%	100.0%		
SMALL BUSINESSES	Small Businesses												
	Low	16	24.2%	\$2,224	14.2%	5.0%	16	24.2%	\$2,224	14.2%	5.4%		
	Moderate	17	25.8%	\$3,773	24.0%	23.7%	17	25.8%	\$3,773	24.0%	21.4%		
	Middle	12	18.2%	\$4,456	28.4%	28.3%	12	18.2%	\$4,456	28.4%	27.7%		
	Upper	21	31.8%	\$5,255	33.5%	42.8%	21	31.8%	\$5,255	33.5%	44.8%		
	Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	\$0	0.0%	0.3%		
	Total	66	100.0%	\$15,708	100.0%	100.0%	66	100.0%	\$15,708	100.0%	100.0%		
SMALL FARM	Small Farms												
	Low	0	0.0%	\$0	0.0%	1.7%	0	0.0%	\$0	0.0%	1.3%		
	Moderate	0	0.0%	\$0	0.0%	12.4%	0	0.0%	\$0	0.0%	18.9%		
	Middle	0	0.0%	\$0	0.0%	25.9%	0	0.0%	\$0	0.0%	13.4%		
	Upper	0	0.0%	\$0	0.0%	59.9%	0	0.0%	\$0	0.0%	64.9%		
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%		
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%		

Originations & Purchases

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

**Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size**

Assessment Area: TX - San Antonio

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2017					2017						
		Bank		Families by Family Income			Count		Dollar				
		Count	%	Dollar \$ (000s)	\$ %	%	#	%	Bank \$ (000s)	%	Agg \$ (000s)	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	\$0	0.0%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	\$0	0.0%	7.9%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	\$0	0.0%	\$0	0.0%	19.1%
	Upper	1	100.0%	\$132	100.0%	39.4%	1	100.0%	\$132	100.0%	\$132	100.0%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	0.0%	18.8%
	Total	1	100.0%	\$132	100.0%	100.0%	1	100.0%	\$132	100.0%	\$132	100.0%	100.0%
REFINANCE	Low	1	100.0%	\$84	100.0%	23.8%	1	100.0%	\$84	100.0%	\$84	100.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	\$0	0.0%	5.9%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	\$0	0.0%	\$0	0.0%	12.4%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	\$0	0.0%	\$0	0.0%	47.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	0.0%	32.4%
	Total	1	100.0%	\$84	100.0%	100.0%	1	100.0%	\$84	100.0%	\$84	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	\$0	0.0%	\$0	0.0%	4.2%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	\$0	0.0%	\$0	0.0%	16.8%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	\$0	0.0%	\$0	0.0%	64.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	0.0%	6.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	\$0	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	\$0	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.4%	0	0.0%	\$0	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	50.0%	\$84	38.9%	23.8%	1	50.0%	\$84	38.9%	\$84	38.9%	1.3%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	\$0	0.0%	\$0	0.0%	6.7%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	\$0	0.0%	\$0	0.0%	15.8%
	Upper	1	50.0%	\$132	61.1%	39.4%	1	50.0%	\$132	61.1%	\$132	61.1%	46.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	0.0%	29.6%
	Total	2	100.0%	\$216	100.0%	100.0%	2	100.0%	\$216	100.0%	\$216	100.0%	100.0%
Small Business	Total Businesses												
	\$1 Million or Less	24	36.4%	\$5,885	37.5%	90.8%	24	36.4%	\$5,885	37.5%	\$5,885	37.5%	33.2%
	Over \$1 Million	24	36.4%	\$6,641	42.3%	8.4%	24	36.4%	\$6,641	42.3%	\$6,641	42.3%	6.7%
	Total Rev. available	48	72.8%	\$12,526	79.8%	99.2%	48	72.8%	\$12,526	79.8%	\$12,526	79.8%	49.9%
	Rev. Not Known	18	27.3%	\$3,182	20.3%	0.8%	18	27.3%	\$3,182	20.3%	\$3,182	20.3%	4.3%
	Total	66	100.0%	\$15,708	100.0%	100.0%	66	100.0%	\$15,708	100.0%	\$15,708	100.0%	100.0%
Small Farm	Total Farms												
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.7%	0	0.0%	\$0	0.0%	\$0	0.0%	68.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	1.3%	0	0.0%	\$0	0.0%	\$0	0.0%	3.2%
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	\$0	0.0%	100.0%

Origination & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix H

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - San Antonio

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	5.1%
Moderate	4	17.4%	\$177	6.6%	27.1%
Middle	4	17.4%	\$157	5.9%	27.4%
Upper	15	65.2%	\$2,338	87.5%	40.4%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	23	100.0%	\$2,672	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - San Antonio

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	2	8.7%	\$117	0.0%	23.8%
Moderate	2	8.7%	\$105	3.9%	17.6%
Middle	6	26.1%	\$657	24.6%	19.1%
Upper	13	56.5%	\$1,793	67.1%	39.4%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	23	100.0%	\$2,672	100.0%	100.0%

Originations & Purchases

**Appendix I – Non-Metropolitan Statewide Limited Scope Assessment Area Loan
Tables**

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI- Gladwin County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison								Bank & Aggregate Lending Comparison									
		2015, 2016								2015					2016				
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar			
		Count	Dollar	Count	Dollar		Count	Dollar	Count	Dollar									
											#	%	\$ (000s)	\$ %	#	%	\$ (000s)	\$ %	#
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	31.2%	0	0.0%	28.4%	\$0	0.0%	26.1%	0	0.0%	29.6%	\$0	0.0%	27.4%	
	Middle	1	100.0%	\$212	100.0%	68.8%	0	0.0%	71.4%	\$0	0.0%	73.7%	1	100.0%	70.1%	\$212	100.0%	72.3%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.1%	
	Total	1	100.0%	\$212	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$212	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	2	40.0%	\$303	47.3%	31.2%	1	25.0%	28.9%	\$168	33.2%	27.7%	1	100.0%	30.9%	\$135	100.0%	28.8%	
	Middle	3	60.0%	\$338	52.7%	68.8%	3	75.0%	71.1%	\$338	66.8%	72.3%	0	0.0%	68.1%	\$0	0.0%	70.8%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	0.4%	
	Total	5	100.0%	\$641	100.0%	100.0%	4	100.0%	100.0%	\$506	100.0%	100.0%	1	100.0%	100.0%	\$135	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	31.2%	0	0.0%	39.7%	\$0	0.0%	39.6%	0	0.0%	29.2%	\$0	0.0%	31.3%	
	Middle	1	100.0%	\$5	100.0%	68.8%	1	100.0%	60.3%	\$5	100.0%	60.4%	0	0.0%	70.8%	\$0	0.0%	68.7%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$5	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	62.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	37.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	2	28.6%	\$303	35.3%	31.2%	1	20.0%	29.6%	\$168	32.9%	27.2%	1	50.0%	30.1%	\$135	38.9%	28.2%	
	Middle	5	71.4%	\$555	64.7%	68.8%	4	80.0%	70.3%	\$343	67.1%	72.7%	1	50.0%	69.3%	\$212	61.1%	71.6%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.5%	\$0	0.0%	0.2%	
	Total	7	100.0%	\$858	100.0%	100.0%	5	100.0%	100.0%	\$511	100.0%	100.0%	2	100.0%	100.0%	\$347	100.0%	100.0%	
SMALL BUSINESSES	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	12	52.2%	\$2,379	57.4%	46.0%	9	60.0%	39.1%	\$1,679	60.9%	40.1%	3	37.5%	41.9%	\$700	50.5%	45.2%	
	Middle	11	47.8%	\$1,765	42.6%	54.0%	6	40.0%	60.9%	\$1,080	39.1%	59.9%	5	62.5%	56.8%	\$685	49.5%	54.7%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.3%	\$0	0.0%	0.1%	
Total	23	100.0%	\$4,144	100.0%	100.0%	15	100.0%	100.0%	\$2,759	100.0%	100.0%	8	100.0%	100.0%	\$1,385	100.0%	100.0%		
SMALL FARM	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	20.9%	0	0.0%	17.6%	\$0	0.0%	18.6%	0	0.0%	50.0%	\$0	0.0%	38.9%	
	Middle	2	100.0%	\$50	100.0%	79.1%	1	100.0%	76.5%	\$25	100.0%	79.9%	1	100.0%	50.0%	\$25	100.0%	61.1%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.9%	\$0	0.0%	1.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	2	100.0%	\$50	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%		

