

PUBLIC DISCLOSURE

July 15, 2024

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**Commercial Bank
6710 Cumberland Gap Parkway
Harrogate, Tennessee 37752**

RSSD ID NUMBER: 497039

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

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

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INSTITUTION’S CRA RATING

INSTITUTION’S CRA RATING: This institution is rated Needs to Improve.

The following table indicates the performance level of Commercial Bank with respect to the Lending, Investment, and Service Tests.

Commercial Bank			
Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X		X
Needs to Improve		X	
Substantial Noncompliance			
OVERALL RATING			

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

Major factors contributing to this rating include:

- The distribution of loans reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas (AA).
- The bank made a low level of community development (CD) loans.
- The bank made little use of innovative and/or flexible lending practices in serving credit needs of its AAs.
- The bank made a poor level of qualified CD investments and grants.
- Retail banking services, which includes accessibility of delivery systems, changes in branch locations, and reasonableness of hours and services, are adequate.
- The bank provided a limited level of CD services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Commercial Bank is a community bank headquartered in Harrogate, Tennessee. The bank is owned by Commercial Bancgroup, Inc., a one-bank holding company also located in Harrogate. As of December 31, 2023, Commercial Bank had total assets of \$1.9 billion and operated 30 banking offices and 37 ATMs in the states of Tennessee and Kentucky. Of the 30 offices, 17 are in Tennessee and 13 in Kentucky. Commercial Bank offers traditional consumer and commercial products and services to serve customers across its footprint.

For purposes of the CRA, Commercial Bank has defined eight AAs across two states, which are listed below, and described in in the applicable *Description of Assessment Area* sections of this report.

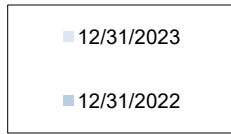
- Southeast Kentucky
- Knoxville, Tennessee
- Claiborne County, Tennessee
- Johnson City, Tennessee
- Kingsport, Tennessee
- Morristown, Tennessee
- Newport, Tennessee
- Williamson/Rutherford Counties, Tennessee

Loan Portfolio

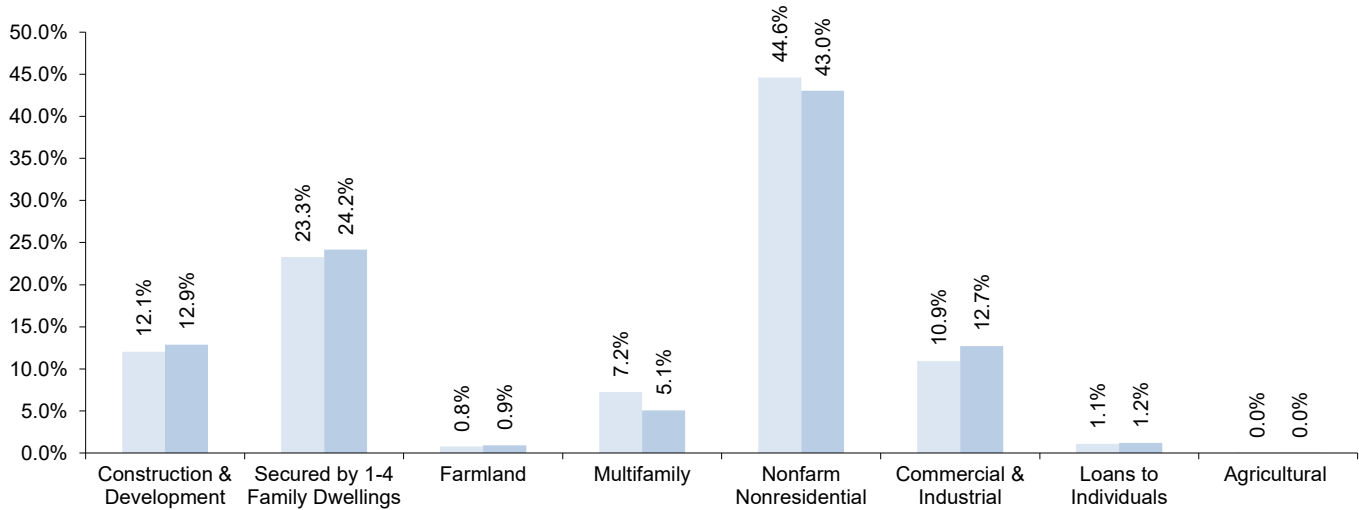
The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report). As shown, primary business lines for the bank include nonfarm/nonresidential real estate and loans secured by one- to four-family dwellings.

COMPOSITION OF LOAN PORTFOLIO					
Loan Type	12/31/2023		12/31/2022		% Change
	\$ (000s)	Percent	\$ (000s)	Percent	
Construction and Development	176,723	12.1%	169,107	12.9%	4.5%
Secured by One- to Four- Family Dwellings	341,475	23.3%	317,305	24.2%	7.6%
Other Real Estate: Farmland	11,550	0.8%	12,032	0.9%	-4.0%
Multifamily	106,206	7.2%	66,750	5.1%	59.1%
Nonfarm nonresidential	654,007	44.6%	564,978	43.0%	15.8%
Commercial and Industrial	159,840	10.9%	166,633	12.7%	-4.1%
Loans to Individuals	16,008	1.1%	16,027	1.2%	-0.1%
Agricultural Loans	73	0.0%	163	0.0%	-55.2%
Total	\$1,465,882	100.00%	\$1,312,995	100.00%	11.6%

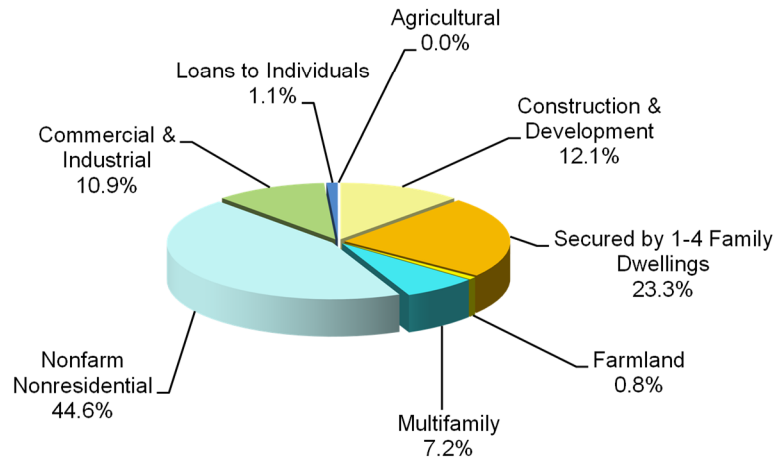
* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included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



Loan Portfolio Trend



**Loan Portfolio
as of
12/31/2023**



Commercial Bank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its AAs. The bank received a “Satisfactory” rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated June 13, 2022 under the Intermediate Small Bank Examination Procedures.

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank’s record of meeting the credit needs of its community, including LMI neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, as well as the economic and demographic characteristics of its defined AAs. Unless otherwise noted, demographic characteristics discussed in the *Description of Operations* section of each AA are derived from 2023 FFIEC Census data and deposit information is taken from the FDIC Deposit Market Share Report data as of June 30, 2023. Commercial Bank’s CRA performance evaluation was based on CRA activities within its AAs using the Large Institution Examination Procedures, which consist of three separately rated tests: Lending, Investment, and Service.

Commercial Bank is an interstate bank with branches in Tennessee and Kentucky; therefore, the scope of this evaluation includes a full-scope review of at least one AA in each state. Each of the AAs are reviewed for lending, investment, and service performance using either full-scope or limited-scope examination procedures. For this exam, full-scope reviews were conducted on two of the bank’s eight AAs: Knoxville, Tennessee and Southeast Kentucky. The other six AAs in Tennessee were evaluated using limited-scope review procedures. Criteria used to select full-scope AAs include the volume of HMDA-reportable and CRA small business lending by number of loans and dollar amount as a percentage of statewide lending activity; deposit market share; number of branches; percentage of statewide deposits; and other nonfinancial considerations.

When determining the overall rating for the institution, the greatest weight was placed on performance in Tennessee, which is the state with the greatest concentration of branches, deposits, and lending.

Lending Test

Under the Lending Test, performance is evaluated using the following criteria and time frames.

Lending Test Performance Criterion	Products Selected for Review	Time Period
Level of Lending Activity	<ul style="list-style-type: none"> • HMDA-reportable loans • CRA small business loans 	January 1, 2022 through December 31, 2023
AA Concentration		
Geographic Distribution of Loans		
Loan Distribution by Borrower’s Profile		
CD Lending		
Product Innovation		

As shown, the review period for the products selected and CD lending was January 1, 2022 through December 31, 2023. HMDA-reportable home purchase, refinance, and home improvement loans were the products selected for review. Small farm, multifamily, and other purpose HMDA-reportable loans were not considered due to the low relative volume of these product types. Based on the total loan volume for each product during the review period, the banks HMDA-reportable lending performance carried greater weight than CRA small business lending when determining overall performance conclusions.

The Lending Test analyses entail comparisons of bank’s lending performance for the entire review period (2022 and 2023) to the applicable AA demographics. Additionally, the bank’s lending performance in 2022 is compared to the performance of other lenders for the same year. Given the timing of this evaluation, aggregate lending data is only available in 2022. Demographic data used for analysis is based on 2023 FFIEC Census data, 2016-2023

American Communities Survey (ACS) 5-year estimates, and Dun & Bradstreet (D&B) data. The demographic data is discussed in the applicable sections for each full-scope AA and demographic tables for the limited-scope AAs are found in Appendix C.

Investment Test

All qualified CD investments, including grants and donations, made between January 1, 2022 and December 31, 2023, were reviewed. In addition, investments made prior to January 1, 2022 but still on the bank’s balance sheet as of December 31, 2023 were also considered. Qualified investments and grants were evaluated to determine the bank’s overall level of activity, use of innovative and/or complex investments, and responsiveness to the credit and CD needs of its AAs.

Service Test

Under the Service Test, performance is evaluated using the following criteria and time frames.

Service Test Performance Criterion	Time Period
Accessibility of Delivery Systems	January 1, 2022 through December 31, 2023
Changes in Branch Locations	
Reasonableness of Business Hours and Services	
CD Services	

As shown, the review period for retail services and CD services was January 1, 2022 through December 31, 2023.

Community Contacts

As part of the CRA evaluation, several community contacts were made with local community and economic development representatives who are familiar with the economic and demographic characteristics as well as credit and CD opportunities in the AAs. Information obtained from the contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank’s performance. Specific information obtained from the community contacts is included in the applicable section of the evaluation for each AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

Lending Test performance is rated Low Satisfactory. The bank’s performance was rated Low Satisfactory in both Tennessee and Kentucky.

Lending Activity

The following table summarizes the bank’s lending activity in 2022 and 2023. As shown, the bank originated more HMDA-reportable loans than CRA small business loans during the review period. Lending levels reflect adequate responsiveness to credit needs and commensurate with deposits in each state. There were no conspicuous gaps in lending activity by income category identified. Detailed information about lending activity can be found the state and full-scope AA sections of this report.

Summary of Lending Activity

Loan Type	#	%	\$(000s)	%
Total Consumer related	0	0	\$0	0
Home Improvement	22	--	\$1,481	--
Home Purchase	353	--	\$93,133	--
Multi-Family Housing	13	--	\$133,408	--
Refinancing	157	--	\$21,514	--
Other Purpose Closed-End	41	--	\$4,459	--
Total HMDA related	586	59	\$253,995	87
Total Non-HMDA related	0	0	\$0	0
Small Business	391	--	\$36,516	--
Total Small Business related	391	39	\$36,516	13
Small Farm	15	--	\$482	--
Total Small Farm related	15	2	\$482	0
TOTAL LOANS	992	100	\$290,993	100

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

Assessment Area Concentration

The bank originated a majority of its loans to borrowers and businesses residing in or located within the AAs. As shown in the table below, by number, 78.8 percent of the HMDA-reportable loans were made to borrowers residing inside the AA and 85.4 percent of CRA small business loans were to businesses located in the AAs.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	21	95.5	\$1,391	93.9	1	4.5	\$90	6.1
Home Purchase - Conventional	262	74.2	\$61,514	66	91	25.8	\$31,619	34
Multi-Family Housing	10	76.9	\$65,337	49	3	23.1	\$68,071	51
Other Purpose Closed-End	36	87.8	\$3,115	69.9	5	12.2	\$1,344	30.1
Refinancing	133	84.7	\$18,249	84.8	24	15.3	\$3,265	15.2
Total HMDA related	462	78.8	\$149,606	58.9	124	21.2	\$104,389	41.1
Small Business	334	85.4	\$26,676	73.1	57	14.6	\$9,840	26.9
Total Small Bus. related	334	85.4	\$26,676	73.1	57	14.6	\$9,840	26.9
Small Farm	12	80	\$395	82	3	20	\$87	18
Total Small Farm related	12	80	\$395	82	3	20	\$87	18
TOTAL LOANS	808	81.5	\$176,677	60.7	184	18.5	\$114,316	39.3

Note: Affiliate loans not included

Distribution of Lending by Geography and by Borrower Income and Business Size

The geographic distribution of HMDA-reportable and CRA small business loans reflects adequate penetration throughout the AAs, given the opportunity and competition in these markets. The analyses of HMDA-reportable and CRA small business lending within each AA are discussed in detail later in this report.

The distribution of lending to borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes. The analyses of HMDA-reportable and CRA small business lending within each AA are discussed in detail later in this report.

Community Development Lending

The bank made a low level of CD loans. Since the previous examination, the bank originated four qualified CD loans in its AAs totaling \$5.6 million. Additional details on CD loans in each AA are discussed later in the report.

Product Innovation

Commercial Bank offers a range of commercial loan products as well as residential mortgages, construction loans, and consumer loans. The bank makes little use of innovative and/or flexible lending practices in serving the credit needs of its AAs but does offer SBA products that provide small businesses access to capital with more flexible terms than conventional commercial financing.

The bank offers affordable deposit products, including checking account with no minimum balance requirements and low monthly service charges. Additionally, the bank provides access to mobile banking for all customers, including access to the Zelle network, as well as mobile deposits and bill payment.

INVESTMENT TEST

Performance under the Investment Test is rated Needs to Improve. During the review period, the bank made one investment for \$238,000 and donations totaling \$79,200. Additionally, the bank had investments totaling \$1.8 million that were purchased prior to this review period and remained on its balance sheet at the end of the review period. Investments were in municipal bonds that financed community services for LMI individuals and the revitalization and stabilization of LMI communities. Most of the bank's contributions supported community services for LMI individuals and affordable housing.

SERVICE TEST

Performance under the Service Test is rated Low Satisfactory. The Service Test evaluates both retail services and CD services. Delivery systems are reasonably accessible to communities and individuals of different income levels across the bank's AAs. Additionally, the bank's record of opening and closing branches or ATMs during the review period generally did not adversely affect the accessibility of its delivery services and services did not vary in such a way that inconveniences LMI communities and/or individuals across its footprint. The bank provided a limited level of CD services during the review period. The majority of the CD services offered were financial education, particularly targeting LMI youth through schools.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

TENNESSEE

CRA RATING FOR TENNESSEE: NEEDS TO IMPROVE

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

Major factors contributing to this rating include:

- The geographic distribution of loans reflects adequate penetration throughout the Tennessee AAs.
- The distribution of loans by borrower income reflects adequate penetration throughout the Tennessee AAs.
- The bank made a low level of CD loans in Tennessee.
- The bank made a poor level of qualified CD investments and grants that exhibit limited responsiveness to identified CD needs in Tennessee.
- Retail banking services were adequate throughout the Tennessee AAs.
- The bank provided a limited level of CD services in Tennessee.

SCOPE OF EXAMINATION

Scoping considerations, including time periods and products, applicable to the review of the Tennessee AAs are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section.

Commercial Bank has seven delineated AAs in Tennessee, and the state rating reflects a composite of performance in these AAs. A full-scope review was conducted for the Knoxville AA. The Knoxville AA was selected for a full-scope review based on the concentration of branches, loans, and deposit activity in this AA. The remaining six AAs were reviewed under limited-scope procedures: Claiborne County, Johnson City, Kingsport, Morristown, Newport, and Williamson-Rutherford Counties.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

As of December 31, 2023, the bank operates 17 branches in the state, representing 56.7 percent of its total branches. The bank holds \$933.5 million in deposits in Tennessee accounting for 80.3 percent of the bank's total deposits. During the review period, Commercial Bank reported a total of 532 HMDA-reportable and CRA small business loans in Tennessee, accounting for 66.8 percent of its total HMDA-reportable and CRA small business loans. Given the concentration of branches, deposits, and loans, performance in the state of Tennessee is weighted more heavily in deriving the overall institution rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

Overview

The Lending Test rating for the state of Tennessee is Low Satisfactory. The rating is derived from performance in each characteristic of the Lending Test applicable to the state, including Lending Activity (adequate); Geographic Distribution (adequate); Borrower Distribution (adequate); and CD Lending (low level). Highlights of each characteristic are found in the sections that follow, with additional descriptions and details within each AA of the state.

Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of Tennessee AAs. The total number and dollar volume of HMDA-reportable and CRA small business loans were considered in arriving at Lending Activity conclusions, as well as competitive factors and the bank’s deposit market share in the AA.

The following table displays the volume of lending activity from January 1, 2022 through December 31, 2023, by loan type. As shown, in Tennessee, the number and dollar volume of HMDA-reportable loans exceeded the number and dollar volume of small business loans. Therefore, HMDA-reportable lending performance was weighted more heavily in deriving the Lending Test rating for the state.

Statewide Summary of Lending Activity
Assessment Areas Located in: Tennessee
2022-2023

Loan Type	#	%	\$(000s)	%
HMDA Home Purchase	164	30.3%	45,409	30.7%
HMDA Refinance	84	15.5%	13,540	9.1%
HMDA Home Improvement	11	2.0%	691	0.5%
HMDA Multi-Family	9	1.7%	65,262	44.1%
HMDA Other Purpose LOC	0	0.0%	0	0.0%
HMDA Other Purpose Closed/Exempt	18	3.3%	2,152	1.5%
HMDA Loan Purpose NA	0	0.0%	0	0.0%
Total HMDA	286	52.9%	127,054	85.8%
Total Small Business	246	45.5%	20,803	14.0%
Total Farm	9	1.7%	245	0.2%
Total Loans	541	100%	148,102	100%

Originations & Purchases

Geographic and Borrower Distribution

The geographic distribution of HMDA-reportable and CRA small business loans reflects adequate dispersion throughout the AAs in Tennessee, and the distribution of loans by borrower income and revenue size of businesses is adequate. The analyses of HMDA-reportable and CRA small business lending within the full-scope AA are discussed in detail later in this report.

Community Development Lending

Commercial Bank made a low level of CD loans in Tennessee. During the review period, the bank originated four loans for \$5.6 million in the Tennessee AA. The largest CD loan for \$3.5 million provided financing to a CDFI for the redevelopment of a mobile home park in the Johnson City AA. More information on CD loans can be found in the full-scope AA section of this report.

INVESTMENT TEST

The Investment Test rating for Tennessee is Needs to Improve.

The bank made a poor level of qualified CD investments and grants in Tennessee, with approximately \$1.7 million in qualified investments and \$53,750 in qualified contributions directly benefiting its Tennessee AAs. Notably, the bank made one contribution for \$20,000 to support three foodbanks located within several AAs in Tennessee. More information on qualified investments and grants can be found in the full-scope AA section of this report.

SERVICE TEST

The Service Test rating for Tennessee is Low Satisfactory.

Retail Services

Delivery systems are reasonably accessible to its geographies and individuals of different income levels in Tennessee, and business hours and services do not vary in a way that inconveniences the AAs in the state. As of December 31, 2023, Commercial Bank operates 17 branches in Tennessee, of which one branch is in a low-income tract and seven branches are in moderate-income tracts, representing 47.1 percent of total branches in the state.

A full array of personal and business banking products and services is offered at all locations in Tennessee AAs. Branch hours are similar at all branches throughout the state and do not vary in a way that inconveniences individual assessment areas. Most branches offer drive-through hours beginning at 7:30 a.m. and lobby hours begin at 8 a.m. All full-service branch lobbies are open until 4 p.m. Monday through Thursday, with nearly all of those branch lobbies open until 6 p.m. on Friday. None of the branches in the state offer Saturday hours. Delivery systems include cash-service ATMs at nearly all of the branches.

During the review period, the bank closed one branch and opened one branch; both were in the Williamson/Rutherford counties AA. The changes in branch locations did not adversely affect the accessibility of delivery systems in the state.

Additional detail on retail services can be found in the full-scope AA section of this report.

Community Development Services

The bank provides a limited level of CD services in Tennessee. During the review period, the bank engaged in 13 CD service activities totaling 46 hours. Most of the CD service activities were financial education to LMI youth or seniors.

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

DESCRIPTION OF INSTITUTION’S OPERATIONS IN KNOXVILLE

Overview

The Knoxville AA includes Knox and Union counties, which are two of the nine counties in the Knoxville, Tennessee MSA. As of December 31, 2023, the bank operated six branches in the AA, representing 35.3 percent of the its total branches in the state of Tennessee. Of the bank’s branches in the AA, there are no branches in low-income tracts, one is located in a moderate-income tract, three are located in middle-income tracts and two are located in upper-income tracts. Within the state of Tennessee, 23.2 percent of the bank’s deposit volume and 31.6 percent of its HMDA-reportable and CRA small business loans by number are in the Knoxville AA.

Knoxville has a competitive banking market, with 30 financial institutions operating 134 branches in 2023. Commercial Bank ranked 11th in deposit market share at 1.3 percent of total deposits (\$216.6 million). First Horizon Bank had the largest deposit market share with 20.0 percent, followed by Truist Bank (17.2 percent), Pinnacle Bank (12.3 percent), and Home Federal Bank of Tennessee (10.5 percent).

For HMDA-reportable lending, Commercial Bank ranked 47th out of 523 reporters in 2022 with 0.4 percent of total HMDA-reportable loan originations and purchases, and 43rd out of 480 reporters in 2023 with 0.3 percent of total HMDA-reportable loan originations and purchases. Mortgage Investors Group Inc., ORNL Federal Credit Union, and Rocket Mortgage were the top HMDA reporters in the market. For CRA small business lending, Commercial Bank ranked 33rd out of 121 reporters in 2022 and 26th out of 109 reporters in 2023 with 0.2 percent of total CRA small business loans in each year. American Express and JP Mortgage Chase were the top CRA lenders in the market during the review period.