Originations & Purchases

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

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Gladwin County

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison											
		2015, 2016						2015						2016					
		Bank		Families by Family Income		Count		Bank		Agg		Dollar		Count		Dollar		Agg	
		#	%	\$ (000s)	\$ %	%	%	#	%	%	%	\$ (000s)	\$ %	#	%	\$ (000s)	\$ %	%	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	7.7%	\$0	0.0%	4.3%	0	0.0%	7.1%	\$0	0.0%	3.4%	
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	14.6%	\$0	0.0%	12.1%	0	0.0%	14.3%	\$0	0.0%	9.9%	
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	17.8%	\$0	0.0%	15.9%	0	0.0%	20.9%	\$0	0.0%	19.5%	
	Upper	1	100.0%	\$212	100.0%	32.6%	0	0.0%	48.0%	\$0	0.0%	55.1%	1	100.0%	48.1%	\$212	100.0%	58.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.9%	\$0	0.0%	12.7%	0	0.0%	9.5%	\$0	0.0%	8.7%	
	Total	1	100.0%	\$212	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$212	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	5.6%	\$0	0.0%	3.6%	0	0.0%	6.6%	\$0	0.0%	3.1%	
	Moderate	1	20.0%	\$54	8.4%	21.9%	1	25.0%	13.8%	\$54	10.7%	9.7%	0	0.0%	12.8%	\$0	0.0%	9.1%	
	Middle	1	20.0%	\$64	10.0%	22.7%	1	25.0%	23.0%	\$64	12.6%	21.9%	0	0.0%	20.7%	\$0	0.0%	19.3%	
	Upper	3	60.0%	\$523	81.6%	32.6%	2	50.0%	43.0%	\$388	76.7%	49.7%	1	100.0%	43.1%	\$135	100.0%	50.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.8%	\$0	0.0%	15.2%	0	0.0%	16.8%	\$0	0.0%	18.3%	
	Total	5	100.0%	\$641	100.0%	100.0%	4	100.0%	100.0%	\$506	100.0%	100.0%	1	100.0%	100.0%	\$135	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	11.8%	\$0	0.0%	3.9%	0	0.0%	9.2%	\$0	0.0%	2.8%	
	Moderate	1	100.0%	\$5	100.0%	21.9%	1	100.0%	16.2%	\$5	100.0%	9.3%	0	0.0%	16.9%	\$0	0.0%	14.5%	
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	29.4%	\$0	0.0%	34.0%	0	0.0%	32.3%	\$0	0.0%	33.2%	
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	38.2%	\$0	0.0%	49.8%	0	0.0%	40.0%	\$0	0.0%	48.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.4%	\$0	0.0%	2.9%	0	0.0%	1.5%	\$0	0.0%	0.7%	
	Total	1	100.0%	\$5	100.0%	100.0%	1	100.0%	100.0%	\$5	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	22.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	32.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	22.8%	0	0.0%	7.2%	\$0	0.0%	4.0%	0	0.0%	7.1%	\$0	0.0%	3.2%	
	Moderate	2	28.6%	\$59	6.9%	21.9%	2	40.0%	14.4%	\$59	11.5%	11.0%	0	0.0%	13.9%	\$0	0.0%	9.7%	
	Middle	1	14.3%	\$64	7.5%	22.7%	1	20.0%	20.9%	\$64	12.5%	19.0%	0	0.0%	21.8%	\$0	0.0%	20.0%	
	Upper	4	57.1%	\$735	85.7%	32.6%	2	40.0%	45.1%	\$388	75.9%	52.6%	2	100.0%	45.4%	\$347	100.0%	54.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.4%	\$0	0.0%	13.4%	0	0.0%	11.8%	\$0	0.0%	12.5%	
	Total	7	100.0%	\$858	100.0%	100.0%	5	100.0%	100.0%	\$511	100.0%	100.0%	2	100.0%	100.0%	\$347	100.0%	100.0%	
Small Business	Total Businesses																		
	\$1 Million or Less	8	34.8%	\$605	14.6%	91.2%	5	33.3%	54.6%	\$520	18.8%	49.7%	3	37.5%	57.1%	\$85	6.1%	43.5%	
	Over \$1 Million	15	65.2%	\$3,539	85.4%	6.5%	10	66.7%					5	62.5%					
	Total Rev. available	23	100.0%	\$4,144	100.0%	97.7%	15	100.0%					8	100.0%					
	Rev. Not Known	0	0.0%	\$0	0.0%	2.3%	0	0.0%					0	0.0%					
	Total	23	100.0%	\$4,144	100.0%	100.0%	15	100.0%					8	100.0%					
Small Farm	Total Farms																		
	\$1 Million or Less	2	100.0%	\$50	100.0%	97.7%	1	100.0%	70.6%	\$25	100.0%	73.6%	1	100.0%	66.7%	\$25	100.0%	83.2%	
	Over \$1 Million	0	0.0%	\$0	0.0%	2.3%	0	0.0%					0	0.0%					
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%					0	0.0%					
	Total	2	100.0%	\$50	100.0%	100.0%	1	100.0%					1	100.0%					
	Total	2	100.0%	\$50	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	
Small Farm	\$100,000 or Less	2	100.0%	\$50	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	2	100.0%	\$50	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	
	Total	2	100.0%	\$50	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	
	Total	2	100.0%	\$50	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	1	100.0%	100.0%	\$25	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix I

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Gladwin County

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	8	42.1%	\$438	39.0%	31.2%
Middle	11	57.9%	\$685	61.0%	68.8%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>19</i>	<i>100.0%</i>	<i>\$1,123</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Gladwin County

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	3	15.8%	\$169	0.0%	22.8%
Moderate	5	26.3%	\$305	27.2%	21.9%
Middle	6	31.6%	\$389	34.6%	22.7%
Upper	5	26.3%	\$260	23.2%	32.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	19	100.0%	\$1,123	100.0%	100.0%

Originations & Purchases

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Gladwin County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count					Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	22.3%	0	0.0%	\$0	0.0%	16.1%	
	Middle	1	100.0%	\$60	100.0%	77.7%	1	100.0%	\$60	100.0%	83.9%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$60	100.0%	100.0%	1	100.0%	\$60	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	1	50.0%	\$52	22.2%	22.3%	1	50.0%	\$52	22.2%	16.0%	
	Middle	1	50.0%	\$182	77.8%	77.7%	1	50.0%	\$182	77.8%	84.0%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	2	100.0%	\$234	100.0%	100.0%	2	100.0%	\$234	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	22.3%	0	0.0%	\$0	0.0%	9.2%	
	Middle	0	0.0%	\$0	0.0%	77.7%	0	0.0%	\$0	0.0%	90.8%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	64.7%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	35.3%	0	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	0.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	1	33.3%	\$52	17.7%	22.3%	1	33.3%	\$52	17.7%	15.7%	
	Middle	2	66.7%	\$242	82.3%	77.7%	2	66.7%	\$242	82.3%	84.3%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	3	100.0%	\$294	100.0%	100.0%	3	100.0%	\$294	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	11	68.8%	\$1,647	62.6%	42.6%	11	68.8%	\$1,647	62.6%	43.4%	
	Middle	5	31.3%	\$985	37.4%	57.4%	5	31.3%	\$985	37.4%	56.4%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	16	100.0%	\$2,632	100.0%	100.0%	16	100.0%	\$2,632	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	\$0	0.0%	2.7%	
	Middle	1	100.0%	\$25	100.0%	82.1%	1	100.0%	\$25	100.0%	97.3%	
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%	\$25	100.0%	100.0%	