Assessment Area Population and Income Characteristics

The Knoxville AA had a population of 498,773 in 2020, which represents an increase of 7.6 percent since 2015. The rate of population growth in the AA outpaced the state of Tennessee at 6.3 percent during this same period.² The AA contains 126 census tracts: 12 low-income tracts (9.5 percent), 19 moderate-income tracts (15.1 percent), 46 middle-income tracts (36.5 percent), 45 upper-income tracts (35.7 percent), and 4 unknown-income tracts (3.2 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated 2022 and 2023 median family income for the Knoxville MSA. As the following table shows, the median family income increased from \$82,000 in 2022 to \$88,600 in 2023.

**Borrower Income Levels
Knoxville, TN MSA**

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2022	\$82,000	0 - \$40,999	\$41,000 - \$65,599	\$65,600 - \$98,399	\$98,400 - & above
2023	\$88,600	0 - \$44,299	\$44,300 - \$70,879	\$70,880 - \$106,319	\$106,320 - & above

² 2011-2015 U.S. Census Bureau American Community Survey; 2020 U.S. Census Bureau Decennial Census

There were 122,347 total families in the AA in 2023. Of these families, 19.8 percent were low-income, 16.4 percent were moderate-income, 20.0 percent were middle-income, and 43.8 percent were upper-income. In the AA, 8.9 percent of families had incomes below the poverty level. The majority of families living below the poverty line live in LMI tracts, which suggests additional lending challenges in these areas.

Housing Characteristics

According to 2023 FFIEC Census data, there are 217,098 total housing units in the AA, of which 59.4 percent are owner-occupied, 31.4 percent are rental units, and 9.3 percent are vacant. In low-income tracts, 23.9 percent of housing units are owner-occupied, which indicates that there could be fewer opportunities for home purchase lending in low-income tracts. It is also important to note that the housing stock in Knox County looks very different from the housing stock in Union County. While the percentage of units that are owner-occupied is similar in both counties, the percentage of vacant units is much higher in Union County (21.3 percent) compared to Knox County (8.7 percent). Additionally, nearly 30 percent of the housing units in Union County are mobile homes. These data points indicate that the two counties likely have different needs for HMDA-reportable lending and other types of housing assistance.

The median age of housing stock across the AA is 43 years, though the housing stock in low-income tracts is significantly older at 56 years, and the median age in moderate-income tracts is 48 years. The older age of homes in LMI tracts is an indicator of potential need for home improvement loans in these tracts.

The median housing value across the AA is \$190,796, which is higher than the state of Tennessee at \$177,600. Median gross rent in the AA is \$928 per month, which is higher than the median gross rent for Tennessee (\$897 per month). However, both the median housing price and median rents are significantly lower in Union County than in Knox County. The affordability ratio³ of the AA (30.8 percent) is similar to the affordability ratio for Tennessee (30.9 percent).

Housing cost burden is a concern in the AA, particularly for renters. In 2023, 40.7 percent of renters were housing cost-burdened, meaning that housing costs equaled 30 percent or more of household income. The issue was particularly acute for LMI renters. Across the AA, 69.7 percent of low-income renters and 41.0 percent of moderate-income renters were housing cost-burdened.⁴ This data indicates that there is need for more affordable rental housing for LMI individuals.

Economic Conditions

Knoxville is one of the faster growing areas in the state of Tennessee.⁵ The area is home to the University of Tennessee, which is also one of the largest employers. The area is known for its diverse range of industries, including advanced manufacturing, healthcare, and technology. Some of the largest employers in the region include the U.S. Department of Energy and Y-12 National Security Complex, followed by Covenant Health and the Knox County Schools.⁶ According to the Bureau of Labor Statistics during the first quarter of 2023, the largest industries in the AA by number of employees include healthcare (38,567), government (32,910), retail trade (31,889) and accommodations and food service (27,755).⁷

³ The housing affordability ratio is calculated by dividing the median household income by the median housing value. It represents the amount of single-family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

⁴ U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

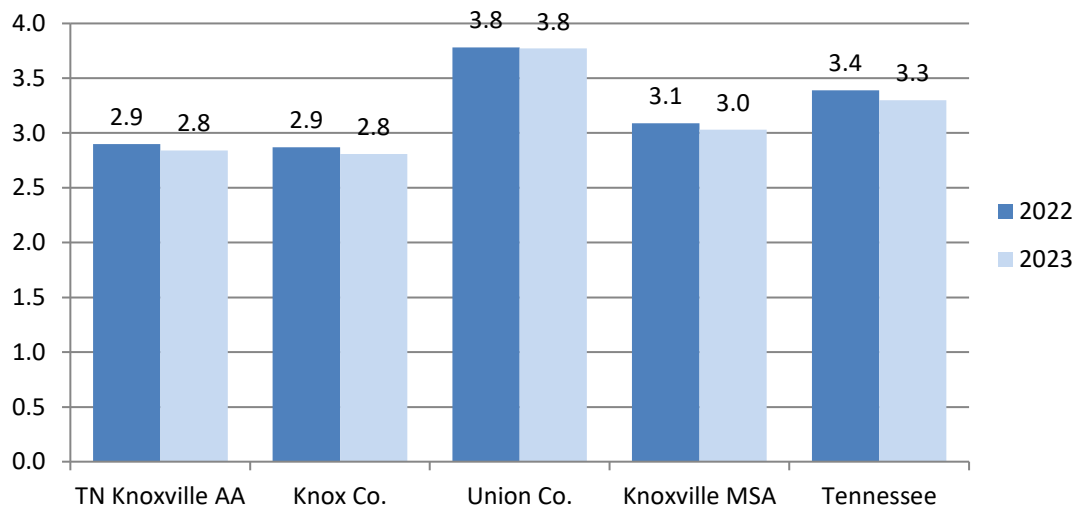
⁵ KnoxNews. "Did Knox County see largest population hike in Tennessee? No, but it's high on the list." May 1, 2024. Accessed 9 August 2024. <https://www.knoxnews.com/story/news/local/2024/05/01/knox-county-is-one-of-the-fastest-growing-counties-in-tennessee/73515406007/>

⁶ Knoxville Chamber "Fact Sheets." 9 Aug. 2024, <https://www.knoxvillechamber.com/economic-development/data-library/>

⁷ Source: Bureau of Labor Statistics (BLS), Quarterly Census of Employment and Wages

The following table shows the unemployment rate for the Knoxville AA, the Knoxville MSA, and the state of Tennessee. As shown, the unemployment rate for the AA was below the unemployment rate for the state of Tennessee in both 2022 and 2023. Within the AA, however, the unemployment rate was higher in Union County than in Knox County, and above the unemployment rate for the state.

Unemployment Rates - TN Knoxville



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

Credit and Community Development Needs

As part of the CRA examination, information was obtained from two community contacts, including an individual engaged in revitalization and affordable housing efforts throughout the Knoxville MSA. The contact noted that Knoxville and Knox County are experiencing significant growth. The county surpassed the half-million population mark in 2023. To accommodate this influx, the City of Knoxville is undertaking a \$20 million revitalization project in the Western Heights neighborhood, to help catalyze additional investment in this area. The contact stated that there are numerous affordable housing projects underway in Knoxville, and the city has allocated \$40 million towards affordable housing development since 2020. This initiative has led to the construction or ongoing development of over 2,300 affordable housing units. However, a significant number of residents are struggling financially, as nearly half of all rental households in Knoxville spend over 30 percent of their income on rent. Competition in the housing market has intensified, with households making under \$20,000 competing against those with incomes exceeding \$50,000 for limited housing options.

Affordable housing has become the primary CD need in the Knoxville area, as home prices have significantly increased since the Covid-19 pandemic. Challenges facing affordable housing developments include high material and labor costs, a shortage of available and affordable lots for development and the process of obtaining building permits. The contact expressed concerns about banks not offering suitable programs or products for LMI consumers. The contact suggested that banks could be more responsive by understanding the specific needs of the community and creating tailored products and programs to address these needs. One specific opportunity mentioned by the contact was homebuyer assistance programs.

The majority of banks in the area, such as Regions, Pinnacle, and Southeast, were said to meet community needs effectively. However, there is a large bank in the Knoxville area that doesn't adequately address the community's development needs, though the contact did not disclose their identity.

A second community contact focused on economic development in the Knoxville region. The contact confirmed the rapid growth in Knoxville, and the impact that growth is having on the community. The contact indicated that access to capital for entrepreneurs was a key need in the area, particularly for entrepreneurs looking to start businesses who need loans between \$5,000 and \$50,000. To help address this need, several banks have partnered with a regional CDFI to capitalize a loan fund for minority, women, and veteran-owned businesses and the contact noted that there is always a need for more banks to participate in these funds.

This contact also discussed several redevelopment areas throughout Knoxville, and the need for more workforce housing. New affordable housing is particularly important to support efforts to attract new jobs, and there are many opportunities for banks to engage in providing support for affordable housing programs.

Assessment Area Demographics

The following tables provide 2023 demographic data and business information from the FFIEC and D&B respectively that are used to analyze the bank's CRA performance. Certain components of the data in the table are discussed throughout this report as they apply to specific parts of the analysis.

Combined Demographics Report

Assessment Area: TN Knoxville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	9.5%	7,531	6.2%	3,006	39.9%	24,172	19.8%
Moderate-income	19	15.1%	16,538	13.5%	2,362	14.3%	20,074	16.4%
Middle-income	46	36.5%	48,037	39.3%	3,968	8.3%	24,482	20.0%
Upper-income	45	35.7%	50,102	41.0%	1,509	3.0%	53,619	43.8%
Unknown-income	4	3.2%	139	0.1%	19	13.7%	0	0.0%
Total Assessment Area	126	100.0%	122,347	100.0%	10,864	8.9%	122,347	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	19,057	4,556	3.5%	23.9%	11,422	59.9%	3,079	16.2%
Moderate-income	33,175	17,860	13.9%	53.8%	12,076	36.4%	3,239	9.8%
Middle-income	83,553	51,283	39.8%	61.4%	24,403	29.2%	7,867	9.4%
Upper-income	78,993	55,154	42.8%	69.8%	18,249	23.1%	5,590	7.1%
Unknown-income	2,320	40	0.0%	1.7%	1,956	84.3%	324	14.0%
Total Assessment Area	217,098	128,893	100.0%	59.4%	68,106	31.4%	20,099	9.3%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,148	5.9%	988	5.6%	155	8.6%	5	4.0%
Moderate-income	2,185	11.2%	1,932	11.0%	237	13.1%	16	12.8%
Middle-income	6,239	31.9%	5,699	32.4%	508	28.2%	32	25.6%
Upper-income	9,716	49.7%	8,776	49.9%	871	48.3%	69	55.2%
Unknown-income	242	1.2%	207	1.2%	32	1.8%	3	2.4%
Total Assessment Area	19,530	100.0%	17,602	100.0%	1,803	100.0%	125	100.0%
Percentage of Total Businesses:			90.1%		9.2%		0.6%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8	4.4%	8	4.7%	0	0.0%	0	0.0%
Moderate-income	19	10.6%	15	8.8%	1	33.3%	3	50.0%
Middle-income	77	42.8%	74	43.3%	0	0.0%	3	50.0%
Upper-income	74	41.1%	73	42.7%	1	33.3%	0	0.0%
Unknown-income	2	1.1%	1	0.6%	1	33.3%	0	0.0%
Total Assessment Area	180	100.0%	171	100.0%	3	100.0%	6	100.0%
Percentage of Total Farms:			95.0%		1.7%		3.3%	

Based on 2023 FFIEC Census Data and 2023 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Lending levels reflect adequate responsiveness to credit needs of the AA. The geographic distribution of loans reflects adequate penetration throughout the AA, and the distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. The bank made a low level of CD loans in the AA.

The analysis included 122 HMDA-reportable loans and 46 CRA small business loans reported by the bank in the AA during the review period. Given the higher volume of HMDA-reportable loans, HMDA-reportable lending performance was weighted more heavily when determining conclusions. Additionally, as shown in the tables in the subsequent sections, during the review period, the bank originated or purchased 76 home purchase loans, 34 home refinance loans, and 5 home improvement loans in the Knoxville AA. Thus, when considering HMDA-reportable loan categories, home purchase and home refinance loans were the primary drivers of the overall performance conclusions for HMDA-reportable lending.

Lending Activity

Lending activity is considered adequate. Overall, 26.4 percent of HMDA-reportable loans and 13.8 percent of CRA small business loans were made in the Knoxville AA.

Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA-reportable and CRA small business lending was compared to demographic information and available aggregate performance. Performance context issues were taken into consideration as well. Based on these factors, the bank's geographic distribution of loans reflects adequate dispersion throughout the AA and does not reveal any conspicuous lending gaps.

Residential Real Estate (HMDA) Lending

Overall, the bank's HMDA-reportable lending reflects good geographic distribution when compared to AA demographics and aggregate lending. The tables and performance context discussed in this section provide details supporting this conclusion.

The following table shows the geographic distribution of the bank's HMDA-reportable loans for the 2022 and 2023 review period in its AA. The tables also include a comparison of HMDA-reportable lending to the FFIEC Census and ACS demographic data as well as the aggregate of HMDA lenders within the AA. The HMDA aggregate lenders' data are the combined total of lending activity reported by all lenders subject to the HMDA in the AA.

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
HOME PURCHASE	Low	5	6.6%	856	3.3%	3.5%	3	5.9%	4.7%	509	2.9%	2.7%	2	8.0%	347	4.3%
	Moderate	16	21.1%	3,285	12.8%	13.9%	11	21.6%	14.3%	1,993	11.3%	10.4%	5	20.0%	1,292	16.0%
	Middle	37	48.7%	14,323	55.7%	39.8%	24	47.1%	39.3%	9,689	54.9%	33.9%	13	52.0%	4,634	57.5%
	Upper	18	23.7%	7,245	28.2%	42.8%	13	25.5%	41.5%	5,457	30.9%	52.9%	5	20.0%	1,788	22.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0	0.0%
	Total	76	100%	25,709	100%	100.0%	51	100%	100%	17,648	100%	100%	25	100%	8,061	100%
REFINANCE	Low	2	5.9%	332	5.9%	3.5%	2	8.3%	3.8%	332	7.4%	2.5%	0	0.0%	0	0.0%
	Moderate	7	20.6%	1,159	20.5%	13.9%	6	25.0%	12.5%	1,102	24.5%	9.4%	1	10.0%	57	5.0%
	Middle	18	52.9%	2,544	45.0%	39.8%	12	50.0%	42.3%	2,086	46.4%	36.0%	6	60.0%	458	39.8%
	Upper	7	20.6%	1,614	28.6%	42.8%	4	16.7%	41.3%	979	21.8%	51.9%	3	30.0%	635	55.2%
	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%
	Total	34	100%	5,649	100%	100.0%	24	100%	100%	4,499	100%	100%	10	100%	1,150	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	3.0%	0	0.0%	4.2%	0	0.0%	0	0.0%
	Moderate	2	40.0%	177	53.5%	13.9%	1	100.0%	10.6%	85	100.0%	7.5%	1	25.0%	92	37.4%
	Middle	2	40.0%	119	36.0%	39.8%	0	0.0%	34.1%	0	0.0%	27.8%	2	50.0%	119	48.4%
	Upper	1	20.0%	35	10.6%	42.8%	0	0.0%	52.4%	0	0.0%	60.5%	1	25.0%	35	14.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Total	5	100%	331	100%	100.0%	1	100%	100%	85	100%	100%	4	100%	246	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	19.5%	0	0.0%	25.2%	0	0.0%	21.0%	0	0.0%	0	0.0%
	Moderate	1	20.0%	96	0.2%	14.5%	0	0.0%	13.5%	0	0.0%	6.1%	1	50.0%	96	0.2%
	Middle	0	0.0%	0	0.0%	29.3%	0	0.0%	27.9%	0	0.0%	27.0%	0	0.0%	0	0.0%
	Upper	1	20.0%	48,000	99.8%	31.7%	0	0.0%	32.4%	0	0.0%	45.7%	1	50.0%	48,000	99.8%
	Unknown	0	0.0%	0	0.0%	5.0%	0	0.0%	0.9%	0	0.0%	0.2%	0	0.0%	0	0.0%
	Total	2	40%	48,096	100%	100.0%	0	0.0%	100%	0	0.0%	100%	2	100%	48,096	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	1.1%	0	0.0%	0.4%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	13.9%	0	0.0%	8.7%	0	0.0%	5.5%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	39.8%	0	0.0%	33.4%	0	0.0%	26.0%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	42.8%	0	0.0%	56.6%	0	0.0%	67.8%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.2%	0	0.0%	0.3%	0	0.0%	0	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	%	Agg %	Bank #	%	Dollar \$ (000s)	%	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	3.8%	0	0.0%	2.8%	0	0.0%	0	0.0%
	Moderate	1	20.0%	154	22.6%	13.9%	0	0.0%	10.7%	0	0.0%	6.9%	1	20.0%	154	22.6%
	Middle	2	40.0%	415	61.0%	39.8%	0	0.0%	36.0%	0	0.0%	24.4%	2	40.0%	415	61.0%
	Upper	2	40.0%	111	16.3%	42.8%	0	0.0%	49.0%	0	0.0%	62.6%	2	40.0%	111	16.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.5%	0	0.0%	3.2%	0	0.0%	0	0.0%
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>680</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>680</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	7.3%	0	0.0%	5.5%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	13.9%	0	0.0%	13.8%	0	0.0%	11.4%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	39.8%	0	0.0%	46.8%	0	0.0%	49.4%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	42.8%	0	0.0%	32.1%	0	0.0%	33.7%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	7	5.7%	1,188	1.5%	3.5%	5	6.6%	4.2%	841	3.8%	5.4%	2	4.3%	347	0.6%
	Moderate	27	22.1%	4,871	6.1%	13.9%	18	23.7%	13.0%	3,180	14.3%	9.3%	9	19.6%	1,691	2.9%
	Middle	59	48.4%	17,401	21.6%	39.8%	36	47.4%	39.2%	11,775	53.0%	32.9%	23	50.0%	5,626	9.7%
	Upper	29	23.8%	57,005	70.8%	42.8%	17	22.4%	43.4%	6,436	28.9%	52.3%	12	26.1%	50,569	86.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.2%	0	0.0%	0.2%	0	0.0%	0	0.0%
	<i>Total</i>	<i>122</i>	<i>100%</i>	<i>80,465</i>	<i>100%</i>	<i>100.0%</i>	<i>76</i>	<i>100%</i>	<i>100%</i>	<i>22,232</i>	<i>100%</i>	<i>100%</i>	<i>46</i>	<i>100%</i>	<i>58,233</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Home Purchase Loans

Home purchase lending in low-income tracts is excellent. In 2022 and 2023, the bank made 6.6 percent of its home purchase loans in low-income tracts, which was greater than the percentage of owner-occupied units in these tracts (3.5 percent). In 2022, the percentage of home purchase lending in low-income tracts (5.9 percent) exceeded aggregate performance (4.7 percent).

Home purchase lending in moderate-income tracts is also excellent. In 2022 and 2023, the bank made 21.1 percent of its home purchase loans in moderate-income tracts, which is greater than the percentage of owner-occupied units in these tracts (13.9 percent). Additionally, in 2022 home purchase lending in moderate-income tracts (21.6 percent) exceeded aggregate lending in moderate-income tracts (14.3 percent).

Home Refinance Loans

Home refinance lending in low-income tracts is good. The bank made just two home refinance loans in low-income tracts during the review period, and the loans were made in 2022. The percentage of loans in low-income tracts (5.9 percent) exceeds the percentage of owner-occupied units in these tracts (3.5 percent). Additionally, lending exceeded aggregate performance in 2022.

Home refinance lending in moderate-income tracts is excellent. In 2022 and 2023, the bank made 20.6 percent of its home refinance loans in moderate-income tracts, which is greater than the percentage of owner-occupied units in these tracts (13.9 percent). In 2022, refinance lending in moderate-income tract (25 percent) was greater than aggregate lending in moderate-income tracts (12.5 percent).

Home Improvement Loans

The bank made only five home improvement loans during the review period and four of these loans were made in 2023. Due to the limited number of loans in this product line, a meaningful analysis of performance could not be completed.

Small Business Lending

The geographic distribution of the bank’s CRA small business lending reflects poor penetration throughout the AA. The following table shows the geographic distribution of CRA small business loans within the AA for the 2022 and 2023 review period. It also includes a comparison of the bank’s lending to D&B data and aggregate lenders within the AA. The CRA aggregate lending data are the combined total of lending reported by all lenders subject to CRA loan data reporting requirements in the AA.

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank		Dollar		Total Businesses	Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ 000s	\$ %	Agg %	#	%	\$ 000s
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	5.9%	0	0.0%	4.6%	0	0.0%	4.6%	0	0.0%	0	0.0%
	Moderate	3	6.5%	98	2.2%	11.2%	2	9.1%	12.2%	68	2.9%	13.1%	1	4.2%	30	1.4%
	Middle	12	26.1%	635	14.2%	31.9%	8	36.4%	30.8%	489	21.1%	26.8%	4	16.7%	146	6.8%
	Upper	31	67.4%	3,729	83.6%	49.7%	12	54.5%	51.6%	1,764	76.0%	54.6%	19	79.2%	1,965	91.8%
	Unknown	0	0.0%	0	0.0%	1.2%	0	0.0%	0.4%	0	0.0%	0.8%	0	0.0%	0	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.4%	0	0.0%	0.1%	0	0.0%	0	0.0%
	Total	46	100%	4,462	100%	100.0%	22	100%	100%	2,321	100%	100%	24	100%	2,141	100%

Small business lending in low-income tracts is very poor. The bank made no CRA small business loans in low-income tracts during the review period, yet 5.9 percent of small businesses are in low-income tracts, and 4.6 percent of aggregate lending was in low-income tracts. The performance of aggregate lenders indicates that opportunity exists to lend to businesses located in low-income tracts.

Small business lending in moderate-income tracts is poor. The bank made three small business loans in moderate-income tracts during the review period, which represents 6.5 percent of the bank’s total CRA small business lending during the review period. In comparison, 11.2 percent of total businesses are located in moderate-income tracts. In 2022, 9.1 percent of the banks small business loans were in moderate-income tracts compared to 12.2 percent of aggregate lending.

No conspicuous lending gaps were identified based on an analysis of the dispersion of the loan products reviewed. While the bank did not have lending activity in all AA census tracts, maps did not indicate an absence of loans across LMI tracts, particularly when taking into consideration the location of the bank’s branches in more rural and suburban areas, and therefore further away from the majority of LMI tracts in the AA.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

For this analysis, the distribution of HMDA-reportable lending across borrower income levels and CRA small business lending across business revenue sizes was compared to available demographic information and aggregate performance. Performance context issues were also considered. Considering these factors, the overall

distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different sizes in the AA.

Residential Real Estate (HMDA) Lending

Overall, the bank's HMDA-reportable lending reflects adequate penetration among borrowers of different income levels when compared to AA demographics, aggregate lending, and considering performance context. The following table shows the distribution of the bank's HMDA-reportable loans by the income level of the borrower along with demographics and aggregate information.

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar	
		Count	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %
HOME PURCHASE	Low	4	5.3%	390	1.5%	19.8%	2	3.9%	5.5%	325	1.8%	2.6%	2	8.0%	65	0.8%
	Moderate	10	13.2%	1,990	7.7%	16.4%	8	15.7%	17.6%	1,452	8.2%	12.1%	2	8.0%	538	6.7%
	Middle	17	22.4%	3,982	15.5%	20.0%	13	25.5%	20.7%	3,140	17.8%	18.0%	4	16.0%	842	10.4%
	Upper	33	43.4%	15,729	61.2%	43.8%	23	45.1%	39.3%	11,257	63.8%	51.8%	10	40.0%	4,472	55.5%
	Unknown	12	15.8%	3,618	14.1%	0.0%	5	9.8%	16.9%	1,474	8.4%	15.5%	7	28.0%	2,144	26.6%
	<i>Total</i>	<i>76</i>	<i>100%</i>	<i>25,709</i>	<i>100%</i>	<i>100.0%</i>	<i>51</i>	<i>100%</i>	<i>100%</i>	<i>17,648</i>	<i>100%</i>	<i>100%</i>	<i>25</i>	<i>100%</i>	<i>8,061</i>	<i>100%</i>
REFINANCE	Low	3	8.8%	114	2.0%	19.8%	0	0.0%	11.2%	0	0.0%	6.5%	3	30.0%	114	9.9%
	Moderate	6	17.6%	1,050	18.6%	16.4%	6	25.0%	21.4%	1,050	23.3%	16.4%	0	0.0%	0	0.0%
	Middle	5	14.7%	800	14.2%	20.0%	3	12.5%	21.8%	676	15.0%	20.0%	2	20.0%	124	10.8%
	Upper	14	41.2%	2,752	48.7%	43.8%	11	45.8%	31.8%	2,117	47.1%	42.8%	3	30.0%	635	55.2%
	Unknown	6	17.6%	933	16.5%	0.0%	4	16.7%	13.7%	656	14.6%	14.3%	2	20.0%	277	24.1%
	<i>Total</i>	<i>34</i>	<i>100%</i>	<i>5,649</i>	<i>100%</i>	<i>100.0%</i>	<i>24</i>	<i>100%</i>	<i>100%</i>	<i>4,499</i>	<i>100%</i>	<i>100%</i>	<i>10</i>	<i>100%</i>	<i>1,150</i>	<i>100%</i>
HOME IMPROVEMENT	Low	1	20.0%	92	27.8%	19.8%	0	0.0%	8.0%	0	0.0%	4.9%	1	25.0%	92	37.4%
	Moderate	2	40.0%	137	41.4%	16.4%	1	100.0%	15.0%	85	100.0%	10.6%	1	25.0%	52	21.1%
	Middle	1	20.0%	67	20.2%	20.0%	0	0.0%	20.5%	0	0.0%	16.0%	1	25.0%	67	27.2%
	Upper	1	20.0%	35	10.6%	43.8%	0	0.0%	53.3%	0	0.0%	65.0%	1	25.0%	35	14.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.3%	0	0.0%	3.5%	0	0.0%	0	0.0%
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>331</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>85</i>	<i>100%</i>	<i>100%</i>	<i>4</i>	<i>100%</i>	<i>246</i>	<i>100%</i>
MULTI FAMILY	Low	0	0.0%	0	0.0%	19.8%	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%	0.9%	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%
	Upper	0	0.0%	0	0.0%	43.8%	0	0.0%	5.4%	0	0.0%	0.8%	0	0.0%	0	0.0%
	Unknown	2	100.0%	48,096	100.0%	0.0%	0	0.0%	93.7%	0	0.0%	99.2%	2	100.0%	48,096	100.0%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>48,096</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>48,096</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	19.8%	0	0.0%	6.5%	0	0.0%	4.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	16.4%	0	0.0%	15.8%	0	0.0%	9.2%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.0%	0	0.0%	20.0%	0	0.0%	13.6%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	43.8%	0	0.0%	53.9%	0	0.0%	70.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.8%	0	0.0%	3.2%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022				2023					
		Bank		Families by Family Income		Count	Dollar		Count	Dollar		Count	Dollar			
		Count	Dollar	%	%		Bank	Agg		Bank	Agg		Bank	Bank		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	3	60.0%	271	39.9%	19.8%	0	0.0%	9.6%	0	0.0%	5.0%	3	60.0%	271	39.9%
	Moderate	2	40.0%	409	60.1%	16.4%	0	0.0%	12.4%	0	0.0%	6.9%	2	40.0%	409	60.1%
	Middle	0	0.0%	0	0.0%	20.0%	0	0.0%	21.8%	0	0.0%	15.4%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	43.8%	0	0.0%	49.7%	0	0.0%	65.7%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	6.3%	0	0.0%	7.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>680</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>680</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	19.8%	0	0.0%	1.8%	0	0.0%	0.8%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	16.4%	0	0.0%	0.9%	0	0.0%	1.3%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.0%	0	0.0%	0.9%	0	0.0%	1.4%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	43.8%	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%	96.3%	0	0.0%	96.5%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	11	9.0%	867	1.1%	19.8%	2	2.6%	7.5%	325	1.5%	3.2%	9	19.6%	542	0.9%
	Moderate	20	16.4%	3,586	4.5%	16.4%	15	19.7%	18.1%	2,587	11.6%	11.1%	5	10.9%	999	1.7%
	Middle	23	18.9%	4,849	6.0%	20.0%	16	21.1%	20.8%	3,816	17.2%	15.6%	7	15.2%	1,033	1.8%
	Upper	48	39.3%	18,516	23.0%	43.8%	34	44.7%	39.1%	13,374	60.2%	43.3%	14	30.4%	5,142	8.8%
	Unknown	20	16.4%	52,647	65.4%	0.0%	9	11.8%	14.5%	2,130	9.6%	26.8%	11	23.9%	50,517	86.7%
	<i>Total</i>	<i>122</i>	<i>100%</i>	<i>80,465</i>	<i>100%</i>	<i>100.0%</i>	<i>76</i>	<i>100%</i>	<i>100%</i>	<i>22,232</i>	<i>100%</i>	<i>100%</i>	<i>46</i>	<i>100%</i>	<i>58,233</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Home Purchase Loans

Home purchase lending to low-income borrowers is poor. During the review period, the bank made 5.3 percent of its home purchase loans to low-income borrowers, which was below the percentage of low-income families in the AA at 19.8 percent. Additionally, lending to low-income borrowers (3.9 percent) was below aggregate lending (5.5 percent) in 2022.

Home purchase lending to moderate-income borrowers is adequate. During the review period, the bank made 13.2 percent of its home purchase loans to moderate-income borrowers, which was below the percentage of moderate-income families in the AA at 16.4 percent. Lending to low-income borrowers (15.7 percent) was below aggregate lending to moderate-income borrowers at 17.6 percent in 2022.

Home Refinance Loans

Home refinance lending to low-income borrowers is poor. During the review period, the bank made 8.8 percent of its home refinance loans to low-income borrowers, which was below the percentage of low-income families in the AA (19.8 percent). The bank made no refinance loans to low-income borrowers in 2022, while 11.2 percent of aggregate loans were made to low-income borrowers, which indicates that demand is present. In 2023, the bank made three loans to low-income borrowers, which represented 30 percent of total refinance loans; however, aggregate lending data is not available for comparison.

Home refinance lending to moderate-income borrowers is adequate. During the review period, 17.6 percent of refinance loans were made to moderate-income borrowers, which exceeds the percentage of moderate-income

families at 16.4 percent. In 2022, 25 percent of the bank’s loans were to moderate-income borrowers, which exceeded aggregate performance at 21.4 percent. However, the bank made no refinance loans to moderate-income borrowers in 2023.

Home Improvement Loans

The bank made only five home improvement loans during the review period and four of those loans were made in 2023. Due to the limited number of loans in this product line, a meaningful analysis of performance could not be completed.

Small Business Lending

Small business lending to businesses of different sizes is adequate. As shown in the table below, the bank made 41.3 percent of its CRA small business loans to businesses with revenues of \$1 million or less during the review, which is below the percentage of total businesses with revenues of \$1 million or less (90.1 percent). In 2022, the bank’s lending to businesses with gross annual review of \$1 million or less (63.6 percent) exceeded aggregate performance (46.9 percent). Aggregate lending data was not available for 2023.

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: TN Knoxville

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022				2023						
		Bank		Dollar		Total Businesses	Count		Dollar		Count		Dollar				
		Count	%	\$ (000s)	\$ %		%	#	%	%	\$ 000s	\$ %	%	#	%	\$ 000s	\$ %
SMALL BUSINESS	Revenue	\$1 Million or Less	19	41.3%	1,916	42.9%	90.1%	14	63.6%	46.9%	1,647	71.0%	33.2%	5	20.8%	269	12.6%
		Over \$1 Million	22	47.8%	1,796	40.3%	9.2%	7	31.8%		574	24.7%		15	62.5%	1,222	57.1%
		Total Rev. available	41	89.1%	3,712	83.2%	99.4%	21	95.5%		2,221	95.7%		20	83.3%	1,491	69.6%
		Rev. Not Known	5	10.9%	750	16.8%	0.6%	1	4.5%		100	4.3%		4	16.7%	650	30.4%
		Total	46	100%	4,462	100%	100%	22	100%		2,321	100%		24	100%	2,141	100%
	Loan Size	\$100,000 or Less	35	76.1%	1,804	40.4%		15	68.2%	89.4%	778	33.5%	28.6%	20	83.3%	1,026	47.9%
		\$100,001 - \$250,000	7	15.2%	1,058	23.7%		5	22.7%	5.5%	743	32.0%	17.9%	2	8.3%	315	14.7%
		\$250,001 - \$1 Million	4	8.7%	1,600	35.9%		2	9.1%	5.1%	800	34.5%	53.5%	2	8.3%	800	37.4%
		Total	46	100%	4,462	100%		22	100%	100%	2,321	100%	100%	24	100%	2,141	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	14	73.7%	609	31.8%		10	71.4%		505	30.7%		4	80.0%	104	38.7%
		\$100,001 - \$250,000	3	15.8%	507	26.5%		2	14.3%		342	20.8%		1	20.0%	165	61.3%
		\$250,001 - \$1 Million	2	10.5%	800	41.8%		2	14.3%		800	48.6%		0	0.0%	0	0.0%
		Total	19	100%	1,916	100%		14	100%		1,647	100%		5	100%	269	100%

Community Development Lending

The bank made a low level of CD loans. During the review period, the bank originated one CD loan totaling \$2.0 million in the Knoxville AA. This loan was to an organization that aims to prevent crime in senior living facilities that primarily house LMI seniors and to provide education to staff on financial exploitation of the elderly. The bank’s CD lending performance is below the performance of other similar banks in the AA.

INVESTMENT TEST

The bank made a poor level of qualified CD investments totaling \$16,000. All of the investments during the review period were grants. The bank provided a \$2,500 grant to a nonprofit that supports affordable housing for LMI individuals and a grant for \$10,000 to an organization working to break the cycle of homelessness. The remaining grants provided college scholarships to students at schools where the majority of students receive free or reduced-price lunch.

SERVICE TEST

As described below, retail banking services are adequate and the bank provides a limited level of CD services in the AA.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to portions of the bank’s geographies and individuals of different income levels throughout the Knoxville AA. In deriving this conclusion, the distribution of branches by census tract income level was compared to the distribution of households and businesses among the tract categories in the AA. As the following tables show, the bank operated six branches in the AA. The bank had no branches in low-income tracts, where 8.1 percent of households and 5.9 percent of businesses are located. The bank had one branch in a moderate-income tract (16.7 percent of total branches) which exceeded the percentage of households (15.2 percent) and businesses (11.2 percent) located in these tracts. However, the one branch in a moderate-income tract is located in Union County, while the majority of the LMI tracts in the AA are in Knox County, which limits the accessibility of this branch to LMI geographies and individuals in the AA.

The bank did not close any branches during the review period and closed one cash-only ATM in an upper-income tract. The closure of this ATM generally did not adversely affect the bank’s delivery systems in the Knoxville AA. The bank offers weekday lobby and drive-through hours of operation that are similar across the branches, with all branch lobbies opening at 8 a.m. and drive-throughs opening at 7:30 a.m. The bank offers extended hours until 6 p.m. at all branches on Friday but no branches in the AA offer Saturday hours. The bank offers the same suite of products and services throughout the AA. Thus, services do not vary in a way that inconveniences the assessment area, particularly LMI geographies or individuals.

The table below shows the distribution of branches and ATMs along with households and businesses by tract category.

Geographic Distribution of Branches & ATMS
Assessment Area: TN Knoxville

Tract Category	Branches							ATMS								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	Open	Closed	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	12	9.5%	8.1%	5.9%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Moderate	1	16.7%	0	0	1	1	0	Total	1	14.3%	0	0.0%	0	0	1	14.3%	0	0	19	15.1%	15.2%	11.2%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Middle	3	50.0%	0	0	3	3	0	Total	4	57.1%	0	0.0%	0	0	4	57.1%	0	0	46	36.5%	38.4%	31.9%
DTO	0		0	0	0			SA	1		0		0	0	1		0	0				
Upper	2	33.3%	0	0	2	2	0	Total	2	28.6%	0	0.0%	0	0	2	28.6%	0	1	45	35.7%	37.3%	49.7%
DTO	0		0	0	0			SA	0		0		0	0	0		0	1				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	3.2%	1.0%	1.2%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	6	100%	0	0	6	6	0	Total	7	100%	0	0.0%	0	0	7	100%	0	1	126	100%	100%	100%
DTO	0		0	0	0			SA	1		0		0	0	1		0	1				

Based on 2023 FFIEC Census Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMS

Community Development Services

The bank provides a limited level of CD services in the AA. During the review period, bank employees provided two CD service activities totaling six hours. The two activities were focused on elder abuse and were targeted to LMI seniors.

**METROPOLITAN AREA(S)
LIMITED-SCOPE REVIEW**

The following AAs were reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution's CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review revealed the bank's CRA performance in these AAs is generally consistent with the areas that received a full-scope review. Please refer to the tables in Appendices C and D for additional information regarding these assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE METROPOLITAN ASSESSMENT AREAS

Johnson City AA (Washington County):

- As of December 31, 2023, Commercial Bank operated one branch in the AA, representing 5.9 percent of its branches in Tennessee.
- As of December 31, 2023, the bank had \$3.9 million in deposits in the AA, representing 0.4 percent of total deposits in Tennessee.

Kingsport AA (Sullivan County):

- As of December 31, 2023, Commercial Bank operated one branch in the AA, representing 5.9 percent of its branches in Tennessee.
- As of December 31, 2023, the bank had \$23.5 million in deposits in the AA, representing 2.5 percent of total deposits in Tennessee.

Morristown AA (Hamblen County):

- As of December 31, 2023, Commercial Bank operated two branches in the AA, representing 11.8 percent of its branches in Tennessee.
- As of December 31, 2023, the bank had \$53.2 million in deposits in the AA, representing 5.7 percent of total deposits in Tennessee.

Williamson-Rutherford Counties AA (Williamson County and 11 tracts in Rutherford County):

- As of December 31, 2023, Commercial Bank operated one branch in the AA representing 5.9 percent of its branches in Tennessee.
- As of December 31, 2023, the bank had \$24.0 million in deposits in the AA, representing 2.6 percent of total deposits in Tennessee.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Through the use of available facts and data, including performance and demographic information, performance in each AA was evaluated, and compared with the bank's overall performance in the state. The conclusions regarding performance are provided in the tables below.

Performance in the Limited-Scope Review Metropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Johnson City	Consistent	Consistent	Consistent
Kingsport	Not Consistent (below)	Consistent	Consistent
Morristown	Not Consistent (below)	Not Consistent (above)	Consistent
Williamson-Rutherford counties	Not Consistent (below)	Not Consistent (below)	Consistent

The performance standards of the Lending Test for limited-scope MSA areas included the geographic distribution of loans, the borrower distribution of loans, and CD loans. For the geographic distribution of loans, performance was adequate in the Morristown AA and poor in the remaining MSA AA. Borrower distribution was adequate in the Johnson City and Morristown AA and poor in Kingsport and Williamson-Rutherford counties. The bank had a good level of CD loans in the Johnson City AA (\$3.5 million) but few, if any CD loans in the remaining AA.

Qualifying amounts and conclusions for the bank’s investment and grant activity in limited-scope MSA areas were as follows: \$7,000 in Johnson City (poor); \$1,000 in Kingsport (poor); \$245,100 in Morristown (adequate); and no investments or grants in Williamson-Rutherford counties (very poor).

The performance standards of the Service Test for limited-scope MSA areas included retail banking and CD services. Retail banking services were good in the Johnson City, Kingsport, and Morristown AAs and poor in the Williamson-Rutherford counties AA. Qualifying hours and conclusions for CD services were as follows: 1 hour in Kingsport (limited level) and 3 hours in Morristown (limited level). The bank had no qualified CD service activities in Johnson City or Williamson-Rutherford counties.

**NONMETROPOLITAN STATEWIDE AREA(S)
LIMITED-SCOPE REVIEW**

The following AAs were reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution’s CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review revealed the bank’s CRA performance in these AAs is generally consistent with the areas that received a full-scope review. Please refer to the tables in Appendices C and D for additional information regarding these AAs.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN TENNESSEE NON-METROPOLITAN ASSESSMENT AREAS

Claiborne AA (Claiborne County):

- As of December 31, 2023, Commercial Bank operated four branches in the AA, representing 23.5 percent of its branches in Tennessee.
- As of December 31, 2023, the bank had \$437.5 million in deposits in the AA, representing 46.9 percent of total deposits in Tennessee.

Newport AA (Cocke County):

- As of December 31, 2023, Commercial Bank operated two branches in the AA, representing 11.8 percent of its branches in Tennessee.
- As of December 31, 2023, the bank had \$174.7 million in deposits in the AA, representing 18.7 percent of total deposits in Tennessee.

CONCLUSION(S) WITH RESPECT TO PERFORMANCE TESTS

Through the use of available facts and data, including performance and demographic information, performance in each AA was evaluated, and compared with the bank’s overall performance in the state. The conclusions regarding performance are providing in the tables below.

Performance in the Limited-Scope Review Metropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Claiborne	Consistent	Not Consistent (above)	Consistent
Newport	Not Consistent (below)	Consistent	Consistent

The performance standards of the Lending Test for limited-scope non-MSA areas included the geographic distribution of loans, the borrower distribution of loans, and CD loans. For the geographic distribution of loans, performance was good in Claiborne and adequate in Newport. Borrower distribution was also good in the Claiborne AA and adequate in the Newport AA. The bank had a low level of CD loans in the Claiborne AA (\$57,000) and no CD loans in Newport.

The bank made an adequate level of investments in the Claiborne AA and a poor level of investments in Newport. The qualifying amounts for the bank's investment and grant activity in the limited-scope non-MSA areas were as follows: \$1.4 million in Claiborne and \$1,250 in Newport.

The performance standards of the Service Test for limited-scope non-MSA areas include retail banking and CD services. Retail banking services were good in the Newport AA and adequate in the Claiborne AA. Qualifying hours and conclusions for CD services were as follows: 36 hours in Claiborne (adequate) and the bank had no qualified CD service activities in Newport (very poor).

KENTUCKY

CRA RATING FOR KENTUCKY: SATISFACTORY

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

Major factors contributing to this rating include:

- The geographic distribution of loans reflects good penetration in Kentucky.
- The distribution of loans by borrower income reflects adequate penetration in Kentucky.
- The bank made few, if any, CD loans in Kentucky.
- The bank made a poor level of qualified CD investments and grants in Kentucky.
- Retail banking services are good in Kentucky.
- The bank provided an adequate level of CD services in Kentucky.

SCOPE OF EXAMINATION

Commercial Bank's one AA in Kentucky is the Southeast Kentucky non-metropolitan area AA. As a result, the Southeast Kentucky AA was reviewed using full-scope examination procedures. Scoping considerations, including time periods and products, applicable to the review of the AAs are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. To augment this evaluation, several recently conducted community contact interviews were referenced.

DESCRIPTION OF INSTITUTION'S OPERATIONS SOUTHEAST KENTUCKY NON-METROPOLITAN ASSESSMENT AREA

Overview

The Southeast Kentucky AA includes Bell, Harlan, Knox, Laurel and Whitley counties, located in a non-metropolitan area in Southeast Kentucky. As of December 31, 2023, the bank operated 13 branches in the AA, including one in a low-income tract, four in moderate-income tracts, and eight in middle-income tracts. As this is the only AA in Kentucky, 100 percent of the bank's deposit volume and lending in the state are in this AA.

Small community banks are the primary financial institutions in the AA. Overall, there are 15 institutions in the AA with 69 branches and total deposits of \$3.2 billion. Commercial Bank the holds the largest volume of deposits in the AA, with \$504.8 million as of June 30, 2023, or 15.9 percent of total deposits. Community Trust Bank has 12.6 percent of deposits followed by Cumberland Valley National Bank & Trust (12.2 percent) and Forcht Bank (11.3 percent).