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: MI - Gladwin County

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Families by Family Income %	Count			Dollar		
		Count	%	Dollar \$ (000s)	\$ %		Bank	%	Agg %	Bank \$ (000s)	\$ %	Agg %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	6.4%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	20.2%	0	0.0%	18.9%	\$0	0.0%	13.1%
	Middle	1	100.0%	\$60	100.0%	24.7%	1	100.0%	17.8%	\$60	100.0%	17.1%
	Upper	0	0.0%	\$0	0.0%	31.1%	0	0.0%	44.5%	\$0	0.0%	55.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.3%	\$0	0.0%	10.7%
	Total	1	100.0%	\$60	100.0%	100.0%	1	100.0%	100.0%	\$60	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	9.7%	\$0	0.0%	4.9%
	Moderate	1	50.0%	\$52	22.2%	20.2%	1	50.0%	16.7%	\$52	22.2%	15.3%
	Middle	0	0.0%	\$0	0.0%	24.7%	0	0.0%	20.5%	\$0	0.0%	19.3%
	Upper	1	50.0%	\$182	77.8%	31.1%	1	50.0%	41.0%	\$182	77.8%	48.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.2%	\$0	0.0%	12.5%
	Total	2	100.0%	\$234	100.0%	100.0%	2	100.0%	100.0%	\$234	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	9.0%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	20.2%	0	0.0%	17.9%	\$0	0.0%	8.1%
	Middle	0	0.0%	\$0	0.0%	24.7%	0	0.0%	32.8%	\$0	0.0%	22.7%
	Upper	0	0.0%	\$0	0.0%	31.1%	0	0.0%	37.3%	\$0	0.0%	58.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	9.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	24.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	31.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	7.8%	\$0	0.0%	3.9%
	Moderate	1	33.3%	\$52	17.7%	20.2%	1	33.3%	18.0%	\$52	17.7%	13.6%
	Middle	1	33.3%	\$60	20.4%	24.7%	1	33.3%	20.1%	\$60	20.4%	18.1%
	Upper	1	33.3%	\$182	61.9%	31.1%	1	33.3%	42.6%	\$182	61.9%	53.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.5%	\$0	0.0%	11.3%
	Total	3	100.0%	\$294	100.0%	100.0%	3	100.0%	100.0%	\$294	100.0%	100.0%
Small Business Loan Size	Total Businesses											
	\$1 Million or Less	5	31.3%	\$447	17.0%	89.7%	5	31.3%	55.6%	\$447	17.0%	44.5%
	Over \$1 Million	10	62.5%	\$1,835	69.7%	7.6%	10	62.5%				
	Total Rev. available	15	93.8%	\$2,282	86.7%	97.3%	15	93.8%				
	Rev. Not Known	1	6.3%	\$350	13.3%	2.7%	1	6.3%				
	Total	16	100.0%	\$2,632	100.0%	100.0%	16	100.0%				
	\$100,000 or Less	9	56.3%	\$451	17.1%		9	56.3%	89.6%	\$451	17.1%	26.6%
	\$100,001 - \$250,000	3	18.8%	\$527	20.0%		3	18.8%	4.9%	\$527	20.0%	16.4%
Small Farm Loan Size	\$250,001 - \$1 Million	4	25.0%	\$1,654	62.8%		4	25.0%	5.6%	\$1,654	62.8%	57.0%
	Total	16	100.0%	\$2,632	100.0%		16	100.0%	100.0%	\$2,632	100.0%	100.0%
	Total Farms											
	\$1 Million or Less	1	100.0%	\$25	100.0%	97.5%	1	100.0%	52.9%	\$25	100.0%	82.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.5%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	1	100.0%	\$25	100.0%	100.0%	1	100.0%				
	\$100,000 or Less	1	100.0%	\$25	100.0%		1	100.0%	94.1%	\$25	100.0%	70.2%
\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	5.9%	\$0	0.0%	29.8%	
\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	
Total	1	100.0%	\$25	100.0%		1	100.0%	100.0%	\$25	100.0%	100.0%	

Origination & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix I

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Gladwin County

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	22.3%
Middle	7	100.0%	\$266	100.0%	77.7%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	7	100.0%	\$266	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Gladwin County

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	24.0%
Moderate	3	42.9%	\$130	48.9%	20.2%
Middle	1	14.3%	\$25	9.4%	24.7%
Upper	3	42.9%	\$111	41.7%	31.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	7	100.0%	\$266	100.0%	100.0%

Originations & Purchases

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Lenawee County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison									
		2015, 2016				2015				2016							
		Bank		Owner Occupied Units		Count		Dollar		Count		Dollar					
		Count	Dollar	Count	Dollar	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg
		#	%	\$ (000s)	%	#	%	\$ (000s)	%	#	%	\$ (000s)	%	#	%	\$ (000s)	%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	33.7%	0	0.0%	30.6%	0	0.0%	28.7%	\$0	0.0%
	Upper	1	100.0%	\$32	100.0%	67.6%	0	0.0%	66.3%	1	100.0%	71.3%	\$32	100.0%	76.0%	\$32	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	1	100.0%	\$32	100.0%	100.0%	0	0.0%	100.0%	1	100.0%	100.0%	\$32	100.0%	100.0%	\$32	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	2	50.0%	\$279	54.6%	32.4%	2	100.0%	32.7%	2	100.0%	31.0%	2	100.0%	27.3%	\$279	100.0%
	Upper	2	50.0%	\$232	45.4%	67.6%	0	0.0%	67.3%	2	100.0%	69.0%	2	100.0%	72.7%	\$232	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	4	100.0%	\$511	100.0%	100.0%	2	100.0%	100.0%	4	100.0%	100.0%	\$511	100.0%	100.0%	\$511	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	32.4%	0	0.0%	34.7%	0	0.0%	27.7%	0	0.0%	39.1%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	67.6%	0	0.0%	65.3%	0	0.0%	72.3%	0	0.0%	60.9%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
MULTI-FAMILY	Multi-Family Units																
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	56.3%	0	0.0%	100.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	43.7%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	2	40.0%	\$279	51.4%	32.4%	2	100.0%	33.4%	2	100.0%	31.3%	2	100.0%	28.7%	\$279	100.0%
	Upper	3	60.0%	\$264	48.6%	67.6%	0	0.0%	66.6%	3	100.0%	68.7%	3	100.0%	71.3%	\$264	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	5	100.0%	\$543	100.0%	100.0%	2	100.0%	100.0%	5	100.0%	100.0%	\$543	100.0%	100.0%	\$543	100.0%
SMALL BUSINESSES	Small Businesses																
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	5	41.7%	\$315	22.2%	39.4%	3	42.9%	39.0%	5	100.0%	18.5%	2	40.0%	34.1%	\$155	27.9%
	Upper	7	58.3%	\$1,105	77.8%	60.6%	4	57.1%	61.0%	7	100.0%	81.5%	3	60.0%	65.9%	\$400	72.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
SMALL FARM	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	12	100.0%	\$1,420	100.0%	100.0%	7	100.0%	100.0%	12	100.0%	100.0%	\$865	100.0%	100.0%	\$555	100.0%
	Small Farms																
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	12.5%	\$0	0.0%
SMALL FARM	Upper	1	100.0%	\$241	100.0%	79.2%	0	0.0%	100.0%	1	100.0%	100.0%	1	100.0%	87.5%	\$241	100.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%
	Total	1	100.0%	\$241	100.0%	100.0%	0	0.0%	100.0%	1	100.0%	100.0%	\$241	100.0%	100.0%	\$241	100.0%

Originations & Purchases
2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: MI - Lenawee County