For HMDA-reportable lending, Commercial Bank ranked 7th out of 179 reporters in 2022 with 3.4 percent of total loan originations and purchases and 6th out of 161 reporters in 2023 with 3.4 percent of total loan originations and purchases. Community Trust Bank, L&N Federal Credit Union, Rocket Mortgage, and Vanderbilt Mortgage and Finance were the top HMDA lenders in the market during the review period. For CRA small business lending, Commercial Bank ranked 11th out of 66 reporters in 2022 and 9th out of 62 reporters in 2023 with approximately 1.9 percent of total CRA small business loans in each year. American Express, Capital One, and JP Mortgage Chase were the top CRA small business lenders in the market during the review period.

Assessment Area Population and Income Characteristics

The population in the AA was 180,446 in 2020, which represents a decline of 1.8 percent since 2015. The population loss in Bell County during this time period was 13.8 percent, while Harlan and Knox counties also lost more than 5 percent of their population. Other nonmetropolitan areas in Kentucky experienced very minor population loss during this period, while overall, population in the state increased by 2.5 percent.⁸

The AA contains 59 census tracts: 4 low-income tracts (6.8 percent), 25 moderate-income tracts (42.4 percent), 24 middle-income tracts (40.7 percent), and 6 upper-income tracts (10.2 percent). Bell, Harlan, Knox and Whitley counties are all designated as distressed-nonmetropolitan counties due to high rates of poverty, so middle-income tracts in these counties are eligible geographies for certain CD activities. Harlan County is also considered a distressed geography due to elevated unemployment rates and population loss.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated 2022 and 2023 statewide median family income for the non-metropolitan areas in Kentucky. As the following table shows, the median family income increased from \$61,700 in 2022 to \$64,900 in 2023.

**Borrower Income Levels
Kentucky State Non-metro**

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2022	\$61,700	0 - \$30,849	\$30,850 - \$49,359	\$49,360 - \$74,039	\$74,040 - & above
2023	\$64,900	0 - \$32,449	\$32,450 - \$51,919	\$51,920 - \$77,879	\$77,880 - & above

Within the AA, it is important to note the wide variation in the median family income. Harlan County had the lowest median family income in 2020, at \$35,908, which represents a 5 percent decline compared to the median family income in 2015. Laurel and Whitley counties have the highest median family incomes in the AA, yet even these counties still fall below the median family income for non-MSA Kentucky that was \$54,327 in 2020.⁹

There were 47,756 families in the AA in 2020. Of these families, 30.7 percent were low-income, 18.7 percent were moderate-income, 17.4 percent were middle-income, and 33.1 percent were upper-income. In the AA, 23.0 percent of families had incomes below the poverty level, though the percentage of families below the poverty level was higher in Bell and Harlan counties. The majority of families below the poverty line live in LMI tracts, which may suggest additional lending challenges in these areas.

⁸ Source: 2011-2015 U.S. Census Bureau American Community Survey; 2020 U.S. Census Bureau Decennial Census

⁹ 2011 - 2015 U.S. Census Bureau American Community Survey; 2016 - 2020 U.S. Census Bureau American Community Survey. Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

Housing Characteristics

According to 2023 FFIEC Census data, there are 83,043 total housing units in the AA, of which 56.3 percent are owner-occupied, 26.4 percent are rental units, and 17.3 percent are vacant. Notably, nearly 25 percent of all housing units are mobile homes, which could indicate a need for a different type of financing or housing assistance.

The median age of housing stock across the AA is 43 years, though the housing stock in low-income tracts is significantly older at 53 years. The older age of homes is an indicator of potential need for more home improvement lending.

The median housing value across the AA is \$89,905, which is well below the median housing value in Kentucky of \$147,100 and well below other nonmetropolitan areas of the state at \$107,295. The median house value varies widely in the AA, from a low of \$62,800 in Bell County to \$116,300 in Laurel County. Median gross rent in the AA is \$610 per month, which is less than the median gross rent in Kentucky (\$783 per month) and in non-metropolitan Kentucky (\$657 per month). The affordability ratio¹⁰ for the AA (38.6 percent) is higher than the affordability ratio for the state (35.5 percent), indicating that housing is more affordable in the AA than elsewhere in the state, particularly in Bell, Harlan, and Knox counties.

Housing cost burden is a concern in the AA, particularly for low-income renters and owners. In 2023, 54.0 percent of low-income renters and 43.6 percent of low-income homeowners were housing cost-burdened, meaning that housing costs equaled 30 percent or more of household income.¹¹ This data indicates that there is great need for more affordable housing, particularly for low-income individuals in the AA.

Economic Conditions

The Southeast Kentucky AA is located within the Appalachian Region. The region has traditionally relied on coal mining and other manufacturing and faced significant challenges in recent years with the decline in the coal industry. According to a community contact, at one time, the coal industry provided high paying jobs from \$80,000 to \$100,000. With the loss of jobs in this sector, and limited opportunities in other industry sectors, some skilled workers have left the area, and those that remain are trying to survive on much lower incomes. The region is focused on efforts to recruit new industries and workforce development, to help workers transition to new opportunities. The largest industry sectors across the AA are accommodation and food service, administrative services, and health care and social services. The growth of accommodation and food service reflect the new emphasis on tourism, focused on the natural landscape of the region.

This region in Southeastern Kentucky has historically struggled with intergenerational poverty, high rates of unemployment, population decline, and lower educational attainment. The population in this area is highly dependent on federal transfer payments such as Medicaid, food stamps, and the Earned Income Tax Credit.¹² The Appalachian Regional Commission (ARC), a federal-state partnership dedicated to promoting economic development and addressing quality of life issues for Appalachian residents, releases annual listings of each Appalachian county's economic health from best to worst. Every county is designated as either attainment, competitive, transitional, at-risk, or distressed. The ARC bases its classifications on several economic indicators, including poverty rates, per capita market income, and the three-year average of unemployment rates. Bell,

¹⁰ The housing affordability ratio is calculated by dividing the median household income by the median housing value. It represents the amount of single-family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

¹¹ U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

¹² New York Times. December 21, 2018. [Where Government Is a Dirty Word, but Its Checks Pay the Bills - The New York Times](https://www.nytimes.com/2018/12/21/us/politics/where-government-is-a-dirty-word-but-its-checks-pay-the-bills) (nytimes.com) accessed August 24, 2024

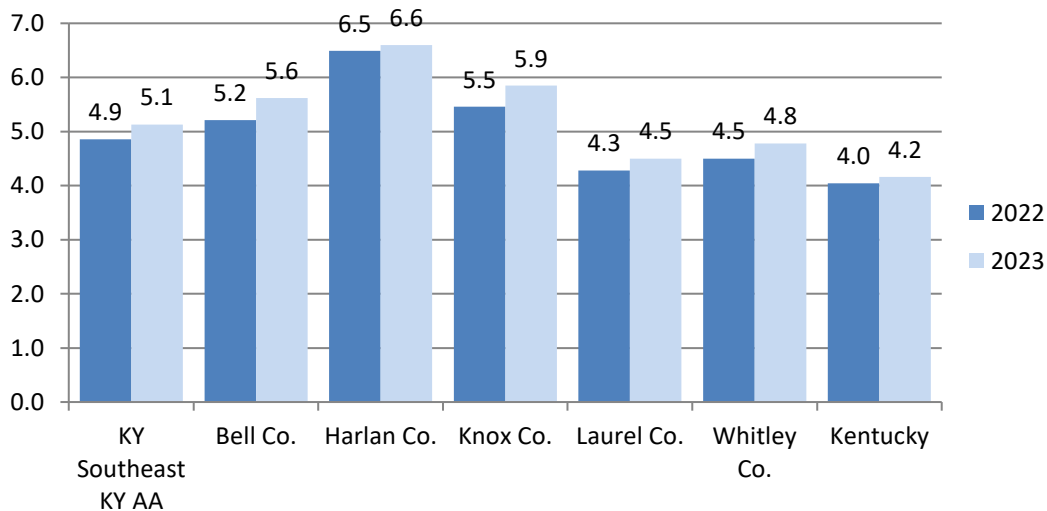
Harlan, Knox and Whitley counties are all considered distressed, while Laurel County is considered at-risk, though there are multiple tracts within the county that meet the criteria for distressed.¹³

Eastern Kentucky has been devastated by the opioid crisis. The Centers of Disease Control and Prevention identified 220 counties in 26 states as the most vulnerable to other types of addiction-related health issues as a result of the opioid epidemic.¹⁴ All counties in this AA were included on the CDC list, and Bell and Knox counties were listed in the top ten most vulnerable counties nationwide. The opioid epidemic has contributed to lower rates of labor force participation and created significant challenges in local communities. According to a community contact, local schools have been particularly hard hit because many students are not being cared for at home and need additional assistance from schools for food, afterschool care, and other services that schools do not have the funding to provide. More support is needed for the schools to serve these vulnerable children.

In July 2022, portions of Eastern Kentucky were devastated by severe flooding. The flooding destroyed homes, businesses, and infrastructure and led to the displacement of many residents. While the worst of the flooding occurred further north of the AA, Whitley County was impacted and included in the disaster declaration approved by the Federal Emergency Management Agency (FEMA). This region is prone to flooding due to the topography and legacy impacts of coal mining, which indicates that there may be a need for additional assistance to help not just with the recovery from the 2022 flooding, but also to help communities and residents, particularly LMI residents prepare for future flooding events.¹⁵

The following table shows the unemployment rate percentages for the AA and the state of Kentucky. The unemployment rates reflect the poor economic conditions. In 2022 and 2023, the unemployment rate for the AA exceeded the unemployment rate for the state of Kentucky. Within the AA, the unemployment rate was highest in Harlan County at 6.6 percent in 2023, which exceeded the unemployment rate for the state at 4.2 percent in the same year.

Unemployment Rates - KY Southeast KY



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

¹³ Appalachian Regional Commission. County Economic Status and Distressed Areas by State, FY 2023.

County Economic Status and Distressed Areas in Appalachian Kentucky, Fiscal Year 2023 (arc.gov). Accessed August 23, 2024

¹⁴ Centers for Disease Control and Prevention: <https://www.cdc.gov/pwid/vulnerable-counties-data.htm>

¹⁵ Klesta, Matt. Cleveland Federal Reserve Bank. September 23, 2023. [Resilience and Recovery: Insights from the July 2022 Eastern Kentucky Flood \(clevelandfed.org\)](https://www.clevelandfed.org/publications/resilience-and-recovery-insights-from-the-july-2022-eastern-kentucky-flood). Accessed August 23, 2024

According to the 2023 data from D&B, 90.2 percent of all businesses in the AA have revenues under \$1.0 million and are therefore considered small businesses. A community contact noted that the region is full of creative people and small businesses but there is a lack of opportunity and available capital for these individuals to grow their small business ideas.

Credit and Community Development Needs

As part of the CRA examination, information was obtained from interviews with several community contacts to provide additional information on the assessment area. One contact was with a foundation that serves Appalachian Kentucky, including three of the counties in the AA. This contact provided context on the economic and labor market condition, noted above. In addition, the contact noted a number of CD needs facing the region. First, the contact indicated that there is a great need for workforce development. In part, this is to address the transition away from the coal industry. However, the contact also noted that it's challenging to get people to work, and indicated that this could be due to the fear of the "benefits cliff." These individuals may be concerned that if they increase their income, they will lose access to needed federal assistance for healthcare and/or childcare. The contact also noted that there is a need for more assistance to schools, to help the students who have been impacted by the opioid epidemic as discussed above. Finally, the contact indicated that there is an opportunity for a CDFI or other financial institution to help connect resources, to develop programs, and to provide other services for small businesses. There is also a need for more flexible loan products, or a revolving loan fund, to provide more affordable access to capital for small businesses.

A second community contact was with a regional organization focused on strengthening the economic development capacity of eastern Kentucky. The organization was created in response to the collapse of the coal industry. This contact focused specifically on the need for better broadband infrastructure, and the opportunity for banks to get engaged and support efforts to expand access to broadband. This contact also mentioned the need for support of workforce development initiatives. Finally, a community contact focused on affordable housing noted that there is great need for more housing assistance and particularly assistance to help LMI families repair and rehab their existing homes. There is very little new housing built in the area, so renovations are most important to allow individuals to remain in their homes.

None of the contacts identified any issues with local financial institutions; however, it was noted that there were more opportunities for them to get involved. One contact felt that banks were not engaged with reaching out to LMI individuals or small businesses, and that left a gap between the more vulnerable residents and banks. This contact indicated that more collaboration and engagement is needed, and more flexible products would help meet the needs of this community.

Assessment Area Demographics

The following tables provide 2023 demographic data and business information from the FFIEC and D&B that are used to analyze the bank's CRA performance in the AA. Certain components of the data in the table are discussed throughout this report as they apply to specific parts of the analysis.

Combined Demographics Report

Assessment Area: KY Southeast KY

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	6.8%	3,293	6.9%	1,379	41.9%	14,678	30.7%
Moderate-income	25	42.4%	20,049	42.0%	5,890	29.4%	8,954	18.7%
Middle-income	24	40.7%	20,085	42.1%	3,252	16.2%	8,330	17.4%
Upper-income	6	10.2%	4,329	9.1%	467	10.8%	15,794	33.1%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	59	100.0%	47,756	100.0%	10,988	23.0%	47,756	100.0%
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,083	2,759	5.9%	45.4%	1,838	30.2%	1,486	24.4%
Moderate-income	34,777	19,525	41.7%	56.1%	9,344	26.9%	5,908	17.0%
Middle-income	35,462	20,164	43.1%	56.9%	9,235	26.0%	6,063	17.1%
Upper-income	6,721	4,338	9.3%	64.5%	1,471	21.9%	912	13.6%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	83,043	46,786	100.0%	56.3%	21,888	26.4%	14,369	17.3%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	260	5.4%	231	5.4%	26	6.7%	3	3.7%
Moderate-income	1,532	32.1%	1,370	31.8%	140	36.3%	22	27.2%
Middle-income	2,504	52.4%	2,258	52.4%	198	51.3%	48	59.3%
Upper-income	479	10.0%	449	10.4%	22	5.7%	8	9.9%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	4,775	100.0%	4,308	100.0%	386	100.0%	81	100.0%
	Percentage of Total Businesses:			90.2%		8.1%		1.7%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	4	4.0%	4	4.0%	0	0.0%	0	0.0%
Moderate-income	39	38.6%	39	38.6%	0	0.0%	0	0.0%
Middle-income	51	50.5%	51	50.5%	0	0.0%	0	0.0%
Upper-income	7	6.9%	7	6.9%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	101	100.0%	101	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:			100.0%		0.0%		0.0%

Based on 2023 FFIEC Census Data and 2023 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Lending levels reflect adequate responsiveness to credit needs of the AA. The geographic distribution of loans reflects good penetration throughout the AA, and the distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. The bank made few, if any, CD loans in the AA.

The analysis included 176 HMDA-reportable loans and 88 CRA small business loans reported by the bank in the AA during the review period. Given the higher volume, HMDA-reportable lending performance was weighted more heavily when determining conclusions. Additionally, as shown in the tables in the subsequent sections, during the review period, the bank originated or purchased 98 home purchase loans, 49 home refinance loans, and 10 home improvement loans in the Southeast Kentucky AA. Thus, when considering HMDA-reportable loan categories, home purchase and home refinance loans were the primary drivers of the overall performance conclusions for HMDA-reportable lending.

Lending Activity

Lending activity is considered adequate. Overall, 38.1 percent of HMDA-reportable loans and 26.3 percent of CRA small business loans were made in the AA.

Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA-reportable and CRA small business lending was compared to demographic information and available aggregate performance. Performance context issues were taken into consideration as well. Based on these factors, the geographic distribution of loans reflects good dispersion throughout the AA and does not reveal any conspicuous lending gaps.

Residential Real Estate (HMDA) Lending

Overall, the bank's HMDA lending reflects good geographic distribution when compared to AA demographics and aggregate lending. The tables and performance context discussed in this section provide details supporting this conclusion.

The following table shows the geographic distribution of the bank's HMDA-reportable loans for 2022 and 2023 within its AA. The table also includes a comparison of the bank's HMDA-reportable lending to the FFIEC Census and ACS data as well as the aggregate of HMDA lenders within the AA. The HMDA aggregate lending data are the combined total of lending activity reported by all lenders subject to HMDA in the AA.

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: KY Southeast KY

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
HOME PURCHASE	Low	11	11.2%	1,009	6.3%	5.9%	6	11.3%	5.5%	679	7.1%	4.5%	5	11.1%	330	5.1%
	Moderate	43	43.9%	6,410	39.8%	41.7%	21	39.6%	32.5%	3,345	34.9%	29.4%	22	48.9%	3,065	47.1%
	Middle	39	39.8%	7,400	45.9%	43.1%	22	41.5%	49.2%	4,587	47.8%	51.7%	17	37.8%	2,813	43.2%
	Upper	5	5.1%	1,286	8.0%	9.3%	4	7.5%	12.8%	986	10.3%	14.4%	1	2.2%	300	4.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Total	98	100%	16,105	100%	100.0%	53	100%	100%	9,597	100%	100%	45	100%	6,508	100%
REFINANCE	Low	8	16.3%	325	6.9%	5.9%	6	18.2%	3.1%	173	5.5%	2.1%	2	12.5%	152	9.9%
	Moderate	17	34.7%	1,394	29.6%	41.7%	10	30.3%	29.6%	921	29.0%	27.4%	7	43.8%	473	30.8%
	Middle	22	44.9%	2,777	59.0%	43.1%	15	45.5%	52.5%	1,864	58.8%	53.6%	7	43.8%	913	59.4%
	Upper	2	4.1%	213	4.5%	9.3%	2	6.1%	14.7%	213	6.7%	16.9%	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%
	Total	49	100%	4,709	100%	100.0%	33	100%	100%	3,171	100%	100%	16	100%	1,538	100%
HOME IMPROVEMENT	Low	2	20.0%	152	21.7%	5.9%	0	0.0%	3.0%	0	0.0%	2.1%	2	25.0%	152	23.9%
	Moderate	3	30.0%	232	33.1%	41.7%	1	50.0%	30.2%	13	20.6%	23.9%	2	25.0%	219	34.4%
	Middle	5	50.0%	316	45.1%	43.1%	1	50.0%	52.7%	50	79.4%	51.9%	4	50.0%	266	41.8%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	14.2%	0	0.0%	22.0%	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%
	Total	10	100%	700	100%	100.0%	2	100%	100%	63	100%	100%	8	100%	637	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	12.6%	0	0.0%	15.4%	0	0.0%	18.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	47.4%	0	0.0%	46.2%	0	0.0%	58.3%	0	0.0%	0	0.0%
	Middle	1	10.0%	75	100.0%	29.6%	0	0.0%	30.8%	0	0.0%	23.3%	1	100.0%	75	100.0%
	Upper	0	0.0%	0	0.0%	10.3%	0	0.0%	7.7%	0	0.0%	0.5%	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%
	Total	1	10%	75	100%	100.0%	0	0.0%	100%	0	0.0%	100%	1	100%	75	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	5.9%	0	0.0%	3.0%	0	0.0%	1.1%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	41.7%	0	0.0%	40.9%	0	0.0%	44.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	43.1%	0	0.0%	37.9%	0	0.0%	32.8%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	18.2%	0	0.0%	22.1%	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%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: KY Southeast KY

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	%	Agg %	Bank #	%	Dollar \$ (000s)	%	
OTHER PURPOSE CLOSED/EXEMPT	Low	1	5.6%	37	3.8%	5.9%	0	0.0%	6.1%	0	0.0%	1.4%	1	11.1%	37	5.8%
	Moderate	11	61.1%	476	49.4%	41.7%	7	77.8%	38.8%	256	79.3%	32.3%	4	44.4%	220	34.4%
	Middle	6	33.3%	450	46.7%	43.1%	2	22.2%	46.9%	67	20.7%	50.7%	4	44.4%	383	59.8%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	8.2%	0	0.0%	15.7%	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%
	<i>Total</i>	<i>18</i>	<i>100%</i>	<i>963</i>	<i>100%</i>	<i>100.0%</i>	<i>9</i>	<i>100%</i>	<i>100%</i>	<i>323</i>	<i>100%</i>	<i>100%</i>	<i>9</i>	<i>100%</i>	<i>640</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	5.9%	0	0.0%	3.4%	0	0.0%	2.7%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	41.7%	0	0.0%	41.4%	0	0.0%	33.6%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	43.1%	0	0.0%	41.4%	0	0.0%	47.8%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	13.8%	0	0.0%	15.9%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	22	12.5%	1,523	6.8%	5.9%	12	12.4%	4.7%	852	6.5%	4.0%	10	12.7%	671	7.1%
	Moderate	74	42.0%	8,512	37.7%	41.7%	39	40.2%	32.0%	4,535	34.5%	29.5%	35	44.3%	3,977	42.3%
	Middle	73	41.5%	11,018	48.9%	43.1%	40	41.2%	49.8%	6,568	49.9%	51.4%	33	41.8%	4,450	47.4%
	Upper	7	4.0%	1,499	6.6%	9.3%	6	6.2%	13.4%	1,199	9.1%	15.0%	1	1.3%	300	3.2%
	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%
	<i>Total</i>	<i>176</i>	<i>100%</i>	<i>22,552</i>	<i>100%</i>	<i>100.0%</i>	<i>97</i>	<i>100%</i>	<i>100%</i>	<i>13,154</i>	<i>100%</i>	<i>100%</i>	<i>79</i>	<i>100%</i>	<i>9,398</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Home Purchase Loans

Home purchase lending in low-income tracts is excellent. During the review period, the bank made 11.2 percent of its home purchase loans in low-income tracts, which was greater than the percentage of owner-occupied units in these tracts (5.9 percent). In 2022, the percentage of the bank’s home purchase lending in low-income tracts (11.3 percent) exceeded aggregate performance (5.5 percent).

Home purchase lending in moderate-income tracts is good. In 2022 and 2023 combined, the bank made 43.9 percent of its home purchase loans in moderate-income tracts, which was above the percentage of owner-occupied units in these tracts (41.7 percent). Additionally, in 2022 the bank’s home purchase lending in moderate-income tracts (39.6 percent) exceeded aggregate lending in moderate-income tracts (32.5 percent).

Home Refinance Loans

Home refinance lending in low-income tracts is excellent. In 2022 and 2023, the bank made 16.3 percent of its loans in low-income tracts, which was greater than the percentage of owner-occupied units in these tracts (5.9 percent). Additionally, the bank’s lending (18.2 percent) in 2022 was greater than aggregate (3.1 percent).