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
							2015						2016					
							Count			Dollar			Count			Dollar		
		Bank		Families by Family Income			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		Count	Dollar		%		#	%		\$ (000s)	\$ %		#	%		\$ (000s)	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	2.8%	\$0	0.0%	1.5%	0	0.0%	3.9%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	19.4%	\$0	0.0%	13.5%	0	0.0%	18.3%	\$0	0.0%	12.6%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	25.6%	\$0	0.0%	23.9%	0	0.0%	22.4%	\$0	0.0%	19.4%
	Upper	1	100.0%	\$32	100.0%	56.1%	0	0.0%	37.5%	\$0	0.0%	46.7%	1	100.0%	40.8%	\$32	100.0%	51.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.7%	\$0	0.0%	14.4%	0	0.0%	14.5%	\$0	0.0%	14.2%
	Total	1	100.0%	\$32	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$32	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	4.2%	\$0	0.0%	1.9%	0	0.0%	4.2%	\$0	0.0%	2.5%
	Moderate	1	25.0%	\$128	25.0%	14.5%	1	50.0%	15.2%	\$128	45.9%	10.4%	0	0.0%	11.8%	\$0	0.0%	7.9%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	17.5%	\$0	0.0%	14.1%	0	0.0%	20.1%	\$0	0.0%	15.1%
	Upper	3	75.0%	\$383	75.0%	56.1%	1	50.0%	45.4%	\$151	54.1%	52.4%	2	100.0%	47.4%	\$232	100.0%	54.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.7%	\$0	0.0%	21.2%	0	0.0%	16.5%	\$0	0.0%	20.5%
	Total	4	100.0%	\$511	100.0%	100.0%	2	100.0%	100.0%	\$279	100.0%	100.0%	2	100.0%	100.0%	\$232	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	4.2%	\$0	0.0%	2.4%	0	0.0%	4.7%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	18.1%	\$0	0.0%	6.7%	0	0.0%	10.9%	\$0	0.0%	7.2%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	19.4%	\$0	0.0%	12.6%	0	0.0%	17.2%	\$0	0.0%	5.9%
	Upper	0	0.0%	\$0	0.0%	56.1%	0	0.0%	56.9%	\$0	0.0%	77.7%	0	0.0%	62.5%	\$0	0.0%	82.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.4%	\$0	0.0%	0.6%	0	0.0%	4.7%	\$0	0.0%	1.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	56.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	9.5%	0	0.0%	3.5%	\$0	0.0%	1.7%	0	0.0%	4.1%	\$0	0.0%	2.2%
	Moderate	1	20.0%	\$128	23.6%	14.5%	1	50.0%	17.6%	\$128	45.9%	11.9%	0	0.0%	15.2%	\$0	0.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	19.9%	0	0.0%	21.9%	\$0	0.0%	19.4%	0	0.0%	21.2%	\$0	0.0%	17.0%
	Upper	4	80.0%	\$415	76.4%	56.1%	1	50.0%	42.1%	\$151	54.1%	49.4%	3	100.0%	44.7%	\$264	100.0%	52.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	14.9%	\$0	0.0%	17.6%	0	0.0%	14.9%	\$0	0.0%	17.9%
	Total	5	100.0%	\$543	100.0%	100.0%	2	100.0%	100.0%	\$279	100.0%	100.0%	3	100.0%	100.0%	\$264	100.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	3	25.0%	\$110	7.7%	92.5%	2	28.6%	45.0%	\$10	1.2%	42.4%	1	20.0%	46.4%	\$100	18.0%	40.7%
	Over \$1 Million	5	41.7%	\$610	43.0%	6.7%	3	42.9%					2	40.0%				
	Total Rev. available	8	66.7%	\$720	50.7%	99.2%	5	71.5%					3	60.0%				
	Rev. Not Known	4	33.3%	\$700	49.3%	0.9%	2	28.6%					2	40.0%				
	Total	12	100.0%	\$1,420	100.0%	100.0%	7	100.0%					5	100.0%				
Small Business Loan Size	Total Businesses																	
	\$100,000 or Less	7	58.3%	\$415	29.2%		4	57.1%	89.2%	\$210	24.3%	25.3%	3	60.0%	90.5%	\$205	36.9%	29.5%
	\$100,001 - \$250,000	4	33.3%	\$700	49.3%		2	28.6%	5.6%	\$350	40.5%	19.3%	2	40.0%	4.7%	\$350	63.1%	18.6%
	\$250,001 - \$1 Million	1	8.3%	\$305	21.5%		1	14.3%	5.2%	\$305	35.3%	55.4%	0	0.0%	4.7%	\$0	0.0%	51.9%
	Total	12	100.0%	\$1,420	100.0%		7	100.0%	100.0%	\$865	100.0%	100.0%	5	100.0%	100.0%	\$555	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	0	0.0%	\$0	0.0%	98.0%	0	0.0%	20.0%	\$0	0.0%	25.2%	0	0.0%	25.0%	\$0	0.0%	22.5%
	Over \$1 Million	0	0.0%	\$0	0.0%	2.0%	0	0.0%					0	0.0%				
	Not Known	1	100.0%	\$241	100.0%	0.0%	0	0.0%					1	100.0%				
	Total	1	100.0%	\$241	100.0%	100.0%	0	0.0%					1	100.0%				
	Total	1	100.0%	\$241	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$241	100.0%	100.0%
Small Farm Loan Size	Total Farms																	
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	66.7%	\$0	0.0%	15.4%	0	0.0%	75.0%	\$0	0.0%	15.1%
	\$100,001 - \$250,000	1	100.0%	\$241	100.0%		0	0.0%	20.0%	\$0	0.0%	32.9%	1	100.0%	18.8%	\$241	100.0%	50.2%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	13.3%	\$0	0.0%	51.7%	0	0.0%	6.3%	\$0	0.0%	34.7%
	Total	1	100.0%	\$241	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$241	100.0%	100.0%
	Total	1	100.0%	\$241	100.0%		0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$241	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix I

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Lenawee County

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%
Middle	11	26.8%	\$890	35.7%	32.4%
Upper	30	73.2%	\$1,604	64.3%	67.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	41	100.0%	\$2,494	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Lenawee County

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank				
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	2	4.9%	\$100	0.0%	9.5%
Moderate	4	9.8%	\$205	8.2%	14.5%
Middle	15	36.6%	\$705	28.3%	19.9%
Upper	20	48.8%	\$1,484	59.5%	56.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>\$2,494</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: MI - Lenawee County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	1	100.0%	\$109	100.0%	51.6%	1	100.0%	\$109	100.0%	50.2%	
	Upper	0	0.0%	\$0	0.0%	48.4%	0	0.0%	\$0	0.0%	49.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$109	100.0%	100.0%	1	100.0%	\$109	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	51.6%	0	0.0%	\$0	0.0%	47.8%	
	Upper	0	0.0%	\$0	0.0%	48.4%	0	0.0%	\$0	0.0%	52.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	51.6%	0	0.0%	\$0	0.0%	31.4%	
	Upper	0	0.0%	\$0	0.0%	48.4%	0	0.0%	\$0	0.0%	68.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	86.4%	0	0.0%	\$0	0.0%	75.1%	
	Upper	0	0.0%	\$0	0.0%	13.6%	0	0.0%	\$0	0.0%	24.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	1	100.0%	\$109	100.0%	51.6%	1	100.0%	\$109	100.0%	49.2%	
	Upper	0	0.0%	\$0	0.0%	48.4%	0	0.0%	\$0	0.0%	50.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$109	100.0%	100.0%	1	100.0%	\$109	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	4	100.0%	\$505	100.0%	60.5%	4	100.0%	\$505	100.0%	39.3%	
	Upper	0	0.0%	\$0	0.0%	39.5%	0	0.0%	\$0	0.0%	60.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	4	100.0%	\$505	100.0%	100.0%	4	100.0%	\$505	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	43.2%	0	0.0%	\$0	0.0%	1.0%	
	Upper	0	0.0%	\$0	0.0%	56.8%	0	0.0%	\$0	0.0%	99.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	

Originations & Purchases

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: MI - Lenawee County

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Families by Family Income			Count		Dollar			
		#	%	\$ (000s)	\$ %	%	#	%	Bank \$ (000s)	Bank \$ %	Agg \$ %	
HOME PURCHASE	Low	1	100.0%	\$109	100.0%	13.9%	1	100.0%	\$109	100.0%	1.1%	
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	\$0	0.0%	12.0%	
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	20.0%	
	Upper	0	0.0%	\$0	0.0%	52.3%	0	0.0%	\$0	0.0%	50.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	16.2%	
	Total	1	100.0%	\$109	100.0%	100.0%	1	100.0%	\$109	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	13.9%	0	0.0%	\$0	0.0%	1.9%	
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	\$0	0.0%	12.3%	
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	17.9%	
	Upper	0	0.0%	\$0	0.0%	52.3%	0	0.0%	\$0	0.0%	54.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	13.6%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	13.9%	0	0.0%	\$0	0.0%	0.1%	
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	\$0	0.0%	5.4%	
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	14.2%	
	Upper	0	0.0%	\$0	0.0%	52.3%	0	0.0%	\$0	0.0%	80.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	13.9%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	52.3%	0	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	1	100.0%	\$109	100.0%	13.9%	1	100.0%	\$109	100.0%	1.3%	
	Moderate	0	0.0%	\$0	0.0%	13.0%	0	0.0%	\$0	0.0%	11.6%	
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	\$0	0.0%	18.8%	
	Upper	0	0.0%	\$0	0.0%	52.3%	0	0.0%	\$0	0.0%	52.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	16.2%	
	Total	1	100.0%	\$109	100.0%	100.0%	1	100.0%	\$109	100.0%	100.0%	
Small Business	Total Businesses											
	\$1 Million or Less	1	25.0%	\$150	29.7%	92.2%	1	25.0%	\$150	29.7%	43.5%	
	Over \$1 Million	1	25.0%	\$100	19.8%	6.8%	1	25.0%				
	Total Rev. available	2	50.0%	\$250	49.5%	99.0%	2	50.0%				
	Rev. Not Known	2	50.0%	\$255	50.5%	1.0%	2	50.0%				
	Total	4	100.0%	\$505	100.0%	100.0%	4	100.0%				
	Total Farms											
	\$100,000 or Less	2	50.0%	\$105	20.8%		2	50.0%	\$105	20.8%	37.0%	
	\$100,001 - \$250,000	2	50.0%	\$400	79.2%		2	50.0%	\$400	79.2%	28.7%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	34.4%	
	Total	4	100.0%	\$505	100.0%		4	100.0%	\$505	100.0%	100.0%	
Small Farm	Total Farms											
	\$1 Million or Less	0	0.0%	\$0	0.0%	97.8%	0	0.0%	\$0	0.0%	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	2.2%	0	0.0%				
	Not Known	0	0.0%	\$0	0.0%	0.0%	0	0.0%				
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%				
	\$100,000 or Less	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	12.5%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	87.5%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%		0	0.0%	\$0	0.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2017 FFEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix I

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: MI - Lenawee County

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%
Middle	8	53.3%	\$544	37.5%	51.6%
Upper	7	46.7%	\$907	62.5%	48.4%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	15	100.0%	\$1,451	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: MI - Lenawee County

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	2	13.3%	\$140	0.0%	13.9%
Moderate	2	13.3%	\$154	10.6%	13.0%
Middle	4	26.7%	\$300	20.7%	20.8%
Upper	7	46.7%	\$857	59.1%	52.3%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	15	100.0%	\$1,451	100.0%	100.0%

Originations & Purchases

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - Kerr County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison							Bank & Aggregate Lending Comparison										
		2015, 2016							2015					2016					
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar					
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank		Agg				
		#	%	\$ (000s)	\$ %								\$ (000s)	\$ %		\$ (000s)	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	1	33.3%	\$149	30.8%	2.6%	1	33.3%	5.3%	\$149	30.8%	4.3%	0	0.0%	3.3%	\$0	0.0%	2.6%	
	Middle	1	33.3%	\$155	32.0%	68.7%	1	33.3%	59.6%	\$155	32.0%	55.6%	0	0.0%	66.1%	\$0	0.0%	63.2%	
	Upper	1	33.3%	\$180	37.2%	28.7%	1	33.3%	35.1%	\$180	37.2%	40.1%	0	0.0%	30.6%	\$0	0.0%	34.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	3	100.0%	\$484	100.0%	100.0%	3	100.0%	100.0%	\$484	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	1.2%	\$0	0.0%	0.6%	0	0.0%	4.7%	\$0	0.0%	3.4%	
	Middle	0	0.0%	\$0	0.0%	68.7%	0	0.0%	61.6%	\$0	0.0%	59.7%	0	0.0%	58.9%	\$0	0.0%	58.1%	
	Upper	1	100.0%	\$181	100.0%	28.7%	1	100.0%	37.2%	\$181	100.0%	39.7%	0	0.0%	36.4%	\$0	0.0%	38.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$181	100.0%	100.0%	1	100.0%	100.0%	\$181	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	2.6%	0	0.0%	2.8%	\$0	0.0%	0.9%	0	0.0%	1.9%	\$0	0.0%	0.3%	
	Middle	0	0.0%	\$0	0.0%	68.7%	0	0.0%	63.9%	\$0	0.0%	69.5%	0	0.0%	67.9%	\$0	0.0%	64.4%	
	Upper	1	100.0%	\$120	100.0%	28.7%	1	100.0%	33.3%	\$120	100.0%	29.5%	0	0.0%	30.2%	\$0	0.0%	35.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$120	100.0%	100.0%	1	100.0%	100.0%	\$120	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Multi-Family Units																		
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	4.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	86.8%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Upper	0	0.0%	\$0	0.0%	8.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
HMDA TOTALS	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	1	20.0%	\$149	19.0%	2.6%	1	20.0%	3.9%	\$149	19.0%	3.0%	0	0.0%	3.7%	\$0	0.0%	2.7%	
	Middle	1	20.0%	\$155	19.7%	68.7%	1	20.0%	60.4%	\$155	19.7%	57.5%	0	0.0%	64.1%	\$0	0.0%	63.2%	
	Upper	3	60.0%	\$481	61.3%	28.7%	3	60.0%	35.7%	\$481	61.3%	39.5%	0	0.0%	32.2%	\$0	0.0%	34.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
SMALL BUSINESSES	Total	5	100.0%	\$785	100.0%	100.0%	5	100.0%	100.0%	\$785	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Small Businesses																		
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	1.7%	0	0.0%	1.8%	\$0	0.0%	0.7%	0	0.0%	1.5%	\$0	0.0%	0.4%	
	Middle	28	87.5%	\$3,222	92.9%	77.1%	19	86.4%	72.0%	\$1,978	93.2%	71.9%	9	90.0%	72.6%	\$1,244	92.5%	78.7%	
	Upper	4	12.5%	\$246	7.1%	21.2%	3	13.6%	21.3%	\$145	6.8%	23.0%	1	10.0%	20.7%	\$101	7.5%	17.2%	
SMALL FARM	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	5.0%	\$0	0.0%	4.4%	0	0.0%	5.1%	\$0	0.0%	3.7%	
	Total	32	100.0%	\$3,468	100.0%	100.0%	22	100.0%	100.0%	\$2,123	100.0%	100.0%	10	100.0%	100.0%	\$1,345	100.0%	100.0%	
	Small Farms																		
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
SMALL FARM	Middle	4	66.7%	\$320	78.0%	72.5%	2	66.7%	53.1%	\$120	72.7%	82.8%	2	66.7%	53.3%	\$200	81.6%	35.7%	
	Upper	2	33.3%	\$90	22.0%	27.5%	1	33.3%	34.4%	\$45	27.3%	13.3%	1	33.3%	40.0%	\$45	18.4%	58.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	12.5%	\$0	0.0%	3.9%	0	0.0%	6.7%	\$0	0.0%	5.4%	
	Total	6	100.0%	\$410	100.0%	100.0%	3	100.0%	100.0%	\$165	100.0%	100.0%	3	100.0%	100.0%	\$245	100.0%	100.0%	