Home refinance lending in moderate-income tracts is adequate. In 2022 and 2023, the bank made 34.7 percent of its home refinance loans in moderate-income tracts, which was less than the percentage of owner-occupied units in these tracts (41.7 percent). In 2022, the bank’s refinance lending in moderate-income tract (30.3 percent) was similar to aggregate lending in moderate-income tracts (29.6 percent).

Home Improvement Loans

Home improvement lending in low-income tracts is adequate. The bank made only 10 total home improvement loans during the review period and two in low-income tracts. The percentage of loans in low-income tracts (20 percent) exceeded the percentage of owner-occupied units in these tracts (5.9 percent). The bank made no loans in 2022 so performance could not be compared to aggregate.

Home improvement lending in moderate-income tracts is also adequate. The bank made three loans in moderate-income tracts, or 30 percent of total loans, which was less than the percentage of owner-occupied units in these tracts at 41.7 percent, but exceeded aggregate performance in 2022.

Small Business Lending

Overall, the geographic distribution of the bank’s CRA small business lending reflects good penetration throughout the AA. The following table shows the geographic distribution of small business loans within the AA for 2022 and 2023. It also includes a comparison of the bank’s small business lending to D&B data and the aggregate lenders. The CRA aggregate lenders’ data are the combined total of lending activity reported by all lenders subject to CRA loan data reporting requirements in the AA.

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: KY Southeast KY

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022				2023					
		Bank				Total Businesses	Count		Dollar		Count	Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %		
SMALL BUSINESSES	Low	6	6.8%	863	14.7%	5.4%	4	8.5%	5.0%	439	16.7%	5.5%	2	4.9%	424	13.1%
	Moderate	27	30.7%	2,612	44.5%	32.1%	15	31.9%	30.9%	711	27.0%	32.1%	12	29.3%	1,901	58.7%
	Middle	55	62.5%	2,398	40.8%	52.4%	28	59.6%	51.1%	1,482	56.3%	51.6%	27	65.9%	916	28.3%
	Upper	0	0.0%	0	0.0%	10.0%	0	0.0%	11.1%	0	0.0%	10.0%	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%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	2.0%	0	0.0%	0.8%	0	0.0%	0	0.0%
	<i>Total</i>	<i>88</i>	<i>100%</i>	<i>5,873</i>	<i>100%</i>	<i>100.0%</i>	<i>47</i>	<i>100%</i>	<i>100%</i>	<i>2,632</i>	<i>100%</i>	<i>100%</i>	<i>41</i>	<i>100%</i>	<i>3,241</i>	<i>100%</i>

Small business lending in low-income tracts is good. The percentage of loans in low-income tracts (6.8 percent) is greater than the percentage of businesses located in these tracts (5.4 percent). In 2022, the bank’s small business lending to businesses in low-income tracts (8.5 percent) exceeded the performance of aggregate lenders (5.0 percent).

Small business lending in moderate-income tracts is adequate. The percentage of small business loans moderate-income tracts during the review period (30.7 percent) was less than the percentage of businesses located in these tracts (32.1 percent). In 2022, lending in moderate-income tracts (31.9 percent) was similar to aggregate performance (30.9 percent).

No conspicuous lending gaps were identified based on an analysis of the dispersion of the loan products reviewed. While the bank did not have lending activity in all AA census tracts, this is a rural area with limited opportunities in all tracts.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

For this analysis, the distribution of HMDA-reportable lending across borrower income levels and small business lending across business revenue sizes was compared to available demographic information and aggregate performance. Performance context issues were also considered. Considering these factors, the overall distribution of loans reflects adequate penetration among customers of different income levels and businesses of different sizes in the assessment area.

Residential Real Estate (HMDA) Lending

Overall, the bank's HMDA-reportable lending reflects adequate penetration among borrowers of different income levels when compared to AA demographics, aggregate lending, and performance context. The following table shows the distribution of the bank's HMDA-reportable loans by the income level of the borrowers along with demographic and aggregate information.

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: KY Southeast KY

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar	
		Count	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %
HOME PURCHASE	Low	4	4.1%	211	1.3%	30.7%	2	3.8%	6.3%	139	1.4%	3.2%	2	4.4%	72	1.1%
	Moderate	17	17.3%	1,406	8.7%	18.7%	7	13.2%	20.2%	714	7.4%	14.7%	10	22.2%	692	10.6%
	Middle	21	21.4%	2,536	15.7%	17.4%	14	26.4%	25.4%	1,758	18.3%	23.6%	7	15.6%	778	12.0%
	Upper	49	50.0%	10,945	68.0%	33.1%	27	50.9%	28.7%	6,707	69.9%	38.2%	22	48.9%	4,238	65.1%
	Unknown	7	7.1%	1,007	6.3%	0.0%	3	5.7%	19.4%	279	2.9%	20.3%	4	8.9%	728	11.2%
	<i>Total</i>	<i>98</i>	<i>100%</i>	<i>16,105</i>	<i>100%</i>	<i>100.0%</i>	<i>53</i>	<i>100%</i>	<i>100%</i>	<i>9,597</i>	<i>100%</i>	<i>100%</i>	<i>45</i>	<i>100%</i>	<i>6,508</i>	<i>100%</i>
REFINANCE	Low	4	8.2%	240	5.1%	30.7%	3	9.1%	7.8%	209	6.6%	4.0%	1	6.3%	31	2.0%
	Moderate	8	16.3%	308	6.5%	18.7%	5	15.2%	19.3%	158	5.0%	14.0%	3	18.8%	150	9.8%
	Middle	12	24.5%	1,097	23.3%	17.4%	8	24.2%	26.0%	633	20.0%	24.3%	4	25.0%	464	30.2%
	Upper	23	46.9%	3,012	64.0%	33.1%	15	45.5%	40.8%	2,119	66.8%	50.7%	8	50.0%	893	58.1%
	Unknown	2	4.1%	52	1.1%	0.0%	2	6.1%	6.0%	52	1.6%	7.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>49</i>	<i>100%</i>	<i>4,709</i>	<i>100%</i>	<i>100.0%</i>	<i>33</i>	<i>100%</i>	<i>100%</i>	<i>3,171</i>	<i>100%</i>	<i>100%</i>	<i>16</i>	<i>100%</i>	<i>1,538</i>	<i>100%</i>
HOME IMPROVEMENT	Low	2	20.0%	89	12.7%	30.7%	1	50.0%	4.7%	50	79.4%	3.7%	1	12.5%	39	6.1%
	Moderate	2	20.0%	130	18.6%	18.7%	0	0.0%	17.8%	0	0.0%	14.4%	2	25.0%	130	20.4%
	Middle	1	10.0%	13	1.9%	17.4%	1	50.0%	26.6%	13	20.6%	24.4%	0	0.0%	0	0.0%
	Upper	5	50.0%	468	66.9%	33.1%	0	0.0%	47.3%	0	0.0%	52.2%	5	62.5%	468	73.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.6%	0	0.0%	5.3%	0	0.0%	0	0.0%
	<i>Total</i>	<i>10</i>	<i>100%</i>	<i>700</i>	<i>100%</i>	<i>100.0%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>63</i>	<i>100%</i>	<i>100%</i>	<i>8</i>	<i>100%</i>	<i>637</i>	<i>100%</i>
MULTI FAMILY	Low	0	0.0%	0	0.0%	30.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.7%	0	0.0%	0.0%	0	0.0%	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%	0.0%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	33.1%	0	0.0%	15.4%	0	0.0%	5.9%	0	0.0%	0	0.0%
	Unknown	1	100.0%	75	100.0%	0.0%	0	0.0%	84.6%	0	0.0%	94.1%	1	100.0%	75	100.0%
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>75</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>75</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	30.7%	0	0.0%	7.6%	0	0.0%	4.5%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.7%	0	0.0%	19.7%	0	0.0%	14.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	17.4%	0	0.0%	25.8%	0	0.0%	19.2%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	33.1%	0	0.0%	42.4%	0	0.0%	55.3%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.5%	0	0.0%	6.9%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: KY Southeast KY

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022				2023					
		Bank		Families by Family Income			Count		Dollar		Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Dollar	Bank	Dollar		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	2	11.1%	62	6.4%	30.7%	0	0.0%	8.2%	0	0.0%	4.7%	2	22.2%	62	9.7%
	Moderate	5	27.8%	161	16.7%	18.7%	4	44.4%	24.5%	118	36.5%	16.0%	1	11.1%	43	6.7%
	Middle	2	11.1%	112	11.6%	17.4%	2	22.2%	22.4%	112	34.7%	17.5%	0	0.0%	0	0.0%
	Upper	8	44.4%	591	61.4%	33.1%	3	33.3%	40.8%	93	28.8%	60.3%	5	55.6%	498	77.8%
	Unknown	1	5.6%	37	3.8%	0.0%	0	0.0%	4.1%	0	0.0%	1.5%	1	11.1%	37	5.8%
	Total	18	100%	963	100%	100.0%	9	100%	100%	323	100%	100%	9	100%	640	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	30.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	17.4%	0	0.0%	3.4%	0	0.0%	2.5%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	33.1%	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%	96.6%	0	0.0%	97.5%	0	0.0%	0	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%
HMDA TOTALS	Low	12	6.8%	602	2.7%	30.7%	6	6.2%	6.6%	398	3.0%	3.4%	6	7.6%	204	2.2%
	Moderate	32	18.2%	2,005	8.9%	18.7%	16	16.5%	19.6%	990	7.5%	14.2%	16	20.3%	1,015	10.8%
	Middle	36	20.5%	3,758	16.7%	17.4%	25	25.8%	25.3%	2,516	19.1%	23.1%	11	13.9%	1,242	13.2%
	Upper	85	48.3%	15,016	66.6%	33.1%	45	46.4%	33.3%	8,919	67.8%	41.2%	40	50.6%	6,097	64.9%
	Unknown	11	6.3%	1,171	5.2%	0.0%	5	5.2%	15.3%	331	2.5%	18.1%	6	7.6%	840	8.9%
	Total	176	100%	22,552	100%	100.0%	97	100%	100%	13,154	100%	100%	79	100%	9,398	100%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Home Purchase Loans

Home purchase lending to low-income borrowers is poor. During the review period, the bank made 4.1 percent of its home purchase loans to low-income borrowers, which was below the percentage of low-income families in the assessment area at 30.7 percent. Additionally, in 2022 the bank's lending to low-income borrowers (3.8 percent) was below aggregate lending (6.3 percent). While performance context indicates that there are some barriers to home purchase lending for low-income families, aggregate performance demonstrates that opportunity exists.

Home purchase lending to moderate-income borrowers is also poor. In 2022 and 2023, the bank made 17.3 percent of its home purchase loans to moderate-income borrowers, which was below the percentage of moderate-income families in the AA (18.7 percent). The bank's lending to moderate-income borrowers in 2022 (13.2 percent) was also below aggregate lending (20.2 percent).

Home Refinance Loans

Home refinance lending to low-income borrowers is adequate. In 2022 and 2023, the bank made 8.2 percent of its home refinance loans to low-income borrowers, which was below the percentage of low-income families in the AA (30.7 percent). In 2022, the banks refinance lending to low-income borrowers (9.1 percent) exceeded the aggregate performance (7.8 percent).

Home refinance lending to moderate-income borrowers is also adequate. During the review period, 16.3 percent of refinance loans were made to moderate-income borrowers, which was below the percentage of moderate-

income families at 18.7 percent. In 2022, 15.2 percent of the bank’s loans were made to moderate-income borrowers, which was below aggregate performance at 19.3 percent.

Home Improvement Loans

Home improvement lending to LMI income borrowers is adequate. The bank made only 10 total home improvement loans in the AA during the review period. The bank made two loans to low-income borrowers during the review period, which represented 20 percent of total home improvement loans but was below the percentage of low-income families in the AA (30.7 percent). The bank made two loans to moderate-income borrowers during the review period, which represented 20 percent of total lending and exceeded the percentage of moderate-income families in the AA at 18.7 percent. Given the bank made just two home improvement loans in 2022, it is not possible to conduct a meaningful comparison of performance compared to aggregate performance for this product.

Small Business Lending

Small business lending to businesses of different sizes is excellent. As show in the chart below, the bank made 83.0 percent of its small business loans to businesses with revenues of \$1 million or less during the review, which was less than the percentage of total businesses with revenues of \$1 million or less (90.2 percent). In 2023, lending to businesses with gross annual revenue of \$1 million or less (76.6 percent) nearly doubled aggregate performance (37.3 percent).

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: KY Southeast KY

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022				2023						
		Bank		Dollar		Total Businesses	Count		Dollar		Agg	Agg	Count		Dollar		
		Count	%	\$ (000s)	\$ %		Bank	%	\$ 000s	\$ %			Bank	%	\$ 000s	\$ %	
#	%			%	#	%	%			%	#	%			%		
SMALL BUSINESS	Revenue	\$1 Million or Less	73	83.0%	3,938	67.1%	90.2%	36	76.6%	37.3%	1,172	44.5%	31.9%	37	90.2%	2,766	85.3%
		Over \$1 Million	9	10.2%	1,045	17.8%	8.1%	8	17.0%		1,020	38.8%		1	2.4%	25	0.8%
		Total Rev. available	82	93.2%	4,983	84.8%	98.3%	44	93.6%		2,192	83.3%		38	92.7%	2,791	86.1%
		Rev. Not Known	6	6.8%	890	15.2%	1.7%	3	6.4%		440	16.7%		3	7.3%	450	13.9%
		Total	88	100%	5,873	100%	100%	47	100%		2,632	100%		41	100%	3,241	100%
	Loan Size	\$100,000 or Less	76	86.4%	2,318	39.5%		42	89.4%	96.2%	1,342	51.0%	52.0%	34	82.9%	976	30.1%
		\$100,001 - \$250,000	6	6.8%	1,180	20.1%		3	6.4%	2.1%	570	21.7%	13.5%	3	7.3%	610	18.8%
		\$250,001 - \$1 Million	6	6.8%	2,375	40.4%		2	4.3%	1.7%	720	27.4%	34.5%	4	9.8%	1,655	51.1%
		Total	88	100%	5,873	100%		47	100%	100%	2,632	100%	100%	41	100%	3,241	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	66	90.4%	1,798	45.7%		35	97.2%		922	78.7%		31	83.8%	876	31.7%
		\$100,001 - \$250,000	4	5.5%	860	21.8%		1	2.8%		250	21.3%		3	8.1%	610	22.1%
		\$250,001 - \$1 Million	3	4.1%	1,280	32.5%		0	0.0%		0	0.0%		3	8.1%	1,280	46.3%
		Total	73	100%	3,938	100%		36	100%		1,172	100%		37	100%	2,766	100%

Community Development Lending

The bank made no CD loans in the Southeast Kentucky AA during the review period. Performance context and community contacts indicate that there are opportunities and needs for CD lending in this market, as discussed earlier in this report.

INVESTMENT TEST

The bank made a poor level of qualified CD investments totaling \$421,450. The bank had one investment that remained on its balance sheet from a prior review period totaling \$421,450. This investment was in a school bond that provided financing for schools that serve a majority of students receiving free and reduced-price lunch. Additionally, the bank had grants totaling \$16,450, including \$4,000 to a nonprofit focused on affordable housing and \$2,000 to a Community Action Agency. The donations also provided college scholarships to students at schools where the majority of students receive free or reduced-price lunch. These investments did not demonstrate responsiveness to identified CD needs.

SERVICE TEST

As described below, retail banking services are good and the bank provides an adequate level of CD services in the AA.

Retail Banking Services

Delivery systems are accessible to the bank's geographies and individuals of different income levels throughout the Southeast Kentucky AA. In deriving this conclusion, the distribution of branches by census tract income level was compared to the distribution of households and businesses among the tract categories in the AA. As the following tables show, the bank operated 13 branches in the AA. The bank had one branch in low-income tracts (7.7 percent of total branches), where 6.7 percent of households and 5.4 percent of businesses are located. The bank had four branches in moderate-income tracts (30.8 percent of total branches) which was less than the percentage of households living in those tracts (42.0 percent) but exceeded the percentage businesses (32.1 percent) located in these tracts.

The bank did not open or close any branches during the review period in the AA. The bank offers weekday lobby and drive-through hours of operation that are similar across the branches, with all branch lobbies opening at 8 a.m. and drive-throughs opening at 7:30 a.m. All branches close at 4 p.m. Monday-Thursday with some drive-throughs remaining open until 5 p.m. The bank offers extended hours until 6 p.m. at all branches on Friday but no branches in the AA offer Saturday hours. The bank offers the same suite of products and services throughout the AA. Thus, services do not vary in a way that inconveniences the assessment area, particularly LMI geographies or individuals.

The table below shows the distribution of branches and ATMs along with households and businesses by tract category.

Geographic Distribution of Branches & ATMS
Assessment Area: KY Southeast KY

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend- ed Hours	Week- end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	1	7.7%	0	0	1	1	0	Total	3	17.6%	0	0.0%	0	0	3	17.6%	1	0	4	6.8%	6.7%	5.4%
DTO	0		0	0	0			SA	2		0		0	0	2		1	0				
Moderate	4	30.8%	0	0	3	4	2	Total	4	23.5%	0	0.0%	0	0	4	23.5%	0	0	25	42.4%	42.0%	32.1%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Middle	8	61.5%	0	0	8	8	4	Total	9	52.9%	0	0.0%	0	0	9	52.9%	0	0	24	40.7%	42.8%	52.4%
DTO	1		0	0	1			SA	2		0		0	0	2		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	1	5.9%	0	0.0%	0	0	1	5.9%	0	0	6	10.2%	8.5%	10.0%
DTO	0		0	0	0			SA	1		0		0	0	1		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	13	100%	0	0	12	13	6	Total	17	100%	0	0.0%	0	0	17	100%	1	0	59	100%	100%	100%
DTO	1		0	0	1			SA	5		0		0	0	5		1	0				

Based on 2023 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provided an adequate level of CD services in the AA. During the review period, bank employees provided ten CD service activities totaling 53 hours. All activities were focused on financial education or career training and primarily targeted LMI youth.

APPENDIX A – SCOPE OF EXAMINATION

TIME PERIOD REVIEWED		
January 1, 2022 to December 31, 2023 – Lending and Service Tests (non-CD)		
January 1, 2022 to December 31, 2023 – CD Loans, Investments, and Services		
FINANCIAL INSTITUTION		PRODUCTS REVIEWED
Commercial Bank (Harrogate, Tennessee)		HMDA-reportable and CRA small business loans
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
N/A	N/A	

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION				
Assessment Area	Rated Area	# of Offices	CRA Review Procedures	Branches Visted
Southeast Kentucky	Kentucky	13	Full scope review	--
Knoxville	Tennessee	6	Full scope review	--
Claiborne	Tennessee	4	Limited scope review	--
Johnson City	Tennessee	1	Limited scope review	--
Kingsport	Tennessee	1	Limited scope review	--
Morristown	Tennessee	2	Limited scope review	--
Newport	Tennessee	2	Limited scope review	--
Williamson/Rutherford counties	Tennessee	1	Limited scope review	--

APPENDIX B – SUMMARY OF STATE RATINGS

State	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Kentucky	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Tennessee	Low Satisfactory	Needs to Improve	Low Satisfactory	Needs to Improve

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each rated area in large banks. Summing the points from the Lending, Investment, and Service Tests, each rated area is given a total point value, which equates to an overall rating in accordance with the FFIEC’s Interagency Large Institution CRA Examination Procedures.