Originations & Purchases

2016 FRIC Census Data, 2016 D&B Info, and 2010 ACS Data

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending by Revenue & Loan Size

Assessment Area: TX - Kerr County

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2015, 2016					Bank & Aggregate Lending Comparison											
		2015, 2016					2015						2016					
		Bank		Dollar		Families by Family Income %	Count		Dollar		Agg	Count		Dollar		Agg	Bank	Agg
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	2.2%	\$0	0.0%	0.9%	0	0.0%	2.3%	\$0	0.0%	1.0%
	Moderate	1	33.3%	\$149	30.8%	18.0%	1	33.3%	11.9%	\$149	30.8%	7.6%	0	0.0%	9.8%	\$0	0.0%	5.9%
	Middle	1	33.3%	\$155	32.0%	19.2%	1	33.3%	22.6%	\$155	32.0%	17.4%	0	0.0%	20.2%	\$0	0.0%	15.5%
	Upper	1	33.3%	\$180	37.2%	45.5%	1	33.3%	49.7%	\$180	37.2%	60.8%	0	0.0%	55.1%	\$0	0.0%	65.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.6%	\$0	0.0%	13.3%	0	0.0%	12.6%	\$0	0.0%	12.1%
	Total	3	100.0%	\$484	100.0%	100.0%	3	100.0%	100.0%	\$484	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	3.5%	\$0	0.0%	1.3%	0	0.0%	4.2%	\$0	0.0%	2.2%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	9.4%	\$0	0.0%	4.7%	0	0.0%	10.7%	\$0	0.0%	5.4%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	13.2%	\$0	0.0%	8.2%	0	0.0%	11.0%	\$0	0.0%	6.3%
	Upper	1	100.0%	\$181	100.0%	45.5%	1	100.0%	52.2%	\$181	100.0%	63.8%	0	0.0%	45.8%	\$0	0.0%	53.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.7%	\$0	0.0%	22.0%	0	0.0%	28.3%	\$0	0.0%	32.7%
	Total	1	100.0%	\$181	100.0%	100.0%	1	100.0%	100.0%	\$181	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	8.3%	\$0	0.0%	2.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	2.8%	\$0	0.0%	2.0%	0	0.0%	11.3%	\$0	0.0%	2.6%
	Middle	1	100.0%	\$120	100.0%	19.2%	1	100.0%	16.7%	\$120	100.0%	21.4%	0	0.0%	22.6%	\$0	0.0%	16.8%
	Upper	0	0.0%	\$0	0.0%	45.5%	0	0.0%	69.4%	\$0	0.0%	67.2%	0	0.0%	60.4%	\$0	0.0%	75.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	7.4%	0	0.0%	5.7%	\$0	0.0%	4.7%
	Total	1	100.0%	\$120	100.0%	100.0%	1	100.0%	100.0%	\$120	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	45.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	17.2%	0	0.0%	2.8%	\$0	0.0%	1.0%	0	0.0%	2.8%	\$0	0.0%	1.3%
	Moderate	1	20.0%	\$149	19.0%	18.0%	1	20.0%	10.8%	\$149	19.0%	6.5%	0	0.0%	10.1%	\$0	0.0%	5.4%
	Middle	2	40.0%	\$275	35.0%	19.2%	2	40.0%	19.5%	\$275	35.0%	14.3%	0	0.0%	17.3%	\$0	0.0%	12.0%
	Upper	2	40.0%	\$361	46.0%	45.5%	2	40.0%	51.1%	\$361	46.0%	61.4%	0	0.0%	52.2%	\$0	0.0%	59.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.8%	\$0	0.0%	16.8%	0	0.0%	17.6%	\$0	0.0%	21.9%
	Total	5	100.0%	\$785	100.0%	100.0%	5	100.0%	100.0%	\$785	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Small Business Revenue	Total Businesses																	
	\$1 Million or Less	11	34.4%	\$1,696	48.9%	93.4%	7	31.8%	53.9%	\$716	33.7%	47.9%	4	40.0%	49.0%	\$980	72.9%	51.0%
	Over \$1 Million	4	12.5%	\$210	6.1%	5.6%	3	13.6%					1	10.0%				
	Total Rev. available	15	46.9%	\$1,906	55.0%	99.0%	10	45.4%					5	50.0%				
	Rev. Not Known	17	53.1%	\$1,562	45.0%	0.9%	12	54.5%					5	50.0%				
	Total	32	100.0%	\$3,468	100.0%	100.0%	22	100.0%					10	100.0%				
Small Business Loan Size	\$100,000 or Less	25	78.1%	\$1,240	35.8%		18	81.8%	95.2%	\$819	38.6%	55.0%	7	70.0%	95.3%	\$421	31.3%	51.1%
	\$100,001 - \$250,000	4	12.5%	\$540	15.6%		2	9.1%	2.9%	\$289	13.6%	16.0%	2	20.0%	2.8%	\$251	18.7%	14.9%
	\$250,001 - \$1 Million	3	9.4%	\$1,688	48.7%		2	9.1%	1.9%	\$1,015	47.8%	29.0%	1	10.0%	1.9%	\$673	50.0%	33.9%
	Total	32	100.0%	\$3,468	100.0%		22	100.0%	100.0%	\$2,123	100.0%	100.0%	10	100.0%	100.0%	\$1,345	100.0%	100.0%
Small Farm Revenue	Total Farms																	
	\$1 Million or Less	2	33.3%	\$90	22.0%	99.2%	1	33.3%	81.3%	\$45	27.3%	81.8%	1	33.3%	80.0%	\$45	18.4%	56.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	0.8%	0	0.0%					0	0.0%				
	Not Known	4	66.7%	\$320	78.0%	0.0%	2	66.7%					2	66.7%				
	Total	6	100.0%	\$410	100.0%	100.0%	3	100.0%					3	100.0%				
	Total	6	100.0%	\$410	100.0%		3	100.0%	100.0%	\$165	100.0%	100.0%	3	100.0%	100.0%	\$245	100.0%	100.0%
Small Farm Loan Size	\$100,000 or Less	6	100.0%	\$410	100.0%		3	100.0%	87.5%	\$165	100.0%	33.6%	3	100.0%	86.7%	\$245	100.0%	40.4%
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	10.0%	\$0	0.0%	37.0%
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	12.5%	\$0	0.0%	66.4%	0	0.0%	3.3%	\$0	0.0%	22.6%
	Total	6	100.0%	\$410	100.0%		3	100.0%	100.0%	\$165	100.0%	100.0%	3	100.0%	100.0%	\$245	100.0%	100.0%
	Total	6	100.0%	\$410	100.0%		3	100.0%	100.0%	\$165	100.0%	100.0%	3	100.0%	100.0%	\$245	100.0%	100.0%
	Total	6	100.0%	\$410	100.0%		3	100.0%	100.0%	\$165	100.0%	100.0%	3	100.0%	100.0%	\$245	100.0%	100.0%

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

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

Appendix I

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - Kerr County

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	2	9.1%	\$107	4.3%	2.6%
Middle	16	72.7%	\$2,136	84.9%	68.7%
Upper	4	18.2%	\$273	10.9%	28.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	22	100.0%	\$2,516	100.0%	100.0%

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - Kerr County

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	2	9.1%	\$97	0.0%	17.2%
Moderate	5	22.7%	\$325	12.9%	18.0%
Middle	1	4.5%	\$110	4.4%	19.2%
Upper	14	63.6%	\$1,984	78.9%	45.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	22	100.0%	\$2,516	100.0%	100.0%