State	Lending Test Rating	Investment Test Rating	Service Test Rating	Total Points	Overall Rating
Kentucky	6	1	4	11	Satisfactory
Tennessee	6	1	3	10	Needs to Improve

APPENDIX C – LIMITED SCOPE ASSESSMENT AREAS DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: TN Claiborne

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	2,242	25.6%
Moderate-income	3	33.3%	1,839	21.0%	428	23.3%	1,621	18.5%
Middle-income	6	66.7%	6,911	79.0%	992	14.4%	1,920	21.9%
Upper-income	0	0.0%	0	0.0%	0	0.0%	2,967	33.9%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	9	100.0%	8,750	100.0%	1,420	16.2%	8,750	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	3,178	2,063	21.5%	64.9%	734	23.1%	381	12.0%
Middle-income	12,361	7,545	78.5%	61.0%	3,219	26.0%	1,597	12.9%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	15,539	9,608	100.0%	61.8%	3,953	25.4%	1,978	12.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	87	13.1%	83	13.7%	3	6.4%	1	7.7%
Middle-income	579	86.9%	523	86.3%	44	93.6%	12	92.3%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	666	100.0%	606	100.0%	47	100.0%	13	100.0%
Percentage of Total Businesses:			91.0%		7.1%		2.0%	
	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	0.0%	0	0.0%
Moderate-income	6	25.0%	6	25.0%	0	0.0%	0	0.0%
Middle-income	18	75.0%	18	75.0%	0	0.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	24	100.0%	24	100.0%	0	0.0%	0	0.0%
Percentage of Total Farms:			100.0%		0.0%		0.0%	

Based on 2023 FFIEC Census Data and 2023 D&B Information

Combined Demographics Report

Assessment Area: TN Johnson City

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	6.3%	1,585	4.7%	588	37.1%	6,738	19.9%
Moderate-income	9	28.1%	7,277	21.5%	1,252	17.2%	5,313	15.7%
Middle-income	8	25.0%	11,042	32.6%	790	7.2%	6,875	20.3%
Upper-income	12	37.5%	13,972	41.2%	814	5.8%	14,950	44.1%
Unknown-income	1	3.1%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	32	100.0%	33,876	100.0%	3,444	10.2%	33,876	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,016	778	2.2%	25.8%	1,819	60.3%	419	13.9%
Moderate-income	15,852	6,470	18.5%	40.8%	7,349	46.4%	2,033	12.8%
Middle-income	18,391	12,894	36.8%	70.1%	3,904	21.2%	1,593	8.7%
Upper-income	23,519	14,862	42.5%	63.2%	6,527	27.8%	2,130	9.1%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	60,778	35,004	100.0%	57.6%	19,599	32.2%	6,175	10.2%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	99	2.1%	83	2.0%	13	3.7%	3	8.3%
Moderate-income	1,255	27.2%	1,143	27.1%	106	29.8%	6	16.7%
Middle-income	1,121	24.3%	1,035	24.5%	76	21.3%	10	27.8%
Upper-income	2,115	45.8%	1,941	46.0%	157	44.1%	17	47.2%
Unknown-income	23	0.5%	19	0.5%	4	1.1%	0	0.0%
Total Assessment Area	4,613	100.0%	4,221	100.0%	356	100.0%	36	100.0%
Percentage of Total Businesses:			91.5%		7.7%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	1.0%	1	1.1%	0	0.0%	0	0.0%
Moderate-income	23	24.0%	19	21.3%	1	50.0%	3	60.0%
Middle-income	30	31.3%	28	31.5%	0	0.0%	2	40.0%
Upper-income	42	43.8%	41	46.1%	1	50.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	96	100.0%	89	100.0%	2	100.0%	5	100.0%
Percentage of Total Farms:			92.7%		2.1%		5.2%	

Based on 2023 FFIEC Census Data and 2023 D&B Information

Combined Demographics Report

Assessment Area: TN Kingsport

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.5%	502	1.2%	200	39.8%	9,110	21.3%
Moderate-income	8	20.0%	6,892	16.1%	1,418	20.6%	7,365	17.2%
Middle-income	22	55.0%	24,722	57.8%	2,970	12.0%	8,686	20.3%
Upper-income	9	22.5%	10,677	25.0%	426	4.0%	17,632	41.2%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	40	100.0%	42,793	100.0%	5,014	11.7%	42,793	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,346	404	0.8%	30.0%	763	56.7%	179	13.3%
Moderate-income	14,508	6,399	13.3%	44.1%	5,913	40.8%	2,196	15.1%
Middle-income	42,228	28,452	59.2%	67.4%	9,113	21.6%	4,663	11.0%
Upper-income	17,436	12,816	26.7%	73.5%	2,785	16.0%	1,835	10.5%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	75,518	48,071	100.0%	63.7%	18,574	24.6%	8,873	11.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	507	8.9%	451	8.7%	52	11.3%	4	10.3%
Moderate-income	1,003	17.6%	902	17.4%	97	21.1%	4	10.3%
Middle-income	2,930	51.5%	2,671	51.5%	233	50.7%	26	66.7%
Upper-income	1,245	21.9%	1,162	22.4%	78	17.0%	5	12.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	5,685	100.0%	5,186	100.0%	460	100.0%	39	100.0%
Percentage of Total Businesses:			91.2%		8.1%		0.7%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	3	3.2%	3	3.4%	0	0.0%	0	0.0%
Middle-income	70	75.3%	67	75.3%	0	0.0%	3	75.0%
Upper-income	20	21.5%	19	21.3%	0	0.0%	1	25.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	93	100.0%	89	100.0%	0	0.0%	4	100.0%
Percentage of Total Farms:			95.7%		0.0%		4.3%	

Based on 2023 FFIEC Census Data and 2023 D&B Information

Combined Demographics Report

Assessment Area: TN Morristown

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	8.3%	754	4.7%	384	50.9%	3,374	21.0%
Moderate-income	3	25.0%	3,748	23.3%	894	23.9%	3,110	19.3%
Middle-income	6	50.0%	8,900	55.3%	502	5.6%	3,035	18.9%
Upper-income	2	16.7%	2,685	16.7%	167	6.2%	6,568	40.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	12	100.0%	16,087	100.0%	1,947	12.1%	16,087	100.0%
	Housing	Housing Types by Tract						
	Units by Tract	Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,409	438	2.7%	31.1%	801	56.8%	170	12.1%
Moderate-income	6,773	3,298	20.2%	48.7%	2,785	41.1%	690	10.2%
Middle-income	14,619	9,617	58.8%	65.8%	3,488	23.9%	1,514	10.4%
Upper-income	4,439	2,996	18.3%	67.5%	1,067	24.0%	376	8.5%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	27,240	16,349	100.0%	60.0%	8,141	29.9%	2,750	10.1%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	284	14.7%	247	14.1%	35	20.0%	2	18.2%
Moderate-income	552	28.6%	496	28.4%	55	31.4%	1	9.1%
Middle-income	786	40.7%	727	41.6%	53	30.3%	6	54.5%
Upper-income	311	16.1%	277	15.9%	32	18.3%	2	18.2%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	1,933	100.0%	1,747	100.0%	175	100.0%	11	100.0%
	Percentage of Total Businesses:			90.4%		9.1%		0.6%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	2	8.0%	2	8.0%	0	0.0%	0	0.0%
Middle-income	20	80.0%	20	80.0%	0	0.0%	0	0.0%
Upper-income	3	12.0%	3	12.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	25	100.0%	25	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:			100.0%		0.0%		0.0%

Based on 2023 FFIEC Census Data and 2023 D&B Information

Combined Demographics Report

Assessment Area: TN Newport

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	2,454	25.7%
Moderate-income	3	33.3%	4,210	44.1%	808	19.2%	2,320	24.3%
Middle-income	5	55.6%	5,343	55.9%	583	10.9%	1,925	20.2%
Upper-income	0	0.0%	0	0.0%	0	0.0%	2,854	29.9%
Unknown-income	1	11.1%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	9	100.0%	9,553	100.0%	1,391	14.6%	9,553	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	7,924	3,884	39.4%	49.0%	2,371	29.9%	1,669	21.1%
Middle-income	9,716	5,980	60.6%	61.5%	1,936	19.9%	1,800	18.5%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	17,640	9,864	100.0%	55.9%	4,307	24.4%	3,469	19.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	493	60.6%	443	59.1%	42	87.5%	8	47.1%
Middle-income	320	39.3%	305	40.7%	6	12.5%	9	52.9%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	1	0.1%	1	0.1%	0	0.0%	0	0.0%
Total Assessment Area	814	100.0%	749	100.0%	48	100.0%	17	100.0%
Percentage of Total Businesses:			92.0%		5.9%		2.1%	
	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	0.0%	0	0.0%
Moderate-income	9	24.3%	9	25.7%	0	0.0%	0	0.0%
Middle-income	28	75.7%	26	74.3%	2	100.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	37	100.0%	35	100.0%	2	100.0%	0	0.0%
Percentage of Total Farms:			94.6%		5.4%		0.0%	

Based on 2023 FFIEC Census Data and 2023 D&B Information

Combined Demographics Report

Assessment Area: TN Newport

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	2,454	25.7%
Moderate-income	3	33.3%	4,210	44.1%	808	19.2%	2,320	24.3%
Middle-income	5	55.6%	5,343	55.9%	583	10.9%	1,925	20.2%
Upper-income	0	0.0%	0	0.0%	0	0.0%	2,854	29.9%
Unknown-income	1	11.1%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	9	100.0%	9,553	100.0%	1,391	14.6%	9,553	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	7,924	3,884	39.4%	49.0%	2,371	29.9%	1,669	21.1%
Middle-income	9,716	5,980	60.6%	61.5%	1,936	19.9%	1,800	18.5%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	17,640	9,864	100.0%	55.9%	4,307	24.4%	3,469	19.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	493	60.6%	443	59.1%	42	87.5%	8	47.1%
Middle-income	320	39.3%	305	40.7%	6	12.5%	9	52.9%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	1	0.1%	1	0.1%	0	0.0%	0	0.0%
Total Assessment Area	814	100.0%	749	100.0%	48	100.0%	17	100.0%
Percentage of Total Businesses:			92.0%		5.9%		2.1%	
	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	0.0%	0	0.0%
Moderate-income	9	24.3%	9	25.7%	0	0.0%	0	0.0%
Middle-income	28	75.7%	26	74.3%	2	100.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	37	100.0%	35	100.0%	2	100.0%	0	0.0%
Percentage of Total Farms:			94.6%		5.4%		0.0%	

Based on 2023 FFIEC Census Data and 2023 D&B Information

APPENDIX D – LIMITED SCOPE ASSESSMENT AREAS LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Claiborne

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				Bank & Aggregate Lending										
		2022, 2023				Owner Occupied Units %	2022					2023				
		Bank		Dollar			Count		Dollar			Count		Dollar		
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	\$ (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%
	Moderate	15	28.3%	3,205	30.5%	21.5%	9	32.1%	17.6%	2,522	38.1%	18.1%	6	24.0%	683	17.5%
	Middle	38	71.7%	7,313	69.5%	78.5%	19	67.9%	82.4%	4,100	61.9%	81.9%	19	76.0%	3,213	82.5%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Total	53	100%	10,518	100%	100.0%	28	100%	100%	6,622	100%	100%	25	100%	3,896	100%
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%
	Moderate	5	20.0%	434	11.1%	21.5%	2	14.3%	16.4%	173	6.5%	14.0%	3	27.3%	261	20.4%
	Middle	20	80.0%	3,493	88.9%	78.5%	12	85.7%	83.6%	2,476	93.5%	86.0%	8	72.7%	1,017	79.6%
	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%
	Unknown	0	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%	3,927	100%	100.0%	14	100%	100%	2,649	100%	100%	11	100%	1,278	100%
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%
	Moderate	0	0.0%	0	0.0%	21.5%	0	0.0%	14.3%	0	0.0%	8.0%	0	0.0%	0	0.0%
	Middle	5	100.0%	200	100.0%	78.5%	3	100.0%	85.7%	112	100.0%	92.0%	2	100.0%	88	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Unknown	0	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%	200	100%	100.0%	3	100%	100%	112	100%	100%	2	100%	88	100%
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%
	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%
	Middle	0	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	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%
	Unknown	0	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%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%
OTHER PURPOSE LOC	Low	0	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%	21.5%	0	0.0%	12.5%	0	0.0%	5.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	78.5%	0	0.0%	87.5%	0	0.0%	95.0%	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%
	Unknown	0	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%	100%	0	0.0%	0	0.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Claiborne

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Owner Occupied Units %	Count			Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	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%	21.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Middle	5	100.0%	560	100.0%	78.5%	4	100.0%	100.0%	537	100.0%	100.0%	1	100.0%	23	100.0%	
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>560</i>	<i>100%</i>	<i>100.0%</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>537</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>23</i>	<i>100%</i>	
PURPOSE NOT APPLICABLE	Low	0	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%	21.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	78.5%	0	0.0%	100.0%	0	0.0%	100.0%	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%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Moderate	20	22.7%	3,639	23.9%	21.5%	11	22.4%	16.4%	2,695	27.2%	16.2%	9	23.1%	944	17.9%	
	Middle	68	77.3%	11,566	76.1%	78.5%	38	77.6%	83.6%	7,225	72.8%	83.8%	30	76.9%	4,341	82.1%	
	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%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>88</i>	<i>100%</i>	<i>15,205</i>	<i>100%</i>	<i>100.0%</i>	<i>49</i>	<i>100%</i>	<i>100%</i>	<i>9,920</i>	<i>100%</i>	<i>100%</i>	<i>39</i>	<i>100%</i>	<i>5,285</i>	<i>100%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Claiborne

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar	
		Count	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %
HOME PURCHASE	Low	2	3.8%	128	1.2%	25.6%	0	0.0%	5.1%	0	0.0%	2.5%	2	8.0%	128	3.3%
	Moderate	3	5.7%	564	5.4%	18.5%	1	3.6%	15.1%	233	3.5%	10.9%	2	8.0%	331	8.5%
	Middle	11	20.8%	1,014	9.6%	21.9%	5	17.9%	24.8%	505	7.6%	20.3%	6	24.0%	509	13.1%
	Upper	33	62.3%	7,989	76.0%	33.9%	20	71.4%	41.4%	5,535	83.6%	51.3%	13	52.0%	2,454	63.0%
	Unknown	4	7.5%	823	7.8%	0.0%	2	7.1%	13.6%	349	5.3%	15.1%	2	8.0%	474	12.2%
	<i>Total</i>	<i>53</i>	<i>100%</i>	<i>10,518</i>	<i>100%</i>	<i>100.0%</i>	<i>28</i>	<i>100%</i>	<i>100%</i>	<i>6,622</i>	<i>100%</i>	<i>100%</i>	<i>25</i>	<i>100%</i>	<i>3,896</i>	<i>100%</i>
REFINANCE	Low	0	0.0%	0	0.0%	25.6%	0	0.0%	12.6%	0	0.0%	6.8%	0	0.0%	0	0.0%
	Moderate	8	32.0%	632	16.1%	18.5%	5	35.7%	18.6%	334	12.6%	11.2%	3	27.3%	298	23.3%
	Middle	6	24.0%	826	21.0%	21.9%	3	21.4%	24.6%	426	16.1%	20.5%	3	27.3%	400	31.3%
	Upper	8	32.0%	1,845	47.0%	33.9%	4	28.6%	35.5%	1,398	52.8%	47.4%	4	36.4%	447	35.0%
	Unknown	3	12.0%	624	15.9%	0.0%	2	14.3%	8.7%	491	18.5%	14.1%	1	9.1%	133	10.4%
	<i>Total</i>	<i>25</i>	<i>100%</i>	<i>3,927</i>	<i>100%</i>	<i>100.0%</i>	<i>14</i>	<i>100%</i>	<i>100%</i>	<i>2,649</i>	<i>100%</i>	<i>100%</i>	<i>11</i>	<i>100%</i>	<i>1,278</i>	<i>100%</i>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	25.6%	0	0.0%	4.8%	0	0.0%	5.7%	0	0.0%	0	0.0%
	Moderate	3	60.0%	97	48.5%	18.5%	2	66.7%	23.8%	47	42.0%	10.8%	1	50.0%	50	56.8%
	Middle	2	40.0%	103	51.5%	21.9%	1	33.3%	33.3%	65	58.0%	33.2%	1	50.0%	38	43.2%
	Upper	0	0.0%	0	0.0%	33.9%	0	0.0%	23.8%	0	0.0%	17.1%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	14.3%	0	0.0%	33.2%	0	0.0%	0	0.0%
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>200</i>	<i>100%</i>	<i>100.0%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>112</i>	<i>100%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>88</i>	<i>100%</i>
MULTI FAMILY	Low	0	0.0%	0	0.0%	25.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	21.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	33.9%	0	0.0%	14.3%	0	0.0%	27.2%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	85.7%	0	0.0%	72.8%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	25.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	21.9%	0	0.0%	37.5%	0	0.0%	26.1%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	33.9%	0	0.0%	50.0%	0	0.0%	61.4%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	12.5%	0	0.0%	12.5%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Claiborne

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar	
		Count		Dollar			Bank	Agg	Agg	Bank	Agg	Agg	Bank	Bank		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	20.0%	74	13.2%	25.6%	1	25.0%	10.5%	74	13.8%	5.7%	0	0.0%	0	0.0%
	Moderate	1	20.0%	75	13.4%	18.5%	1	25.0%	21.1%	75	14.0%	10.2%	0	0.0%	0	0.0%
	Middle	2	40.0%	126	22.5%	21.9%	1	25.0%	10.5%	103	19.2%	6.8%	1	100.0%	23	100.0%
	Upper	1	20.0%	285	50.9%	33.9%	1	25.0%	57.9%	285	53.1%	77.2%	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%
	<i>Total</i>	<i>5</i>	<i>100%</i>	<i>560</i>	<i>100%</i>	<i>100.0%</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>537</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>23</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	25.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	21.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	33.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	3	3.4%	202	1.3%	25.6%	1	2.0%	7.0%	74	0.7%	3.5%	2	5.1%	128	2.4%
	Moderate	15	17.0%	1,368	9.0%	18.5%	9	18.4%	16.0%	689	6.9%	10.6%	6	15.4%	679	12.8%
	Middle	21	23.9%	2,069	13.6%	21.9%	10	20.4%	24.4%	1,099	11.1%	19.7%	11	28.2%	970	18.4%
	Upper	42	47.7%	10,119	66.6%	33.9%	25	51.0%	39.4%	7,218	72.8%	49.8%	17	43.6%	2,901	54.9%
	Unknown	7	8.0%	1,447	9.5%	0.0%	4	8.2%	13.2%	840	8.5%	16.3%	3	7.7%	607	11.5%
	<i>Total</i>	<i>88</i>	<i>100%</i>	<i>15,205</i>	<i>100%</i>	<i>100.0%</i>	<i>49</i>	<i>100%</i>	<i>100%</i>	<i>9,920</i>	<i>100%</i>	<i>100%</i>	<i>39</i>	<i>100%</i>	<i>5,285</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: TN Claiborne

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
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%	
	Moderate	22	26.8%	1,027	19.3%	13.1%	12	26.1%	19.0%	636	18.4%	11.9%	10	27.8%	391	20.9%	
	Middle	60	73.2%	4,301	80.7%	86.9%	34	73.9%	80.4%	2,825	81.6%	87.9%	26	72.2%	1,476	79.1%	
	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%	
	Unknown	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%	0.6%	0	0.0%	0.2%	0	0.0%	0	0.0%	
	Total	82	100%	5,328	100%	100.0%	46	100%	100%	3,461	100%	100%	36	100%	1,867	100%	

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: TN Claiborne

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	69	84.1%	4,147	77.8%	91.0%	39	84.8%	53.6%	2,497	72.1%	50.2%	30	83.3%	1,650	88.4%
		Over \$1 Million	3	3.7%	754	14.2%	7.1%	2	4.3%		700	20.2%		1	2.8%	54	2.9%
		<i>Total Rev. available</i>	72	87.8%	4,901	92.0%	98.0%	41	89.1%		3,197	92.4%		31	86.1%	1,704	91.3%
		Rev. Not Known	10	12.2%	427	8.0%	2.0%	5	10.9%		264	7.6%		5	13.9%	163	8.7%
		Total	82	100%	5,328	100%	100%	46	100%		3,461	100%		36	100%	1,867	100%
	Loan Size	\$100,000 or Less	72	87.8%	2,865	53.8%		39	84.8%	93.4%	1,654	47.8%	48.4%	33	91.7%	1,211	64.9%
		\$100,001 - \$250,000	5	6.1%	763	14.3%		3	6.5%	5.1%	457	13.2%	30.3%	2	5.6%	306	16.4%
		\$250,001 - \$1 Million	5	6.1%	1,700	31.9%		4	8.7%	1.5%	1,350	39.0%	21.3%	1	2.8%	350	18.7%
		Total	82	100%	5,328	100%		46	100%	100%	3,461	100%	100%	36	100%	1,867	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	62	89.9%	2,509	60.5%		35	89.7%		1,515	60.7%		27	90.0%	994	60.2%
\$100,001 - \$250,000		4	5.8%	638	15.4%		2	5.1%		332	13.3%		2	6.7%	306	18.5%	
\$250,001 - \$1 Million		3	4.3%	1,000	24.1%		2	5.1%		650	26.0%		1	3.3%	350	21.2%	
Total		69	100%	4,147	100%		39	100%		2,497	100%		30	100%	1,650	100%	

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Johnson City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
HOME PURCHASE	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	2.5%	0	0.0%	1.3%	0	0.0%	0	0.0%
	Moderate	1	50.0%	271	41.3%	18.5%	1	100.0%	20.6%	271	100.0%	16.3%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	30.2%	0	0.0%	27.5%	0	0.0%	0	0.0%
	Upper	1	50.0%	385	58.7%	42.5%	0	0.0%	46.7%	0	0.0%	54.9%	1	100.0%	385	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%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>656</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>271</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>385</i>	<i>100%</i>
REFINANCE	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	1.5%	0	0.0%	0.9%	0	0.0%	0	0.0%
	Moderate	1	50.0%	92	31.3%	18.5%	0	0.0%	20.0%	0	0.0%	16.2%	1	50.0%	92	31.3%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	34.4%	0	0.0%	33.7%	0	0.0%	0	0.0%
	Upper	1	50.0%	202	68.7%	42.5%	0	0.0%	44.1%	0	0.0%	49.2%	1	50.0%	202	68.7%
	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%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>294</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>294</i>	<i>100%</i>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	0.8%	0	0.0%	0.5%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	17.0%	0	0.0%	13.6%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	34.2%	0	0.0%	31.7%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	48.1%	0	0.0%	54.2%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
MULTI FAMILY	Low	0	0.0%	0	0.0%	11.2%	0	0.0%	15.0%	0	0.0%	14.0%	0	0.0%	0	0.0%
	Moderate	1	0.0%	174	1.2%	30.8%	0	0.0%	22.5%	0	0.0%	6.0%	1	50.0%	174	1.2%
	Middle	1	0.0%	14,500	98.8%	14.7%	0	0.0%	22.5%	0	0.0%	16.0%	1	50.0%	14,500	98.8%
	Upper	0	0.0%	0	0.0%	43.3%	0	0.0%	40.0%	0	0.0%	64.0%	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%
	<i>Total</i>	<i>2</i>	<i>0.0%</i>	<i>14,674</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>14,674</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	2.8%	0	0.0%	7.3%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	19.2%	0	0.0%	15.8%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	29.1%	0	0.0%	20.8%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	48.8%	0	0.0%	56.1%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Johnson City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022				2023					
		Bank				Owner Occupied Units %	Count		Dollar		Count		Dollar			
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	Agg %	Bank #	%	Dollar \$ (000s)	Bank %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	1.0%	0	0.0%	1.6%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	15.0%	0	0.0%	10.1%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	37.0%	0	0.0%	38.8%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	47.0%	0	0.0%	49.4%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	22.2%	0	0.0%	26.9%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	50.0%	0	0.0%	47.0%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	27.8%	0	0.0%	26.1%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	2.2%	0	0.0%	2.3%	0	0.0%	0	0.0%
	Moderate	3	50.0%	537	3.4%	18.5%	1	100.0%	19.9%	271	100.0%	15.3%	2	40.0%	266	1.7%
	Middle	1	16.7%	14,500	92.8%	36.8%	0	0.0%	31.9%	0	0.0%	28.1%	1	20.0%	14,500	94.4%
	Upper	2	33.3%	587	3.8%	42.5%	0	0.0%	46.1%	0	0.0%	54.2%	2	40.0%	587	3.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>6</i>	<i>100%</i>	<i>15,624</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>271</i>	<i>100%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>15,353</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Johnson City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar	
		Count	%	Dollar \$ (000s)	%		Bank #	%	Agg %	Bank \$ (000s)	%	Agg %	#	%	Dollar \$ (000s)	%
HOME PURCHASE	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	5.5%	0	0.0%	2.4%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	18.2%	0	0.0%	11.4%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	20.2%	0	0.0%	17.0%	0	0.0%	0	0.0%
	Upper	2	100.0%	656	100.0%	44.1%	1	100.0%	43.3%	271	100.0%	55.5%	1	100.0%	385	100.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	12.8%	0	0.0%	13.7%	0	0.0%	0	0.0%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>656</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>271</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>385</i>	<i>100%</i>
REFINANCE	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	12.9%	0	0.0%	6.7%	0	0.0%	0	0.0%
	Moderate	1	50.0%	92	31.3%	15.7%	0	0.0%	21.7%	0	0.0%	16.5%	1	50.0%	92	31.3%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	21.9%	0	0.0%	20.8%	0	0.0%	0	0.0%
	Upper	1	50.0%	202	68.7%	44.1%	0	0.0%	33.7%	0	0.0%	44.0%	1	50.0%	202	68.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	9.8%	0	0.0%	12.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>294</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>294</i>	<i>100%</i>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	8.7%	0	0.0%	6.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	16.5%	0	0.0%	10.7%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	23.9%	0	0.0%	17.9%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	49.1%	0	0.0%	62.7%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.8%	0	0.0%	2.7%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
MULTI FAMILY	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%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	15.0%	0	0.0%	6.0%	0	0.0%	0	0.0%
	Unknown	2	100.0%	14,674	100.0%	0.0%	0	0.0%	85.0%	0	0.0%	94.0%	2	100.0%	14,674	100.0%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>14,674</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>14,674</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	10.8%	0	0.0%	5.2%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	16.9%	0	0.0%	14.6%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	22.1%	0	0.0%	13.0%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	44.1%	0	0.0%	62.7%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	6.1%	0	0.0%	4.4%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Johnson City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022				2023					
		Bank		Dollar		Families by Family Income %	Count		Dollar		Count		Dollar			
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	%	\$ (000s)	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	6.0%	0	0.0%	3.9%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	18.0%	0	0.0%	13.5%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	25.0%	0	0.0%	19.4%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	39.0%	0	0.0%	38.5%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	12.0%	0	0.0%	24.7%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	11.1%	0	0.0%	7.5%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	11.1%	0	0.0%	14.7%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	77.8%	0	0.0%	77.9%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	8.1%	0	0.0%	3.4%	0	0.0%	0	0.0%
	Moderate	1	16.7%	92	0.6%	15.7%	0	0.0%	18.7%	0	0.0%	11.7%	1	20.0%	92	0.6%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	21.0%	0	0.0%	16.5%	0	0.0%	0	0.0%
	Upper	3	50.0%	858	5.5%	44.1%	1	100.0%	40.6%	271	100.0%	49.1%	2	40.0%	587	3.8%
	Unknown	2	33.3%	14,674	93.9%	0.0%	0	0.0%	11.5%	0	0.0%	19.4%	2	40.0%	14,674	95.6%
	<i>Total</i>	<i>6</i>	<i>100%</i>	<i>15,624</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>271</i>	<i>100%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>15,353</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: TN Johnson City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	2.1%	0	0.0%	1.6%	0	0.0%	1.8%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	27.2%	0	0.0%	22.1%	0	0.0%	16.7%	0	0.0%	0	0.0%	
	Middle	1	11.1%	100	19.0%	24.3%	1	14.3%	26.8%	100	32.8%	26.8%	0	0.0%	0	0.0%	
	Upper	7	77.8%	377	71.7%	45.8%	5	71.4%	48.4%	156	51.1%	53.4%	2	100.0%	221	100.0%	
	Unknown	1	11.1%	49	9.3%	0.5%	1	14.3%	0.5%	49	16.1%	1.1%	0	0.0%	0	0.0%	
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.5%	0	0.0%	0.2%	0	0.0%	0	0.0%	
	Total	9	100%	526	100%	100.0%	7	100%	100%	305	100%	100%	2	100%	221	100%	

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: TN Johnson City

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	9	100.0%	526	100.0%	91.5%	7	100.0%	51.8%	305	100.0%	39.8%	2	100.0%	221	100.0%
		Over \$1 Million	0	0.0%	0	0.0%	7.7%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		<i>Total Rev. available</i>	9	100.0%	526	100.0%	99.2%	7	100.0%		305	100.0%		2	100.0%	221	100.0%
		Rev. Not Known	0	0.0%	0	0.0%	0.8%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
	Total	9	100%	526	100%	100%	7	100%	100%	305	100%	100%	2	100%	221	100%	
	Loan Size	\$100,000 or Less	8	88.9%	355	67.5%		7	100.0%	92.4%	305	100.0%	35.0%	1	50.0%	50	22.6%
		\$100,001 - \$250,000	1	11.1%	171	32.5%		0	0.0%	4.1%	0	0.0%	18.2%	1	50.0%	171	77.4%
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%	3.5%	0	0.0%	46.8%	0	0.0%	0	0.0%
		Total	9	100%	526	100%		7	100%	100%	305	100%	100%	2	100%	221	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	8	88.9%	355	67.5%		7	100.0%		305	100.0%		1	50.0%	50	22.6%
		\$100,001 - \$250,000	1	11.1%	171	32.5%		0	0.0%		0	0.0%		1	50.0%	171	77.4%
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
Total		9	100%	526	100%		7	100%		305	100%		2	100%	221	100%	

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Kingsport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	1.6%	0	0.0%	1.3%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	20.3%	0	0.0%	14.3%	0	0.0%	0	0.0%
	Middle	2	50.0%	582	40.6%	59.2%	2	66.7%	52.1%	582	51.4%	52.9%	0	0.0%	0	0.0%
	Upper	2	50.0%	850	59.4%	26.7%	1	33.3%	26.0%	550	48.6%	31.5%	1	100.0%	300	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%
	Total	4	100%	1,432	100%	100.0%	3	100%	100%	1,132	100%	100%	1	100%	300	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.9%	0	0.0%	0.8%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	14.1%	0	0.0%	10.0%	0	0.0%	0	0.0%
	Middle	1	50.0%	116	22.7%	59.2%	0	0.0%	54.9%	0	0.0%	55.9%	1	50.0%	116	22.7%
	Upper	1	50.0%	395	77.3%	26.7%	0	0.0%	30.1%	0	0.0%	33.2%	1	50.0%	395	77.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Total	2	100%	511	100%	100.0%	0	0.0%	100%	0	0.0%	100%	2	100%	511	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.4%	0	0.0%	0.2%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	9.9%	0	0.0%	7.4%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	57.6%	0	0.0%	60.7%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	32.1%	0	0.0%	31.8%	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%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%
MULTI FAMILY						Multi-Family Units										
	Low	0	0.0%	0	0.0%	5.7%	0	0.0%	4.3%	0	0.0%	2.6%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	32.1%	0	0.0%	42.6%	0	0.0%	51.4%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	45.9%	0	0.0%	40.4%	0	0.0%	17.2%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	16.2%	0	0.0%	12.8%	0	0.0%	28.8%	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%
Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.8%	0	0.0%	1.7%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	6.9%	0	0.0%	3.1%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	51.6%	0	0.0%	49.6%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	40.7%	0	0.0%	45.6%	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%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Kingsport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Owner Occupied Units %	Count			Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Dollar \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.7%	0	0.0%	3.9%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	14.0%	0	0.0%	8.8%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	59.6%	0	0.0%	63.4%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	25.7%	0	0.0%	23.8%	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%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	20.9%	0	0.0%	17.1%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	62.8%	0	0.0%	67.3%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	16.3%	0	0.0%	15.5%	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%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	1.3%	0	0.0%	1.3%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	17.0%	0	0.0%	15.1%	0	0.0%	0	0.0%	
	Middle	3	50.0%	698	35.9%	59.2%	2	66.7%	53.5%	582	51.4%	51.7%	1	33.3%	116	14.3%	
	Upper	3	50.0%	1,245	64.1%	26.7%	1	33.3%	28.2%	550	48.6%	32.0%	2	66.7%	695	85.7%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>6</i>	<i>100%</i>	<i>1,943</i>	<i>100%</i>	<i>100.0%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>1,132</i>	<i>100%</i>	<i>100%</i>	<i>3</i>	<i>100%</i>	<i>811</i>	<i>100%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Kingsport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Families by Family Income %	Count			Dollar		Agg	Count			Dollar	
		Count	Dollar				Bank	Agg	Bank	Agg	Bank		Agg	Bank	Dollar		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %			
HOME PURCHASE	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	7.5%	0	0.0%	3.5%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	19.2%	0	0.0%	12.9%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	21.7%	0	0.0%	19.5%	0	0.0%	0	0.0%	
	Upper	4	100.0%	1,432	100.0%	41.2%	3	100.0%	38.1%	1,132	100.0%	50.5%	1	100.0%	300	100.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	13.5%	0	0.0%	13.5%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>1,432</i>	<i>100%</i>	<i>100.0%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>1,132</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>300</i>	<i>100%</i>	
REFINANCE	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	10.8%	0	0.0%	5.5%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	23.5%	0	0.0%	17.3%	0	0.0%	0	0.0%	
	Middle	1	50.0%	116	22.7%	20.3%	0	0.0%	22.3%	0	0.0%	21.3%	1	50.0%	116	22.7%	
	Upper	1	50.0%	395	77.3%	41.2%	0	0.0%	33.9%	0	0.0%	44.5%	1	50.0%	395	77.3%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	9.5%	0	0.0%	11.4%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>511</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>511</i>	<i>100%</i>	
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	12.6%	0	0.0%	6.8%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	22.3%	0	0.0%	17.5%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	21.0%	0	0.0%	18.8%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	42.2%	0	0.0%	53.6%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.9%	0	0.0%	3.3%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
MULTI FAMILY	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	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%	
	Middle	0	0.0%	0	0.0%	20.3%	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%	17.0%	0	0.0%	8.5%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	83.0%	0	0.0%	91.5%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	7.3%	0	0.0%	3.0%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	13.8%	0	0.0%	7.5%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	26.4%	0	0.0%	18.1%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	47.2%	0	0.0%	68.5%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	5.3%	0	0.0%	2.8%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Kingsport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar	
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	9.6%	0	0.0%	4.6%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	20.6%	0	0.0%	12.3%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	16.2%	0	0.0%	12.9%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	35.3%	0	0.0%	39.8%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	18.4%	0	0.0%	30.4%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	2.3%	0	0.0%	1.3%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	2.3%	0	0.0%	2.6%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	4.7%	0	0.0%	9.5%	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%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	90.7%	0	0.0%	86.6%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	8.8%	0	0.0%	3.9%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	20.1%	0	0.0%	13.0%	0	0.0%	0	0.0%
	Middle	1	16.7%	116	6.0%	20.3%	0	0.0%	21.5%	0	0.0%	18.4%	1	33.3%	116	14.3%
	Upper	5	83.3%	1,827	94.0%	41.2%	3	100.0%	37.2%	1,132	100.0%	46.6%	2	66.7%	695	85.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	12.4%	0	0.0%	18.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>6</i>	<i>100%</i>	<i>1,943</i>	<i>100%</i>	<i>100.0%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>1,132</i>	<i>100%</i>	<i>100%</i>	<i>3</i>	<i>100%</i>	<i>811</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: TN Kingsport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESSES	Low	1	6.7%	61	1.8%	8.9%	0	0.0%	5.0%	0	0.0%	7.1%	1	14.3%	61	5.4%	
	Moderate	5	33.3%	410	12.2%	17.6%	4	50.0%	13.6%	320	14.3%	17.1%	1	14.3%	90	8.0%	
	Middle	6	40.0%	2,707	80.7%	51.5%	3	37.5%	55.3%	1,878	84.1%	56.5%	3	42.9%	829	74.0%	
	Upper	3	20.0%	175	5.2%	21.9%	1	12.5%	25.8%	35	1.6%	19.2%	2	28.6%	140	12.5%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.3%	0	0.0%	0.1%	0	0.0%	0	0.0%	
	Total	15	100%	3,353	100%	100.0%	8	100%	100%	2,233	100%	100%	7	100%	1,120	100%	

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: TN Kingsport

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	7	46.7%	395	11.8%	91.2%	3	37.5%	47.2%	150	6.7%	39.8%	4	57.1%	245	21.9%
		Over \$1 Million	8	53.3%	2,958	88.2%	8.1%	5	62.5%		2,083	93.3%		3	42.9%	875	78.1%
		<i>Total Rev. available</i>	15	100.0%	3,353	100.0%	99.3%	8	100.0%		2,233	100.0%		7	100.0%	1,120	100.0%
		Rev. Not Known	0	0.0%	0	0.0%	0.7%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total	15	100%	3,353	100%	100%	8	100%		2,233	100%		7	100%	1,120	100%
	Loan Size	\$100,000 or Less	11	73.3%	600	17.9%		5	62.5%	92.2%	230	10.3%	33.8%	6	85.7%	370	33.0%
		\$100,001 - \$250,000	1	6.7%	150	4.5%		1	12.5%	4.0%	150	6.7%	16.8%	0	0.0%	0	0.0%
		\$250,001 - \$1 Million	3	20.0%	2,603	77.6%		2	25.0%	3.7%	1,853	83.0%	49.3%	1	14.3%	750	67.0%
		Total	15	100%	3,353	100%		8	100%	100%	2,233	100%	100%	7	100%	1,120	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	7	100.0%	395	100.0%		3	100.0%		150	100.0%		4	100.0%	245	100.0%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total	7	100%	395	100%		3	100%		150	100%		4	100%	245	100%

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Morristown

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count			Dollar		Count			Dollar	
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %		
HOME PURCHASE	Low	2	9.1%	169	2.9%	2.7%	2	13.3%	3.3%	169	4.7%	1.6%	0	0.0%	0	0.0%
	Moderate	2	9.1%	396	6.8%	20.2%	1	6.7%	22.8%	296	8.3%	17.4%	1	14.3%	100	4.4%
	Middle	16	72.7%	4,515	77.1%	58.8%	10	66.7%	57.7%	2,319	65.2%	63.2%	6	85.7%	2,196	95.6%
	Upper	2	9.1%	775	13.2%	18.3%	2	13.3%	16.2%	775	21.8%	17.8%	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%
	Total	22	100%	5,855	100%	100.0%	15	100%	100%	3,559	100%	100%	7	100%	2,296	100%
REFINANCE	Low	1	8.3%	177	8.2%	2.7%	1	14.3%	2.9%	177	15.1%	1.7%	0	0.0%	0	0.0%
	Moderate	4	33.3%	458	21.2%	20.2%	2	28.6%	15.2%	232	19.7%	11.5%	2	40.0%	226	23.0%
	Middle	7	58.3%	1,522	70.6%	58.8%	4	57.1%	62.3%	766	65.2%	63.2%	3	60.0%	756	77.0%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	19.7%	0	0.0%	23.6%	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%
	Total	12	100%	2,157	100%	100.0%	7	100%	100%	1,175	100%	100%	5	100%	982	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	2.9%	0	0.0%	2.2%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	20.2%	0	0.0%	11.7%	0	0.0%	10.3%	0	0.0%	0	0.0%
	Middle	1	100.0%	160	100.0%	58.8%	1	100.0%	66.4%	160	100.0%	64.9%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	19.0%	0	0.0%	22.5%	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%
	Total	1	100%	160	100%	100.0%	1	100%	100%	160	100%	100%	0	0.0%	0	0.0%
MULTI FAMILY	Low	0	0.0%	0	0.0%	13.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	2	200.0%	1,509	70.0%	30.7%	0	0.0%	27.8%	0	0.0%	3.9%	2	66.7%	1,509	79.4%
	Middle	2	200.0%	648	30.0%	46.8%	1	100.0%	55.6%	256	100.0%	76.7%	1	33.3%	392	20.6%
	Upper	0	0.0%	0	0.0%	8.8%	0	0.0%	16.7%	0	0.0%	19.5%	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%
	Total	4	400%	2,157	100%	100.0%	1	100%	100%	256	100%	100%	3	100%	1,901	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	1.2%	0	0.0%	2.3%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	20.2%	0	0.0%	17.3%	0	0.0%	12.8%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	58.8%	0	0.0%	54.3%	0	0.0%	54.9%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	27.2%	0	0.0%	30.1%	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%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Morristown

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Owner Occupied Units %	Count			Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Dollar \$ (000s)	\$ %	Agg %	Bank #	%	Dollar \$ (000s)	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	50.0%	60	47.6%	2.7%	0	0.0%	0.0%	0	0.0%	0.0%	1	50.0%	60	47.6%	
	Moderate	0	0.0%	0	0.0%	20.2%	0	0.0%	30.0%	0	0.0%	34.3%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	58.8%	0	0.0%	60.0%	0	0.0%	51.8%	0	0.0%	0	0.0%	
	Upper	1	50.0%	66	52.4%	18.3%	0	0.0%	10.0%	0	0.0%	13.9%	1	50.0%	66	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%	
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>126</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>126</i>	<i>100%</i>	
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	20.2%	0	0.0%	26.7%	0	0.0%	22.3%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	58.8%	0	0.0%	53.3%	0	0.0%	53.4%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	20.0%	0	0.0%	24.3%	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%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
HMDA TOTALS	Low	4	9.8%	406	3.9%	2.7%	3	12.5%	3.0%	346	6.7%	1.4%	1	5.9%	60	1.1%	
	Moderate	8	19.5%	2,363	22.6%	20.2%	3	12.5%	19.7%	528	10.3%	14.0%	5	29.4%	1,835	34.6%	
	Middle	26	63.4%	6,845	65.5%	58.8%	16	66.7%	59.5%	3,501	68.0%	64.9%	10	58.8%	3,344	63.0%	
	Upper	3	7.3%	841	8.0%	18.3%	2	8.3%	17.8%	775	15.0%	19.7%	1	5.9%	66	1.2%	
	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%	
	<i>Total</i>	<i>41</i>	<i>100%</i>	<i>10,455</i>	<i>100%</i>	<i>100.0%</i>	<i>24</i>	<i>100%</i>	<i>100%</i>	<i>5,150</i>	<i>100%</i>	<i>100%</i>	<i>17</i>	<i>100%</i>	<i>5,305</i>	<i>100%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Morristown

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar	
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Bank	Bank	Bank		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %		
HOME PURCHASE	Low	1	4.5%	91	1.6%	21.0%	1	6.7%	5.2%	91	2.6%	2.8%	0	0.0%	0	0.0%
	Moderate	3	13.6%	304	5.2%	19.3%	2	13.3%	22.9%	204	5.7%	16.3%	1	14.3%	100	4.4%
	Middle	3	13.6%	891	15.2%	18.9%	2	13.3%	23.7%	697	19.6%	22.0%	1	14.3%	194	8.4%
	Upper	9	40.9%	3,901	66.6%	40.8%	5	33.3%	28.6%	1,997	56.1%	40.4%	4	57.1%	1,904	82.9%
	Unknown	6	27.3%	668	11.4%	0.0%	5	33.3%	19.5%	570	16.0%	18.5%	1	14.3%	98	4.3%
	<i>Total</i>	<i>22</i>	<i>100%</i>	<i>5,855</i>	<i>100%</i>	<i>100.0%</i>	<i>15</i>	<i>100%</i>	<i>100%</i>	<i>3,559</i>	<i>100%</i>	<i>100%</i>	<i>7</i>	<i>100%</i>	<i>2,296</i>	<i>100%</i>
REFINANCE	Low	1	8.3%	85	3.9%	21.0%	1	14.3%	13.9%	85	7.2%	8.0%	0	0.0%	0	0.0%
	Moderate	2	16.7%	236	10.9%	19.3%	1	14.3%	22.1%	136	11.6%	17.7%	1	20.0%	100	10.2%
	Middle	5	41.7%	774	35.9%	18.9%	3	42.9%	26.8%	462	39.3%	27.0%	2	40.0%	312	31.8%
	Upper	3	25.0%	885	41.0%	40.8%	1	14.3%	26.1%	315	26.8%	35.1%	2	40.0%	570	58.0%
	Unknown	1	8.3%	177	8.2%	0.0%	1	14.3%	11.1%	177	15.1%	12.2%	0	0.0%	0	0.0%
	<i>Total</i>	<i>12</i>	<i>100%</i>	<i>2,157</i>	<i>100%</i>	<i>100.0%</i>	<i>7</i>	<i>100%</i>	<i>100%</i>	<i>1,175</i>	<i>100%</i>	<i>100%</i>	<i>5</i>	<i>100%</i>	<i>982</i>	<i>100%</i>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	21.0%	0	0.0%	13.1%	0	0.0%	9.4%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	19.3%	0	0.0%	18.2%	0	0.0%	18.4%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	18.9%	0	0.0%	21.2%	0	0.0%	19.3%	0	0.0%	0	0.0%
	Upper	1	100.0%	160	100.0%	40.8%	1	100.0%	45.3%	160	100.0%	51.9%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.2%	0	0.0%	1.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>160</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>160</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
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%
	Moderate	0	0.0%	0	0.0%	19.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	18.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	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%
	Unknown	4	100.0%	2,157	100.0%	0.0%	1	100.0%	100.0%	256	100.0%	100.0%	3	100.0%	1,901	100.0%
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>2,157</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>256</i>	<i>100%</i>	<i>100%</i>	<i>3</i>	<i>100%</i>	<i>1,901</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	21.0%	0	0.0%	11.1%	0	0.0%	7.6%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	19.3%	0	0.0%	19.8%	0	0.0%	12.6%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	18.9%	0	0.0%	25.9%	0	0.0%	25.9%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	40.8%	0	0.0%	38.3%	0	0.0%	50.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.9%	0	0.0%	4.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Morristown

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	%	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	1	50.0%	60	47.6%	21.0%	0	0.0%	15.0%	0	0.0%	16.0%	1	50.0%	60	47.6%	
	Moderate	0	0.0%	0	0.0%	19.3%	0	0.0%	25.0%	0	0.0%	24.2%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	18.9%	0	0.0%	30.0%	0	0.0%	22.2%	0	0.0%	0	0.0%	
	Upper	1	50.0%	66	52.4%	40.8%	0	0.0%	25.0%	0	0.0%	33.3%	1	50.0%	66	52.4%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	5.0%	0	0.0%	4.3%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>126</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>2</i>	<i>100%</i>	<i>126</i>	<i>100%</i>	
PURPOSE NOT APPLICABLE	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%	
	Moderate	0	0.0%	0	0.0%	19.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	18.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	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%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
HMDA TOTALS	Low	3	7.3%	236	2.3%	21.0%	2	8.3%	8.6%	176	3.4%	3.9%	1	5.9%	60	1.1%	
	Moderate	5	12.2%	540	5.2%	19.3%	3	12.5%	21.9%	340	6.6%	14.3%	2	11.8%	200	3.8%	
	Middle	8	19.5%	1,665	15.9%	18.9%	5	20.8%	24.2%	1,159	22.5%	20.0%	3	17.6%	506	9.5%	
	Upper	14	34.1%	5,012	47.9%	40.8%	7	29.2%	28.8%	2,472	48.0%	33.8%	7	41.2%	2,540	47.9%	
	Unknown	11	26.8%	3,002	28.7%	0.0%	7	29.2%	16.4%	1,003	19.5%	28.0%	4	23.5%	1,999	37.7%	
	<i>Total</i>	<i>41</i>	<i>100%</i>	<i>10,455</i>	<i>100%</i>	<i>100.0%</i>	<i>24</i>	<i>100%</i>	<i>100%</i>	<i>5,150</i>	<i>100%</i>	<i>100%</i>	<i>17</i>	<i>100%</i>	<i>5,305</i>	<i>100%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Morristown