Originations & Purchases

Appendix I

Geographic Distribution of HMDA, Small Business, & Small Farm Loans

Assessment Area: TX - Kerr County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count					Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	26.0%	0	0.0%	\$0	0.0%	22.4%	
	Middle	0	0.0%	\$0	0.0%	35.8%	0	0.0%	\$0	0.0%	33.7%	
	Upper	1	100.0%	\$228	100.0%	38.2%	1	100.0%	\$228	100.0%	43.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$228	100.0%	100.0%	1	100.0%	\$228	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	26.0%	0	0.0%	\$0	0.0%	18.6%	
	Middle	0	0.0%	\$0	0.0%	35.8%	0	0.0%	\$0	0.0%	38.8%	
	Upper	0	0.0%	\$0	0.0%	38.2%	0	0.0%	\$0	0.0%	42.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	26.0%	0	0.0%	\$0	0.0%	24.1%	
	Middle	0	0.0%	\$0	0.0%	35.8%	0	0.0%	\$0	0.0%	44.8%	
	Upper	0	0.0%	\$0	0.0%	38.2%	0	0.0%	\$0	0.0%	31.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
MULTI-FAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	55.1%	0	0.0%	\$0	0.0%	9.6%	
	Middle	0	0.0%	\$0	0.0%	35.8%	0	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	9.1%	0	0.0%	\$0	0.0%	90.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	26.0%	0	0.0%	\$0	0.0%	21.3%	
	Middle	0	0.0%	\$0	0.0%	35.8%	0	0.0%	\$0	0.0%	34.9%	
	Upper	1	100.0%	\$228	100.0%	38.2%	1	100.0%	\$228	100.0%	43.8%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Total	1	100.0%	\$228	100.0%	100.0%	1	100.0%	\$228	100.0%	100.0%	
SMALL BUSINESSES	Small Businesses											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	8	61.5%	\$1,648	81.7%	35.1%	8	61.5%	\$1,648	81.7%	28.7%	
	Middle	1	7.7%	\$50	2.5%	37.0%	1	7.7%	\$50	2.5%	42.0%	
	Upper	4	30.8%	\$320	15.9%	27.9%	4	30.8%	\$320	15.9%	26.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	3.3%	
	Total	13	100.0%	\$2,018	100.0%	100.0%	13	100.0%	\$2,018	100.0%	100.0%	
SMALL FARM	Small Farms											
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Moderate	1	25.0%	\$100	34.5%	24.2%	1	25.0%	\$100	34.5%	29.9%	
	Middle	2	50.0%	\$90	31.0%	37.5%	2	50.0%	\$90	31.0%	30.4%	
	Upper	1	25.0%	\$100	34.5%	38.3%	1	25.0%	\$100	34.5%	35.3%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	0.0%	
	Tr Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%	4.4%	
	Total	4	100.0%	\$290	100.0%	100.0%	4	100.0%	\$290	100.0%	100.0%	

Originations & Purchases

2017 FRIC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix I

Borrower Distribution of HMDA Loans & Small Business/Small Farm Lending
by Revenue & Loan Size

Assessment Area: TX - Kerr County

PRODUCT TYPE		Bank Lending & Demographic Data Comparison						Bank & Aggregate Lending Comparison					
		2017						2017					
		Borrower Income Levels				Families by Family Income %	Count			Dollar			
		Bank		Dollar			#	%	Agg %	Bank		Agg %	
		#	%	\$ (000s)	\$ %	%				%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	19.7%	0	0.0%	1.7%	\$0	0.0%	0.7%	
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	9.0%	\$0	0.0%	5.0%	
	Middle	0	0.0%	\$0	0.0%	17.8%	0	0.0%	23.2%	\$0	0.0%	18.1%	
	Upper	1	100.0%	\$228	100.0%	44.5%	1	100.0%	55.9%	\$228	100.0%	66.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.1%	\$0	0.0%	10.1%	
	Total	1	100.0%	\$228	100.0%	100.0%	1	100.0%	100.0%	\$228	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	19.7%	0	0.0%	4.3%	\$0	0.0%	2.2%	
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	11.5%	\$0	0.0%	6.1%	
	Middle	0	0.0%	\$0	0.0%	17.8%	0	0.0%	18.6%	\$0	0.0%	14.4%	
	Upper	0	0.0%	\$0	0.0%	44.5%	0	0.0%	46.7%	\$0	0.0%	56.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	18.9%	\$0	0.0%	20.5%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.7%	0	0.0%	2.0%	\$0	0.0%	1.3%	
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	6.1%	\$0	0.0%	2.0%	
	Middle	0	0.0%	\$0	0.0%	17.8%	0	0.0%	22.4%	\$0	0.0%	14.6%	
	Upper	0	0.0%	\$0	0.0%	44.5%	0	0.0%	63.3%	\$0	0.0%	77.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.1%	\$0	0.0%	4.6%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Middle	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Upper	0	0.0%	\$0	0.0%	44.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	19.7%	0	0.0%	2.5%	\$0	0.0%	1.1%	
	Moderate	0	0.0%	\$0	0.0%	18.0%	0	0.0%	9.6%	\$0	0.0%	5.1%	
	Middle	0	0.0%	\$0	0.0%	17.8%	0	0.0%	21.8%	\$0	0.0%	16.7%	
	Upper	1	100.0%	\$228	100.0%	44.5%	1	100.0%	53.4%	\$228	100.0%	62.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.8%	\$0	0.0%	14.1%	
	Total	1	100.0%	\$228	100.0%	100.0%	1	100.0%	100.0%	\$228	100.0%	100.0%	
Small Business	Total Businesses												
	\$1 Million or Less	6	46.2%	\$1,359	67.3%	92.6%	6	46.2%	53.5%	\$1,359	67.3%	51.9%	
	Over \$1 Million	3	23.1%	\$379	18.8%	6.4%	3	23.1%					
	Total Rev. available	9	69.3%	\$1,738	86.1%	99.0%	9	69.3%					
	Rev. Not Known	4	30.8%	\$280	13.9%	1.0%	4	30.8%					
	Total	13	100.0%	\$2,018	100.0%	100.0%	13	100.0%					
	Total Farms												
	\$100,000 or Less	7	53.8%	\$406	20.1%		7	53.8%	94.8%	\$406	20.1%	48.5%	
Small Farm	\$1 Million or Less	1	25.0%	\$45	15.5%	99.2%	1	25.0%	82.5%	\$45	15.5%	97.6%	
	Over \$1 Million	0	0.0%	\$0	0.0%	0.8%	0	0.0%					
	Not Known	3	75.0%	\$245	84.5%	0.0%	3	75.0%					
	Total	4	100.0%	\$290	100.0%	100.0%	4	100.0%					
	\$100,000 or Less	4	100.0%	\$290	100.0%		4	100.0%	92.5%	\$290	100.0%	48.8%	
	\$100,001 - \$250,000	0	0.0%	\$0	0.0%		0	0.0%	2.5%	\$0	0.0%	10.5%	
	\$250,001 - \$500,000	0	0.0%	\$0	0.0%		0	0.0%	5.0%	\$0	0.0%	40.7%	
	Total	4	100.0%	\$290	100.0%		4	100.0%	100.0%	\$290	100.0%	100.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2017 FFIEC Census Data, 2017 D&B Info, and 2015 ACS Data

Appendix I

Geographic Distribution of Home Equity Lines of Credit

Assessment Area: TX - Kerr County

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Owner Occupied Units %
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	5	50.0%	\$379	45.3%	26.0%
Middle	1	10.0%	\$57	6.8%	35.8%
Upper	4	40.0%	\$400	47.8%	38.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$836</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Borrower Distribution of Home Equity Lines of Credit

Assessment Area: TX - Kerr County

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2017				Families by Family Income
	Bank		Dollar		
	Count				
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	19.7%
Moderate	2	20.0%	\$199	23.8%	18.0%
Middle	5	50.0%	\$415	49.6%	17.8%
Upper	3	30.0%	\$222	26.6%	44.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
Total	10	100.0%	\$836	100.0%	100.0%

Originations & Purchases

Appendix J

Appendix J – Distribution of Branch Delivery System and Branch Openings and Closings