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Total Businesses	Count			Dollar			Count		Dollar	
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %		
SMALL BUSINESSES	Low	1	2.8%	470	13.5%	14.7%	0	0.0%	10.4%	0	0.0%	13.8%	1	5.9%	470	29.6%
	Moderate	5	13.9%	146	4.2%	28.6%	2	10.5%	21.8%	51	2.7%	28.0%	3	17.6%	95	6.0%
	Middle	21	58.3%	1,817	52.3%	40.7%	10	52.6%	46.0%	972	51.6%	41.9%	11	64.7%	845	53.1%
	Upper	9	25.0%	1,041	30.0%	16.1%	7	36.8%	21.1%	861	45.7%	16.2%	2	11.8%	180	11.3%
	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%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.8%	0	0.0%	0.1%	0	0.0%	0	0.0%
	Total	36	100%	3,474	100%	100.0%	19	100%	100%	1,884	100%	100%	17	100%	1,590	100%

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Morristown

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022						2023				
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	18	50.0%	804	23.1%	90.4%	8	42.1%	48.4%	390	20.7%	34.1%	10	58.8%	414	26.0%
		Over \$1 Million	10	27.8%	2,141	61.6%	9.1%	7	36.8%		1,221	64.8%		3	17.6%	920	57.9%
		<i>Total Rev. available</i>	28	77.8%	2,945	84.8%	99.4%	15	78.9%		1,611	85.5%		13	76.5%	1,334	83.9%
		Rev. Not Known	8	22.2%	529	15.2%	0.6%	4	21.1%		273	14.5%		4	23.5%	256	16.1%
		Total	36	100%	3,474	100%	100%	19	100%		1,884	100%		17	100%	1,590	100%
	Loan Size	\$100,000 or Less	26	72.2%	941	27.1%		14	73.7%	90.2%	604	32.1%	25.6%	12	70.6%	337	21.2%
		\$100,001 - \$250,000	6	16.7%	963	27.7%		3	15.8%	4.5%	480	25.5%	17.1%	3	17.6%	483	30.4%
		\$250,001 - \$1 Million	4	11.1%	1,570	45.2%		2	10.5%	5.3%	800	42.5%	57.3%	2	11.8%	770	48.4%
		Total	36	100%	3,474	100%		19	100%	100%	1,884	100%	100%	17	100%	1,590	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	16	88.9%	404	50.2%		7	87.5%		190	48.7%		9	90.0%	214	51.7%
		\$100,001 - \$250,000	2	11.1%	400	49.8%		1	12.5%		200	51.3%		1	10.0%	200	48.3%
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total	18	100%	804	100%		8	100%		390	100%		10	100%	414	100%

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Newport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (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%
	Moderate	2	28.6%	413	33.3%	39.4%	1	25.0%	42.2%	62	11.2%	37.9%	1	33.3%	351	51.2%
	Middle	5	71.4%	826	66.7%	60.6%	3	75.0%	57.8%	491	88.8%	62.1%	2	66.7%	335	48.8%
	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%
	Unknown	0	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%	1,239	100%	100.0%	4	100%	100%	553	100%	100%	3	100%	686	100%
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%
	Moderate	2	22.2%	132	13.2%	39.4%	2	25.0%	36.9%	132	14.1%	32.9%	0	0.0%	0	0.0%
	Middle	7	77.8%	870	86.8%	60.6%	6	75.0%	63.1%	805	85.9%	67.1%	1	100.0%	65	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Unknown	0	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%	1,002	100%	100.0%	8	100%	100%	937	100%	100%	1	100%	65	100%
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%
	Moderate	0	0.0%	0	0.0%	39.4%	0	0.0%	57.9%	0	0.0%	51.2%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	60.6%	0	0.0%	42.1%	0	0.0%	48.8%	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%
	Unknown	0	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%	100%	0	0.0%	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%
	Moderate	1	0.0%	335	100.0%	86.2%	1	100.0%	100.0%	335	100.0%	100.0%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	13.8%	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%
	Unknown	0	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	0.0%	335	100%	100.0%	1	100%	100%	335	100%	100%	0	0.0%	0	0.0%	
OTHER PURPOSE LOC	Low	0	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%	39.4%	0	0.0%	17.6%	0	0.0%	19.3%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	60.6%	0	0.0%	82.4%	0	0.0%	80.7%	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%
	Unknown	0	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%	100%	0	0.0%	0	0.0%

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Newport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	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	16.7%	40	5.1%	39.4%	0	0.0%	31.8%	0	0.0%	29.8%	1	16.7%	40	5.1%
	Middle	5	83.3%	746	94.9%	60.6%	0	0.0%	68.2%	0	0.0%	70.2%	5	83.3%	746	94.9%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>6</i>	<i>100%</i>	<i>786</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>6</i>	<i>100%</i>	<i>786</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	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%	39.4%	0	0.0%	20.0%	0	0.0%	22.4%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	60.6%	0	0.0%	80.0%	0	0.0%	77.6%	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%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	6	26.1%	920	27.4%	39.4%	4	30.8%	40.4%	529	29.0%	36.6%	2	20.0%	391	25.4%
	Middle	17	73.9%	2,442	72.6%	60.6%	9	69.2%	59.6%	1,296	71.0%	63.4%	8	80.0%	1,146	74.6%
	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%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>23</i>	<i>100%</i>	<i>3,362</i>	<i>100%</i>	<i>100.0%</i>	<i>13</i>	<i>100%</i>	<i>100%</i>	<i>1,825</i>	<i>100%</i>	<i>100%</i>	<i>10</i>	<i>100%</i>	<i>1,537</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Newport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar		
		Count	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
HOME PURCHASE	Low	0	0.0%	0	0.0%	25.7%	0	0.0%	5.8%	0	0.0%	2.9%	0	0.0%	0	0.0%	
	Moderate	2	28.6%	128	10.3%	24.3%	2	50.0%	19.7%	128	23.1%	13.7%	0	0.0%	0	0.0%	
	Middle	2	28.6%	410	33.1%	20.2%	1	25.0%	24.2%	275	49.7%	21.0%	1	33.3%	135	19.7%	
	Upper	3	42.9%	701	56.6%	29.9%	1	25.0%	35.4%	150	27.1%	46.3%	2	66.7%	551	80.3%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	14.9%	0	0.0%	16.1%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>7</i>	<i>100%</i>	<i>1,239</i>	<i>100%</i>	<i>100.0%</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>553</i>	<i>100%</i>	<i>100%</i>	<i>3</i>	<i>100%</i>	<i>686</i>	<i>100%</i>	
REFINANCE	Low	2	22.2%	160	16.0%	25.7%	2	25.0%	6.0%	160	17.1%	3.0%	0	0.0%	0	0.0%	
	Moderate	4	44.4%	324	32.3%	24.3%	4	50.0%	23.0%	324	34.6%	17.4%	0	0.0%	0	0.0%	
	Middle	1	11.1%	65	6.5%	20.2%	0	0.0%	24.9%	0	0.0%	26.4%	1	100.0%	65	100.0%	
	Upper	2	22.2%	453	45.2%	29.9%	2	25.0%	34.6%	453	48.3%	39.5%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	11.5%	0	0.0%	13.7%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>9</i>	<i>100%</i>	<i>1,002</i>	<i>100%</i>	<i>100.0%</i>	<i>8</i>	<i>100%</i>	<i>100%</i>	<i>937</i>	<i>100%</i>	<i>100%</i>	<i>1</i>	<i>100%</i>	<i>65</i>	<i>100%</i>	
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	25.7%	0	0.0%	10.5%	0	0.0%	5.5%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	24.3%	0	0.0%	26.3%	0	0.0%	20.1%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	20.2%	0	0.0%	34.2%	0	0.0%	25.8%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	29.9%	0	0.0%	26.3%	0	0.0%	43.9%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.6%	0	0.0%	4.7%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
MULTI FAMILY	Low	0	0.0%	0	0.0%	25.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	24.3%	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%	
	Upper	0	0.0%	0	0.0%	29.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Unknown	1	100.0%	335	100.0%	0.0%	1	100.0%	100.0%	335	100.0%	100.0%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>335</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>335</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	25.7%	0	0.0%	11.8%	0	0.0%	6.4%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	24.3%	0	0.0%	11.8%	0	0.0%	7.5%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	20.2%	0	0.0%	35.3%	0	0.0%	34.5%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	29.9%	0	0.0%	41.2%	0	0.0%	51.7%	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%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Newport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022						2023			
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar	
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Bank	Dollar			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	1	16.7%	40	5.1%	25.7%	0	0.0%	9.1%	0	0.0%	3.6%	1	16.7%	40	5.1%
	Moderate	3	50.0%	306	38.9%	24.3%	0	0.0%	22.7%	0	0.0%	17.7%	3	50.0%	306	38.9%
	Middle	1	16.7%	300	38.2%	20.2%	0	0.0%	9.1%	0	0.0%	5.1%	1	16.7%	300	38.2%
	Upper	1	16.7%	140	17.8%	29.9%	0	0.0%	54.5%	0	0.0%	70.1%	1	16.7%	140	17.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.5%	0	0.0%	3.6%	0	0.0%	0	0.0%
	<i>Total</i>	<i>6</i>	<i>100%</i>	<i>786</i>	<i>100%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>6</i>	<i>100%</i>	<i>786</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	25.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	24.3%	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%
	Upper	0	0.0%	0	0.0%	29.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	3	13.0%	200	5.9%	25.7%	2	15.4%	6.3%	160	8.8%	3.0%	1	10.0%	40	2.6%
	Moderate	9	39.1%	758	22.5%	24.3%	6	46.2%	20.8%	452	24.8%	14.9%	3	30.0%	306	19.9%
	Middle	4	17.4%	775	23.1%	20.2%	1	7.7%	24.6%	275	15.1%	22.4%	3	30.0%	500	32.5%
	Upper	6	26.1%	1,294	38.5%	29.9%	3	23.1%	35.1%	603	33.0%	44.6%	3	30.0%	691	45.0%
	Unknown	1	4.3%	335	10.0%	0.0%	1	7.7%	13.2%	335	18.4%	15.0%	0	0.0%	0	0.0%
	<i>Total</i>	<i>23</i>	<i>100%</i>	<i>3,362</i>	<i>100%</i>	<i>100.0%</i>	<i>13</i>	<i>100%</i>	<i>100%</i>	<i>1,825</i>	<i>100%</i>	<i>100%</i>	<i>10</i>	<i>100%</i>	<i>1,537</i>	<i>100%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: TN Newport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
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%	
	Moderate	1	50.0%	250	90.9%	60.6%	1	50.0%	43.7%	250	90.9%	56.1%	0	0.0%	0	0.0%	
	Middle	1	50.0%	25	9.1%	39.3%	1	50.0%	55.2%	25	9.1%	43.5%	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%	
	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%	
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	1.1%	0	0.0%	0.4%	0	0.0%	0	0.0%	
	<i>Total</i>	2	100%	275	100%	100.0%	2	100%	100%	275	100%	100%	0	0.0%	0	0.0%	

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: TN Newport

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	1	50.0%	25	9.1%	92.0%	1	50.0%	69.0%	25	9.1%	44.7%	0	0.0%	0	0.0%
		Over \$1 Million	1	50.0%	250	90.9%	5.9%	1	50.0%		250	90.9%		0	0.0%	0	0.0%
		<i>Total Rev. available</i>	2	100.0%	275	100.0%	97.9%	2	100.0%		275	100.0%		0	0.0%	0	0.0%
		Rev. Not Known	0	0.0%	0	0.0%	2.1%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
		<i>Total</i>	2	100%	275	100%	100%	2	100%		275	100%		0	0.0%	0	0.0%
	Loan Size	\$100,000 or Less	1	50.0%	25	9.1%		1	50.0%	95.3%	25	9.1%	44.7%	0	0.0%	0	0.0%
		\$100,001 - \$250,000	1	50.0%	250	90.9%		1	50.0%	3.8%	250	90.9%	33.6%	0	0.0%	0	0.0%
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%	0.9%	0	0.0%	21.7%	0	0.0%	0	0.0%
		<i>Total</i>	2	100%	275	100%		2	100%	100%	275	100%	100%	0	0.0%	0	0.0%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	25	100.0%		1	100.0%		25	100.0%		0	0.0%	0	0.0%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		<i>Total</i>	1	100%	25	100%		1	100%		25	100%		0	0.0%	0	0.0%

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Williamson-Rutherford

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	%	Dollar \$ (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%
	Moderate	0	0.0%	0	0.0%	5.9%	0	0.0%	5.9%	0	0.0%	2.8%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	16.5%	0	0.0%	13.4%	0	0.0%	8.6%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	77.6%	0	0.0%	80.7%	0	0.0%	88.6%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	5.9%	0	0.0%	4.9%	0	0.0%	2.5%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	16.5%	0	0.0%	15.5%	0	0.0%	10.2%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	77.6%	0	0.0%	79.6%	0	0.0%	87.3%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	5.9%	0	0.0%	2.4%	0	0.0%	1.2%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	16.5%	0	0.0%	9.8%	0	0.0%	6.6%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	77.6%	0	0.0%	87.8%	0	0.0%	92.2%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
MULTI FAMILY						Multi-Family Units										
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	10.0%	0	0.0%	23.1%	0	0.0%	19.8%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	30.5%	0	0.0%	30.8%	0	0.0%	25.5%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	59.6%	0	0.0%	46.2%	0	0.0%	54.6%	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%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	5.9%	0	0.0%	1.9%	0	0.0%	1.8%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	16.5%	0	0.0%	10.8%	0	0.0%	8.1%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	77.6%	0	0.0%	87.3%	0	0.0%	90.1%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Williamson-Rutherford

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending									
		2022, 2023					2022					2023				
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	%	Dollar \$ (000s)	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	5.9%	0	0.0%	2.7%	0	0.0%	1.7%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	16.5%	0	0.0%	12.4%	0	0.0%	6.1%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	77.6%	0	0.0%	84.9%	0	0.0%	92.1%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	5.9%	0	0.0%	40.4%	0	0.0%	10.2%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	16.5%	0	0.0%	28.1%	0	0.0%	26.3%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	77.6%	0	0.0%	31.6%	0	0.0%	63.6%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%
	Moderate	0	0.0%	0	0.0%	5.9%	0	0.0%	4.8%	0	0.0%	3.1%	0	0.0%	0	0.0%
	Middle	0	0.0%	0	0.0%	16.5%	0	0.0%	13.4%	0	0.0%	9.4%	0	0.0%	0	0.0%
	Upper	0	0.0%	0	0.0%	77.6%	0	0.0%	81.8%	0	0.0%	87.5%	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%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Williamson-Rutherford

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank		Agg	Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %			
HOME PURCHASE	Low	0	0.0%	0	0.0%	11.9%	0	0.0%	1.8%	0	0.0%	0.7%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	11.3%	0	0.0%	7.7%	0	0.0%	3.6%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	16.9%	0	0.0%	12.9%	0	0.0%	8.2%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	59.9%	0	0.0%	61.5%	0	0.0%	72.2%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	16.2%	0	0.0%	15.3%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
REFINANCE	Low	0	0.0%	0	0.0%	11.9%	0	0.0%	5.9%	0	0.0%	2.4%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	11.3%	0	0.0%	12.8%	0	0.0%	7.0%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	16.9%	0	0.0%	16.6%	0	0.0%	12.2%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	59.9%	0	0.0%	52.6%	0	0.0%	64.0%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	12.2%	0	0.0%	14.4%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	11.9%	0	0.0%	2.4%	0	0.0%	0.9%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	11.3%	0	0.0%	6.6%	0	0.0%	3.4%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	16.9%	0	0.0%	13.3%	0	0.0%	8.0%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	59.9%	0	0.0%	75.2%	0	0.0%	83.4%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.4%	0	0.0%	4.4%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
MULTI FAMILY	Low	0	0.0%	0	0.0%	11.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	11.3%	0	0.0%	0.0%	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%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	59.9%	0	0.0%	7.7%	0	0.0%	1.0%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	92.3%	0	0.0%	99.0%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	11.9%	0	0.0%	2.0%	0	0.0%	1.0%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	11.3%	0	0.0%	5.5%	0	0.0%	2.1%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	16.9%	0	0.0%	13.7%	0	0.0%	6.7%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	59.9%	0	0.0%	76.7%	0	0.0%	88.5%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.0%	0	0.0%	1.6%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Williamson-Rutherford

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Families by Family Income %	Count			Dollar			Count		Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	%	Agg %	Bank \$ (000s)	\$ %	Agg %	Bank #	%	Dollar \$ (000s)	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	11.9%	0	0.0%	3.0%	0	0.0%	1.0%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	11.3%	0	0.0%	9.1%	0	0.0%	2.3%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	16.9%	0	0.0%	9.7%	0	0.0%	3.2%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	59.9%	0	0.0%	67.8%	0	0.0%	81.1%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	10.4%	0	0.0%	12.3%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	11.9%	0	0.0%	17.5%	0	0.0%	5.3%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	11.3%	0	0.0%	1.8%	0	0.0%	1.4%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	16.9%	0	0.0%	1.8%	0	0.0%	2.5%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	59.9%	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%	78.9%	0	0.0%	90.8%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	
HMDA TOTALS	Low	0	0.0%	0	0.0%	11.9%	0	0.0%	3.2%	0	0.0%	1.2%	0	0.0%	0	0.0%	
	Moderate	0	0.0%	0	0.0%	11.3%	0	0.0%	8.9%	0	0.0%	4.3%	0	0.0%	0	0.0%	
	Middle	0	0.0%	0	0.0%	16.9%	0	0.0%	14.0%	0	0.0%	8.8%	0	0.0%	0	0.0%	
	Upper	0	0.0%	0	0.0%	59.9%	0	0.0%	61.9%	0	0.0%	69.4%	0	0.0%	0	0.0%	
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	12.0%	0	0.0%	16.3%	0	0.0%	0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	

Originations & Purchases

Based on 2023 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: TN Williamson-Rutherford

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
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%	
	Moderate	0	0.0%	0	0.0%	3.7%	0	0.0%	3.8%	0	0.0%	3.3%	0	0.0%	0	0.0%	
	Middle	54	96.4%	3,110	91.9%	19.0%	14	100.0%	16.6%	891	100.0%	17.5%	40	95.2%	2,219	89.0%	
	Upper	2	3.6%	275	8.1%	77.3%	0	0.0%	79.4%	0	0.0%	79.1%	2	4.8%	275	11.0%	
	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%	
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0	0.0%	
	Total	56	100%	3,385	100%	100.0%	14	100%	100%	891	100%	100%	42	100%	2,494	100%	

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: TN Williamson-Rutherford

PRODUCT TYPE		Bank Lending & Demographic Data					Bank & Aggregate Lending										
		2022, 2023					2022					2023					
		Bank				Total Businesses	Count			Dollar			Count		Dollar		
		Count	Dollar				Bank	Agg	Bank	Agg		Bank	Bank				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	1	1.8%	200	5.9%	90.8%	0	0.0%	50.5%	0	0.0%	35.1%	1	2.4%	200	8.0%
		Over \$1 Million	55	98.2%	3,185	94.1%	8.4%	14	100.0%		891	100.0%		41	97.6%	2,294	92.0%
		<i>Total Rev. available</i>	56	100.0%	3,385	100.0%	99.2%	14	100.0%		891	100.0%		42	100.0%	2,494	100.0%
		Rev. Not Known	0	0.0%	0	0.0%	0.8%	0	0.0%		0	0.0%		0	0.0%	0	0.0%
	Total	56	100%	3,385	100%	100%	14	100%	100%	891	100%	100%	42	100%	2,494	100%	
	Loan Size	\$100,000 or Less	55	98.2%	3,185	94.1%		14	100.0%	92.0%	891	100.0%	33.9%	41	97.6%	2,294	92.0%
		\$100,001 - \$250,000	1	1.8%	200	5.9%		0	0.0%	3.8%	0	0.0%	15.3%	1	2.4%	200	8.0%
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%	4.2%	0	0.0%	50.9%	0	0.0%	0	0.0%
		Total	56	100%	3,385	100%		14	100%	100%	891	100%	100%	42	100%	2,494	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		\$100,001 - \$250,000	1	100.0%	200	100.0%		0	0.0%		0	0.0%		1	100.0%	200	100.0%
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%
		Total	1	100%	200	100%		0	0.0%		0	0.0%		1	100%	200	100%

APPENDIX E – DEFINITIONS AND GENERAL INFORMATION

Definitions

ATM	Automated Teller Machine
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
FFIEC	Federal Financial Institutions Examination Council
HMDA	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LMI	Low- and Moderate-Income
LTD	Loan-to-Deposit
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OMB	Office of Management and Budget
REIS	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

Rounding Convention

Because the percentages presented in tables were rounded to the nearest tenth in most cases, some columns may not total exactly 100 percent.

General Information

The CRA requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Commercial Bank prepared by the **Federal Reserve Bank of Atlanta**, the institution’s supervisory agency, as of **July 15, 2024**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX F – GLOSSARY

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of MSAs. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System (Board), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- I. Low-or moderate-income geographies;
- II. Designated disaster areas; or
- III. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, FDIC, and OCC, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

APPENDIX F – GLOSSARY (Continued)

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 MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Metropolitan area (MA): A MSA or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

Multi-family: Refers to a residential structure that contains five or more units.

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

APPENDIX F – GLOSSARY (Continued)

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 MA. 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 MA, the institution will receive a rating for the multistate MA.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the 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 at least 120 percent of the area median income, or a median family income at least 120 percent, in the case of a geography.