As of: December 31, 2017

Assessment Areas				Percent of Branches by Income Level of Geography				Branch Openings and Closings								Demographics				
Name	% of Deposits	# of Branches	% of Branches	Low	Mod	Mid	Upp	# of Branches Opened	# of Branches Closed	Net Change in Branch Locations				% of Population by Tract Income						
										Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	Unk		
Arizona																				
Phoenix	0.6%	17	3.9%	0.0%	0.0%	52.9%	47.1%	1	2	0	0	0	-1	11.3%	23.0%	31.2%	34.3%	0.2%		
Arizona All Assessment Areas	0.6%	17	3.9%	0.0%	0.0%	52.9%	47.1%	1	2	0	0	0	-1	11.3%	23.0%	31.2%	34.3%	0.2%		
California																				
Fresno MSA	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%	0	1	0	0	0	-1	NA*	NA*	NA*	NA*	NA*		
Greater Los Angeles	10.9%	38	8.7%	2.5%	15.8%	10.5%	63.2%	0	3	0	0	-1	-2	8.8%	29.2%	27.0%	34.5%	0.5%		
Inland Empire	0.1%	3	0.6%	0.0%	33.3%	33.3%	33.4%	1	0	0	0	+1	0	4.9%	24.7%	32.3%	38.2%	0.0%		
Sacramento	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%	0	1	-1	0	0	0	NA*	NA*	NA*	NA*	NA*		
Salinas	0.4%	4	0.9%	25.0%	0.0%	0.0%	75.0%	0	0	0	0	0	0	3.9%	21.5%	35.7%	38.4%	0.5%		
San Diego	1.0%	14	3.2%	14.3%	7.1%	35.7%	42.9%	0	1	0	-1	0	0	9.7%	23.3%	31.3%	35.3%	0.4%		
San Francisco Bay	4.4%	17	3.9%	11.8%	17.7%	29.4%	41.1%	0	0	0	0	0	0	12.0%	22.0%	31.5%	34.1%	0.4%		
San Jose	12.3%	14	3.2%	0.0%	14.3%	21.4%	64.3%	1	0	0	0	0	+1	9.3%	21.3%	36.3%	33.0%	0.1%		
Santa Cruz	1.6%	6	1.4%	16.7%	0.0%	66.6%	16.7%	0	1	0	0	-1	0	6.2%	28.3%	40.0%	25.5%	0.0%		
Ventura	0.1%	1	0.2%	0.0%	0.0%	0.0%	100.0%	0	0	0	0	0	0	5.1%	29.3%	32.8%	32.8%	0.0%		
California All Assessment Areas	30.8%	97	22.1%	7.2%	13.4%	22.7%	53.6%	2	7	-1	-1	-1	-2	8.8%	26.2%	29.9%	34.7%	0.4%		
Florida																				
Fl. Lauderdale-West Palm Beach	0.5%	6	1.4%	0.0%	16.7%	33.3%	50.0%	0	0	0	0	0	0	5.6%	28.7%	32.4%	33.1%	0.2%		
Naples-Immokalee-Marco Island MSA	0.1%	1	0.2%	0.0%	0.0%	0.0%	100.0%	0	0	0	0	0	0	7.2%	23.5%	38.0%	31.3%	0.0%		
Sarasota	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%	0	1	0	0	0	-1	NA*	NA*	NA*	NA*	NA*		
Stuart	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%	0	1	0	0	0	-1	NA*	NA*	NA*	NA*	NA*		
Florida All Assessment Areas	0.6%	7	1.6%	0.0%	14.3%	28.6%	57.1%	0	2	0	0	0	-2	5.8%	28.2%	33.0%	32.9%	0.2%		
Michigan																				
Ann Arbor MSA	1.3%	9	2.1%	0.0%	22.2%	44.6%	22.2%	0	0	0	0	0	0	14.9%	12.9%	40.2%	27.6%	4.4%		
Battle Creek	0.4%	4	0.9%	0.0%	50.0%	0.0%	50.0%	0	1	0	-1	0	0	7.4%	26.5%	39.2%	26.9%	0.0%		
Fenton	0.1%	1	0.2%	0.0%	0.0%	100.0%	0.0%	0	0	0	0	0	0	0.0%	0.0%	23.3%	76.7%	0.0%		
Grand Rapids-Wyoming	0.9%	11	2.5%	0.0%	0.0%	63.6%	36.4%	1	2	0	-1	0	0	5.9%	16.5%	50.3%	27.3%	0.0%		
Jackson MSA	0.7%	9	2.1%	0.0%	55.6%	33.3%	11.1%	0	1	0	0	0	-1	9.9%	19.4%	47.4%	20.2%	3.1%		
Kalamazoo-Portage	0.4%	6	1.4%	16.7%	50.0%	33.3%	0.0%	0	0	0	0	0	0	8.0%	16.7%	51.8%	21.9%	1.6%		
Lansing-East Lansing	0.9%	7	1.6%	0.0%	57.1%	28.6%	14.3%	0	1	0	0	0	-1	9.2%	20.4%	30.3%	34.8%	5.3%		
Midland MSA	0.2%	2	0.4%	0.0%	50.0%	0.0%	50.0%	0	1	0	-1	0	0	3.3%	19.2%	42.2%	35.3%	0.0%		
Muskegon MSA	0.4%	4	0.9%	0.0%	50.0%	0.0%	50.0%	1	1	0	0	-1	+1	11.1%	23.1%	37.6%	28.2%	0.0%		
Southeast Michigan	46.0%	141	32.2%	7.1%	20.6%	29.8%	41.8%	4	11	-3	-1	-1	-2	10.4%	22.9%	33.4%	33.1%	0.2%		
Gladwin County	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%	0	1	0	0	-1	0	0.0%	25.8%	74.2%	0.0%	0.0%		
Lenawee County	0.1%	1	0.2%	0.0%	0.0%	100.0%	0.0%	0	0	0	0	0	0	0.0%	0.0%	54.4%	45.6%	0.0%		
Michigan All Assessment Areas	51.4%	195	44.5%	5.6%	24.6%	31.8%	36.9%	6	19	-3	-4	-3	-3	9.7%	20.7%	37.2%	31.6%	0.8%		
Texas																				
Austin	1.6%	10	2.3%	10.0%	0.0%	30.0%	60.0%	0	1	0	0	-1	0	11.9%	19.7%	33.4%	33.7%	1.3%		
Dallas-Ft. Worth Metroplex	8.9%	54	12.3%	11.1%	22.2%	29.7%	37.0%	1	0	0	+1	0	0	12.1%	25.8%	27.7%	34.3%	0.1%		

Appendix J

Assessment Areas				Percent of Branches by Income Level of Geography				Branch Openings and Closings								Demographics				
Name	% of Deposits	# of Branches	% of Branches	Low	Mod	Mid	Upp	# of Branches Opened	# of Branches Closed	Net Change in Branch Locations				% of Population by Tract Income						
										Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	Unk		
Houston	5.5%	48	11.0%	12.5%	18.8%	20.8%	47.9%	0	8	-1	-1	-4	-2	12.2%	26.0%	25.9%	35.6%	0.3%		
San Antonio	0.3%	6	1.4%	16.7%	16.7%	33.3%	33.3%	0	3	0	-1	-1	-1	7.2%	33.4%	27.8%	31.6%	0.0%		
Kerr County	0.3%	4	0.9%	0.0%	50.0%	25.0%	25.0%	0	1	0	-1	0	0	0.0%	35.0%	34.3%	30.7%	0.0%		
Texas All Assessment Areas	16.6%	122	27.9%	11.5%	19.7%	26.2%	42.6%	1	13	-1	-2	-6	-3	11.5%	26.3%	27.6%	34.4%	0.2%		
All Assessment Areas	100.0%	438	100.0%	7.3%	19.6%	29.0%	42.9%	10	43	-5	-7	-10	-11	9.6%	25.5%	30.4%	34.1%	0.4%		

* No longer an assessment area as of December 31, 2017